Drug delivery systems – The Notified Body perspective

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Disclaimer

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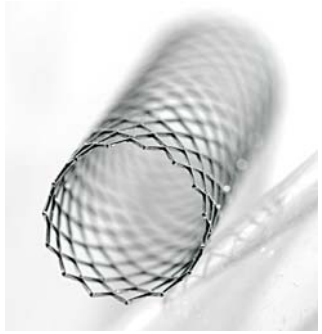
This presentation is based on information available as of today and prepared to my best knowledge. This presentation presents my personal understanding of the medical device requirements in Europe.

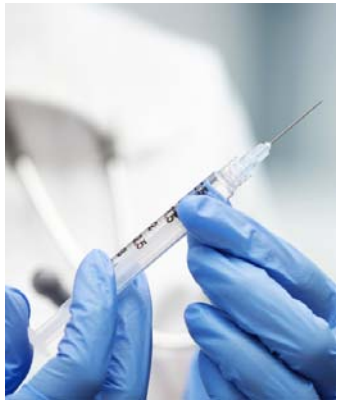
Where the presentation includes images that were taken from public websites a citation to the original source is included.

Notified Bodies and medicinal substances



Device incorporating a medicinal substance

- Drug with ancillary action → 93/42/EEC 2017/745
- Drug with principal action → 2001/83/EC



Device intended to administer a drug

- Not integral → 93/42/EEC 2017/745
- Integral → 2001/83/EC

Concept of integral product

2017/745 – Article 1 (9)

*if the device intended to administer a medicinal product and the medicinal product are placed on the market in such a way that they form a **single integral product** which is **intended exclusively for use in the given combination** and which is **not reusable**, that single integral product shall be governed by Directive 2001/83/EC*

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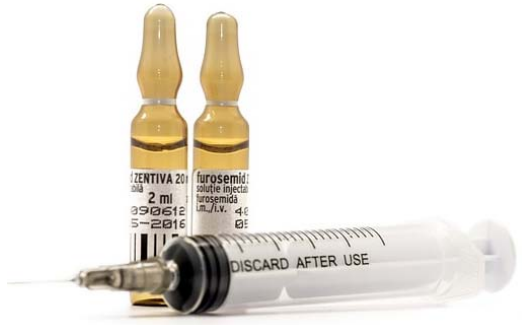
Integral



Integral if sold together and with specific indication

MDR Article 117

Article 117 replaces Annex I section 3.2 (12) of 2001/83/EC

If the dossier does not include the results of the conformity assessment […] and where for the conformity assessment of the device, if used separately, the involvement of a notified body is required […], the authority shall require the applicant to provide an ***opinion on the conformity of the device part with the relevant general safety and performance requirements*** *set out in Annex I to that Regulation* ***issued by a notified body***

