PHARMACEUTICAL PRODUCTS RECALL

GUIDELINE

Department of Drugs and Food

Ministry of Health

Unofficial translation

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1.Introduction and Definition

1.1.Introduction

When pharmaceutical products are suspected of poor quality or being potential harmful to users, they may be subjected to a recall and all related information must be reported to the Department of Drugs and Food, Ministry of Health.

This Guideline is intended to ensure that in the event of a necessary recall, the recall operation are effectively and efficiently carried out by the manufacturers, import-export companies, pharmacies, depots of pharmacy, and certicate holders of pharmaceutical product in order to safeguard the public health.

The Law on Drug law management amendment in Article 10, point 2 :to be fined 5.000.000Riels(Five million riels) to 10.000.000Riels(Ten million riels) to any person who:

-Opens, closes or transfers premises of wholesale, import-distribute company, export company without permision from the Ministry of Health.

-is a quilty of an offence to the provision and condition of bussiness

-import, export pharmaceutical products without permission from the Ministry of Health

-disrtibutes, selles pharmaceutical products and cosmetics which are not registered in Ministry of Health.

-selles defective and expiry date medicines.

New article 11 states that any person who disrupts the implementation of this law is liable to conviction to fine from 2.000.000Riels(two million riels) to 10.000.000riels(ten million riels) and to impresonment for 1month to 6 months.

New article 13: any government officials who collude with or defy on their duties in the implementatin of new article 10, 11 and 12 will be punished by administrative sanction.If necessary, send them to the court.

This Guideline is recognized by the licensing authority appropriate to the specialized requirement for the recall of pharmaceutical products.Any licensee who failed to comply with the Law on Drug Management and Regulation of Ministry of Health may revoke or suspend the license for a definite period.

Ministry of Health (Department of Drugs and Food) has the role to monitor the progress and effectiveness of the recall and may alert the public about the problem of the products and instruct the licensee to recall and dispose of the poducts.

1.2.Definition

- Licensee is the person or business that has the primary resposibility for the supply.The Licensee could be Manufacturers inside and outside of the country, representative of manufacturer, import-export company, pharmacy, depot of pharmacy and pharmaceutical product supplier (Government and private hospital, and all private sectors).
- Recall: A process for withdrawing or removing a pharmaceutical product from the pharmaceutical disrtibution chain because of defects in the product, complaints of serious adverse reactions to the product or concern that the product is or may be counterfeit. Recall is a duty and responsibility of Ministry of Health, manufacturer inside and outside the country, representative of manufacturer, import-export company, pharmacy, depot of pharmacy and pharmaceutical product supplier (Government and private hospital, and all private sectors).

- Market: import-export companies, pharmacy, depot of pharmacy and pharmaceutical product supplier (Government and private hospital, and all private sectors).
- Licensee: manufacturers or import-export companies.

2.Stage of Recall Procedure

2.1. When the information about the problem of pharmaceutical products has received, the Ministry of Health (Department of Drugs and Food) should make a notification of those products and dispatch to the relevant licensee for investigation.

2.2.Initiation of a Recall:There are enough information relating to the products required for assessment of recal.l

2.3.Assessment of Recall:The classification, level and strategy of recall are determined depending on the potential hazard of the defective products and the extent of product distribution.

2.4.Strategy of Recall: It may be done via letter, press release,Radio, TV, or any means to dispatch those information to relevant firms for notifying about the recall.

2.5.Report of Recall: owners of the products should make reports and submit to the Department of Drugs and Food before and after operation.

2.6.Evaluation of the Recall:The effectiveness of the recall is monitored by Drug Inspector in all levels.

