



## Speakers



Dr Rainer Gnibl  
GMP Inspector for EMA and  
Local Government



Dr Gerald Kindermann  
GxP Consulting



Dr Ágnes Kis  
Compliance Consultant, formerly F.  
Hoffmann La-Roche



Dr Ulrich Kissel  
European QP Association,  
KisselPharmaConsulting



Aidan Madden  
FivePharma



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# Complaint Handling and Recall Management



Live Online Training on 19/20 November 2024



*How to implement EU-GMP Chapter 8*

## Highlights

- 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

**Facing the GMP- GVP Interface:  
the Role of the QP and the QPPV**

## Objectives

During this Live Online Training, 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

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) together with the Qualified Person for Pharmacovigilance (QPPV) 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

This Live Online Training 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 Day 1

### Complaint Handling Session

How to handle Complaints - Complaint Management Process

- Regulations (EU, US FDA)
- How to organize the process
- The complaint sample and sample chain custody
- Complaint investigation: Examples
- Pitfalls

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

How to handle Complaints - Complaint Management Quality System

- Quality Metrics & KPIs
- Reporting and trend evaluation
- Technical complaints versus safety signals
- The role of the QP and QPPV
- Effectiveness of PQS



Q & A Session 1

### 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.



Case Study

Quality Risk Management in Complaint Handling and Recall Procedures



Q & A Session 2

# Programme Day 2

## 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.

#### A practical View: Access to the Root Cause

#### When to Recall or not to Recall – Apply Root Cause Analysis

A hypothetical scenario will be shown: What action needs to be taken, what information is needed, who should be involved, and ultimately - Is a recall required and if so to what level?



Q & A Session 3

### Your Benefit

#### Internationally Acknowledged Certificate from ECA Academy

The EU GMP Guide requires: „... All personnel should be aware of the principles of Good Manufacturing Practice that affect them and receive initial and continuing training, ...“ This is why you receive an acknowledged participant certificate, which lists the contents of the Live Online Training in detail and with which you document your training.



#### Participants' comments from the November 2020 Live Online Training Course

„Good organisation and speakers.“

Silke Teynor, Betapharm Arzneimittel GmbH, Germany

“Good, professional speakers. Very comprehensive; well documented. Very useful.”

Madalina Toghia, WORWAG Pharma Romania SRL, Romania

## 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**  
GxP Consulting, Switzerland

Dr Gerald Kindermann was 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. Since 2019 he is working as Senior Pharma Consultant.



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

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Reservation Form (Please complete in full)



## Complaint Handling and Recall Management Live Online Training on 19/20 November 2024

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German law shall apply. Court of jurisdiction is Heidelberg.

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## Date of the Live Online Training

Tuesday, 19 November 2024, 9.00 – 17.30 h

Wednesday, 20 November 2024, 9.00 – approx. 13.00 h

All times mentioned are CET.

## Technical Requirements

We use Webex for our live online training courses and webinars. At <https://www.gmp-compliance.org/training/online-training-technical-information> you will find all the information you need to participate in our events and you can check if your system meets the necessary requirements to participate. If the installation of browser extensions is not possible due to your rights in the IT system, please contact your IT department. Webex is a standard nowadays and the necessary installation is fast and easy.

## Fees (per delegate, plus VAT)

ECA Members € 1,690

APIC Members € 1,790

Non-ECA Members € 1,890

EU GMP Inspectorates € 945

The conference fee is payable in advance after receipt of invoice.

## Registration

Via the attached reservation form, by e-mail or by fax message. Or you register online at [www.gmp-compliance.org](http://www.gmp-compliance.org).

## Presentations/Certificate

The presentations will be made available to you prior to the Live Online Training as PDF files. After the event, you will automatically receive your certificate of participation.

## Conference language

The official conference language will be English.

## You cannot attend the Live Event?

We also offer many of the training courses and conferences as recordings. This means that you can watch the videos of the event „on demand“ – whenever it suits you – on our web server. It is quite uncomplicated and doesn't require any software – you simply watch the video on your browser. You can find all recorded events at [www.gmp-compliance.org/recordings](http://www.gmp-compliance.org/recordings).

## Organisation and Contact

ECA has entrusted Concept Heidelberg with the organisation of this event.

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P.O. Box 10 17 64

69007 Heidelberg, Germany

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

[info@concept-heidelberg.de](mailto:info@concept-heidelberg.de) | [www.concept-heidelberg.de](http://www.concept-heidelberg.de)

### For questions regarding content please contact:

Dr Andrea Kühn-Hebecker (Operations Director) at +49(0)62 21/84 44 35, or at [kuehn@concept-heidelberg.de](mailto:kuehn@concept-heidelberg.de).

### For questions regarding organisation please contact:

Mr Maximilian Bauer (Organisation Manager) at +49(0)62 21/84 44 25, or at [bauer@concept-heidelberg.de](mailto:bauer@concept-heidelberg.de).