EUROPEAN BUSINESS COUNCIL IN JAPAN
THE EUROPEAN (EU) CHAMBER OF COMMERCE IN JAPAN

EBC Medical Devices and IVD Committee

Board of Representatives

Report of the Regulatory Affairs Committee

16:20-16:40 on December 8, 2022

Vice Chairman: Takeshi Fujiwara

Committee Chairman: Miyo Nishimuta

Report of the Regulatory Affairs Committee
AGENGA

- Activity Report 2022
- 2023 Activity Policy
- < Recent trends in Regulatory Affairs >
- 20th Regular opinion exchange meeting on Approval Examination of medical devices and IVD and safety measures (September 1)
  - ➢ Materials submitted by the MHLW
    - Activities on accelerating the review of the approval of medical devices “AI IDATEN”
    - Implementation of the revised Drugs and Drugs Act. “UDI”
  - ➢ Materials submitted by the PMDA
    - Operational achievements in FY2021
    - The Online system for applications and notifications
    - Business Conditions of Program Medical Devices, etc.
- 3rd Government-Industry Dialogue for the Creation of Innovative Medical Devices (November 28)
  - ➢ Materials submitted by European Business Association Medical Device and IVD Committee (EBC)
    - My Number Card

Report of the Regulatory Affairs Committee on activities Jan-Dec 2022
Total number of meetings 123

- Medical Device Cyber Security WG (9 times)
- Program Medical Device Regulation SubWG (12 times)
  Consider ensuring transparency in the review process TF (6 times)
- Program Medical Device WG Insurance Compliance SubWG (3 times)
- Clinical Evaluation Committees (8 times)
  Clinical Regulation Subcommittee
  T3: Protection and Education of Subjects WG (6 times)
  T4: Clinical Evaluation WG (3 times)
  T5: RWD/RWE Utilization Study WG (twice)
  CIN registry study Group (6 times)
- UDI committees (5 tumes)
- Regulatory Affairs Committee (6 times)
  Review-related sub-committees (5 times)
  Good Advertising Standards Interpretation WG (5 times)
  Consideration of revision of raw material notifications due to changes in raw material safety assessment methods (4 times)
- QMS Committee (6 times)
- Package Insert Operation Improvement WG (5 times)
- Standards subcommittee (4 times)
- Health and Labour Sciences Research: QMS (7 times)
  Health and Welfare Sciences Research: Requirements for the General manufacturing and sales manager (2 times)
- Human Resources Project for Mirai (7 times)

- Collaboration for Optimization of Medical Device Regulations and Approval Examination (January 13, July 14)
- Tripartite Meeting (4 times)
- 20th Regular opinion exchange meeting on Approval Examination of medical devices and IVD and safety measures (September 1)
- 3rd Government-Industry Dialogue for the Creation of Innovative Medical Devices (November 28)

Thank you all for your very busy schedules.

The Regulatory Affairs Committee's 2023 Activity Policy

We propose the appropriate and optimized medical device review and regulatory systems through meetings with government authorities and industry activities related to pharmaceutical affairs.

Reference 1

厚生労働省 ひと、くらし、みらいのために Ministry of Health, Labour and Welfare

20th Regular opinion exchange meeting on Approval Examination of medical devices and IVD and safety measures

