

RE: FOI 23/941 - RE: Re: Freedom of Information request - Co-proxamol Stop The Over Charging !

MHRA Customer Services <MHRACustomerServices@mhra.gov.uk>

Wed 03/01/2024 13:57

[REDACTED]
Our ref: FOI 23/941

Dear [REDACTED]

Thank you for your request of 30 November 2023 under the Freedom of Information Act. This request follows an earlier request we received from you (FOI 23/595) which related to the Commission on Human Medicines (CHM) rather than the MHRA. The request we have processed is as set out below.

Your original request (FOI 23/595) requested the following:

Sir Munir Pirmohamed was elected Chair of the CHM on 12th February 2021. He made a statement regarding CYP2D6 deficiency: "We have to make clear co-proxamol, being easily metabolised and direct acting, is a valuable treatment or we will lose it!" MHRA totally ignored the plight of 131250 CYP2D6 deficient patients and banned the drug on 1st January 2008.

He had previously prepared a report on enzyme CYP2D6 deficient patients. I first brought this to the attention of MLCSU relating to a report they prepared for NHS / NHSCC "Items which should not be routinely prescribed in primary care Consultation Report' on 21stDecember 2018.
https://www.whatdotheyknow.com/request/items_which_should_not_be_routin (Ref: FOI-058121).

As a direct result of this consultation the price CCG's had to pay had escalated from £49.50 per box during 2017 to £1285.00 during August 2020 (for Stafford & Surrounds CCG), they paid £12.85 per tablet! (£1,156.50 for 90 tablets)

<https://openprescribing.net/national/england/0407010Q0AAAAAA/price-per-unit/?date=2020-08-01>

My request:

As Sir Munir Pirmohamed is now Chair of the CHM could he supply all communications he had with MHRA and the UK Government regarding the ban on Co-proxamol?

Could you also supply an Email address so I'm able to submit further evidence via a PDF file?

We had subsequent correspondence with you in which we confirmed that we had searched CHM records for FOI 23/595 (as requested) and asked you whether you wished for us to conduct the same search, but this time of MHRA records. You responded on 30 November 2023 to confirm that you would like us to do so:

Re: "Can you please confirm by reply whether you would like to request a search, under the Freedom of Information Act, of MHRA records."

Yes please, can you use the information in my initial request or do I have to issue a new request?

This response covers our search of MHRA records.

Our response

Your request did not specify a timeframe, accordingly we could not set any date parameters around our search for correspondence. Given the time that has elapsed since the withdrawal of co-proxamol it is likely that not all individuals who were working at the MHRA at the time are still in post. In such situations our only way to ensure we capture all correspondence that may be in scope is to ask our IT support team to run a search of the MHRA email servers, which is the approach we followed for this request.

The total number of items returned that are in scope of your request was 3,179. If we allowed 2 minutes to review each item that would take over 6000 minutes, approximately 100 hours. We therefore judge that Section 12 of the Freedom of Information Act applies to your request. Section 12 allows public authorities to refuse requests where the cost of dealing with them would exceed the appropriate limit, which for central government is set at £600. This represents the estimated cost of one person spending 24 working hours in determining whether the department holds the information, locating, retrieving and extracting the information.

However, we have undertaken a sampling exercise to look at some of the results with a view to suggesting how you may wish to refine your request. From that sampling exercise we believe there is considerable duplication within the results (for example the same email sent to multiple MHRA email addresses will appear in the search results multiple times, as the result for each recipient will be included). We have applied the filters that the searching software provides, so as to remove as many duplicate results as far as we can. The only option now is a manual review of each item, the timing for which is set out in the estimate above, and it is why we cannot proceed any further at this point. We would note that the sampling exercise to date has identified that many of the emails we will need to review are not relevant to the request, as they are not emails sent by (or to) Sir Munir.

We can suggest the following ways that you could refine your request:

- **Timeframe:** if you could provide us one or more timeframes, that would help us narrow the search. From the wording of your request we are not clear whether your interest is from the time of the withdrawal, from the time Sir Munir became Chair of CHM, or both. If it is both then we can relatively easily remove several years of search results, were you to submit a refined request; we would however, encourage you to be as specific as possible in selecting the relevant date for the search.
- **Email address:** if you were to undertake an online search for Sir Munir's email address you will find his email address at the University of Liverpool (Munirp@liverpool.ac.uk). That same address has appeared in the sampling exercise we undertook. If you would be prepared to submit a refined request for emails to/from this email address from any MHRA email address then we believe this could offer further refinement to the results.

