Medicines & Healthcare products Regulatory Agency

10 South Colonnade
Canary Wharf
London
E14 4PU
United Kingdom
gov.uk/mhra

[redacted]

11 December 2023

Dear [redacted]

FOI 23/724: Vitamin B12

Thank you for your communication, dated 10 November 2023, requesting clarification of the response, dated 10 November 2023, which the MHRA provided to your request FOI 23/724.

Please find below, our responses to your queries:

MHRA response:

1. **Are you saying Hydroxocobalamin is only POM because it is injectable?**

No, the legal status or classification of Vitamin B12 injectable (hydroxocobalamin) as a prescription medicine is not solely due to it being authorised for parenteral administration – that is by injection; however, this is a major contributing factor for the POM classification, which is consistent with the criterion 'is normally prescribed by a doctor or dentist for parenteral administration' set out in Regulation 62(3) of the Human Medicines Regulations 2012 [SI 2012/2016 as amended].

In our response dated 10 November 2023, we explained that, aside from the route of administration, other aspects within Regulation 62 of the Human Medicines Regulations 2012 [SI 2012/2016 as amended] also apply in consideration of the most suitable legal status of vitamin B12 (hydroxocobalamin) injection. An important aspect is that vitamin B12 (hydroxocobalamin) injections are authorised in the UK to treat conditions which require diagnosis and management by a physician. This is another reason why vitamin B12 injections are classified as prescription only medicines (POM).

2. **You say "To note, there are injectable vitamin B12 products available which are not licensed medicinal products and are administered for general health supplementation and intended, or marketed, for non-medicinal purposes" so why cannot these be sold over the counter?**

Injectable vitamin B12 products available in the UK which are not licensed medicinal products and are administered for general health supplementation and intended, or marketed, for non-medicinal purposes are not included under the definition of a medicinal product within the Human Medicines Regulations 2012 and consequently fall outside the remit of MHRA. Therefore, we are unable to comment on the supply of these non-medicinal products.

Medicines licensed by the MHRA cannot be supplied in the UK outside the conditions of their Marketing Authorisations. Therefore, licensed injectable Vitamin B 12 products, which are licensed as prescription only medicines, cannot be supplied as over the counter medicines. The reclassification of vitamin B12 injections to non-prescription medicines to enable these to be purchased over-the counter is not supported by current legislation.

For information concerning reclassification of medicines, please refer to the MHRA website page via the below electronic link:

Medicines: reclassify your product - GOV.UK (www.gov.uk).

3. **You say, "Please note that the approved maintenance doses in the UK for injectable Vitamin B12 medicinal products containing hydroxocobalamin (or a hydroxocobalamin salt) indicated for Vitamin B12 deficiency or related disorders vary from 1000 micrograms (1 ml) every 1, 2 or 3 months, depending on the Marketing Authorisation and the indication." Which is it 1, 2 or 3 months because as far as my research and personal experience goes GPs only prescribe on 3 monthly cycles.**

We provided you with summary details of indications and associated maintenance doses (ranging from 1000 micrograms monthly to 1000 micrograms every three months) approved for licensed Vitamin B12 hydroxocobalamin medicinal products in ‘Table 1: Hydroxocobalamin Marketing Authorisations’ in our response dated 10 November 2023; this information is also available in the product information provided on the MHRA website.

The frequency of administration of a medicine is ultimately a clinical practice decision; based on the SmPC which is approved by the MHRA. We suggest that you contact your healthcare provider if you wish to pursue this issue further. In addition, you may wish to contact the Department for Health & Social Care (DHSC) and NHS Business Services Authority (NHSBSA) regarding prescribing policies as these fall to them, whilst the National Institute for Health and Care Excellence (NICE) and NHS England may also be able to help you further with your enquiry as well.

