

Recall Issues in CIED

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COI Disclosure

Name of First Author:

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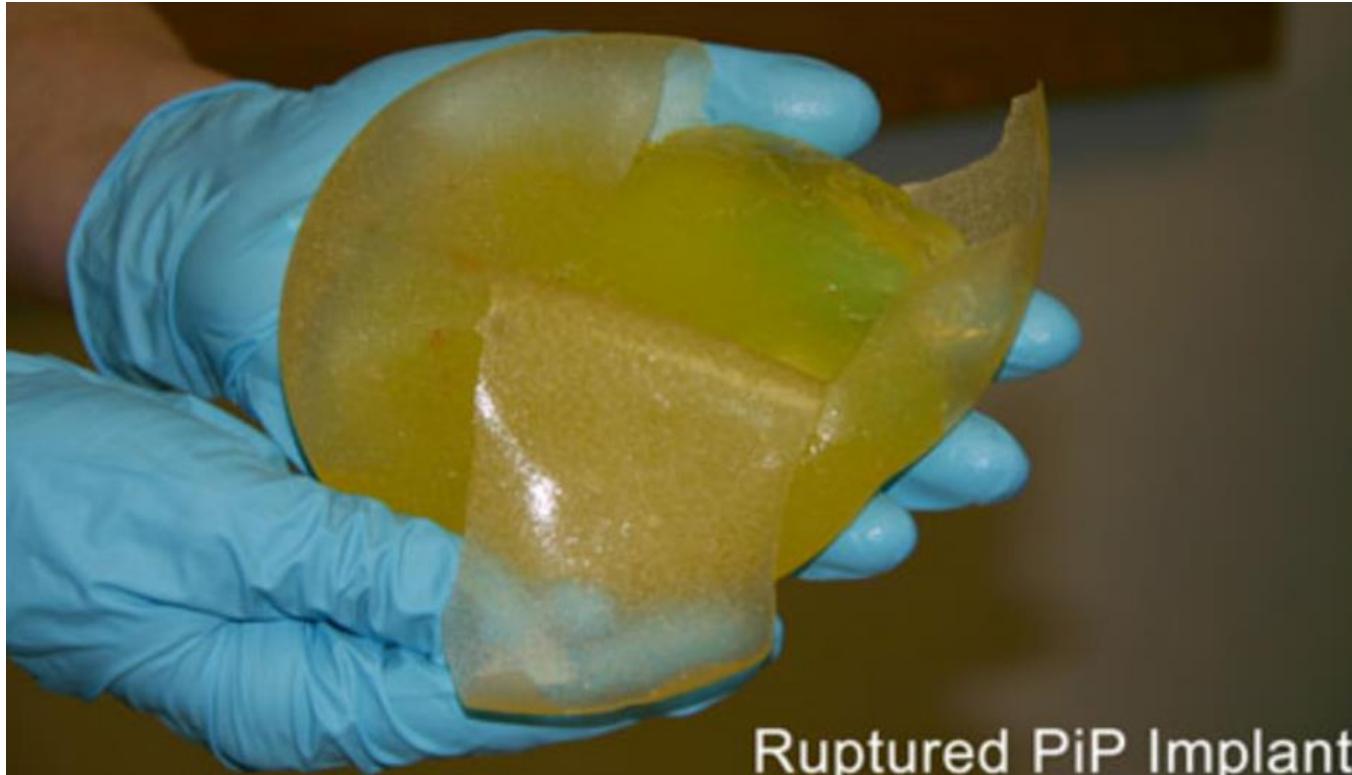


2017 Annual Spring Scientific Conference of the KSC
in conjunction with KHRS, KSIC, KSE, and KSoLA

PIP (Poly Implant Prosthèse)

- French company founded in 1991
- Illegally manufacturing and selling breast implants
- **Cheaper industrial-grade silicone instead of the mandated medical-grade silicone**
- Hundreds of thousands of unapproved implants sold globally by PIP from 2001 to 2010
- **500% higher risk of rupturing or leaking**
- Several deaths due to systemic toxicity and several cases of induced **breast cancer**.

PIP (Poly Implant Prosthèse)



Ruptured PiP Implant

Hip joint replacement

- “Metal on metal”
- High level of torque
- High failure rate
- Necrosis (tissue death)
- Increased levels of metal
- Pain at the implant, sometimes spreading to the groin and



FAULTY METAL ON METAL HIP REPLACEMENTS

In a total hip replacement, normally the ball and the socket in the joint are replaced by metal implant devices. Hip devices imitate the joint by implanting the patient with a ball that mimics the femoral head and a cup that mimics the acetabulum socket. Around 2000 several hip replacement manufacturers placed metal on metal implants on the market. These implants may cause serious injuries because the metal ball and cup grind against each other causing metal debris to enter the body, causing a number of symptoms.