Materials submitted by the MHLW

September 1, 2022

Ministry of Health, Labour and Welfare of Japan

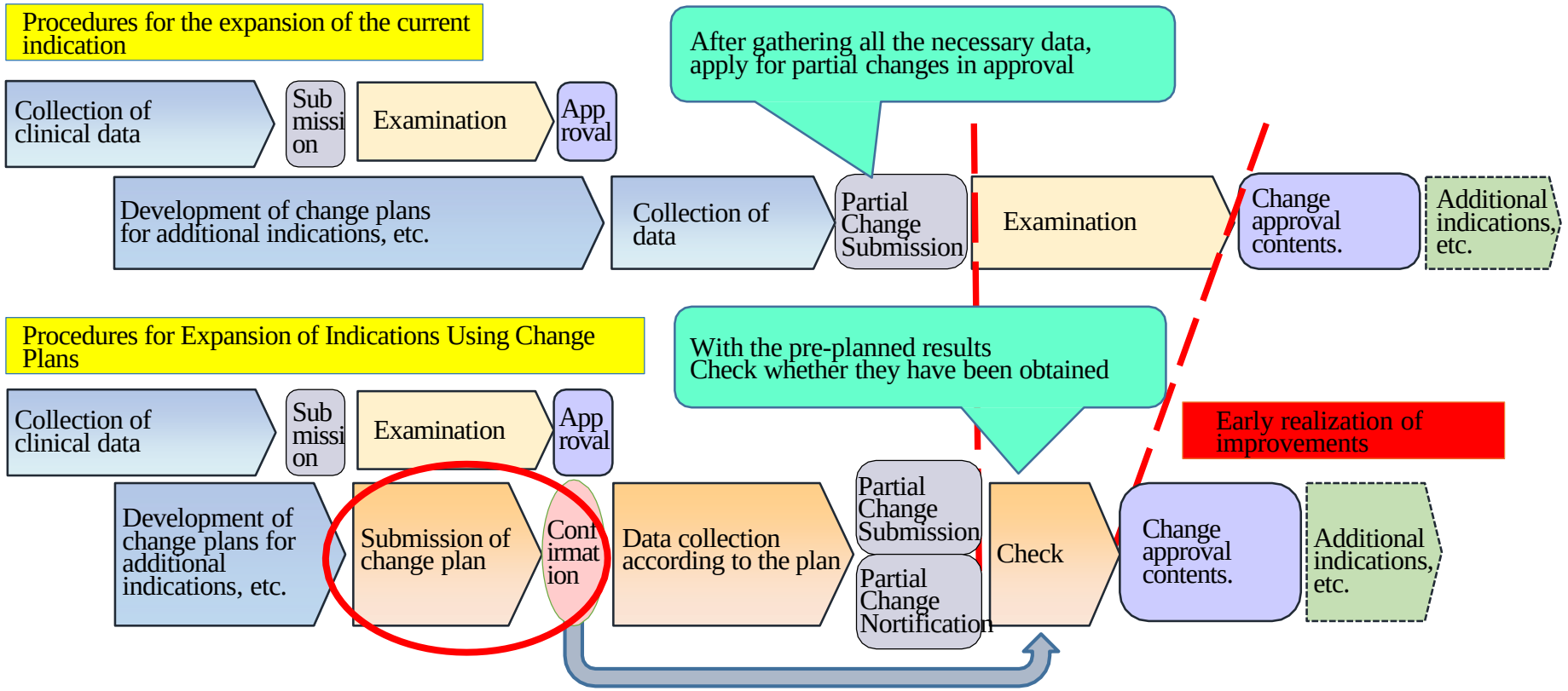
Activities on accelerating the review of the approval of medical devices

DASH for SaMD (Packaging strategies to accelerate the practical application of the program medical devices.)

3. Introduction of an approval system according to the characteristics of medical devices

○ Introduction of an approval review system that enables continuous improvement by checking the plan for the medical device expected to be improved* during the review process and allowing partial changes to be made within the planned scope.

* Medical devices that constantly change performance after marketing, such as medical devices that utilize AI, medical devices that use real-world data collected after marketing (RWD: real-world data), and additional optional parts to improve usability is assumed.



Advance Confirmation System for Improvement Plans

IDATEN (Improved Design within Approval for Timely Evaluation and Notice)

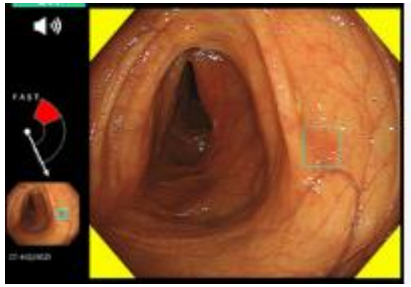
The overall picture of Program Medical Devices Based on previous approvals (Update Version)

Non-medical device	Medical devices		
Not intended for the diagnosis, treatment /Equivalent to “Class I”*	Class II	Class III	Class IV
For the health management Program (Example: programs that provide advice on diet, and exercise to maintain and improve health)	For treatment		
	Treatment planning support 61 items		
		Programmer for implantable therapeutic devices 2 items	
	Behavioral change application 2 items		
Educational program (Example: Training programs for health professionals)	For diagnostic purposes		
In-hospital operational support program (Example: medical appointments, electronic medical records)	Diagnostic imaging support 301 items		
	Diagnostic support other than diagnostic imaging support 85 items		
“Class I” equivalent program (Example: programs for vision testing and color vision testing)		Mutational analysis 7 items	
	Diagnostic Support for Home Use 2 items		

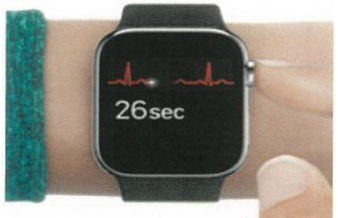
*Stand-alone programs equivalent to “Class I” are non-medical devices.
*Total number of approved and certified products (as of the end of September 2022)

(Behavior Change Applications)
Hypertension treatment aids app
→Aids hypertension treatment through behavior change

(Diagnostic Imaging Support)
The endoscopic imaging assistance program
→Polyp detection to warn and assist in the detection of lesions.



