Practical advice for radiopharmacy and nuclear medicine services in the event of a no-deal Brexit

In the event of an agreed UK withdrawal deal it is anticipated that supply will continue as it is now, without disruption.

However, should a no-deal Brexit become a reality, it is important services have a contingency plan to mitigate against any delays or disruption which may be experienced.

Radiopharmaceuticals are medicines, and the Government has been working with pharmaceutical companies to ensure that Brexit does not result in patients being unable to receive the medicines they need.

Much of the work done has been around stockpiling – and suppliers of radiopharmaceutical kits may well be doing this. However, clearly there are problems with doing this for the shorter lived radioisotopes used in many nuclear medicine studies.

Please note: this does not apply to PET-CT radiopharmaceuticals, which will continue to be delivered as usual. The vast majority of PET-CT radiotracers are not affected by Brexit as they are manufactured in cyclotrons throughout the UK or are produced form generators that last for many months to years.

All radiopharmaceutical suppliers have been asked to use air freight to ship radiopharmaceuticals. This would start before a no-deal Brexit occurs. Some companies feel their plans will ensure no delays but others anticipate there may be some delay to their delivery times.

It is advised that you liaise directly with your suppliers to find out whether you are likely to experience delays for individual products.

Risk assessment

As already recommended by the British Nuclear Medicine Society (BNMS), you should carry out a risk assessment on the impact a no-deal Brexit may have on your nuclear medicine service. This should be on the trust/health board risk register, and you should appraise your trust/health board Chief Executive and Brexit lead, if they are not one and the same person.

The following may help to reduce the likelihood of disruption and delays, and should be considered as part of that risk assessment:

Communication

It cannot be overestimated how important this is. Communicate with both suppliers and with other radiopharmacy and nuclear medicine colleagues in the weeks leading up to Brexit so that you have factored in the advice contained in this guidance where applicable. Make sure
everyone in your team is aware of the potential problems, such as delays, which may occur in the event of a no deal Brexit.

**Local contingencies**

Speak to neighbouring radiopharmacies to find out when their generator delivery day is. Where possible, it is advised that different delivery days be arranged, so that back-up supply can be arranged if necessary and possible. Please refer to the guidance produced by the UK Radiopharmacy Group on transfer of Tc-99m eluates and sharing of Mo-99/Tc-99m generators between different hospitals for further information. Please see:


**Procurement arrangements**

Contact your procurement department to explore making arrangements to purchase outside the normal cost envelope if necessary.

If it is likely your generator will arrive later than practical for use on the day of delivery, consider ordering a higher activity generator for the first couple of weeks (one reference activity step higher) to allow for not using it on the usual first day of delivery. It may be possible to combine a higher activity generator with a request for it to be supplied the day prior to your usual delivery so in effect your usual eluted activities could be retained. A one day delay to delivery would reduce available activity by approximately 20%.

This clearly needs to be funded, but for a two week period should not amount to too much – especially when considering the clinical and financial impact of not doing the necessary studies.

However, a note of caution should be applied here: a lot has been done to streamline the radiopharmacy production process in order to make the most effective use of molybdenum-99, which can sometimes be in limited supply. Before deciding upon this, speak to the supplier of your generator to ascertain whether delays are actually anticipated.

The Department of Health and Social Care and has said it and relevant health agencies will work alongside the BNMS to monitor the costs of radiopharmaceuticals to the NHS in 2019-20. If the costs escalate significantly guidance could be provided to providers and commissioners on agreeing new local tariff prices that consider the increased cost of radiopharmaceuticals. In addition, we can consider for future years whether to remove the costs of the radiopharmaceuticals from the nuclear medicine tariffs and pay for them on a pass-through basis if the costs are becoming increasingly volatile. This should protect providers from price rises.

**Workload and appointment times**

Keep workload lighter for the first week following a no-deal Brexit, in order to see more clearly what the impact is likely to be. This is easier to manage than making a lot of cancellations should deliveries be delayed. Ensure that senior trust management are aware of the potential impact on waiting times.
Consider booking lower activity tests on your generator delivery day so that you can still fulfil all patient appointments using the remaining delivered generators(s) and schedule higher activity studies for later in the week.

If necessary, consider short term changes to the working day – for example, if higher activity tests are postponed, or if deliveries arrive later than usual, extended days later on in the week or weekend working could be instigated in the short term.

If it looks like there is a possibility of delay to non-technetium radiopharmaceuticals – and this will be ascertained by talking to the relevant supplier – again do not book them for the week after a no-deal Brexit until you have a clearer idea of the timeliness of their supply.