METAL HIP INJURIES

Infection	Cobalt Poisoning
Debris Buildup	Metallosis
Ossification	Osteonecrosis
Device Loosening	Fracture
Dislocation	



500,000 PEOPLE



Have Received a Metal on Metal Hip

16,800 REPORTS



From 2000 to 2011 the FDA received almost 16,800 reports of injuries from patients who had all-metal hips

On average, metal on metal hips **FAIL AT A RATE OF ALMOST 14%**



after 7 years but the failure rate can be much higher depending on the implant

IMPLANTS THAT ALLEGED TO BE DEFECTIVE

Biomet M2a-Magnum	Almost 500 Lawsuits
DePuy ASR	Recalled and Over 10,750 Lawsuits
DePuy Pinnacle	3,300 Lawsuits
Smith & Nephew R3 Acetabular	Recalled
Stryker ABG II and Rejuvenate Modular	Over 150 Lawsuits
Wright Conserve and Profemur	Almost 50 Lawsuits
Zimmer Durom Cups	Recalled and Over 200 Lawsuits

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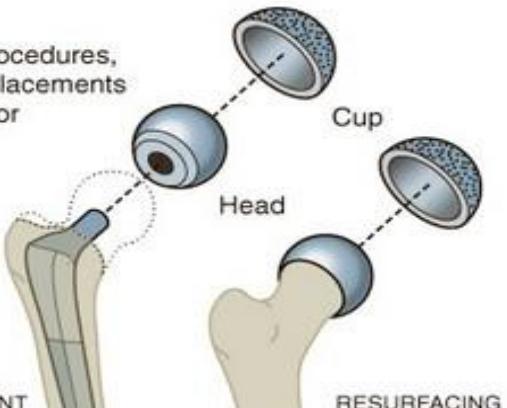
The Effects of Metal Wear

Research has shown that metal-on-metal hip replacements can generate tiny particles of debris that can damage soft tissue and bone.

METAL COMPONENTS

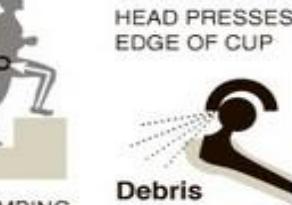
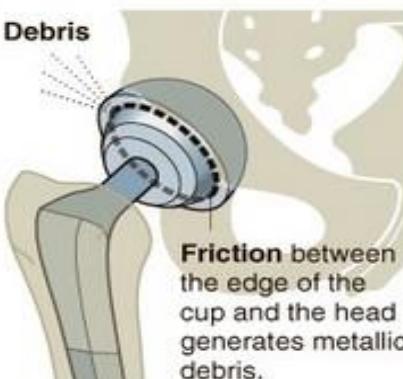
In **metal-on-metal** hip procedures, whether conventional replacements or resurfacings, both major components, the **head** (which replaces the top of the thigh bone) and the **cup** (which replaces the hip socket), are made of metal.

CONVENTIONAL HIP REPLACEMENT



THE PROBLEM

Friction between the head and cup causes wear to these metal parts, which results in **tiny particles of metallic debris**. These particles may be small enough to enter tissue or the bloodstream. The most severe wear is caused by **edge-loading**.



Edge-loading occurs when the head presses against the edge of the cup. It is most pronounced during activities like rising from a chair or climbing stairs.

(1-2): 20–37..

Definition and classification of medical device recall



- U.S. Food and Drug Administration (FDA)

- Class I: will cause **serious adverse health consequences or death**
- Class II: may cause **temporary or medically reversible adverse health consequences** or where the **probability of serious adverse health consequences** is remote
- Class III: is **not likely to cause adverse health consequences**