(Diagnostic Support for Home Use)
Home electrocardiogram application
→Detects signs of atrial fibrillation and recommends hospital visits.



Implementation of the revised Drugs and Drugs Act.

Improving traceability

Current status

○ By displaying barcodes on pharmaceuticals and medical devices, it is possible to construct a product traceability system, which is expected to be used in distribution and in medical practice. In recent years, efforts for standardized bar code labeling and utilization have been promoted both in Japan and overseas.

<Display GS1 standard bar code on pharmaceuticals and medical devices>

GS1-128 symbol (code 128)
→Information other than the product code can be added as an international standard.

(01) 14912345000016 (17) 200831 (10) AB123
Product code | UBD | Lot No.

Major information that can be displayed in GS1-128

(01)	Product code (GTIN/JAN)
→ Unique codes: manufacturer, product, packaging units	
(11)	Date of manufacture
(17)	UBD: Expiration date
(10)	Lot No.
(21)	Serial number
(30)	Quantity

※Determine the meaning of code by the number in the first parenthesis.

<Register product information in database>

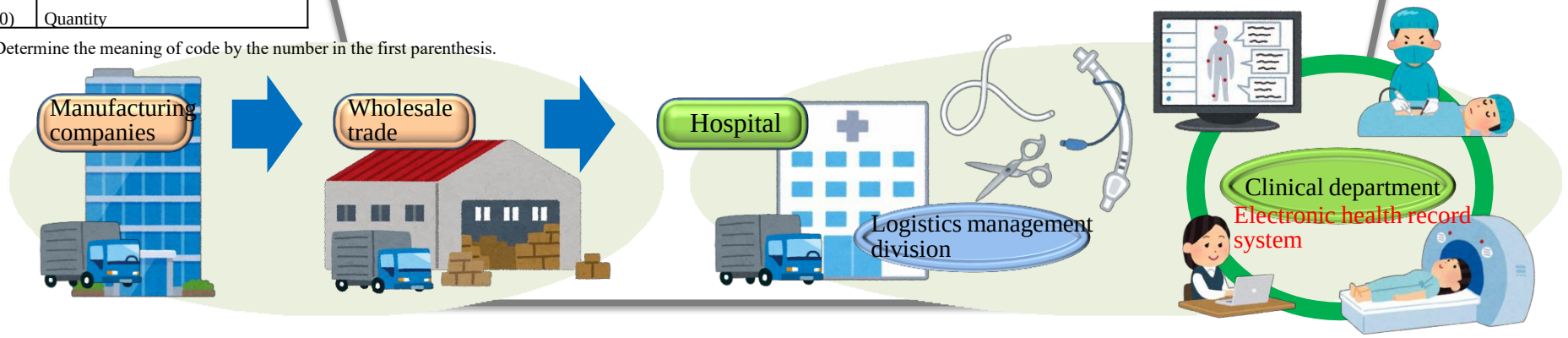
Pharmaceutical products Standard code master

Medical devices Database

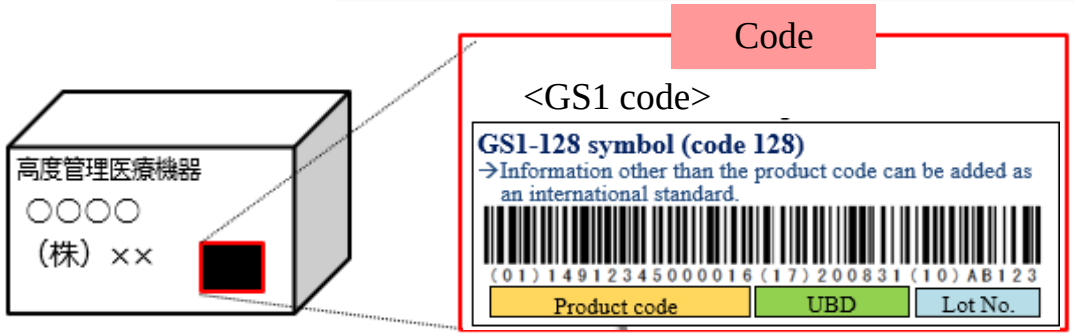
Use of bar codes in logistics and medical fa

