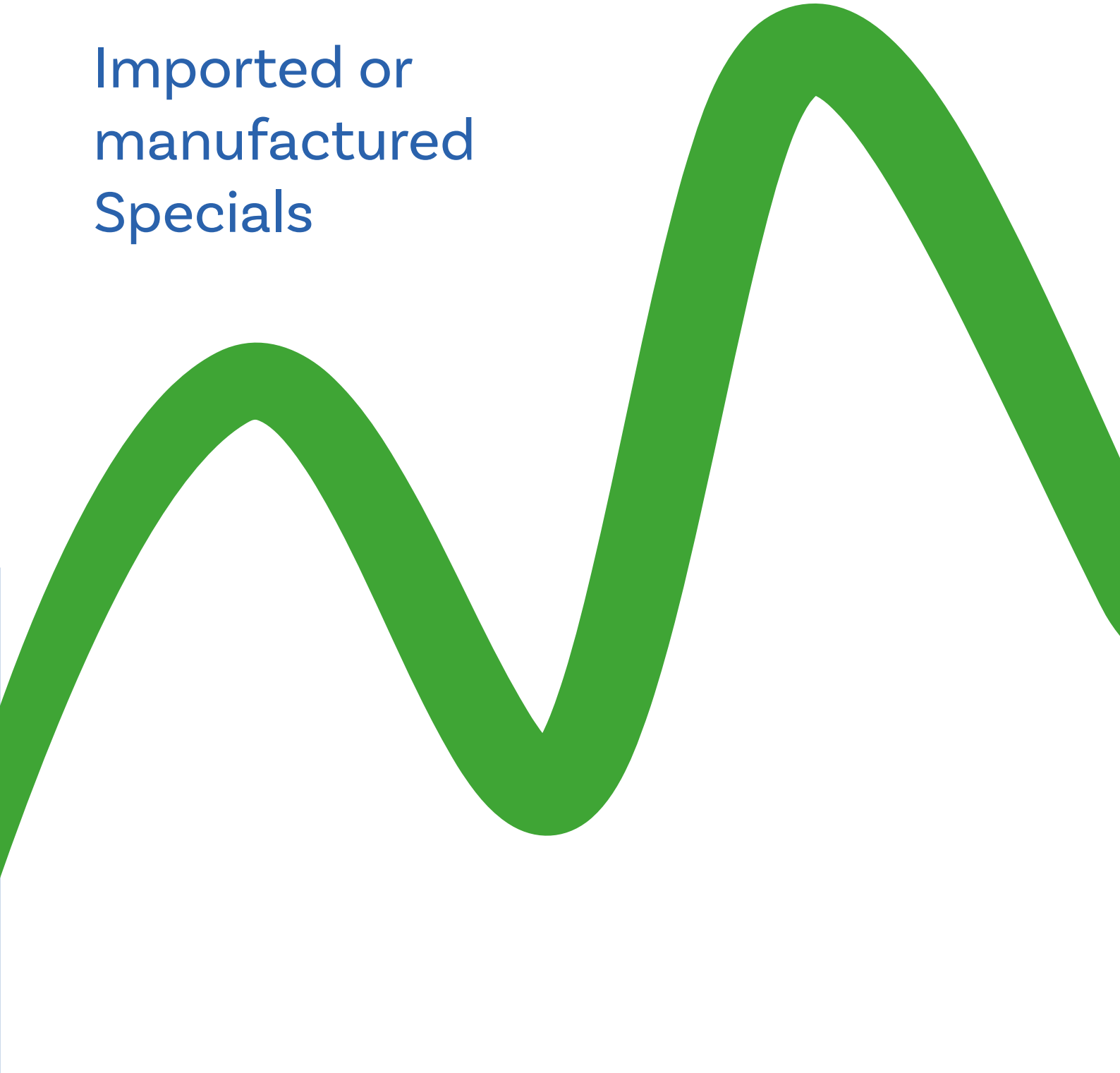
Mawdsleys

The Unlicensed Conundrum

Imported or manufactured Specials



The Unlicensed Conundrum - Imported or Manufactured Specials?