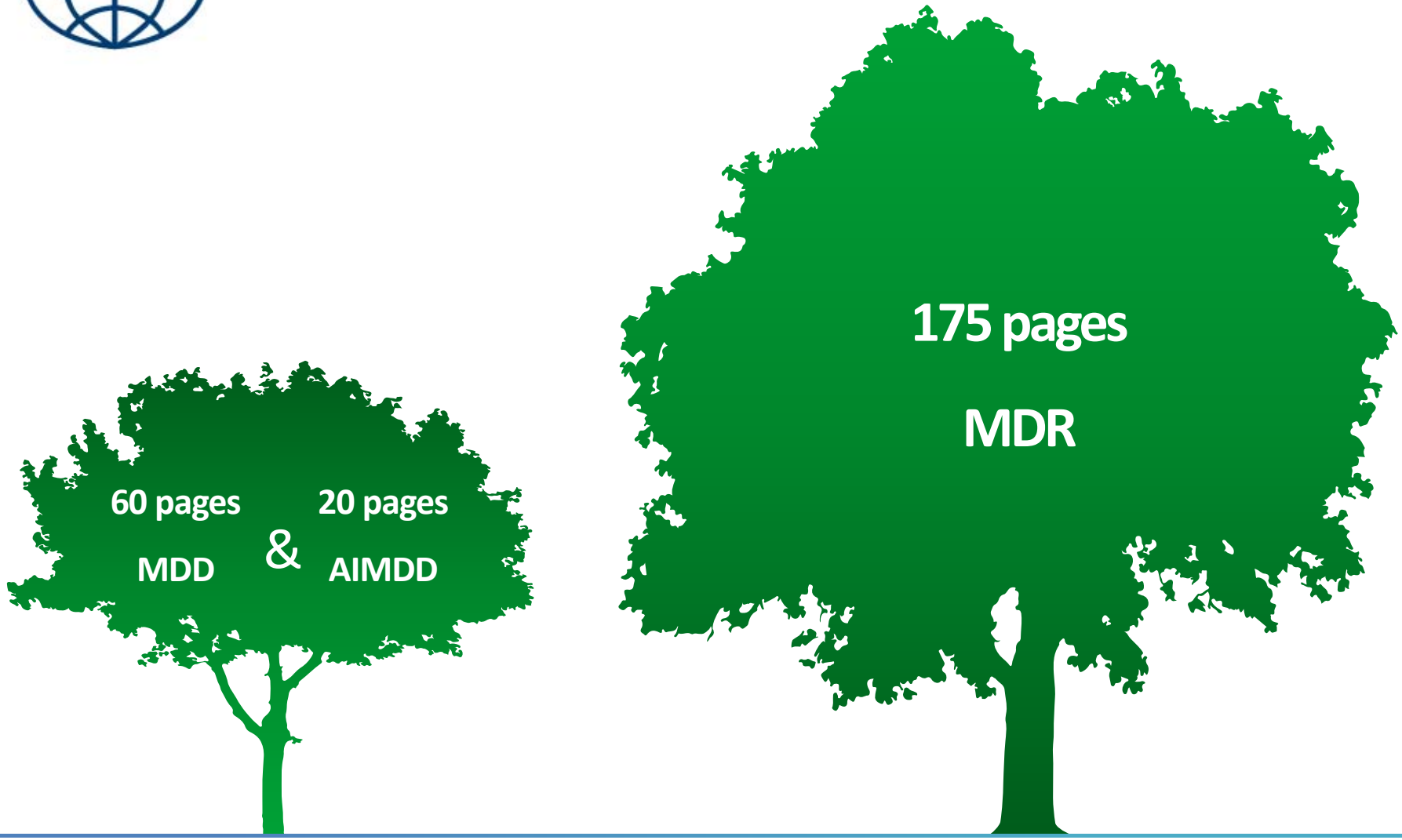
2001/83/EC

CE mark
or
NB opinion

CE mark vs NB opinion

	CE mark	NB opinion
Conformity assessment	Full CE assessment	
Outcome	CE certificate	NB report
Post-approval	Surveillance	No NB involvement
Time	Depends on the device classification and NB	Same – 10-15 days (TÜV SÜD)
Cost	Depends on the device classification and NB	≈ same

MDR at a glance



Key changes

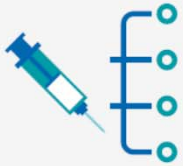
Product scope expansion

Implementation of unique device identification

Rigorous post-market oversight

Identification of person responsible for regulatory compliance

Common specifications



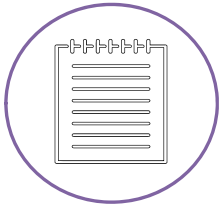
Reclassification of devices according to risk, contact duration and invasiveness

More rigorous clinical evidence for class III and implantable medical devices

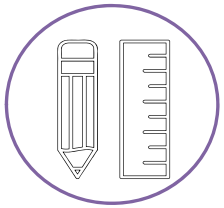
Systematic clinical evaluation of Class IIa and Class IIb medical devices

No "grandfathering" provisions

General Safety and Performance Requirements



GSPR 1 – 9	General Requirements



GSPR 10 - 22	Design and Manufacture

GSPR 23	Information supplied with the device

GSPR in summary

- In principle similar to current ERs but with more details
- More emphasis on risk and state-of-the-art concept
- Inclusion of specific requirement for device with no medical purpose
- More details about chemical, physical and biological properties
  → not only biocompatibility but also mechanical properties (e.g. strength, ductility, fracture resistance, surface properties, size, etc.)
- More specific requirements on use of CMR and endocrine-disrupting substances: max 0.1% w/w without justification
- Specific requirements for devices intended to be used by lay person
- Labels/IFU
- Implant card (Article 18)

GPRS specific to drug delivery systems

Annex I – 10.3

[…] if the devices are intended to administer medicinal products they shall be designed and manufactured in such a way as to be compatible with the medicinal products concerned in accordance with the provisions and restrictions governing those medicinal products and that the performance of both the medicinal products and of the devices is maintained in accordance with their respective indications and intended use.

Annex I – 10.4.1

[…] Devices, or those parts thereof or those materials used therein that (re)administer medicines, body liquids or other substances, including gases, to/from the body shall only contain the following substances in a concentration that is above 0,1 % weight by weight (w/w) where justified […]:
(a) substances which are carcinogenic, mutagenic or toxic to reproduction […]
(b) substances having endocrine-disrupting properties […]

Labeling requirements

Annex I – 23.2

The label shall bear […] where applicable, an indication that the device contains or incorporates a medicinal substance […]

Annex I – 23.4

The instructions for use shall contain […] information that allows the user and/or patient to be informed of any warnings, precautions, contra-indications, measures to be taken and limitations of use regarding the device. […] The information shall cover, if the device is intended to administer medicinal products, tissues or cells of human or animal origin, or their derivatives, or biological substances, any limitations or incompatibility in the choice of substances to be delivered

Challenges

Notified Bodies	Manufacturers
Timeline for implementation (May 2020)	
	Stricter requirements as compared to MDD
Resources	
	Extra-cost
	Overlapping reviews (e.g. drug-device compatibility, labelling, etc.)

Product Service

Choose certainty.
Add value.

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