○Efficiency of logistics management
○In-hospital inventory management

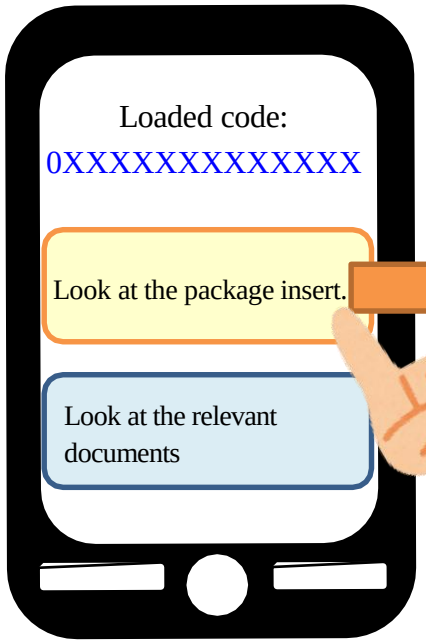
○Improvement of medical safety
(Prevention of mishandling, identification of recall lots, etc.)



Access image from GS1 code to the package insert

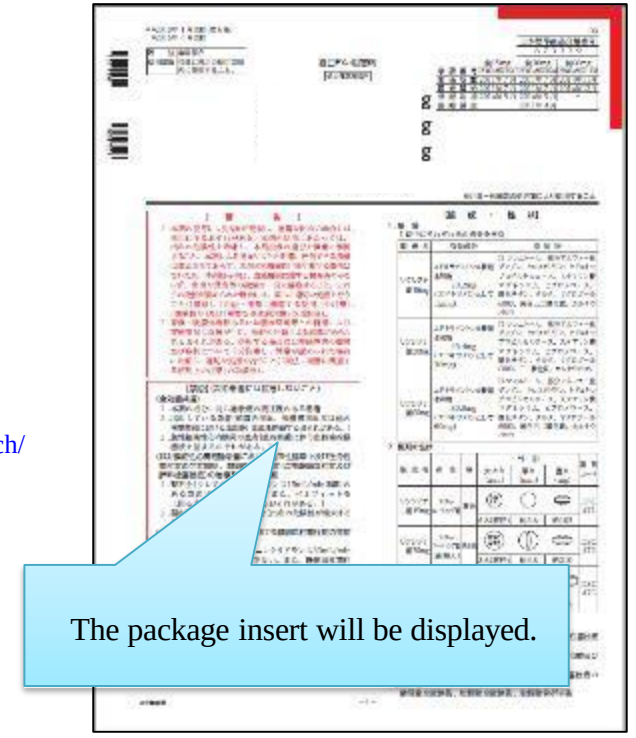


Package insert navigation system



Read GS1 code information using the apps.
The URL of the redirect page is generated from the GS1 code.

https://www.pmda.go.jp/PmdaSearch/bookSearch/01/0XXXXXXXXXXXXX



○ Exceptions to the display of codes on the packaging are permitted for types of drugs and medical devices.
- ✔ Drugs and medical devices that cannot be coded because of the small area
- ✔ Large medical equipment
- ✔ Stand-alone medical device program etc.

20th Regular opinion exchange meeting on Approval Examination of medical devices and IVD and safety measures

Materials submitted by the PMDA

Independent administrative institution
Pharmaceuticals and Medical Devices Agency

Pharmaceuticals and Medical Devices Agency

Operational achievements in FY2021

○ Review Period and Number of Approvals in FY2021

Breakdown		Total review period (Target)	Total review period and number (Actual results)	Total review period and number of the COVIT-19 related products (Actual results)
Medical devices	New medical device (Priority)	10.0 months (80% tile value)	8.9 months	—
			1	0
	New medical device (Normal)	14.0 months (80% tile value)	11.9 months	—
			33	0
	Improved medical devices (with clinical data)	10.0 months (60% tile value)	8.8 months	2.1 months
			43	2 Note 1
	Improved medical devices (w/o clinical data)	6.0 months (60% tile value)	5.7 months	3.9 months
			208	3 Notes 2
	Me-too device	4.0 months (60% tile value)	3.6 months	0.2 months
			737	3
IVD	Specialized Consultations, etc. Products	12.0 months (60% tile value)	6.2 months	3.1 months
			93	49
	General Products	7.0 months (80% tile value)	6.3 months	4.6 months
			67	2

Note 1: Related to the COVID-19 pneumonia image analysis support program. Note 2: Ventilators, etc. Note 3: General syringe with needle