Definition and classification of medical device recall

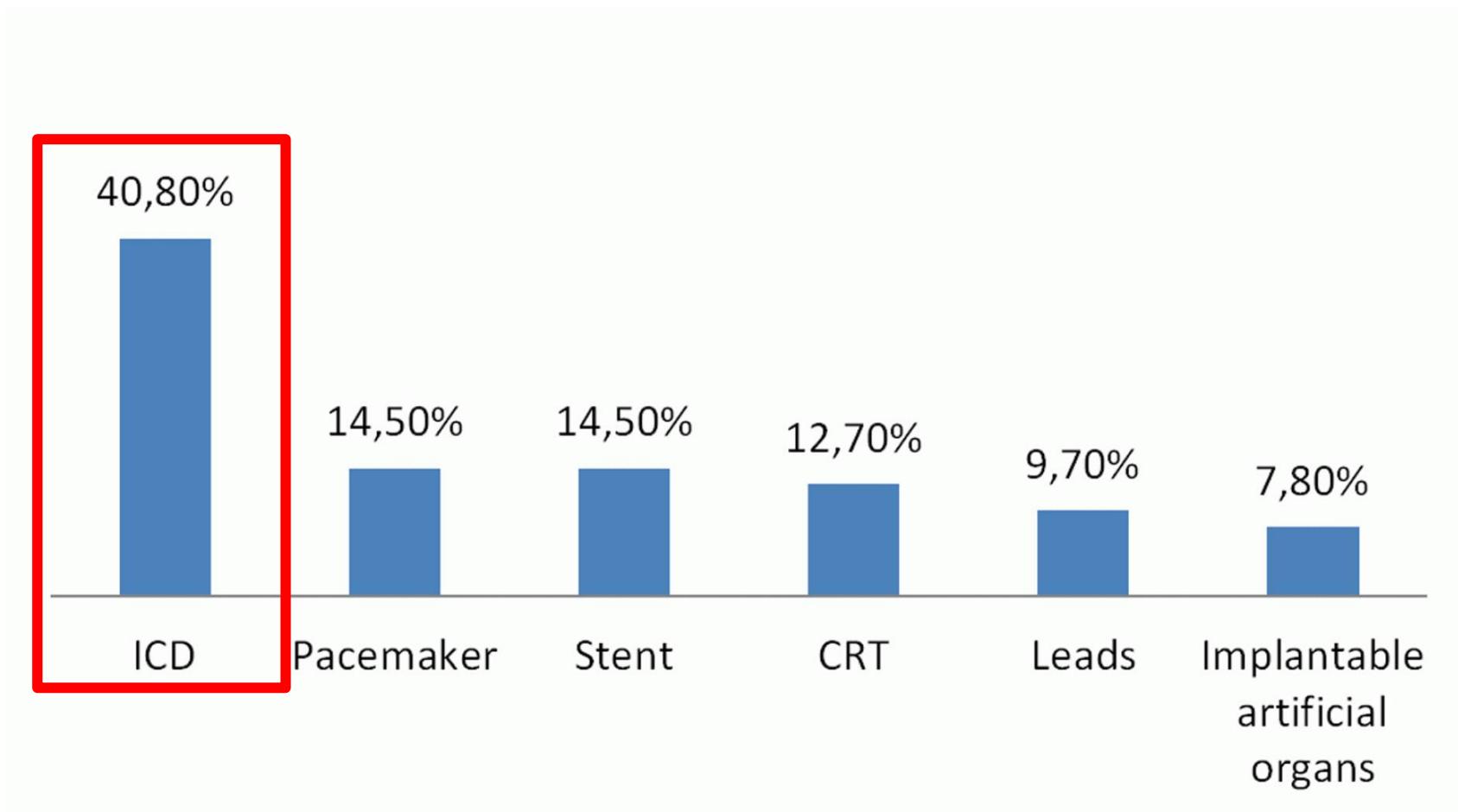
The screenshot shows the HSA website's navigation bar at the top, featuring links for About HSA, Careers, Contact Info, Feedback, Sitemap, and Pages. Below the navigation is a search bar. The main content area is titled 'Field Safety Corrective Action'. On the left, there is a sidebar with a blue header 'HEALTH PRODUCTS REGULATION' containing links for Therapeutic Products, Blood Services, Applied Sciences, e-Services, Publications, and News & Events. The main content area includes a photograph of a stethoscope and a clipboard with documents, and text explaining the reporting requirements for FSCAs.

- EU member: “Field Safety Corrective Actions”.
- Action taken by a manufacturer to reduce a risk of death or serious deterioration in the state of health associated with the use of a medical device that is already placed on the market.

Number of cardiac implants and total recall reports

Regulatory authorities	Total cardiac implant recalls	Total recall report	Time period availability
U.S. Food and Drug Administration (FDA)	12	335	2004–2014
Canada, Health Canada (HC-SC)	10	2486	2005–2014
Australia. Therapeutic Goods Administration (TGA)	12	1050	2012-2014
New Zealand. Medicines and Medical Devices Safety Authority (Medsafe)	3	723	2012-2014
UK. Medicines and Healthcare Products Regulatory Agency (MHRA)	24	554	2004-2014
Ireland. Health Products Regulatory Authority (HPRA)	3	149	2004-2014
Switzerland. Swiss Agency for Therapeutic Products (Swissmedic)	67	3697	2005-2014
Germany. Federal Institute for Drugs AND Medical Devices (BfArM)	96	6632	2005-2014
PR China. China Food and Drug Administration (CFDA)	6	195	2010-2014
China Hong Kong Health Department	29	788	2005-2014
Saudi Arabia. Saudi Food and Drug Authority (SFDA)	38	5103	2011-2014

