Medicines & Healthcare products
Regulatory Agency

10 South Colonnade
Canary Wharf
London
E14 4PU
United Kingdom

[redacted]

21st May 2024

FOI2024/00072

Dear [redacted],

Thank you for your information request, dated 29th April 2024, where you requested:

> *"1. the minutes of the MHRA meetings with Pfizer-BioNTech and AstraZeneca on Covid-19 vaccine safety, for the meetings when they moved to less frequent schedules after May 2022 for Pfizer-BioNTech (8 further meetings) and after November 2021 for AstraZeneca (3 further meetings). Stated in your letter of 11th April 2024.*
>
> *2. the minutes of the meetings held with Moderna on Covid-19 vaccine safety, from when they began in 2021 until they completed holding these meetings."*

The MHRA may hold information in relation to your request. However, on this occasion we are refusing the request as Section 12 (39) applies, specifically:

Aggregation of requests:

(39). *When a public authority is estimating whether the appropriate limit is likely to be exceeded, it can include the costs of complying with two or more requests if the conditions laid out in regulation 5 of the Fees Regulations can be satisfied.*
Those conditions require the requests to be:
• made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign;
• made for the same or similar information; and
• received by the public authority within any period of 60 consecutive working days.

As this request is for similar information to your previous request and it has been made within the 60-day period, based on our estimates for the time required to locate, retrieve and extract the relevant information, this additional request, combined with the previous request, would exceed the 24 hour appropriate limit for central government, legislative bodies and the armed forces.

We should explain that when section 12 applies, it applies to the whole request. This will include any further suggestions for narrowing included within the request itself. There is no requirement in the FOIA for a public authority to work up to the cost limit, or to retrieve information up to the cost limit if it is estimated that the request will exceed the appropriate limit; if section 12 applies, the ICO recommends that the whole request should be refused. These points are explained in the ICO's guidance on section 12.

I hope that the explanation provided is helpful, but 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 of this response; and can be addressed to this email address.

Yours sincerely,

FOI Team
Safety and Surveillance
Medicines and Healthcare products Regulatory Agency

If you have a query about this email, please contact us. If you are unhappy with our decision, you may ask for it to be reviewed. That review will be undertaken by a senior member of the Agency who has not previously been involved in your request. If you wish to pursue that option please write to the Communications Directorate, 4-T, Medicines and Healthcare products Regulatory Agency, (via this email address). After that, if you remain dissatisfied, you may ask the Information Commissioner at:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF