

# Complaint Handling and Recall Management

How to implement EU-GMP Chapter 8 and FDA-Requirements

## SPEAKERS:



**Dr Rainer Gnibl**  
*GMP-Inspector for EMA and local Government, Germany*



**Dr Gerald Kindermann**  
*F. Hoffmann-La Roche Ltd., Switzerland*



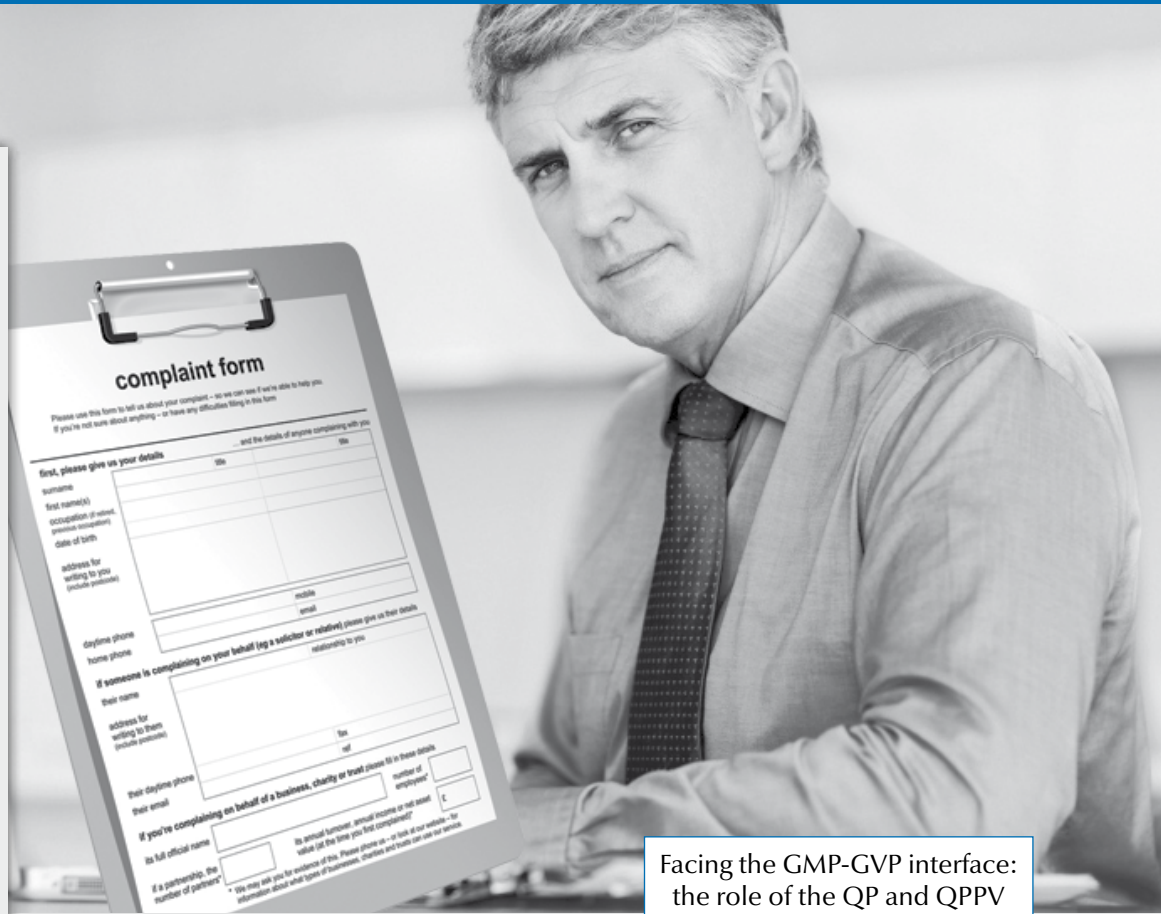
**Dr Ágnes Kis**  
*Compliance Consultant, formerly with F. Hoffmann La-Roche Ltd, Switzerland*



**Dr Ulrich Kissel**  
*European QP Association, KisselPharmaConsulting, Germany*



**Aidan Madden**  
*FivePharma, Ireland*



12/13 November 2019, Vienna, Austria

## LEARNING OBJECTIVES:

- Regulatory requirements
- Complaint Handling
  - Management
  - Documentation
  - Failure Investigation
- Quality Risk Management
  - Background
  - Implementation
  - Case Study
- GMP-GVP interface: the role of the QP and QPPV
- Recall
  - Management
  - Mock Recalls
  - Decision Making Process



# Complaint Handling and Recall Management

12/13 November 2019, Vienna, Austria

## Objectives

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During this course, you will learn all relevant aspects to efficiently organise and improve your Complaint Handling and Recall System to **fulfil current GMP requirements** and to **get the best benefit for your daily business**.

## Background

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**In principle, every complaint might cause a recall, and every complaint may provide an opportunity to improve.**

According to the **EU-GMP Guide Chapter 8**, the pharmaceutical **industry must review all complaints** and other information concerning potentially defective products carefully according to written procedures. In order to provide for all contingencies, a system should be designed to investigate the need to **recall, if necessary, promptly and effectively products** known or suspected to be adulterated from the market-place.

According to the EU- GMP Guide, a person should be designated responsible for handling the complaints and deciding the measures to be taken. The **Qualified Person (QP)** should be made aware of any complaint, and be actively involved in the investigation and any subsequent recall.

The **handling of technical complaints** (also called **non-medical complaints**) triggers high demands on the process organisation and quality system. However, these complaints are also a chance for **continuous improvement** and to prevent the reoccurrence of future failures.

Reviewing **FDA's Warning Letters** of the last fiscal years reveals that Complaint Handling processes are a hot topic. Recent media coverage of recalls due to non-GMP operations and counterfeit products entering the supply chain are also an indication of how important it is to treat all complaints with the highest priority. The main failures can be found in the overall process and in inadequate investigations, as the following excerpts show:

- "Your firm failed to follow procedures for the handling of all written and oral complaints"
- "The inadequacy of your firm's quality oversight is demonstrated by the failure to perform thorough investigations of product failures and complaints."
- "The QCU failed to ensure customer complaints were adequately investigated"
- "Your firm failed to review and approve complaints"

## Target Audience

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This course is designed for all personnel involved in complaint handling and/or recall activities at their company and all responsible persons like the Qualified Person / the Qualified Person for Pharmacovigilance (QPPV) and decision makers who want to improve the existing process.

## Programme

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### Regulatory Requirements for Complaint Handling and Recalls - The Inspector's View

- EU Legislation on Complaints, Recalls & Falsification
- Real Intension of Complaint Handling
- Definition and Classification of Quality Defects
- Rapid Alert System - RAS
- What a Complaint Handling SOP should consider
- What a Recall SOP should consider

## Complaint Handling Session

### How to handle complaints - complaint management process

- Regulations
- How to organize the process
- The complaint sample and sample chain custody
- Pitfalls

### How to handle complaints - complaint management quality system

- KPIs
- Reporting and trend evaluation
- Technical complaints versus safety signals
- The role of the QP and QPPV
- Counterfeits

**A practical view:**  
**Share experience - access to the root cause**

## Quality Risk Management Session

### The Basics of Quality Risk Management

- Definitions and abbreviations
- Fundamentals
- Regulatory requirements and expectations
- Areas of application
- Construction of a QRM matrix

## Implementation of a Quality Risk Management System in Complaint Handling

How to use real data from global issues to determine process understanding and customer satisfaction and to set priorities.

### Workshop on Case Studies: Quality Risk Management in Complaint Handling and Recall Procedures

## Recall Session

### The Handling of Recalls

- Implementation in the system
- The recall process
- Flow of information
- Documentation

### How to perform a Mock-Recall

Both FDA and EU-GMPs call for regular evaluations of the effectiveness of the recall processes. This session will show you, how such an effectiveness check could be performed.

### Workshop: When to recall or not to recall – that's the question

The participants will work through a single hypothetical scenario. Working in small groups the participants will need to decide what action to take, what information is needed, who should be involved, and ultimately decide if a recall is required and if so to what level.

Participants' comments:  
„Good mixture between lecture and workshops.“  
Margit Watervall, CSL Behring, Switzerland (May 2016)

“Excellent conference – I would like to see a „Level 2“ on the same subject e.g. “Level 2 advanced”.  
Jill Fern, Théa PHARMA S.A.,  
Switzerland (June 2017)



## Speakers



### Dr Rainer Gnibl

*GMP Inspector for EMA and local Government, Germany*

Dr Rainer Gnibl is pharmacist and GMP Inspector for the District Government of Upper Bavaria and the EMA and performs GMP-inspections worldwide. Before that, he was working for the Bavarian Ministry of Environment and Health. Rainer Gnibl also holds a lectureship at the University Erlangen-Nürnberg.



