



Medicines & Healthcare products
Regulatory Agency

MHRA
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request-1080205-ef14b3f7@whatdotheyknow.com

www.gov.uk/mhra

03 May 2024

Dear [REDACTED]

FOI 24/334

Thank you for your email of 29 February 2024, containing a request to the Commission on Human Medicines (CHM), under the Freedom of Information Act (FOIA).

Your request

"I wish to understand when, and the extent to which, the risk of mRNA frameshifting in relation to Covid mRNA products, as identified in the study published by Cambridge University MRC Toxicology Unit, was considered by the Commission on Human Medicines request-1080205-ef14b3f7@whatdotheyknow.com

Please disclose complete relevant extracts (i.e. complete relevant sections or paragraphs to allow for contextualisation) of any emails sent to or copied to, or received by any emails sent by or copied, or received by the Commission on Human Medicines during the period 1 January 2021 to 31 December 2023, the title or any sub-title of which responds to a word search for "frameshift", "frame shift", including by identifying variations of those same words (for example in a plural or present participle form)."

On the 5 April 2024, you further clarified that

"I did indeed mean to say "any emails sent by or copied to, or received by the Commission on Human Medicines."

It would be very helpful to also see the meeting minutes - yes please"



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Our response

We can confirm that the CHM does hold the information you have requested.

Whilst the CHM does hold the information you have requested, we consider that the information is exempt from disclosure because Section 12 of the FOIA applies.

Section 12 allows public authorities to refuse requests where the cost of dealing with them would exceed the “appropriate limit” in the FOIA; for central government departments this is set at £600. This represents the estimated cost of one person spending 24 working hours to determine if the requested information is held, and then to locate, retrieve and extract it.

In determining that Section 12 applies we have conducted a search of our records for any emails containing “*frameshift*”, “*frame shift*”, we have also searched against variations of these words (for example in a plural or present participle form) as you have requested.

We have identified that there are 270 emails in scope of the searches described above. We estimate a review time of 5 minutes per email (which is an average to take account of emails with one or more attachments). This would be 22.5 hours work, before we have then extracted any relevant information to you and presented it in a format which provides the relevant context. After some refining we anticipate that these emails would still have to be reviewed by subject matter experts/technical teams to determine the relevance and confidentiality level.

Whilst your request has asked that we:

“Please disclose complete relevant extracts (i.e. complete relevant sections or paragraphs to allow for contextualisation)...”

in practice this may not be possible if exemptions apply to those sections or paragraphs. We would then need to redact those and create non-exempt contextual information to meet your request. We estimate with the volume of emails this will be at least 5 hours of further work, which takes the request beyond the 24-hour threshold.

As we consider that the request for emails engages Section 12, we have not made any consideration of your request for meeting minutes.

Advice and Assistance

Under Section 16(1) we wish to offer you advice and assistance to refine your request. Though please be aware that exemptions may apply to a narrowed request for information.

In terms of reducing the scope of your request, you may wish to consider reducing the timeframe your request covers, or to let us know if there are any additional specific terms we could search against to refine the results further.

Appeal Rights



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If you have a query about the information provided, please reply to this email.

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 from 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,

FOI Team
MHRA Customer Service Experience Team

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