



**IMDRF** International Medical  
Device Regulators Forum

# Japan Update - Implementation of PMD Act -

March, 2015





## Topics

- Implementation of PMD Act; Revision of Pharmaceutical Affairs Law (PAL)
- PMDA Medical Device Training Seminar



## Implementation of PMD Act:

- The act came into force *on 25 November 2014*.
- Relevant guidelines for PMD Act have been issued in time. These can be found in the following site (in Japanese):

<http://www.mhlw.go.jp/stf/seisakunitsuite/bunya/000045726.html>



## Brief overview of PMD Act

- Salient points;
  1. Strengthen safety measures regarding drugs and medical devices
  2. Revise medical device regulations based on its characteristics
  3. Introduce cellular and tissue therapeutic product regulations based on its characteristics
- PAL has been renamed as “Act on Securing Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics” = “***PMD Act***”.



## Some Class III Medical Devices undergo certification

GHTF Classification	
<b>Class A</b>	<b>extremely low risk</b> X-Ray film
<b>Class B</b>	<b>low risk</b> MRI, bronchial catheters
<b>Class C</b>	<b>medium risk</b> artificial bones, dialyzer
<b>Class D</b>	<b>high risk</b> pacemaker, artificial heart valves

Classification in Japan		
Category	Pre-market regulation	# of JMDN*
<b>General MDs (Class I)</b>	<b>Self declaration</b>	<b>1,195</b>
<b>Controlled MDs (class II)</b>	<b>Third party Certification</b>	<b>1,801 (1,369 for 3<sup>rd</sup> Parties)</b>
<b>Specially Controlled MDs (class III &amp; IV)</b>	<b>Minister's Approval (Review by PMDA)</b>	<b>757</b>
		<b>345</b>

\*JMDN: Japanese Medical Device Nomenclature As of April, 2014



## Software as a Medical Device (SaMD) is newly regulated in PMD Act

Example of Medical Device with embedded program

### Image Diagnostic Apparatus



It processes, stores and displays image data from CT, MRI etc.



Data from CT scanning

Processing by program



3D image of a skull

### PAL



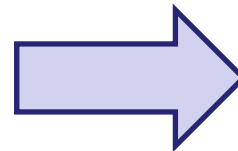
Software (program)



Hardware

**Combination of hardware and software is regulated as a total system.**

**PMD Act**



### SaMD



Software (program)

