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APPENDIX 2

TELEFAX TO DR. PAUL ADAMS - ROOM NO. 1526
FROM DR.)
TELEFAX NOS.

No. of pages: 5 including this cover page.

Date of transmission: 14th February 1989

89 02 14 14:56

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CONFIDENTIAL

Answers provided to Dr. Paul Adams of the CSM on 14th February 1989.

1. Medical Vaccines and therapeutic proteins, licensed or in clinical trial: which products contain material of bovine origin?
2. Which is the country of origin?

<u>PRODUCT:</u>	<u>PRESENCE OF BOVINE MATERIAL</u>
ORAL POLIO VACCINE	<p>Foetal calf serum, New Zealand origin since mid-1988.</p> <p>Earlier foetal calf serum, UK and NZ origin.</p> <p>Commercial supply from third parties.</p> <p>Used only in cell growth stage.</p>
ALMEVAX RUBELLA	<p>No bulk made since 1978, used Foetal calf serum of UK and NZ origin of commercial supply from third parties for cell growth stage.</p>
ARILVAX YELLOW	<p>No bovine material incorporated.</p>
DIGIBIND	<p>No bovine material incorporated.</p>
WELLFERON	<p>Adult bovine serum, UK origin for cell growth. Purified through process that substantially removes bovine serum. Process destroys or eliminates scrapie agent. Once existing serum stocks are exhausted the process will utilise serum from areas free of BSE. Immunoaffinity sera of UK origin used in downstream processing. Produced in house. Diet free of BSE risk fed to donor cattle since mid-1988.</p>

89 02/14 14:57

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03

<u>PRODUCT:</u>	<u>PRESENCE OF BOVINE MATERIAL</u>
	Adult bovine serum. UK origin, for cell growth. Purified through a process which substantially removes bovine serum. Will utilize only New Zealand sourced adult bovine serum from March 1989. Immunoaffinity sera of UK origin used in downstream processing. Produced in house. Donor animals fed only BSE risk free diet since mid-1988.
DIPHTHERIA	Oxheart: beef muscle digest produced in house. Of UK origin to mid-1988, Southern Irish origin subsequently. Now seeking sources free of BSE.
TETANUS	Calcium Casein and acid hydrolysed casein digest of UK (Scotland) origin from Bullocks heart infusion broth produced in house. UK origin. Bullocks heart of Southern Irish origin from mid-1988. Now seeking sources free of BSE.
DIPHTHERIA AND TETANUS	As above.
PERTUSSIS	Acid hydrolysed Casein digest of UK (Scotland) origin from Single large bulk supply lasts for many years.
TRIVAX DIPHTHERIA, TETANUS PERTUSSIS	As above
CHOLERA) Horse muscle digest. UK origin.
)
)
TYPHOID)
)
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89 02/14 14:56

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64

PRODUCT: PRESENCE OF BOVINE MATERIAL

Horse muscle digest and Ox liver digest,
origin. Used only in Papua, New
Guinea.

Casein digest as above. Last bulk
prepared 1978.

No bovine material incorporated.

3. How much bulk stock of product has been manufactured since 1980?
4. What are the current stock levels?

PRODUCT	UNIT	BULK MADE SINCE 1980 (Approx)	CURRENT STOCKS* (Approx)
	DOSES	6.6 million	1.1 million
	DOSES	8.5 million	0.7 million
	DOSES	47.6 million	1,300L bulk and 4.25 million doses.
	LITRES	5,573	460
	LITRES	11,435	820
	LITRES	643	10
	LITRES	23,215	1,250
	LITRES	14,930	750
	LITRES	5,009	488
	DOSES	Made prior to 1980	33,832 doses.
	LITRES/MU	3.0 million L	1.7 mega units.
	VIALS	29,000	7,400

*Stocks shown are in the final stages of manufacture at
Additionally there are stocks in earlier stages
of process and material in the distribution chain.
Material in the earlier stages cannot be simply expressed as
final doses.

5. How long would it take to switch to non UK bovine origin material?

To change all bovine material sources from UK to non UK source will take approximately 18 months but stock will last a variable time.

6. How long would it take to switch to non bovine material?

To change to non bovine material will take at least five years and would involve clinical equivalence testing.

JM Stand

Dr.

Telephone:

Fax: ..