3.Notification of a Pharmaceutical Product Problem

Recall might be initiated as a result of reports or complaints on quality, safety or efficacy from a variety of sources.The reports or complaints may be referred by manufacturers, import-export companies, pharmacies, depot of pharmacies, hospitals, clinics and all persons involved. Any way, recall may be initiated as a result of analysis and

testing of samples of pharmaceutical products by the manufacturers and by the Ministry of Health (Department of Drugs and Food). Recall of pharmaceutical products manufactured overseas might be initiated by the Department of Drugs and Food with referrence to the notification from oversea health authorities, or information received directly from such NGOs. The important information is quality defects, poor quality, safety or efficacy problem on pharmaceutical products which can have harmful effects to consumers.

4.Initiation of recall and Information required for Assessment of Recall

When the licensee decides to initiate a recall on pharmaceutical products, it is required to notify all information relating to those products to Department of Drugs and Food, Ministry of Health.The information required may include:

4.1.Details of the Problem(see annex 1)

- name and telephone of the person reporting the problem
- Location of the problem
- nature of the problem
- number of similar report received
- result of investigations on suspect samples
- result of tests on suspect samples.

4.2.Details of the Product (ANNEX 2)

- name of the product and descripton including active ingredients,dossage form, strength, registration no. pack size.
- batch number, date of manufactured and expiry date
- name and address of manufacturer
- name, address of import-export company and contact telephone and email address
- date of released or imported

- quantity of manufactured or distributed
- distribution list.

4.3.Health hazard evaluation and proposed action(see annex 3)

- type of hazard, and evaluation of health hazard to user.
- action proposed by the Licensee.
- proposed recall classification and level.

5.Recall Strategy

There are a number of factors common to all recalls that need to be considered in tailoring an appropriate recall strategies. These include the nature of the deficiency in the product, the incidence of complaints, public safety defect, and quality defect via distribution network. The Licensee should take an action effectively to recall and should inform the Department of Drugs and Food.The recall strategy should be agreed by the Department of Drugs and Food.The appropriate strategy should be proposed by Licensee to the Department of Drugs and Food before processing.

In the recall strategy, the Licensee should mention the followings:

1. Indicate the proposed level in the distribution chain (In case of distribution level recall).
2. In case of consumer level recall, additional information should be mentioened:
    - indicate the duration and location of recall spots.
    - indicate the telephone number for enquiry.
    - indicate the proposed refund mechanism or condition of refund(by means of money, credit notes or product replacement)
3. Indicate how the message of recall will be delivered to theconsumers eg. press release, recall letter, telephone, radio or TV.
4. Report on what have the consumers been instructed to do with the recalled product.

5. Indicate the name, title and telephone number of the recall contact person for each of its consignees.
6. Provide a propsed disposal plan of the recalled products,whether they would be destroyed or returned to overseas manufacturer.
7. Inform the Department of Drugs and Food before product destruction. Department of Drugs and Food should choose drug inspector to witness the destruction.

5.1. Classification

There are 3 classes of recall

Class I Recalls:occur when products are potentially life-threatening or could cause a serious risk to health.

Examples of class I defects

- Wrong Poduct (label and contents are different products)
- Correct product but wrong strength
- Chemical contamination with serious medical consequence
- Mix up of some products with more than one container involved
- Wrong active ingredient in a multi-component product with serious medical consequence.

Class II Recalls occur when product defects could cause illness or mistreatment, but are not class I.

Examples of Class II defects

- Mislabeling eg. wrong or missing text or figures
- Missing or incorrect information-leaflet or inserts
- Microbial contamination of non-ophthalmic sterile product with medical consequences
- Non-compliance with specification (assay, stability, fill/weight or dissolution)

- Insecure closure with serious medical consequences (eg.Cytotoxics, child resistant containers, potent products)

Class III Recalls occur when product defects may not pose a siignificant hazard to health, but withdraw may be initiated for other reasonns.

Examples of class III defects

- Faulty packaging eg. wrong or missing batch number or expiry date
- Faulty closure
- Contamination-microbial spoilage, dirt or detritus, particulate matter.

Class I or Class II recalls are considered to be urgent safety-related recalls. They must be reported to the Department of Drugs and Food for further evaluation and investigation.

Class III recalls are considered to be non-safety-related recalls.