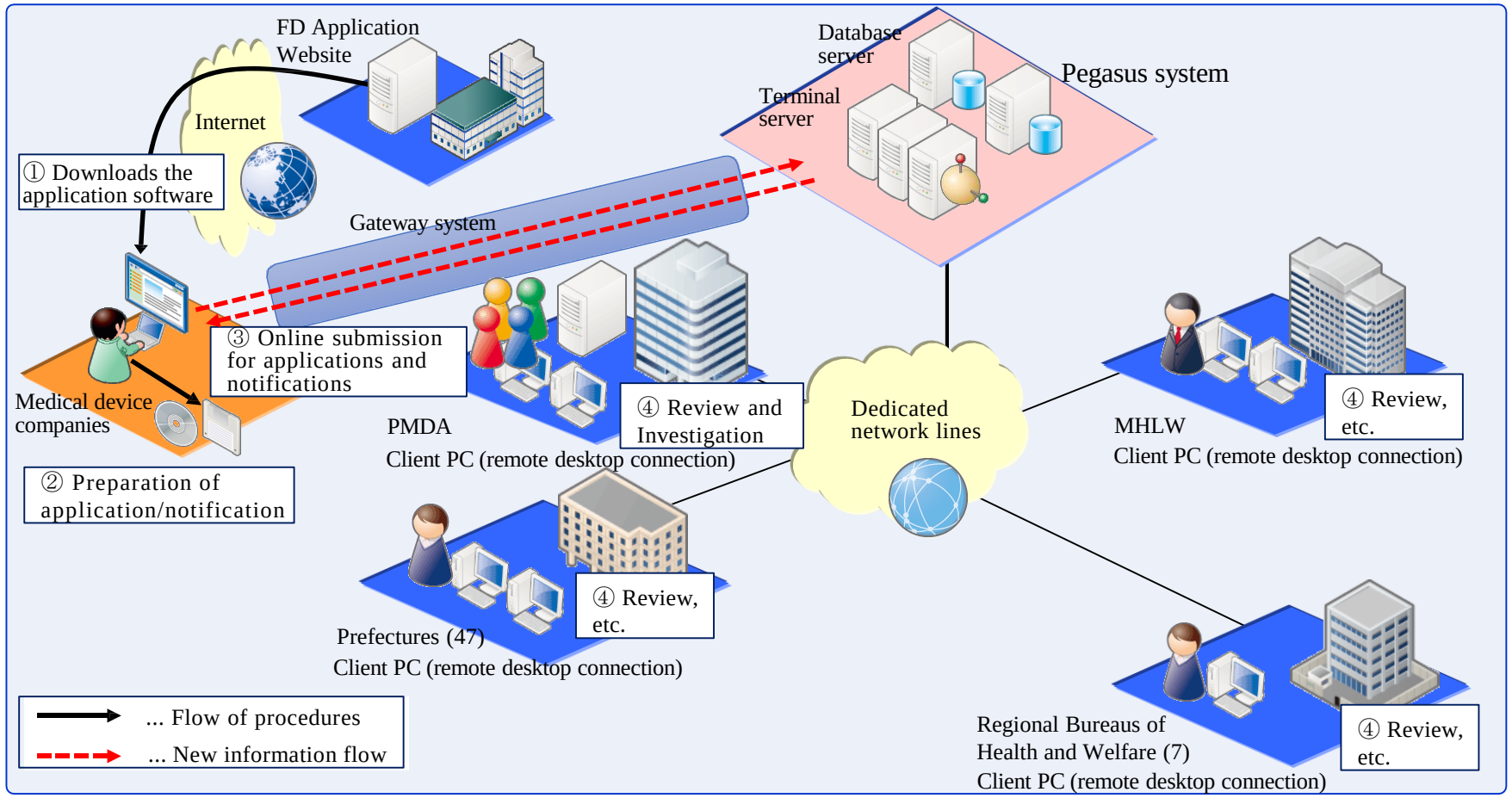
The On-line system for applications and notifications

The Online system workflow for applications, notification

Paper-based submissions and notifications are still possible.

Online reception is available for
Notification: Started in July 2021
Submission: Scheduled to start during FY2022 (see next page).

① The applicant downloads the application software
② Prepare application, notification, and other documents
③ Online submission for applications and notifications to the Pegasus system using the gateway system (submit application information and attached documents)
④ Information sent to the Pegasus system is viewed, reviewed, and investigated by the contact person.
⑤ For the results of the business license and approval review, a business license and approval letter are issued (in paper media).