12/2/88 3

HUMAN & VETERINARY MEDICINES WORKING GROUP RE BSE

MEETING 22/2/88 AT 10.00AM AT MARKET TOWERS

Members invited to attend: Chairman Professor Collee

Biologicals Subcommittee

Professor Collee
Dr Schild
Dr Minor
Dr Tyrell

Invited Experts

Dr Klinberlin
Dr Martin

MAFF

Dr Little
Mr Kidd
Mr Bradley
Mr Wilesmith
Mr Scolan

Medicines Division

Dr Adams
Dr Jefferys
Dr Rotblat
Dr Purves
Mr Sloggem
Mr Bewley
Mr Love
Mrs Alderman
Mr Askins

Other DH

Dr Pickles
Mr Cunningham
Dr Salisbury
Mr Colman
Dr Sutton

For Information

Dr Jones
Mr Wilson

14/02/89

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APPENDIX 4VETERINARY PRODUCTS COMMITTEEChairman

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*Dean of Faculty of Veterinary
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Head of Statistics
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Compton
Near Newbury

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APPENDIX 5

MEMBERSHIP OF THE COMMITTEE ON SAFETY OF MEDICINES 1988

Professor A W Asscher BSc MD FRCP (Chairman)
Dean of St George's Hospital Medical School, London

Professor S S Bleehen B A MB BChir FRCP
Professor of Dermatology, Sheffield University and Consultant
Dermatologist Royal Hallamshire Hospital
(Appointed 30 August 1988)

Professor T G Booth OBE BPharm PhD FPS MCPP
Professor of Pharmacy Practice, University of Bradford

Professor A M Breckenridge MSc MD FRCP
Professor of Clinical Pharmacology, Liverpool University

Professor J G Collee MD FRCP FRCPath
Professor of Bacteriology, University of Edinburgh Medical School

Professor P H Elworthy BPharm DSc PhD CChem MRSC FPS MCPP
Emeritus Professor of Pharmacy, University of Manchester
Visiting Professor of Pharmaceutics, King's College and the School of
Pharmacy, University of London

Professor A T Florence DSc PhD FRSC FRSE FPS
Professor of Pharmacy, University of Strathclyde
(from 1 January 1989, Dean of the School of Pharmacy, University of London)

Professor M W Greaves MD PhD FRCP
Professor of Clinical Dermatology, St John's Hospital for Diseases of the
Skin, London
(resigned 31 July 1988)

Professor H S Jacobs BA MD FRCP
Professor of Endocrinology, The University College and Middlesex Hospital
School of Medicine, London

Dr W A Jerrett MB BCh FRCGP
General Practitioner, Glamorgan

Professor M J S Langman BSc MD FRCP
Professor of Medicine, University of Birmingham

Professor D H Lawson MD FRCP (Edin) FRCP (Glas)
Consultant Physician in Clinical Pharmacology, Royal Infirmary, Glasgow
Visiting Professor, University of Strathclyde, Glasgow

Mr F E Loeffler FRCS FRCOG
Consultant Obstetrician and Gynaecologist
St Mary's and Queen Charlotte's Hospitals, London

Professor J O'D McGee MD PhD FRCPath MA (Oxon)
Professor and Head, Nuffield Department of Pathology and Bacteriology
University of Oxford, John Radcliffe Hospital

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Professor A E M McLean BM PhD FRCPATH
Professor of Toxicology, University College and Middlesex School of Medicine,
London

Dr Elizabeth Mayne MD FRCP(G) FRCPATH
Consultant Haematologist, Royal Victoria Hospital, Belfast

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Reader in Psychiatry, St Mary's Hospital, London

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Professor of Rheumatology, Northern General Hospital, Edinburgh

Dr B L Pentecost MD FRCP
Consultant Physician, Birmingham

Professor M D Rawlins BSc MD FRCP (London) FRCP (Edin)
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University of Newcastle-upon-Tyne

Professor M P Vessey MA MD FRCP FRCPE FRCGP
Professor of Social and Community Medicine, Radcliffe Infirmary, Oxford

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Ministry of Agriculture Fisheries and Food

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APPENDIX 6

FACSIMILE TRANSMISSION FORM

For completion by the originator:

Date 14.2.89 Time 9.45 No. of pages 1+5
Name Jane Garrick Extension 421
Room No. 1003 Building TOKT Division AITD Branch B
Urgency VERY URGENT

Please use BLOCK LETTERS

To:
Facsimile No. (if known) _____
Full name and address _____

From: _____

Please repeat to:

(a) Facsimile No. (if known) _____ (b) DR H PICKLES
Full name and address DR P ADAMS OH, MARKET TOWERS
OH, MARKET TOWERS, 1 NINE ELMO LANE
1 NINE ELMO LANE SW8 5AR, LNE
SW8 5AR, LNE

(c) _____ (d) _____
RIS25

(e) _____ (f) _____

For completion by operator

Job completed: Date _____ Time _____ Job No. 413

14/02/89 09:51

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BSE

Our Ministry meets Professor Southwood later today. Due to lack of time ~~the~~ it was not possible to clear with you the attached briefing which has gone to him, as per the Vet. medicine contribution to a wider brief. If you have any essential comments, can I have them by 3.00 pm latest today

A J C Taylor
Tolworth Tower Gate 22.