### Dr Gerald Kindermann

*F. Hoffmann-La Roche Ltd., Switzerland*

Dr Gerald Kindermann is Product Quality Manager at the Global Quality Group at Roche working on quality systems. Before that he was Group Leader Quality Control and Quality Manager for the Supply Center.



### Dr Ágnes Kis

*Compliance Consultant, formerly with F. Hoffmann-La Roche Ltd, Switzerland*

Before starting working as a consultant in July 2018, Ágnes Kis was Global Complaint Lead Investigator and Global GMP Compliance Auditor at Roche. In a similar role, she was with Novartis Vaccines and Diagnostics. Before her industrial career, Ágnes Kis was Senior GMP/GDP Inspector for the Hungarian National Institute of Pharmacy and Nutrition (OGYÉI) and expert member in various working groups at EMA, PIC/S and the European Commission.



### Dr Ulrich Kissel

*European QP Association, KisselPharmaConsulting, Germany*

Ulrich Kissel is Qualified Person and Member of the Board of Directors of the European Qualified Person Association (EQPA). He works as a GMP consultant and contract QP to the Pharmaceutical Industry. Previous to his current role he held leadership positions in Quality and Supply Chain and served for many years as QP for Roche.



### Aidan Madden

*FivePharma, Ireland*

Aidan Madden is Managing Directive and Senior Consultant with FivePharma. Before that he was Quality Manager at Wyeth, Senior Microbiologist at Baxter and QC Manager at Fort Dodge Laboratories. He was also working at Teagasc, a government research laboratory and at the National University of Ireland in Galway.

## Social Event



In the evening of the first course day, you are cordially invited to a social event. This is an excellent opportunity to share your experiences with colleagues from other companies in a relaxed atmosphere.

## Easy Registration



Reservation Form:  
**CONCEPT HEIDELBERG**  
P.O. Box 10 17 64  
69007 Heidelberg  
Germany



Reservation Form:  
+ 49 6221 84 44 34



e-mail:  
[info@concept-heidelberg.de](mailto:info@concept-heidelberg.de)



Internet:  
[www.gmp-compliance.org](http://www.gmp-compliance.org)



+ 49 6221 84 44 34

Reservation Form (Please complete in full)

### Complaint Handling and Recall Management

12/13 November 2019, Vienna, Austria

Mr.  Ms.

Title, first name, surname

Company

Department

Important: Please indicate your company's VAT ID Number

Purchase Order No. (if applicable)

Street/P.O. Box

City

Zip Code

Country

Phone/Fax

E-Mail (please fill in)

If the bill-to-address deviates from the specifications on the right, please fill out here:

CONCEPT HEIDELBERG

P.O. Box 101764

Fax +49 (0) 62 21/84 44 34

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#### General terms and conditions

If you cannot attend the conference you have two options:

1. We are happy to welcome a substitute colleague at any time.
2. If you have to cancel entirely we must charge the following processing fees: Cancellation
  - until 2 weeks prior to the conference 10 %
  - until 1 week prior to the conference 50 %
  - within 1 week prior to the conference 100 %.CONCEPT HEIDELBERG reserves the right to change the materials,

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#### Date

Tuesday, 12 November 2019, 9.00h – 18.00h  
(Registration and coffee 8.30h – 9.00h)

Wednesday, 13 November 2019, 9.00 – 15.00h

#### Venue

Radisson Blu  
Park Royal Palace Hotel, Vienna  
Schlossallee 8  
1140 Vienna, Austria  
Phone +43/1/89110 9 200  
[info.parkroyalpalace.vienna@radissonblu.com](mailto:info.parkroyalpalace.vienna@radissonblu.com)

#### Fees (per delegate plus VAT)

ECA Members € 1,590  
APIC Members € 1,690  
Non-ECA Members € 1,790  
EU GMP Inspectorates € 895  
The conference fee is payable in advance after receipt of invoice and includes conference documentation, dinner on the first day, lunch on both days and all refreshments.  
VAT is reclaimable.

#### Accommodation

CONCEPT HEIDELBERG has reserved a limited number of rooms in the conference hotel. You will receive a room reservation form/POG when you have registered for the event. Reservation should be made directly with the hotel. Early reservation is recommended

#### Conference Language

The official conference language will be English.

#### Organisation and Contact

ECA has entrusted Concept Heidelberg with the organisation of this event.  
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**For questions regarding content please contact:**  
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at +49-(0)6221/84 44 35 or per e-mail at [kuehn@concept-heidelberg.de](mailto:kuehn@concept-heidelberg.de).

**For questions regarding reservation, hotel, organisation etc. please contact:**  
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