UNIT-4

Complaints

There is always the possibility that some defective products may reach the customers, even though a company makes best efforts to design, manufacture, and sell safe and reliable products.

A complaint is a statement that says something is unsatisfactory or unacceptable about the product or packaging in terms of any defect in pharmaceutical product.

→ Complaints may be received from Pharmacists, Physicians, wholesalers, retailers, patients, etc.

→ Therefore, as per GMP, industry has their own procedures to maintain records, investigation and review steps of complaints and accordingly a system to recall the product from the market.

Types of complaints

Complaints may be categorised into three types:

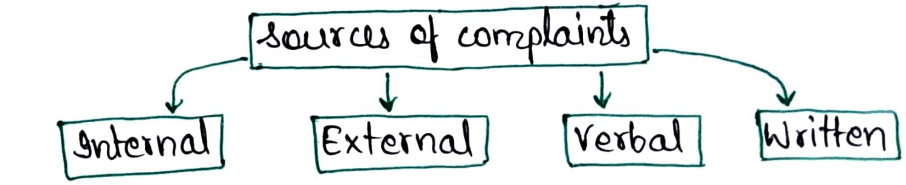
1) Quality Complaints :- These complaints arise at consumer level, regarding the physical, chemical and biological properties or conditions of labelling or packaging of the product.

2) Adverse Drug Reactions (ADR) complaints

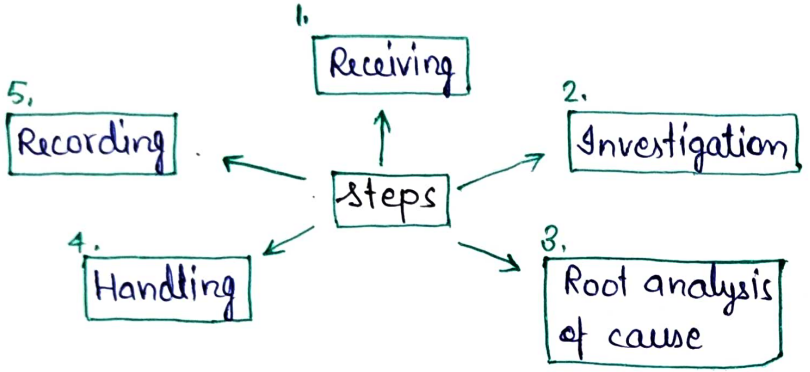
These complaints arise due to allergic reactions, any unwanted reactions, or fatal reaction of product.

3) Other medically related complaints

These complaints arise due to lack of efficacy or clinical response of the product.



steps involved in resolving the product complaints



(A) Receiving the complaints

1) customer complains by one of the sources like email, letter, toll free number, etc.
2) Company contact person open the form that includes customer personal details and information about the complaint.
3) The matter is undertaken by Quality Assurance Complaint Officer (QACO).

(B) Investigation

(1) Technical investigation starts which may be:
- → Documentation-based investigation
- → Laboratory-based investigation

(2) QACO prepares final report and checks the seriousness of the complaint.

(C) Root Analysis of Cause

(1) After investigation by QACO, corrective action is taken.
(2) QACO write a letter to customer about the investigative approach taken, results found and their implications.
(3) A free offer product might be delivered to reimburse the customer if required.

(D) Handling and Report Analysis

QACO elaborate monthly reports which contains the number of complaints the company received in this period, the number of confirmed confirmed complaints, non-confirmed or counterfeit complaints, nature of complaints, which batches are involved, the root cause of complaints and cost of handling the complaints to company.

(E) Recording of Complaints

Records of complaints include:

(1) Contents of complaint: name, dosage form, type of package, batch no., date, place of complaint, cause of complaint, name and address of complainant.

(2) Result of investigations

(3) Follow-up measures: Reply to complainant, remedial action taken, informing to regulatory authorities about serious defects that may arise in future.

Handling of Returned Good

Finished product when sent back to manufacturer, distributer, importer is known as returned good. Reasons for return of goods may be some quality problems, accidental damage, product expiry or other reasons.