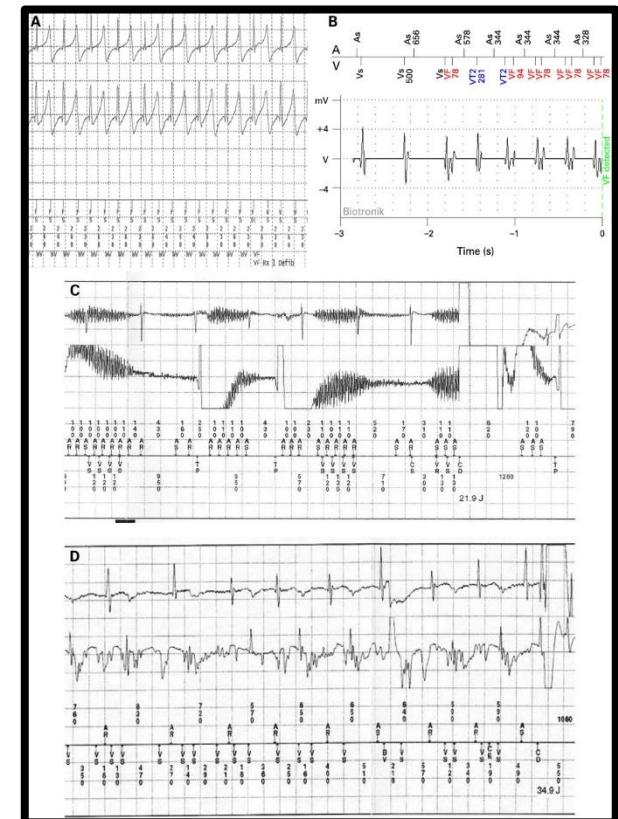
Recall ratio of different categories of cardiac implant medical devices



Recall reasons among cardiac implant medical devices

- Regarding different problems causing the recall

- Device battery; 33.0%
- Incorrect therapy delivery; 31.1%
- Software problems; 15.5%
- Connection problems; 14.6%
- Deliver correct output data; 5.8%



Ratio of recall reasons among cardiac implant medical devices

Categories	Sub-categorizes	ICD	CRT	Pacemaker	Stent	Leads	Implantable artificial organs	Total number
Battery	Capacitor	10	6					16
	Voltage	2						2
	Connection	2	1			1		4
	Battery defect	3						3
	Reporting			2				2
	Premature battery depletion	4	2	1				7
Software	Performance inconsistency problem	5	1	1				7
	Inappropriately set	2	1	1				4
	Lead to battery defect	2		2				4
	Influence by environment			1				1
Output data	Incorrect express	1		1				2
	No output			1				1
	No or incorrect feedback						3	3

Ratio of recall reasons among cardiac implant medical devices

Categories	Sub-categorizes	ICD	CRT	Pacemaker	Stent	Leads	Implantable artificial organs	Total number
Therapy delivery	Background influence	1						1
	Pacing inhibition	4	1					5
	Inappropriate therapy	2		2				4
	Equipment malfunction	3	1		1			5
	Fractured				6	1		7
	Failed or partial deployment				6			6
	Leak			1				1
	Inadequate size				2	1		3
Connection	Weakened bond	1				1		2
	Partially or fully separated					1		1
	Separation of wires			2	2			4
	Bend relief					1		1
	Lead insulation abrasion					5		5
	Materials detached from guide wires					2		2
	Total number	43	13	15	15	10	8	103

Implantable cardioverter defibrillator (ICD)

- 42 recalled ICD reports
 - 50%; battery problems
 - 23.8%; therapy delivery
 - 21.4%; software malfunctions
- 10/21 reports of battery problems
 - Capacitor issues
 - Accelerated degradation of the capacitors, increasing the risk of faulty therapy delivery

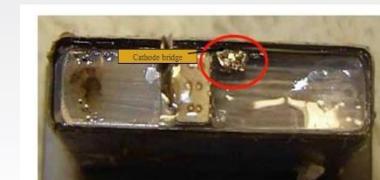
LITHIUM DEPOSIT FORMATION

- When an ICD or CRT-D device charges its capacitors, there is a chemical reaction causing a variation in the lithium ion concentration in the battery.
- After the charging process completes, this concentration must equalize which can lead to the formation of lithium clusters.
- If a Lithium deposit forms between an adjacent anode and cathode surface within the battery, a short circuit could result and lead to premature battery depletion



LITHIUM (Li) DEPOSIT INDUCED SHORTING

- In some cases, Li deposits have been found close to an exposed cathode surface like the cathode bridge, creating a potential shorting mechanism.
- The photos below show a Li deposit located on the top of the battery after the header was removed from the battery of a device exposed to continuous high rate discharge.