Dr P. Adams } DH
Dr H. Pickles } Mr Taylor

DRAFT

CONTRIBUTION TO COMMENTARY ON SOUTHWOOD REPORT

Veterinary medicines

The Report

1. At paragraphs 5.3.3 - 5.3.5, the Report assesses the risk that vaccines and other medicinal products derived from animal material. Although the Report recognises that the risk of transmission of BSE to humans is remote, the identification of a substantial range of medicines which could theoretically pose a risk is, in our view, and that of the Department of Health, alarmist. The risk, at least to humans, appears remote and with care it can be minimised.

2. The Report recommends (paragraph 8.2) that the attention of the licensing authority and Veterinary Products Committee be drawn to the emergence of BSE, so that appropriate action may be taken. Such action should cover existing and new products.

Action in hand

3. The VPC has already been consulted about the risks arising from BSE. Draft guidelines to be issued to all manufacturers of medicinal products have been prepared in close consultation with Department of Health staff. These are being considered by the VPC and, in parallel, by the Committees advising on human medicines. A copy is attached.

4. The Minister should note, however, that the guidelines represent a counsel of perfection:

- (i) Guidance 1, on the use of defined, BSE-free sources, will be severely restrictive. A number of farms in the UK will meet these criteria but they have not been identified; farms overseas ostensibly meet the criteria but we cannot be sure that non-detection of BSE in all cases equates with

14/02 89 09:52

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freedom from the disease. Moreover, many countries are unsuitable sources of medicinal material because of other, endemic diseases. New Zealand, ~~and possibly Australia~~ appears the safest source, but their supply is unlikely to match demand.

(ii) Most pharmaceutical companies buy from specialist producers of primary and intermediate material, whose activities lie outside the powers of the Medicines Act. Product licence holders, who are responsible for the quality of their products, would therefore need to secure assurances from their suppliers that the guidance is being respected. This might pose problems in a minority of cases and if serious doubts were to arise about the quality of any product we could withdraw its licence.

(iii) Guideline 4, on collection techniques, conflicts with normal practice in abattoirs, where most material is obtained. This is unlikely to matter if reliable BSE-free sources are used, although a risk of cross-contamination might remain.

(iv) The sterilisation treatment recommended in Guideline 5 is generally inappropriate to biological medicines - which it would destroy - but would be suitable for some tools and equipment.

5. Although NOAH (the National Office of Animal Health, representing animal pharmaceutical companies) accept the need for guidelines, they have not seen the draft, which they may find more rigorous than expected. They may respond by pressing for assistance in complying with the guidelines (eg. by introducing a BSE-free farm certification scheme, extension of Medicines Act controls to primary source suppliers). Any proposals would need to be considered in relation to their likely effectiveness in improving the supply of BSE-free material.

14 02/89 09:53

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Further action

6. In addition to the guidelines and again in close consultation with the Department of Health, we are drawing up a list of all medicines manufactured from bovine material. This is necessary in order to cover existing as well as new medicines, a point noted in the Southwood Report recommendation. Although some information is readily available, this is not exhaustive, and we shall be writing to each product licence holder requiring them (under the Medicines Act) to provide information in respect of each licensed product on bovine material noted in its manufacture.

7. When the product information has been reviewed it will be possible to determine what, if anything, further should be done to safeguard human and animal health, taking into account the importance of maintaining adequate supplies of vaccines against major human health hazards such as measles and polio.

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PROPOSED JOINT CSM/VPC GUIDELINES FOR INDUSTRY

The following guidelines are addressed to product licence holders and applicants.

1. Scope

It is intended that all products licensed under the Medicines Act 1968 for human or veterinary use, that are administered parenterally or to open wounds, should conform to these guidelines if they contain material from a bovine source, or if bovine material has been used during their manufacture.

Although these guidelines relate to BSE and materials of bovine origin, they should also be considered as applicable to material from sheep, goats, deer, and some other animals susceptible to scrapie-like agents, which are not suitable alternative sources.

2. Cattle source

Bovine material should come from cattle, taken from a closed herd in the female line since 1980, in which no animal has been clinically suspected of having BSE, and which has not been fed rations containing ruminant derived protein during that period.

3. Tissues excluded

No nerve or neural tissue, spleen, thymus and other lymphoid tissue, placental tissue or cell cultures of bovine origin should be used in the manufacture of medicinal products.

4. Collection techniques

All possible measures should be taken to avoid contamination of the bovine material with BSE agent, in particular:

no tissue is to be used in medicinal products when collected postmortem from a bovine animal after brain penetrative stunning.

all tissue collected from the bovine animal should be taken aseptically using sterile equipment. Needles, syringes, scalpel blades etc should be disposable items.

it is recommended that whenever possible, source animals should be calves up to 6 months old.

for serum: all cellular components must be removed.

for foetal calf serum: great care should be taken to avoid contamination by placenta and foetal fluids. All cellular components must be removed.

5. Sterilization

When sterilization procedures are used, they should be demonstrated to be capable of inactivating scrapie-like agents - at present thought to be autoclaving using a porous load cycle at 134°C-138°C for 18 minutes at 30 psi.

6. Product

Whenever possible, the product should be terminally sterilised by a validated method.