We are all familiar with the situation of a licensed product not being available for a patient, and a prescription for an unlicensed medicine being written instead. But the actual process of obtaining the product can be very time-consuming for a hospital pharmacy, with many options available.

At Mawdsleys, in our Unlicensed Medicines division, we know only too well the challenges faced with unlicensed medicines. Looking at the MHRA hierarchy, it is clear that there are many acceptable options with unlicensed medicines, but that some are preferred over others:

Increasing assurance of pharmaceutical quality, safety & efficacy

Hierarchy of inherent risk associated with unlicensed medicines

Origin of medicine	What the MHRA does	What the purchaser is responsible for
UK licensed medicine	MHRA assesses and approves individual products and the manufacturer's premises and processes. Quality, safety and efficacy is assured.	
Off-label use of UK licensed medicine	MHRA assesses and approves individual products and the manufacturer's premises and processes. Quality is assured.	• Safety and efficacy of off-label use • Risks of administration outside the SPC
Imported product*	MHRA evaluates and assesses import notifications for individual medicines. The regulator in the country of origin assesses and approves individual products and the manufacturer's premises and processes: this may or may not be equivalent to the UK.	• Clinical suitability and licensed indications • Sourcing from a country with an equivalent regulatory framework to the UK • Controlling risks of medication error because of unfamiliar/foreign language packaging, labelling and leaflets
UK Special manufactured by MS holder	MHRA inspects and approves the Specials licence holder's premises and processes, but not the individual products.	• Checking manufacturer has an appropriate licence • Ensuring products meets the purchasing specification • Obtaining evidence that the formulation and the shelf life are validated
Extemporaneously dispensed medicine under pharmacist's supervision	No MHRA oversight. The medicine is made under the supervision of a pharmacist in response to a prescription	• The medicine is made in a Registered pharmacy • Ensuring product meets the purchasing specification • Obtaining evidence that the formulation and shelf life are validated
Imported product not licensed in country of origin	MHRA evaluates and assesses import notifications for individual medicines. There is no regulatory framework in the country of origin.	• Checking manufacturer standards are equivalent to EU GMP • Ensuring products meets the purchasing specification • Obtaining evidence that the formulation and the shelf life are validated • Controlling risks of medication error because of unfamiliar/foreign language packaging, labelling and leaflets
Food supplement or other non-medicine	Nothing: Regulatory framework is food law. No assurance of quality, safety or efficacy	Cannot meet the standards for a medicine

Increasing risk management responsibility of purchaser

*Countries with an equivalent regulatory framework are EEA and countries with mutual recognition agreements. Medicines licensed in third countries may not be subject to safeguards equivalent to GMP. Discuss with Regional QA Specialist or MHRA if necessary.

(Source: MHRA)

Clearly the preferred choice is for a doctor to prescribe a UK licensed medicine, whether it is licensed for the indication it is required for, or off- label. After this, an imported product licensed in a country with an equivalent regulatory framework to the UK is preferred, followed by a UK Special manufactured by a holder of a Manufacturing Specials (MS) licence.

So what is the difference between an imported unlicensed medicine and a manufactured special?

An imported unlicensed medicine

"is a product which is manufactured and will hold a license in another country but it is not a licensed product in the UK".

Specials

"are unlicensed medicinal products manufactured in the UK for human use which have been specially prepared to meet a prescription ordered for individual patients without the need for the manufacturer to hold a marketing authorisation for the medicinal product concerned."

(Source: PSNC)