<http://www.mhra.gov.uk/Publications/Safetywarnings/MedicalDeviceAlerts/CON316337>

UK. Medicines and Healthcare Products Regulatory Agency (MHRA). Medical Device Alert: Implantable cardioverter defibrillators (ICD) and cardiac resynchronisation therapy devices (CRT-D) manufactured by Boston Scientific (MDA/2013/072). 2013

Pacemaker

- 15 reported pacemaker recalls
 - 33.3%; software malfunction

20.0% battery problems

Table 2. Pacemaker and Implantable Cardioverter-Defibrillator Malfunction Rates

Malfunction	Pacemaker				ICD		
	No. (%)*			Meta-analysis, % (95% CI)	No. (%)*		Meta-analysis, % (95% CI)
	UK Registry	Danish Register	Bilitch Registry		Danish Register	Bilitch Registry	
Battery	1395 (55.8)	131 (41.1)	100 (62.1)	52.8 (42.3-63.2)	104 (77.6)	204 (81.6)	80.1 (76.0-83.9)
No or low output	306 (12.2)	67 (21.0)	16 (9.9)	14.3 (9.0-20.6)	6 (4.5)	0	1.5 (0.4-9.3)
Programming malfunction	78 (3.1)	11 (3.4)	5 (3.1)	3.2 (2.6-3.9)	0	0	0
Miscellaneous†	278 (11.1)	18 (5.6)	10 (6.2)	7.9 (4.4-12.3)	4 (3.0)	17 (6.8)	5.6 (3.5-8.0)
Unspecified	444 (17.8)	92 (28.8)	30 (18.6)	21.6 (14.8-29.3)	20 (14.9)	29 (11.6)	12.9 (9.7-16.4)
Total	2501 (100)	319 (100)	161 (100)	100	134 (100)	250 (100)	100

Abbreviations: CI, confidence interval; ICD, implantable cardioverter-defibrillator.

*Percentage of column totals may not add to 100% due to rounding.

†Includes device header abnormalities, magnetic switch malfunctions, charge circuit abnormalities. See "Methods" section for details.

Swiss Agency for Therapeutic Products. St. Jude Medical Accent SR Model PM1110 and Accent DR Model 2112 Pacemakers Potential for the Inability to Provide Rate Responsive Sensor Driven Pacing Rates. 2012 [cited 7 December 2012]. Available: https://www.swissmedic.ch/recalllists_dl/07073/Vk_20121212_02-e1.pdf.

Coronary stent

- **15 recalled coronary stent reports**
 - Therapy delivery problems
 - Fracture of the device
 - Partially deployed or failed therapy
 - Inadequate size of the coronary stent

U.S. Food and Drug Administration. Boston Scientific To Recall Additional Coronary Stent Systems. 2004, 29.Nov.2012 [cited 16 July 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm133098.htm>.

U.S. Food and Drug Administration. Boston Scientific Express2TM (bare metal) Coronary Stent. 2004, 02.May.2014 [cited 16 Jul 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm064772.htm>.

U.S. Food and Drug Administration. Boston Scientific Taxus Express2TM Coronary Stent. 2004, 02. May.2014 [cited 1 July 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm064778.htm>.

Coronary stent

- 1 death and 18 serious injuries with the TAXUS stent
- 2 deaths and 25 serious injury with the Express2 stent
- Both design **did not allow the balloon to deflate**, which resulted in the **impeded removal of the balloon after stent placement**

U.S. Food and Drug Administration. Boston Scientific To Recall Additional Coronary Stent Systems. 2004, 29.Nov.2012 [cited 16 July 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm133098.htm>.

U.S. Food and Drug Administration. Boston Scientific Express2TM (bare metal) Coronary Stent. 2004, 02.May.2014 [cited 16 Jul 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm064772.htm>.

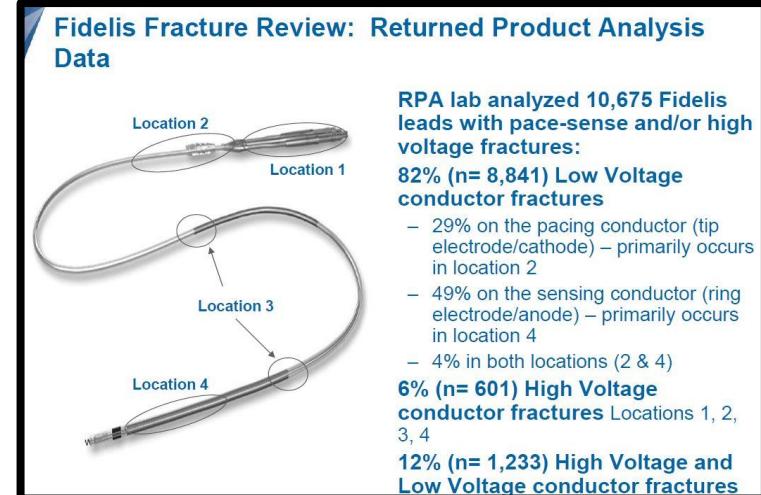
U.S. Food and Drug Administration. Boston Scientific Taxus Express2TM Coronary Stent. 2004, 02. May.2014 [cited 1 July 2004]. Available: <http://www.fda.gov/MedicalDevices/Safety/ListOfRecalls/ucm064778.htm>.