DHSC
Department of Health and Social Care - GOV.UK (www.gov.uk)
Telephone 0300 790 4007

NHS Business Services Authority
Welcome | NHSBSA
mailto:nhsbsa.prescriptionservices@nhs.net
Telephone: 0191 283 8924

NICE
NICE | The National Institute for Health and Care Excellence
Telephone: +44 (0)300 323 0140

NHS England
NHS England » Freedom of Information requests
Telephone: 0300 311 22 33

4. **You say "We have searched our records (including the records for the original UK brand leader Neo-Cytamen 1000 Injection (PLR 00004/5026)) and have not found the original justification that was submitted that would address your query. Therefore, having exhausted all the usual avenues in our search for this information, we have concluded that, it is no longer on our systems in a retrievable form." So, are you saying you have no documented justification for your guidelines which I must then assume includes N.I.C.E as it was they who referred me onto you?**

The MHRA has not found the clinical data that were generated in support of the initial application for Vitamin B12. Hydroxocobalamin is a subject of Product Licence of Right (PLR), which was originally granted a Marketing Authorisation to Glaxo Laboratories Limited (PLR 00221/5041) on 14 February 1973. This product was on the market before the Medicines Act 1968 came into force in 1971. With the exception of certain categories of medicines, all such licences were reviewed in the 1980s to ensure that the products were safe, of suitable quality and had evidence of efficacy. Because of the length of time that such products had been on the market they were considered to have well established use and original clinical data to today's standards was not necessarily available.

To assist with your query, we are providing you with the clinical overview submitted to support the application for Hydroxocobalamin 1mg/1ml, solution for injection (PL 00075/0691; previously PL 17507/0035), a bibliographical application supported by published data and first authorised to Auden Mckenzie (Pharma Division) Limited on 07 April 2004.

It should be noted that redactions have been made to the document under Section 41 (Information provided in confidence) and Section 43 (Commercial Confidentiality) of the Freedom of Information Act (FOIA).

Section 41 is an absolute exemption and requires no consideration of the public interest. Section 43 is a conditional exemption, and a consideration of the public interest should be made. We have considered the public interest when applying Section 43 of the Freedom of Information Act (FOIA). The exemption is to safeguard the commercially sensitive information/industrial secrets of a third party/commercial enterprise (which can include a Government Department). This exemption is conditional on the public interest in releasing it not outweighing the company's/commercial enterprise's right to confidentiality and the

probable damage that the company/commercial enterprise could suffer as a result of the information being released. In this case we have not identified any issues which would benefit the public as a whole by being brought to their attention (examples of issues would be a major public health risk or a major procedural failure or irregularity).

5. **You say "There is no vitamin B12 methylcobalamin medicinal product authorised by the MHRA for use within the UK. Prescribers may resort to unlicensed medicine if they believe it to be required. We refer you to the page on the General Medical Council (the public body that maintains the official register of medical practitioners within the United Kingdom) on the prescribing of unlicensed medicines:**

   https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gmc-uk.org%2Fethical-guidance%2Fethical-guidance-for-doctors%2Fprescribing-and-managing-medicines-and-devices%2Fprescribing-unlicensed-medicines&data=05%7C01%7CFOILicensing%40mhra.gov.uk%7C1e6e09834d8645286c5d08dbe4ff60cb%7Ce527ea5c62584cd2a27f8bd237ec4c26%7C0%7C0%7C638355558828734528%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=4hPOupE5moPl0nsDF0fS8%2Bb7T9yucxsFaYfYaxmCWXk%3D&reserved=0.

   So, are you saying that my GP could prescribe methylcobalamin injections? The link you sent me above leads to a PAGE NOT FOUND ERROR perhaps you could provide me with the correct URL.

We stated in our correspondence of 10 November 2023 that there is no medicinal Vitamin B12 (methylcobalamin) injection product authorised by the MHRA for use within the UK.

However, clinicians may prescribe unlicensed medicines if, in their clinical judgement, there is no suitable licensed available alternative that is capable of meeting their individual patient's needs. This is done under their own responsibility and should take into account the safe use of medicines.

With regard to the non-functional electronic link to the General Medical Council that you have provided, this is not the same as that we provided in our response dated 10 November 2023. Nonetheless, we have checked the link that we provided in our response dated 10 November 2023 and have found it no longer directs to the required page; this page may have been moved, updated or deleted. Therefore, you may wish to access the below page via the electronic link:

https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-practice-in-prescribing-and-managing-medicines-and-devices/prescribing-unlicensed-medicine.

If the link does not direct to the page on unlicensed medicines; please enter 'unlicensed medicines into the search function that will instead be available at the bottom of the directed to page.

We trust that our responses clarify the matter and now consider this FOI request closed.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within 2 months of the date you receive this response and addressed to: info@mhra.gov.uk.

Please remember to quote the reference number above in any future communications.

If you were to remain dissatisfied with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request, unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire
SK9 5AF.
Yours sincerely,

The FOI Team,
Healthcare Quality and Access.