Timing of the start of online submission

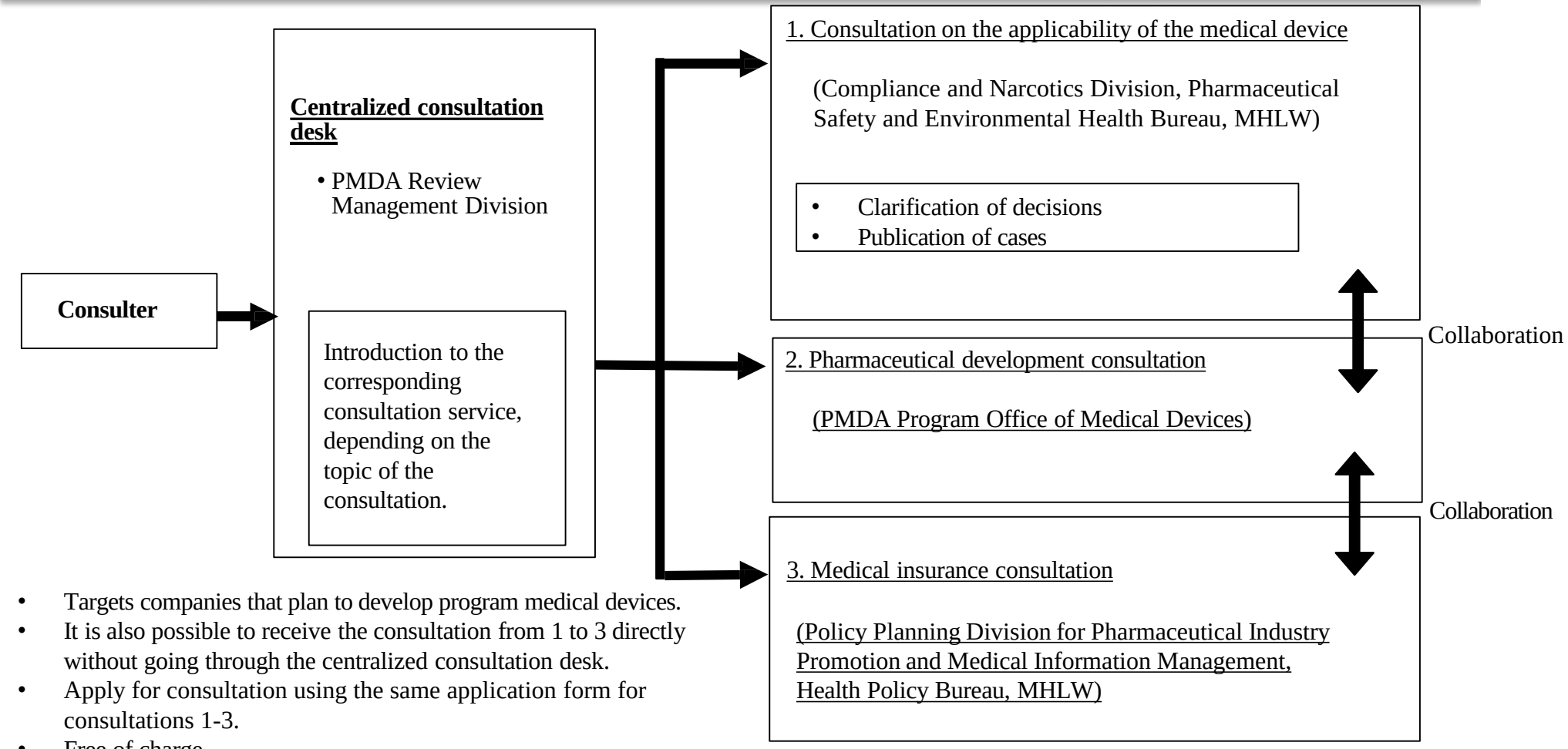
Classification	Online submission
1.Medical devices	
・New medical device	July 2022
・Improved medical devices (with clinical data)	July 2022
・Improved medical devices (w/o clinical data)	October 2022
・Me-too device	January 2023
2.IVD	
・New product	July 2022
・Non-conforming product to approval standards (with clinical data)	July 2022
・Product out of the approval criteria (with clinical data)	July 2022
・Product out of the approval criteria (w/o clinical data) [New file product only]	October 2022
・Products within approval criteria	January 2023
・Non-conforming product to approval standards (w/o clinical data)	January 2023
・Product out of the approval criteria (w/o clinical data) [Partial amendment only]	January 2023
3.Others	
・Other than the above (Re-examination, User performance evaluation, IDATEN)	January 2023

◎ On-line submission for reliability and QMS inspections started in July 2022

Business Conditions of Program Medical Devices, etc.