This Guide do not apply to the recall of pharmaceutical products related to regulatory issues eg.approved change of packging, design, or leaflet. The classification of recalls is determined by Department of Drugs and Food depending on the nature of hazard.

5.2.Recalls: apply to wholesaler, Retailer and consumer

1.Wholeasaler: All parties involved including manufacturers, import-export companies, and pharmacies.

2.Retailer: All public and private hospital pharmacies, pharmacies, and depot of pharmacies.

3.Cosumer: Patients and other consumers.

5.3.Communication to public:

In case of recall, the Licensee may prepare letters with a factual statement of the reasons for the recall of the product, together with specific details that will allow the product to be easily identified and then send to the clients. The letter should use the company letterhead include date, name of company, name and title of signatory.

The text of recall may include:

5.3.1.Description of the pharmaceutical product: name of the product, name of manufacturer and its country, name of import-export company, registration number, pack size, dossage form, strength, lot number, manufacturing date, and expiry date.

5.3.2.Hazard with the product: The reason for the recall should be concisely explained. It should be made clear that further distribution and use of the product should cease immediately.

5.3.3.Instruction for recall of the product: The Licensee should clarify the method of return, disposal or correction and refund mechanism of the product.

5.3.4.Public alert

Immediate alert to public is usually reserved for Class I and Class II recalls. In necessary, immediate alert to public may be issued through telephones, news papers, radios or TV.

6.Responsibility of Licensees

Licensees have responsibilities for recall of their pharmaceutical products such as:

- Records or invoices of all sales or distributing their pharmaceutical products should be retained and establishing procedures which will assist in facilitating recall should such action become necessary.(see annex 4)
- Records of recall and their invoices should be retained or kept readily accessible for 1 year after expiry date to permit a complete and rapid recall of any lot or batch of a pharmaceutical product.
- The reports pertaining to the recall should be summitted to Department of Drugs and Food within 2 weeks after the date approved by Department of Drugs and Food.

6.1.Responsibility of the Licensee

The Licensee has prime responsibility for implementing recall action and for ensuring compliance with the recall procedure at its various stages. However, no recall

should be undertaken without permission from Department of Drugs and Food. When proposal to recall reveived, Department of Drugs and Food should appoint drug inspector with his/her name and contact phone number to coordinate the recall.This officer has to report the progress of recall regularly to Department of Drugs and Food.

For Class I and Class II recall, Licensee should notify its clients within 24 hours upon the decision of recall. Licensee should utilize to immedieately diseminate information on the recall.

6.2.Recall mechanism

Licensee should set up a refund mechanism for the recalled products.

6.3.Post -recall

After the timeframe directed by Ministry of Health (Department of Drugs and Food), Licensee is to provide the Department of Drugs and Food with the report within 2 weeks after the date mentioned by Ministry of Health (Department of Drugs and Food).

The report should contain the following information(see annex 5):

- the number imported (with imported documents)
- the number distributed (with distributed invoices)
- the number of consugnees
- the quantity in stock (stock card)
- the number of responses received from them
- the quantity of stock returned by each consignee and total
- date and means of recall.

6.4.Method of destruction

Prior to destruction, Licensee is to submit the permission to destruction to Ministry of Health (Department of Drugs and Food) with appriate method, location and time.When received the proposal from Licensee, Ministry of Health (Department of Drugs and Food)

examines the proposal and then reply. In case of finding unsafety or environment affect or public safety, Ministry of Health (Department of Drugs and Food) send it back to Licensee with the corrective method. Ministry of Health (Department of Drugs and Food) is to appoint drug inspetor to monitor and follow up this operation and report to Ministry of Health (Department of Drugs and Food).

After obtaining the report from Licensee and report from drug inspector on destruction, Ministry of Health (Department of Drugs and Food) should issue the evaluation report to Licensee.

If Ministry of Health (Department of Drugs and Food) found that Licensee failed to implementing as approved, Licensee is to face to the law on drug management.