Look at the timing of appointments – could non-technetium SPECT studies be scheduled later in the day or in the afternoon? Again, this may require some short term changes to the working day.

**Delivery arrangements**

If there is a possibility that non-technetium radiopharmaceuticals usually delivered to the radiopharmacy could be delivered after the department has closed, consider whether they could be delivered directly to the nuclear medicine department so that they could be drawn up there. This would be subject to their expiry time and would depend on the local facility. This must be first discussed with the relevant radioactive waste adviser to ensure that no Environment Agency Permit conditions are breached.

Reference should be made to the UK Radiopharmacy Group/BNMS document on Safe Drawing up of Radiopharmaceuticals. Please see:


This recommends that drawing up is done in an area supplied with Grade A air. However, if the vial is single dose, this is not necessary.

The exception to this is In-111 Octreoscan, which is subject to further on-site manufacture, which **must** be carried out in the radiopharmacy.

**Practical advice for running a clinical nuclear medicine/radionuclide radiology service with reduced radiopharmaceutical availability**

**Prioritisation**

In the weeks leading up to Brexit you should consider how to prioritise requests based on clinical need, should supplies be compromised. In practical terms this will require increased time for vetting and communication with radiopharmacy and referring clinicians.

Consideration needs to be given not only to the clinical urgency of the investigation but the logistics of the entire service, for example associated theatre time for sentinel node surgery.

**Administered activity reduction**

Activity levels for all investigations can be reduced with a compensatory increase in imaging time. Generally, this will produce a diagnostic investigation; however, this decreases patient
experience (due to prolonged scan times), slows work flow and increases movement artefacts.

**Imaging tests: considerations and alternatives**

Bone scans: All bone scans can be performed using NaF-18 PET-CT subject to costs (commissioning) and logistics. This may be a viable alternative for a small sub section of scans but for the vast majority this not likely to feasible. MRI and CT can be used as alternatives for some indications depending on local expertise and capacity.

MUGA/Myocardial Perfusion Scintigraphy: Some of these studies can be substituted with echocardiography and/or MRI depending on local expertise and capacity.

Sentinel nodes: Although methylene blue can be used on its own this offers reduced sensitivity - there are no real alternative imaging tests.

Somatostatin receptor imaging: Ga-68 DOTA-TATE and DOTANOC can be used instead. These PET tracers are only available in a small number of centres with gallium generators.

I-123 MIBG: Consider prioritising urgent paediatric cases.

I-123 DaTScans: For diagnosis of Dementia with Lewy bodies F-18 FDG PET-CT may be helpful. MRI is useful in Parkinson's disease of vascular aetiology and some Parkinson plus syndromes.

DMSA/MAG3 renograms: Although MRI and US can give some of the information, substitution will only be practicable in departments with specialist expertise.

V/Q: In all patients (except severe renal impairment and iodine contrast allergy) CTPA is a viable alternative.

**Non-imaging test considerations**

With regard to SeHCAT and red cell mass studies there are no viable alternatives.

GFR: If validated, Iohexol GFRs may be done as long as the patient is not allergic to iodine containing contrast.

**Radionuclide therapy**

The situation concerning radionuclide therapy is less clear. At the time of writing this guidance, only one supplier has been confident it will be able to deliver therapy doses on particular required days. Therapy radionuclides have longer half-lives and so these offer more scope for managing delivery delays. This may include being flexible in the time and day a radionuclide therapy is given. If this involves Y90 microspheres for SIRT this may also require some flexibility from interventional radiology.

If any product arrives late, expiry time and date should be checked, and available activity checked against the prescribed activity. If an available treatment dose is more than 10% below the prescribed activity the therapy should not be given and your relevant Administration of Radioactive Substances Advisory Committee (ARSAC) practitioner should...
be informed. Hospital management should be made aware of these issues and an appropriate note placed on the relevant departmental risk register.

In the weeks leading up to Brexit, you should discuss with ARSAC practitioners how potential delays in treatment could affect the number of days that a patient has been off medication and whether any adjustments will be required to protocols.

As many patients have to organise personal and work arrangements around their scheduled therapy, they should be advised that their day of treatment could potentially change by a day or two at short notice, and that departments will update them as soon as possible if appointments need to be re-arranged.

_A joint document produced by the British Nuclear Medicine Society, the UK Radiopharmacy Group and The Royal College of Radiologists._

_This document was finalised on 5 March 2019 and reflects political circumstances and supply information to the best of the collective authors’ knowledge at the time of writing and issue._