In summary, we are refusing your request under Section 12 on the grounds set out above. We have suggested ways you may wish to refine your request should you wish to do so.

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 two 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

Or online via: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Yours sincerely

MHRA Customer Experience Centre
Communications and engagement team
Medicines and Healthcare products Regulatory Agency
10 South Colonnade, Canary Wharf, London E14 4PU

-----Original Message-----

From: MHRA Customer Services <MHRACustomerServices@mhra.gov.uk>

Sent: Tuesday, December 5, 2023 4:43 PM

[REDACTED]
Subject: FOI 23/941 - RE: Re: Freedom of Information request - Co-proxamol Stop The Over Charging
!

Our Ref: FOI 23/941

Dear [REDACTED]

RE: REQUEST UNDER THE FREEDOM OF INFORMATION ACT 2000

Thank you for your enquiry which we received on 30 November.

I confirm that your request is now being handled under the Freedom of Information Act and you should receive a reply within 20 working days from our date of receipt.

If you need to contact us again about this request, please quote the reference number above.

Please be aware that we publish FOIs replies and these are redacted and are located on our website at the following link below.

<https://www.gov.uk/government/collections/freedom-of-information-responses-from-the-mhra-2021>

Kind Regards,

MHRA Customer Experience Centre
Communications and engagement team
Medicines and Healthcare products Regulatory Agency
10 South Colonnade, Canary Wharf,

London E14 4PU
Telephone 020 3080 6000

-----Original Message-----

From [REDACTED]

Sent: Thursday, November 30, 2023 9:06 PM

To: MHRA Customer Services <MHRACustomerServices@mhra.gov.uk>

Subject: RE: Re: Freedom of Information request - Co-proxamol Stop The Over Charging !

Dear MHRA Customer Services,

Re: "Can you please confirm by reply whether you would like to request a search, under the Freedom of Information Act, of MHRA records."

Yes please, can you use the information in my initial request or do I have to issue a new request?

Yours sincerely,

[REDACTED]

-----Original Message-----

Dear [REDACTED]

Thank you for your email.

Your request was addressed to the Commission on Human Medicines, and as stated in the internal review:

The review therefore confirms that following reasonable searches of the CHM's records, the requested information is not held.

The review then stated:

You may wish to direct a request to the MHRA more broadly to see if they hold any relevant information. The MHRA's records (and information held for the purposes of FOI) are not covered by a request to the CHM, so have not been searched as part of your current request.

Can you please confirm by reply whether you would like to request a search, under the Freedom of Information Act, of MHRA records.

Yours sincerely

MHRA Customer Experience Centre
Communications and engagement team
Medicines and Healthcare products Regulatory Agency
10 South Colonnade, Canary Wharf, London E14 4PU

Please use this email address for all replies to this request:
request-1014153-0344fbe2@whatdotheyknow.com

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For more detailed guidance on safely disclosing information, read the latest advice from the ICO:

[https://eur01.safelinks.protection.outlook.com/?](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whatdotheyknow.com%2Fhelp%2Fico-guidance-for-authorities&data=05%7C01%7CMHRACustomerServices%40mhra.gov.uk%7C8eae61e206454ba1472208dbf1e82e5b%7Ce527ea5c62584cd2a27f8bd237ec4c26%7C0%7C0%7C638369751760251032%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=bp%2FTK32gP6JhUSkGj2uBh2pCPg4cAm%2Fw3tha77hovXI%3D&reserved=0)

[url=https%3A%2F%2Fwww.whatdotheyknow.com%2Fhelp%2Fico-guidance-for-authorities&data=05%7C01%7CMHRACustomerServices%40mhra.gov.uk%7C8eae61e206454ba1472208dbf1e82e5b%7Ce527ea5c62584cd2a27f8bd237ec4c26%7C0%7C0%7C638369751760251032%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=bp%2FTK32gP6JhUSkGj2uBh2pCPg4cAm%2Fw3tha77hovXI%3D&reserved=0](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whatdotheyknow.com%2Fhelp%2Fico-guidance-for-authorities&data=05%7C01%7CMHRACustomerServices%40mhra.gov.uk%7C8eae61e206454ba1472208dbf1e82e5b%7Ce527ea5c62584cd2a27f8bd237ec4c26%7C0%7C0%7C638369751760251032%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=bp%2FTK32gP6JhUSkGj2uBh2pCPg4cAm%2Fw3tha77hovXI%3D&reserved=0)

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