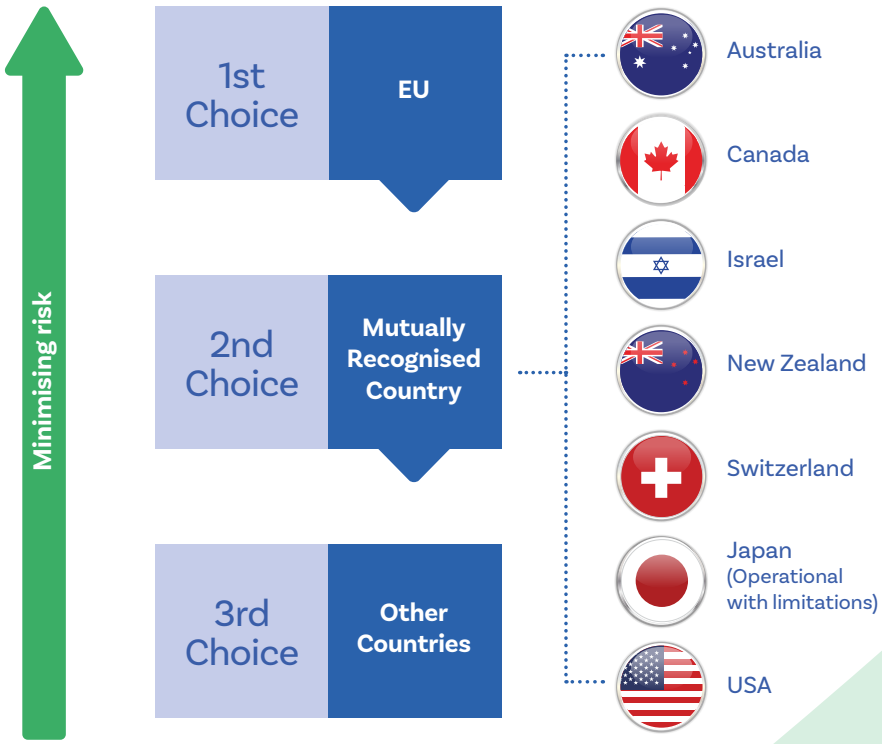
Quality

Clearly the whole basis of the MHRA hierarchy is that the further down it you go, the lower the assurance of pharmaceutical quality, safety and efficacy. However there will be instances for all hospitals where it is necessary to descend the hierarchy, and it is important to ensure that your suppliers operate at the highest possible standard, whichever type of unlicensed product is being sourced.

At Mawdsleys, although we do supply a selected range of high-quality manufactured specials, we specialise in imported unlicensed medicines for hospitals, knowing that this is the preferred choice over a manufactured special. We have very strict regulatory processes and quality checks which mean that the quality of the imported unlicensed medicines we provide is extremely high, as identified in the scores we consistently achieve on NHS tenders.

Mawdsleys follow the below sourcing hierarchy, based on MHRA guidance, when purchasing unlicensed imported products:

MHRA Sourcing Hierarchy - Unlicensed Imports



We ensure most products:

- Are already in English (outer & inner packaging)
- Are labelled in English (outer & inner packaging)
- Are labelled in English (externally)
- Have translated English PIL inserted/available

We will always try to source from the first two options above, as far as possible. We validate all our suppliers on an ongoing basis to ensure the highest possible quality of products are sourced.

TSE

Where sourcing from a non EU or non Mutually Recognised Country it is essential that unlicensed imported medicines are TSE compliant. At Mawdsleys our regulatory team assess all products for TSE compliance.

SPC, PIL, C of A or C of C?

Prescribers, bound by their professional codes and ethics of their statutory bodies, will be conscious of the risk of not having appropriate supporting documentation for an unlicensed medicine, or perhaps having the information but it is not in English. It is vital with unlicensed medicines that important product information be available quickly from your supplier, and in English – often of course pharmacists will be tasked to source information for doctors in advance of them writing the prescription for the patient, so time is of the essence. At Mawdsleys translated PILs and SPCs as well as our own Product Summary Sheets are readily available.

When ordering a manufactured special, a Certificate of Analysis (C of A) or a Certificate of Conformity (C of C) is available, but with unlicensed imports, it is a Summary of Product Characteristics (SPC) or a Patient Information Leaflet (PIL), and at times it is possible to source a C of A. At Mawdsleys we also create our own Product Summary Sheets for unlicensed imports.

Certificate of Analysis (C of A)

For a batch manufactured special, a Certificate of Analysis (C of A) is usually available. A Certificate of Analysis is a document issued by Quality Assurance that confirms that a regulated product meets its product specification. It commonly contains the actual results obtained from testing performed as part of quality control of an individual batch of a product.
(Source: Sigma Aldrich)

Certificate of Conformity (C of C)

For a bespoke manufactured special produced as a one-off a Certificate of Conformity (C of C) is usually available. A Certificate of Conformity confirms that the final product conforms to the specification supplied by the pharmacist and should be signed by a suitably authorised person.