Cardiac resynchronization therapy (CRT)

- 13 recall reports of CRT
 - 9 reports; battery issues
 - (6 capacitor malfunction, 2 premature battery depletion)
 - 2 reports; software problems
 - 2 reports; delivery problems

Leads

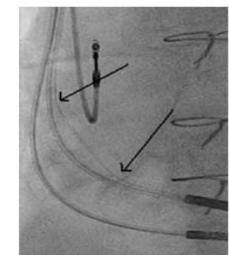
- 10 recall reports
 - 9 connection problems
 - 2 separation of wires
 - 5 lead insulation abrasion
 - 2 coating materials detaching
 - 1 fracture of the device



Background: What are Externalized Conductors?

Definition:

The appearance by x-ray or fluoroscopy of conductors outside of the lead body due to an abrasion-related breach of the outer insulation



Locations: 91% of all Externalized Conductors are between RV and SVC shock coils.

Clinical Presentation: Visual vs. Electrical:

- Most externalized conductors present as an observation on X-ray or fluoroscopy **without functional abnormalities**
- Over 85% of **externalized conductors** in returned leads **functioned normally** due to their ETFE insulation
- There have been no reports of failure to pace or deliver a shock that have been attributable to the presence of an externalized conductor

Leads

- Internal insulation breach under the right ventricular (RV) and the Superior Vena Cava (SVC) defibrillation coil electrode
 - resulting in low pacing impedance, ventricular oversensing and inappropriate therapies

The death and serious injury reports from 103 identified recall reports

Recall date	Product name	Announced regulatory authority	Distribution	Volume	Effect
2011/11 /28	Riata and Riata ST Silicone Endocardial Defibrillation Leads	FDA, Swissmedic, BfArM	Worldwide	79,000 implanted worldwide	3 deaths and 2 serious injuries
2008/06/23	Stent, cardiovascular	Swissmedic,	Worldwide	7 complaint reports	2 serious injuries
2007/10 /15	Sprint Fidelis Defibrillator Leads	FDA, HC-SC IMB, MHRA, Swissmedic, China HK, BfArM	Worldwide	268,000 implanted worldwide	5 deaths
2004/07/01	Express2 paclitaxel drug-eluting & bare metal coronary stent system	FDA	Worldwide	Model 1: 500,000 manufactured, recall 85,000 Model 2: 600,000 manufactured, recall 11,000	Model 1: 1 death and 18 injured; Model 2: 2 deaths and 25 injuries
2004/04 /04	Micro Jewell II Model 7223Cx and GEM DR Model 7271(ICD)	FDA, MHRA	Worldwide	6,268 manufactured, 1,800 implanted	1 serious injuries and 4 deaths

Swiss Agency for Therapeutic Products. Urgent Medical Device Field Safety Notice ISOLINE defibrillation leads, model 2CR5, 2CR6 and 2CT6. 2013 [cited 28 January 2013]. Available: https://www.swissmedic.ch/recalllists_dl/07246/Vk_20130130_10-e1.pdf.

Different recall management according to the same recall event in different regulatory authorities

Regulatory Authority	Recall Date	Recall Level	Volume	Effect	Recall Reasons	Background Information	Patient contact Methods	Outcome of the recall
U.S. FDA	2007/10/15	Class I	268,000 implanted worldwide, 172,000 in U.S	less than 1% defected, no specific number of deaths and injuries	yes	yes	Toll-free number	no
Canada. HC-SC	2007/11/05	Recall	268,000	5 deaths, none in Canada	yes	yes	Phone	no
Ireland. IMB	2007/10/15	Recall	1,178 implanted in Ireland	N/a	yes	yes	Phone	no
UK. MHRA	2007/10/19	Immediate action	6900 leads distributed in the UK	23 reports of leads fracture in UK	yes	yes	Phone	Deadline (action complete): 28.12.2007
SwitzerlandSwissmedic	2007/10/19	Recall	268,000 implanted worldwide	665 chronic fractures in returned leads	yes	yes	Phone	no
China HK	2007/10/15	Recall	More than 200 distributed in HK	no serious injury or death in HK	yes	yes	Phone	no
Germany BfArM	2007/10/15	Field Safety Corrective Action	268,000 implanted worldwide, 16,000 in Germany	665 chronic fractures in returned leads, 350 fractured in Germany	yes	yes	Phone	no