DASH for SaMD (Package Strategy for Accelerating the Commercialization of Program Medical Devices)

Centralized consultation desk for program medical device



- Targets companies that plan to develop program medical devices.
- It is also possible to receive the consultation from 1 to 3 directly without going through the centralized consultation desk.
- Apply for consultation using the same application form for consultations 1-3.
- Free of charge

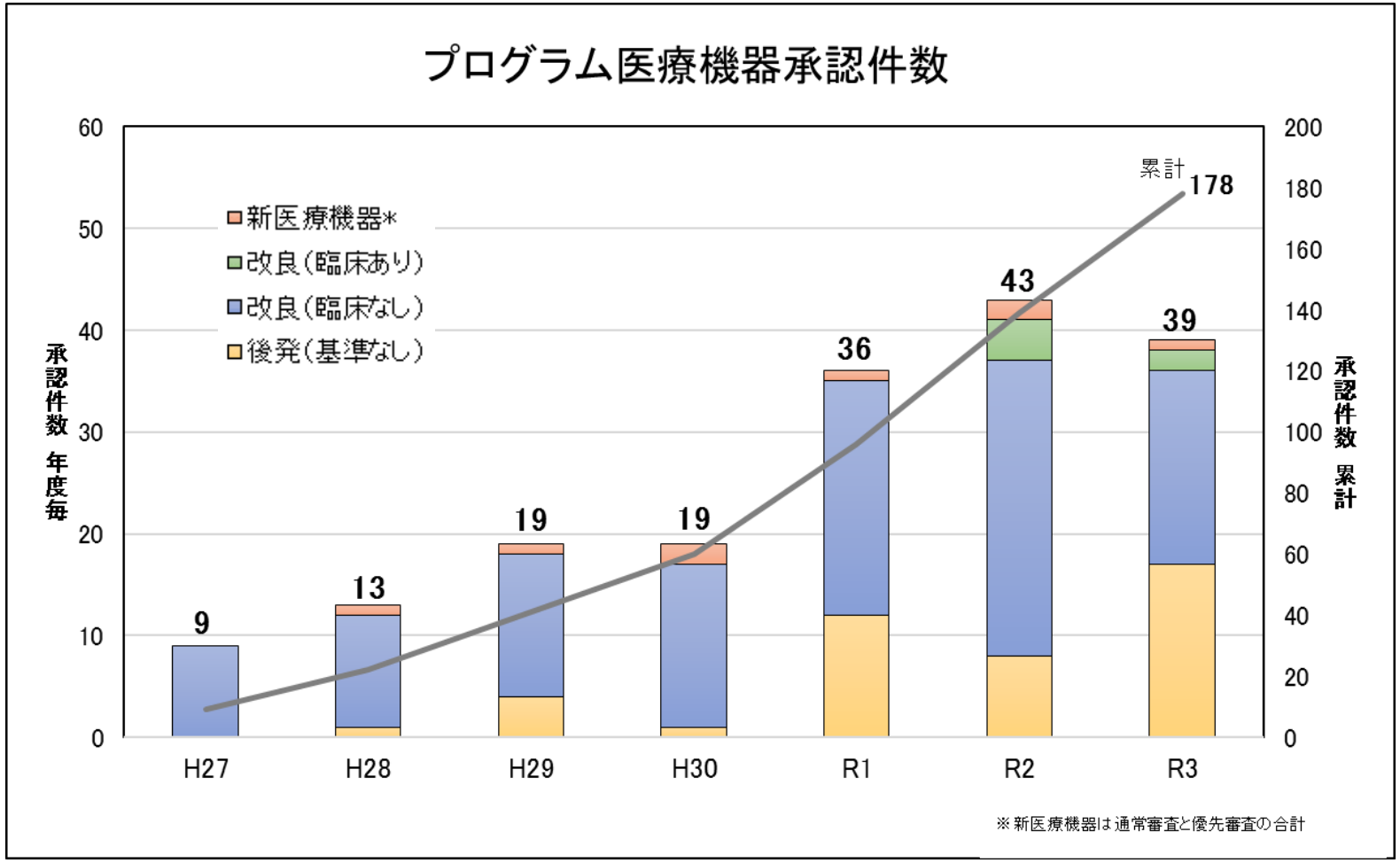
The number of consultations received *Multiple consultations are possible per application.

Overall	1. Applicable Consultation	2. Development consultation	3. Medical insurance consultation
238 cases	175 cases	110 cases	43 cases

※Data from April 2021 to the end of March 2022

Changes in the Number of Approvals of Program Medical Devices by Year

As of the end of March 2022



- Program medical devices were newly defined according to the "Act on Quality, Efficacy and Safety Assurance of Pharmaceuticals and Medical Devices" promulgated on November 27, 2013 (effective November 25, 2014).
- Program Medical Device (Definition):

  A device intended to be used for diagnosis, treatment, or prevention of human diseases or to affect the structure or function of the human body in a tangible form installed in a general-purpose computer, mobile information device, etc.

