Adverse Event:
Any sign, symptom or illness which is associated with the use of a drug or device. Adverse events which my be classified as 'serious' requiring expedited handling include, but are not limited to, an associated event which: results in death; is life-threatening; results in hospitalization or prolongation of hospitalization; results in persistent or significant disability or incapacity; or results in congenital anomaly or birth defect

2. **Complaint Handling System**
All GMP manufacturing sites should establish a formalized program for the handling of customer complaints. A comprehensive complaint handling program should include the following elements:

- A written Standard Operating Procedure (SOP) for processing complaints;
- Individually numbered complaint files for each incident report received;
- When complaints are received orally, a system for documenting on the complaint form the information such that it is complete, factual and not editorial;
- Directions for handling the complaint samples in an appropriate and safe manner;
- Complete evaluation and documentation of results, including assessment of health risk, if any;
- Evaluation, documentation, and final disposition of the potential adverse event complaints.
- Review of relevant data and summary of findings to include a conclusion and/or corrective actions (with effective dates);
- Preparation of an appropriate response that includes results of the investigation;
- Review of the completed file, communication of the response to the complainant and maintaining a copy of the response in the file;
- Complaint files should be located in a designated area (accessible to the manufacturing area if kept offsite), and maintained according to the site's record retention policy.
- Complaint review and analysis for trends should be conducted and reported to senior management and affected departments (Sales, Marketing, Production, Product Development, Legal, Packaging, etc.) on a periodic basis.
- Computer systems used for report management and/or trend analysis should be validated.

In addition, the appropriate regulatory agencies and/or competent authorities should be informed, when necessary, if the site is considering action following possibly faulty manufacture, product deterioration, detection of counterfeiting or any other serious quality problems with a product.

3. **Complaint Files**
A complaint file should be established for any written or oral complaint received by the site. Each complaint file that is opened should be assigned a unique identifying number.

- Review of the complaint database for trends pertaining to similar events, similar products, and/or similar materials.
- Documentation of any medical, legal, expert, or literature review.
- Any planned or completed corrective actions.
- Any other supportive or pertinent follow-up information for the investigation.

However, each complaint is unique, and should be investigated in a manner consistent with the risk presented by the complaint, and the specifics of the situation. All the aspects listed above may not be required for a thorough investigation.

Special attention should be given to establishing whether a complaint was the result of counterfeiting. For products manufactured at a contractor facility, the responsibility for handling customer complaints needs to be defined in the contractual agreements between the parties concerned. Records and sample retention programs should also be considered in these agreements.

7. **Summary/Conclusion**
After the evaluation and investigation of the product complaint have been completed, a brief summary of the complaint should be added to the file determining, where feasible, the most probable explanation for the cause. Appropriate corrective actions and persons responsible for the execution should be documented in the file. If no corrective action is required, a statement to this effect should be included.

8. **Review and Response**
After the complaint has been summarized and the conclusions documented, the entire file should be reviewed and approved by appropriate site quality personnel. The review should be signed and dated.

Whenever possible, a response letter to the complainant with copies going to the required sales/marketing departments and any other interested parties should be prepared and sent in a timely manner. A copy of response letter should remain in complaint file.

9. **File Closure**
When all information and documentation is assembled in the file, the complaint file should be closed. Each site should have a mechanism for timely file closure included in its complaint handling procedure. Typically, routine complaints can be closed within 30 – 45 days. Those complaints which require product analysis may take up to 60 – 90 days, depending on the nature and seriousness of the complaint. Outside resources may be required to complete a thorough evaluation. If complaint analysis requires more than the specified time frame for closure, an explanation should be added to the file. Under no circumstance should a file remain open for more than the specified limit without a reasonable explanation for the delay documented in the file.

Internal audits of the complaint handling process should be conducted on a periodic basis.