의료기기법 - 의료기기 회수·폐기 등 업무 처리 지침

구 분	관련 규정
의료기기법	<ul style="list-style-type: none">- 제31조(부작용관리)- 제34조(회수 · 폐기 및 공포명령 등)
의료기기법 시행령	<ul style="list-style-type: none">- 제13조(권한의 위임)
의료기기법 시행규칙	<ul style="list-style-type: none">- 제52조(위해 의료기기 회수 기준 및 절차 등)- 제53조(회수계획의 공표 등)- 제54조(회수대상 의료기기의 폐기 등)- 제57조(회수 · 폐기 및 공표 명령 등)

의료기기법 시행규칙

■ 제51조 (부작용 보고 등)

- ① 법 제31조제1항에 따라 **의료기기의 부작용에 관한 사항의 보고를 하려는 자는 다음 각 호에서 정하는 바에 따라 하여야 하고 관련 자료를 2년간 보존하여야 한다.**
 1. **사망이나 생명에 위협을 주는 부작용을 초래한 경우에는 7일 이내.** 이 경우 상세한 내용을 최초 보고일부터 8일 이내에 추가로 보고하여야 한다.
 2. 다음 각 목에서 정한 부작용을 초래하거나 이상사례가 나타난 경우 15일 이내
 - 가. 입원 또는 입원기간의 연장이 필요한 경우
 - 나. 회복이 불가능하거나 심각한 불구 또는 기능 저하를 초래하는 경우
 - 다. 선천적 기형 또는 이상을 초래하는 경우
- ② 식품의약품안전처장은 법 제31조제4항에 따라 의료기관 개설자에게 부작용과 회수계획 등을 알릴 때에는 방문, 우편, 전화, 전자우편 또는 팩스 등의 방법으로 한다.
- ③ 법 제31조제5항에 따라 **환자에게 부작용과 회수계획을 등을 알린 의료기관 개설자는 별지 제42호서식의 환자동보확인서를 작성하여 식품의약품안전처장에게 제출하여야 한다.**
- ④ 제1항부터 제3항까지에서 규정한 사항 외에 부작용 보고 및 관리에 관한 세부사항은 식품의약품안전처장이 정하여 고시한다.

의료기기법 시행규칙

■ 제52조 (위해 의료기기의 회수 기준 및 절차 등)

- ① 법 제31조제2항에 따라 의료기기 수리업자 · 판매업자 및 임대업자는 수리 · 판매 또는 임대하는 의료기기가 인체에 위해를 끼치거나 끼칠 위험이 있는 의료기기(이하 "회수대상 의료기기"라 한다)로 의심되는 경우에는 해당 의료기기의 수리 · 판매 또는 임대를 즉시 중단하고 그 사실을 해당 의료기기의 제조업자 또는 수입업자(이하 "회수의무자"라 한다)에게 알려야 한다.
- ② 법 제31조제2항에 따라 회수의무자는 그가 제조 또는 수입하여 판매 · 임대한 의료기기 중 회수대상 의료기기로 의심되는 의료기기와 제1항에 따라 통보받은 의료기기가 다음 각 호의 어느 하나에 해당하는 의료기기인지를 확인하여야 한다.
- 의료기기의 사용으로 완치될 수 없는 중대한 부작용을 일으키거나 사망에 이르게 하거나, 그러한 부작용 또는 사망을 가져올 우려가 있는 의료기기
 - 의료기기의 사용으로 완치될 수 있는 일시적 또는 의학적인 부작용을 일으키거나, 그러한 부작용을 가져올 수 있는 의료기기
 - 의료기기의 사용으로 부작용은 거의 일어나지 아니하나 법 제19조에 따른 기준규격에 부적합하여 안전성 및 유효성에 문제가 있는 의료기기