Summary of Product Characteristics (SPC)

A product's "summary of product characteristics (SPC)" outlines, among other things, the indication(s), recommended dose(s), contraindications, and special warnings and precautions for use on which the licence is based, and it is in line with such use that the benefits of the medicine have been judged to outweigh the potential risks. Furthermore, a licensed medicine: has been assessed for efficacy, safety, and quality; has been manufactured to appropriate quality standards; and when placed on the market is accompanied by appropriate product information and labelling.
(Source: MHRA)

Patient Information Leaflet (PIL)

Patient Information Leaflets (PILs) contain easy-to-understand information for the patient about what their medicine is for and how they should take it. The PIL is an abridged version of the SPC, written for the patient.

Product Summary Sheets

The Product Summary Sheets created by Mawdsleys serve to show all the key product information for an unlicensed import, such as storage conditions, country of origin etc, in one place, making it easy for doctors to make prescribing decisions.

Summary

Unlicensed Imports are licensed products in their country of origin. Therefore they have been approved by the regulatory authorities in that country. This is the main reason why they are preferred over a manufactured special and why there is a lot more detailed information available for unlicensed imports.

The table below summarises the documentation generally available for each type of unlicensed medicine:

Type of Unlicensed Medicines	Documentation to Ask For	To Note
Unlicensed Import	PIL SPC Product Summary Sheet	Ensure as far as possible this information is in English
Manufactured Special (bespoke)	Certificate of Conformity (C of C)	
Manufactured Special (batch)	Certificate of Analysis (C of A)	

Over labelling and translation

As well as supporting documentation it is important that the packs of unlicensed imports are in English, and therefore at Mawdsleys we ensure that the majority of our products are over- labelled in English. We also insert PILs in English where necessary, or can make them available to our customers. All of this is done to make sure the MHRA hierarchy of risk is adhered to, and that healthcare professionals can ensure a high level of patient safety. For manufactured specials we make sure either the C of A or the C of C is made available for most products.

Expiry dates

Another key difference between an unlicensed import and a manufactured special is in the shelf life. Imports, since they act like a normal licensed product, can have up to three years' shelf life whereas bespoke manufactured specials by their nature will have a lot less than this – on average about 28 days. Batch manufactured specials can have up to two years.

Service

With unlicensed medicines it goes without saying that it is vital to have somebody at the end of the phone who understands the products and is able to advise. At Mawdsleys, our dedicated Business Development Managers and Customer Services team are fully trained in unlicensed imports and regularly talk to our highly experienced research team about new products that need to be sourced. Our researchers are constantly using their expertise and contacts to find products which our customers request.

We proactively seek out rapid alternatives to products which have gone short in the UK, an ongoing issue for procurement staff in hospitals. Mawdsleys work closely with manufacturers around the world to provide solutions for product shortages as and when they happen in the UK. Working with the manufacturers enables better availability, supply and cost. We also work closely with the Department of Health and the Medicines and Healthcare Regulatory Authority (MHRA) to provide support and solutions for the ongoing problems UK shorts present. Availability and speed are important with unlicensed medicines. Mawdsleys are the largest importer of unlicensed medicines into the UK, and have access to over 2,000 imported medicines and stock over 500 imported medicines. This means our products can be with hospitals free of delivery charge next day (including cold-chain) in many cases, if ordered by 4pm the day before.

Conclusion

There are clearly instances where both unlicensed imports and manufactured specials are prescribed for patients, and also instances where a specific drug is prescribed and it is the decision of the pharmacist whether an unlicensed import or a manufactured special is dispensed. What is important is that healthcare professionals have all the information they need to make an informed choice, and to source the products safely. Choosing the right partner for unlicensed medicines is fundamental.

This information could be used for your Continuing Professional Development (CPD).

For Unlicensed Medicines Enquiries please contact us:

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