**Software itself is independently regulated**



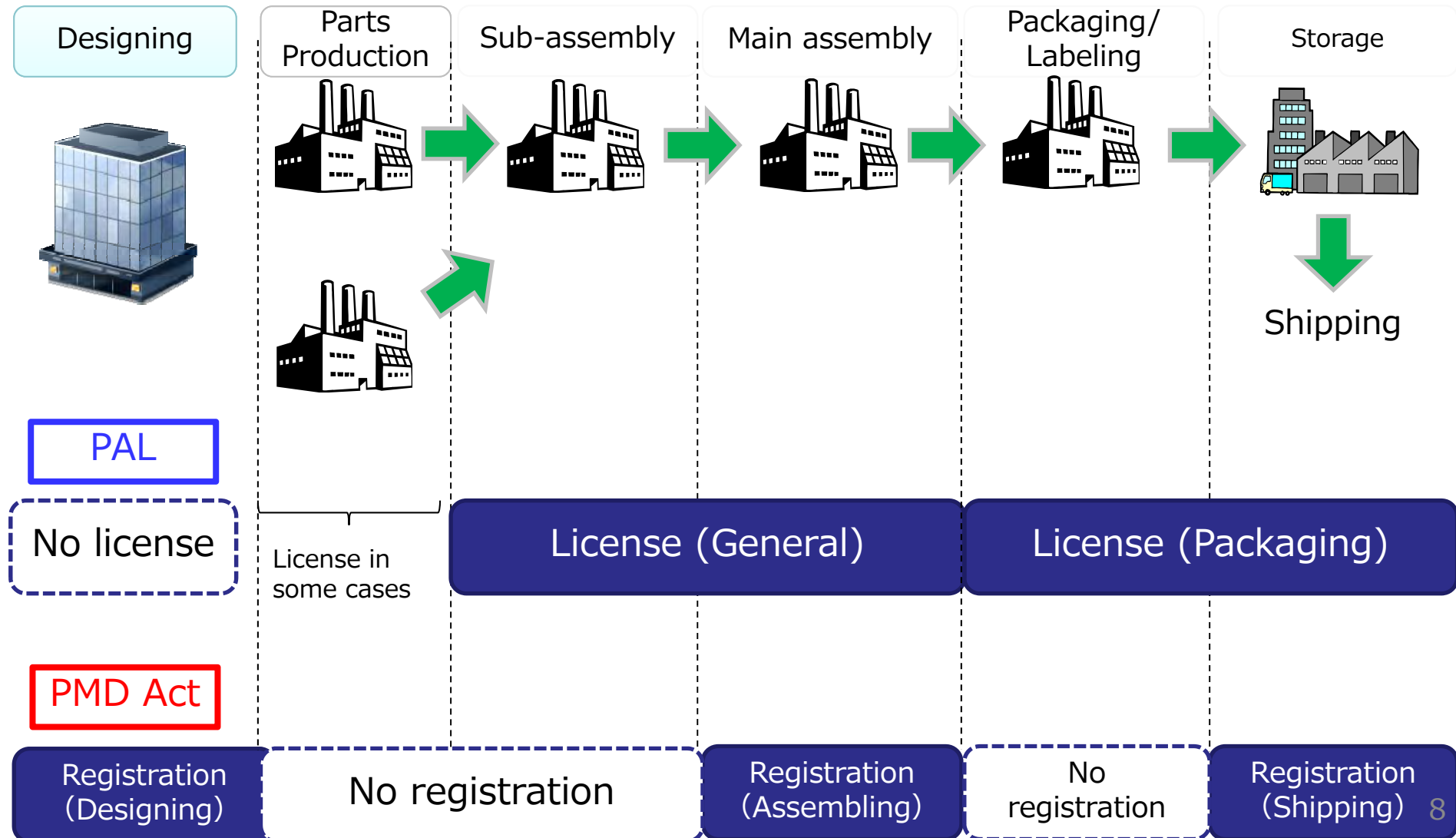
## Manufacturer is required to be registered, instead of to be licensed

	PAL	PMD Act
Licensing system	License (domestic) Accreditation (foreign)	<u>Registration</u> <u>(both domestic and foreign)</u>
Authority to provide license	Prefecture (domestic) MHLW (biological, foreign)	<u>Prefecture (domestic)</u> <u>MHLW (foreign)</u>
Category	General, Sterilization, Biological, Packaging etc.	<u>No categorization</u>
Requirements for licensing	No reasons for disqualification	No reasons for disqualification
	Facilities requirements (according to categories)	<u>None</u> <u>(no practical/document inspection for facilities)</u> ↓ Facilities are assessed in QMS inspection

- The Scope of manufacturers that should be registered is narrowed. However, a manufacturer in charge of designing is newly required to be registered.
- Required materials for registration is simplified.



## Example of registration as a manufacturer







## Introduction of more efficient QMS inspection system

1. QMS inspection is conducted on the Marketing Authorization Holder (including manufacturing sites), not site by site.
2. QMS inspection is conducted per product family, not on individual product.
3. Structure of QMS ordinance has been changed in alignment with ISO 13485:2003.



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## 2nd PMDA Medical Device Training Seminar for regulators in other jurisdictions

- It was held on February 2 – 6, 2015 at PMDA (Tokyo, JAPAN).
- Topics such as pre-market review, QMS and PMS were provided.
- The following jurisdictions were participated:
  - ✓ Australia
  - ✓ Brazil
  - ✓ Singapore
  - ✓ Taiwan
  - ✓ Fellow of the Mansfield Foundation (USA)





Thank you



MHLW



PMDA