의료기기법 시행규칙

- ③ 회수의무자는 제2항에 따른 확인 결과 해당 의료기기가 제2항 각 호에 해당하면 즉시 해당 의료기기의 판매를 중지하는 등의 조치를 하고, 제2항에 따라 확인된 날부터 다음 각 호의 구분에 따른 기간 이내에 별지 제43호서식의 회수계획서를 회수의무자의 소재지를 관할하는 지방식품의약품안전청장에게 제출하여야 한다. 이 경우 회수의무자는 식품의약품안전처장이 정하는 전산프로그램을 이용하여 회수계획서를 제출할 수 있다.
1. 제2항제1호의 의료기기: 5일 이내
 2. 제2항제2호 및 제3호의 의료기기: 15일 이내
- ④ 회수의무자가 제3항에 따라 회수계획서를 보고할 경우에는 다음 각 호의 서류를 첨부하여야 한다.
1. 해당 품목의 제조·수입 기록서 사본 및 판매처별 판매량·판매일, 임대인별 임대량·임대일 등의 기록
 2. 제53조제3항에 따라 통보할 회수계획통보서
 3. 회수사유를 적은 서류
 4. 회수대상 의료기기가 제2항제1호에 해당하는 경우에는 해당 의료기를 사용한 의료기관 명칭, 소재지 및 개설자 성명 등 의료기기 개설자에 관한 정보
- ⑤ 회수의무자는 제3항에 따른 회수계획서를 작성할 경우 회수종료 예정일을 회수가 시작된 날부터 30일 이내로 하여야 한다. 다만, 그 기한 내에 회수하기 어렵다고 판단되는 경우에는 그 사유를 밝히고 회수기한을 30일을 넘어 정할 수 있다.
- ⑥ 지방식품의약품안전청장은 제3항 및 제4항에 따라 보고받은 회수계획이 미흡하다고 판단되는 경우에는 해당 회수의무자에게 회수계획의 보완을 명할 수 있다.

의료기기법 - 의료기기 회수·폐기 등 업무 처리 지침

■ 제53조 (회수계획의 공표 등)

① 회수의무자는 법 제31조제3항에 따라 지방식품의약품안전청장으로부터 회수계획 공표 명령을 받으면 다음 각 호의 구분에 따라 그 회수계획을 공표하여야 한다.

1. 제52조제2항제1호의 의료기기: 「방송법」 제2조제1호에 따른 방송, 「신문 등의 진흥에 관한 법률」 제9조제1항에 따라 등록한 전국을 보급지역으로 하는 일반일간신문[당일 인쇄 · 보급되는 해당 신문의 전체판(版)을 말한다] 또는 이와 같은 수준 이상의 대중매체(회수대상 의료기기의 사용목적, 사용방법 등을 고려하여 식품의약품안전처장이 인정하는 매체를 포함한다)에 공고

2. 제52조제2항제2호의 의료기기: 의학 · 의공학 전문지 또는 이와 같은 수준 이상의 매체에 공고

3. 제52조제2항제3호의 의료기기: 회수의무자의 인터넷 홈페이지 또는 이와 같은 수준 이상의 매체에 공고

② 지방식품의약품안전청장은 회수의무자의 상호, 제품명, 제조번호, 제조일, 사용기한 · 유효기한 및 회수사유를 인터넷 홈페이지에 게재할 수 있다.

③ 회수의무자는 회수대상 의료기기를 취급하는 수리업자 · 판매업자 · 임대업자 또는 의료기관의 개설자(이하 "회수대상 의료기기의 취급자"라 한다)에게 방문, 우편, 전화, 전보, 전자우편, 팩스 또는 언론매체를 통한 공고 등을 통하여 회수계획을 알려야 하며, 그 통보 사실을 증명할 수 있는 자료를 회수종료일부터 2년간 보관하여야 한다.

의료기기법 - 의료기기 회수·폐기 등 업무 처리 지침

■ 제54조 (회수대상 의료기기의 폐기 등)

- ① 회수의무자는 회수하거나 반품받은 의료기기를 폐기하거나 그 밖에 위해를 방지할 수 있는 조치를 하고, 그에 대하여 [별지 제45호서식](#)의 회수평가보고서를 작성하여야 한다.
- ② 회수의무자는 제1항에 따라 회수대상 의료기기를 폐기하는 경우에는 [별지 제46호서식](#)의 폐기신청서에 다음 각 호의 서류를 첨부하여 관할 시·도지사에게 제출하고 관할 특별시·광역시·도·특별자치도(이하 "시·도"라 한다) 관계 공무원의 입회 하에 환경 관련 법령으로 정하는 바에 따라 폐기하여야 하며, [별지 제47호서식](#)의 폐기확인서를 작성하여 2년간 보관하여야 한다.
 1. [별지 제43호서식](#)의 회수계획서 사본
 2. [별지 제44호서식](#)의 회수확인서 사본
- ③ 회수의무자는 회수가 끝난 경우에는 [별지 제48호서식](#)의 회수종료보고서에 다음 각 호의 서류를 첨부하여 회수의무자의 소재지를 관할하는 지방식품의약품안전청장에게 제출하여야 한다.
 1. [별지 제44호서식](#)의 회수확인서 사본
 2. [별지 제45호서식](#)의 회수평가보고서 사본
 3. [별지 제47호서식](#)의 폐기확인서 사본(폐기한 경우만 해당한다)

Conclusion

- **Traceability** and **transparency** of safety hazards information is crucial.
- Efficient safety-reporting system for monitoring the patients' safety.
- The public and relevant stakeholders **such as physicians, manufacturers, regulatory authorities** should be prepared to appropriately deal with related issues in the context of **patient safety**.



경청해 주셔서 감사합니다