→ salvaged drug products are returned goods which had been subjected to improper storage conditions like extreme temperature, humidity, smoke, fumes, pressure and radiation.

→ Once the product is returned, it should be identified as such and stored.

→ The container, carton, or labelling of storage should be investigated regarding the safety, identity, strength, quality, or purity of the drug product.

→ The returned drug product should be destroyed if it is proved to not comply to appropriate standards.

→ Records of returned products should be maintained, along with product name and label potency of the drug product, reason for return, quantity returned.

→ There should be written procedures for the holding, testing and reprocessing of returned drug product.

Recalling

Recalling of products means withdrawing or removing the product from distribution due to quality issues or adverse drug reactions. Generally, it becomes necessary to recall the products in cases of complaints regarding any adverse effect or defect in product.

Primary reasons for a product recall

1) Due to violation of a government act, standard or other mandatory regulations.
2) Negative feedback or too many complaints from consumers.
3) Product characteristics do not match up to the advertised claims for safety and effectiveness.
4) Any new additional research and product testing suggests product recall.
5) Additional serious product liability claims or losses.

Types of Recall

1) Class I :- It involves a life-threatening situation.
2) Class-II :- It involves a potentially hazardous but not life-threatening situation.
3) Class-III :- It involves no serious hazards and is usually limited to the wholesale level.

Product Recall Procedure

The following steps should be taken for product recall:

1) Step-I :- To determine degree of recall.
   a) degree-I : If product has high health risk and require freezing of stock within 24 hrs.
   b) degree-II : If product has minor health risk and require freezing of stock within 72 hours.
   c) degree-III : product is recalled due to other reasons.
2) Step-II :- Under this step, following instructions are given:
   i) The internal stock of the product is frozen.
   ii) The record and report of recalled product is established.

(iii) The return of the recalled product is organised.

(3) Step-III :- Product recall is made according to the information/ data given below:

(i) Reason for recall

(ii) Details of product recalled, such as individual batch, the nature of risk, etc.

(iii) Causes of defects.

(iv) Address, telephone numbers of persons to be contacted at national, provincial levels.

(v) Adresses, telephone numbers of distributers, wholesalers, hospitals, etc. are contacted.

Waste Disposal

Within a pharmaceutical plant, the disposal of waste may be of following types:

1) Product Disposal

→ The product to be disposed off should be removed from its packaging.

→ Incineration procedure is preffered over landfill for product disposal.

2) Printed Packaging Disposal :- Generally, there are no health risks associated with disposal of printed packaging components, including labels, inserts and cartons. However, ineffective disposal can lead to public concern that product may be associated with the packaging. Therefore, such products should be incinerated.

3) General Trash and Sewage

Generally, normal local services are sufficient for trash and sewage disposal.

Some ingredients of the pharmaceutical waste are:

- Oil and grease
- Mercury
- Lead
- Phenolic
- Chromium
- Arsenic

Document Maintenance in Pharmaceuticals

A document is any written statement or proof of any activity in pharmaceuticals.

→ The basic rules in any GMP regulations specify that the manufacturer must maintain proper documentation and records.

→ Good documentation is an essential part of the quality assurance system.

Objectives of Documentation

1) To define the specifications and procedures for all materials and manufacture and control methods.
2) To ensure that the personnel associated with manufacturing know their work and the time of doing it.
3) To ensure that authorised personnel have the required information to decide whether or not to release a batch of a drug for sale.
4) Provide clear cut procedures to be followed.

Batch Formula Record

Batch Formula Record (BFR) is a document that provides full record of manufacturing history of each batch of every product.

→ A batch manufacturing record should be completed during the production of each batch of products and APIs.

→ It should contain the following information:

1) The product name, the size and number of batch.
2) The dates of different production stages.
3) Production details (equipment used and yields)
4) The in-process controls conducted and their results.
5) Details of and signed authorisation for any unintended deviation from the master formula.
6) Initials of the operators and date and signature of the person responsible for the production.
7) A decision for the release or rejection of the batch for sale along with the date and signature of the person who will take the decision.