Reference:

-PHARMACEUTICAL PRODUCTS RECALL GUIDELINES
December 2012, Hong Kong, China

PHARMACEUTICAL PRODUCT PROBLEM REPORT (ANNEX1)

Detail of the Problem		
Name of Company:		
Name of contact:		Position/Occupation
Address:		
Tel:	Fax:	E-mail:
Nature of the Problem		
Date of receiving complaint:		
Source of complaint ☐ patient ☐ Customer ☐ Retailer ☐ Self-inspection ☐ Medical Doctor ☐ Pharmacist ☐ Other		
Number of similar report received:		
Description of the problem		
Result of tests/investigation on suspect		
Has manufacturer/distributor been contacted ☐ No ☐ Yes(Please write down their name)		
Other relevant information		

DETAIL OF THE PRODUCT(ANNEX2)

Name of the product	Registration number:	
Active Ingredient & Strength	Pack Size	
Indications		
Dosage Form	Manufacturing date	
Batch Number	Expiry date	
Disrtibution of Porducts ☐ Hospital ☐ Pharmacy/Depot ☐ Private Sectors ☐ Other		
Manufacturer		
Name		
Address		
Tel:	Fax:	E-mail:
Quantity manufactured	Date:	
Quantity distributed	From.....to.....	
Quantity in stock	Date:	
Importer		
Name		
Address		
Tel:	Fax::	E-mail:
Quantity imported	Date:	
Quantity distributed	From.....to.....	
Quantity in stock	Date:	
Wholesalers (please attach distribution list)		
Name		
Address		
Tel:	Fax:	E-mail:
Quantity received	Date:	
Quantity distributed	From.....to.....	
Quantity in stock	Date	

Has the product been export outside Cambodia? ☐ Yes ☐ No If yes, please specify the export ountries.....

Name of Reporter.....

Tel.....Date.....

Signature of reporter.....

RECALL NATIFICATION FORM (ANNEX 3)

Risk Assessment

Type of hazard	☐ Quality	☐ Safety	☐ Efficacy	☐ Labeling
	☐ Other————			
Evaluation of Health Hazard to users:				
Proposed recall classification ☐ ClassI		☐ Class II		☐ Class III
Recall start date:			Proposed recall end date:	
Resposible officer of recall			Tel:	
Proposed recall level ☐ Wholesale		☐ Retail		☐ Consumer
Location of recall:				
Operation hours and duration of the recall:				
Means of refund ☐ Money		☐ Replacement	☐ Other	
Proposed recall strategy:				

Name of reporter.....Position.....

Tel.....Date.....

Signature of reporter.....

RECALL REPLY FORM (ANNEX4)

To :

Tel :

Address :

Subject :

From: Pharmacy AAAAA.....

Contact person:

Tel :

Address :

I do/do not have stock which is subject to this recall

I have reported and returned all the stock on hand to (Company Name.....)

Stock received

Batch No.....Quantity.....

Batch No.....Quantity.....

Batch No.....Quantity.....

Unused stock subject to recall

Batch No.....Quantity.....

Batch No.....Quantity.....

Batch No.....Quantity.....

Any other relevant details.....

.....

I declare that the information provided by me in this reply form is complete and true to the best of my knowlegde.

Signature.....Date.....

FINAL REPORT FORM (ANNEX 5)

Details of the recalled products	
Name of the product	Regstration Number
Active ingredient & Strength	Batch/lot number
Dossage form	Pack size
Manufacturing date	Expiry date
Reason for recall	
Extent of distribution	
Quantity manufactured or imported	
Quantity exported	Date
Quantity distributed	Number of consignee
Quantity in stock	
Action taken by the Licensee	
Result of recall	
Quantity of stock returned	Quantity stock out
Quantity of stock used or sold by the consignee	
Number of recall reply form received from consignee	
Disposal Plan	
Method of disposal ☐ Destroy ☐return to oversea manufacturer ☐ Other	
Detail of disposal method	

Name of Licensee.....

Name and Signature of recall officer.....

Date.....