→ Data may be recorded by electronic data-processing systems.

→ Electronically stored batch records should be protected by back-up transfer.

Master Formula Record

Master Formula Record (MFR) is a product-specific document.

MFR should be reviewed, and any changes to be made should be approved by designated personnel responsible for production and quality control.

→ There should be MFRs related to all manufacturing procedures for each product to be manufactured.

→ These records should be prepared and authorised by the competent technical staff, i.e., head of production and quality control.

→ The master formula record should include the following details.

1) Product name and the reference code related to its specifications.

2) The patent and proprietary name and generic name of the product.
3) A description of the dosage form, strength and composition of the product.
4) Name and quantity and reference number of the starting materials to be used.
5) Location and equipment to be used.
6) Detailed stepwise processing instructions and the time taken for each step.
7) storage conditions and labelling conditions of the products and their containers.
8) Packing details and specimen labels.

SOP

Standard operating Procedures (SOP) is a set of instructions which describes how an activity is performed step-wise. It ensures the smoothness of operation in order to achieve desired quality.

→ An SOP should contain description of task in simple and straightforward way.

→ SOPs reduce errors and variation in the operation.
→ Any abbreviations used in the SOP should be mentioned at the beginning.
→ SOPs should be prepared by respective departments and then approach to QA for reviewing its compliance with GMP. After QA approval, SOP is signed, dated and authorized by senior personnel of concerned department.
→ SOP instructions should be followed without any alteration to achieve the desired product.

Elements of SOP

1) Company name
2) Title
3) Purpose
4) Procedure
5) Quality Assurance / Quality control
6) References

Quality Audit

Auditing is defined as inspection of a process or a system to ensure that whether it is working as per the requirements.

Quality audits are performed at definite intervals.

Objectives of audit

→ To recommend corrective actions.
→ To monitor improvement
→ To build confidence in GMP and QA system.
→ To verify if the production and control systems are operating as intended.

Quality Review

Quality Review is an evaluation process conducted on a regular basis for pharmaceutical products, to assess the quality standard of each drug product.

→ It is an effective tool to enhance the consistency of manufacturing and overall quality of the product.
→ A representative number of batches must be selected and a review must be done of the documents associated with them.
→ Both approved and rejected batches must be a part of this study.
→ Along with this, it is also important to evaluate any complaints received regarding the same product batches.
→ By doing these activities, it is possible to find the areas where improvement is important.
→ Performing a quality review is essential as it enables the better understanding of processes which can guide further quality improvements.

Quality Documentation

This comprises of all the documents that forms a part of company's quality management system.

This comprises of documents such as:

- Quality policy
- Quality procedures

→ Work instructions

→ Records

Quality Policy / Manual :- Describes the quality system and what has to be done as an organisation to implement.

Quality Procedures :- Describes how the quality system will be implemented, methods to be used, what to do, when to do, and where to do.

Work Instructions :- Its a department which gives details of each task is to be done. They are represented by SOPs in pharma industry.

Records :- It is the final part of documentation system.

It contains evidences and proofs that quality policy, work instructions and procedures have been executed as directed.

Records and Documents

Documentation and Records are maintained throughout the manufacturing process. It must meet the basic requirements of Good Documentation Practices. It should contain the following details:

1) A review of the starting materials and primary packaging materials.
2) A review of critical in-process controls and finished product results.
3) A review of all batches that failed to meet the established specifications and standards.
4) A review of quality-related product returns, complaints and recalls and the investigations performed.
5) A review of post-marketing commitments.
6) A review of all the changes made to the processes or analytical methods.

7) A review of the results of stability monitoring programme and any adverse trends.

Distribution Records

After thorough testing and approval batches are released for distribution by qc department.

Warehousing department must contain records of batches released for distribution in systematic manner.

It plays a crucial part during the necessity of product recall from the market.

Distribution records should contain the following:

1) Name, strength and dosage form description of the product.
2) Name and address of the consignee.
3) Date and quantity shipped.
4) Lot number of the drug product.

The main objective of distribution records is to ensure that adequate data are available during product recall.