  However, programmed medical devices are excluded from the scope of medical devices if there is little risk of affecting human life and health in the event of functional impairment, etc.

Status of Approval of Medical Devices (Programs) Utilizing AI (as of the end of April 2022)

No.	Approval Date / Partial Change Date	Brand name	Company who have obtained manufacturing and marketing approval	Product overview, etc.
1	H30.12.6	Endoscopic imaging support software EndoBRAIN	Cybernet Systems Co., Ltd.	Ultra-Extended Endoscopy to Determine Tumor/Non-Tumor Colorectal Lesions
2	R1.9.17	EIRL medical image analysis software Aneurysm	Elpixel Stock Association Company	From an MRI head angiogram to an aneurysmal artery Assisting in detecting candidate points similar to deformation
3	R1.12.25	Similar image case search software FS-CM687	Fujifilm shares Company	Analyze the target area for diagnostic images (worship nodules/diffuse disease/liver mass) from X-ray CT images and assist in retrieving similar images from the database of the institution in use
4	R2.4.27	Endoscopic imaging support software EndoBRAIN-UC	Cybernet Systems Co., Ltd.	Supporting the display of the degree of inflammation (activity/remission) in ulcerative colitis from ultra-magnified endoscopic images
5	R2.5.8	Pulmonary nodule detection program FS-AI688	Fujifilm shares Company	X-ray CT image to help detect possible pulmonary nodular shadows
6	R2.6.3 (R2.8.11)	COVID-19 Pneumonia Image Analysis AI Program InferRead CT Pneumonia ※The brand name was changed at the time of the change.	CES Carto Co., Ltd.	3 levels of confidence to assist in the display of the potential imaging findings from X-ray CT images in COVID-19 pneumonia
7	R2.6.19	AI-Rad companion	Siemens Healthcare Co., Ltd.	X-ray CT image to help detect possible pulmonary nodular shadows
8	R2.6.29 (R3.3.29)	Endoscopic Imaging Support Program EndoBRAIN-EYE	Cybernet System Mu Corporation	Detection of the Presence of Colorectal Polyps from Endoscopic Images Support
9	R2.6.29	Ali-M3, a COVID-19 pneumonia image analysis program	MIC Medical, Inc.	3 levels of confidence to assist in the display of the potential imaging findings from X-ray CT images in COVID-19 pneumonia
10	R2.7.15	Endoscopic imaging support software EndoBRAIN-Plus	Cybernet Systems Co., Ltd.	Support for Pathological Prediction of Colorectal Lesions (Non-Tumor/Adenoma/Mucosal Cancer/Invasive Cancer)

Status of Approval of Medical Devices (Programs) Utilizing AI (as of the end of April 2022)

No.	Approval Date / Partial Change Date	Brand name	Company who have obtained manufacturing and marketing approval	Product overview, etc.
11	R2.8.20	EIRL X-Ray Lung node medical image analysis software	ELPIXEL CO., LTD.	Help detect possible pulmonary nodular shadows from chest radiographs
12	R2.9.2	Endoscopy support program EW10-EC02	Fujifilm Corporation	Endoscopic Imaging to Assist in Detection and Differential Diagnosis of Colorectal Polyps
13	R2.11.24	RN-Deca Breast Cancer Diagnosis Support Program Toe	CES DECALL Co., Ltd. To	Ultrasound of the breast helps detect potential lesions
14	R2.11.30	WISE VISION Endoscopic Image Analysis AI	NEC Corporation	Endoscopic images to assist in the diagnosis of precolonic and early colorectal cancer lesion candidates with a gross appearance of elevated type
15	R3.5.26	C O VID-19 Pneumonia Image Analysis Program FS-AI693	Fujifilm Corporation	3 levels of confidence to assist in the display of the potential imaging findings from X-ray CT images in COVID-19 pneumonia
16	R3.7.7	Chest radiographic lesion detection (CAD) plog Ram LU-AI689	Fujifilm shares Company	Chest X-ray image showing abnormal findings such as pulmonary nodules and pneumothorax Support for detection of candidate shadows
17	R.3.9.1	Rib fracture detection program FS-AI69, Type 1	Fujifilm Corporation	Support for detection of potential rib fractures from X-ray CT images
18	R3.10.11	Imaging support software KDSS-C XR-AI-101	Konica Minolta Co., Ltd.	Support for the detection of possible abnormal findings such as lung nodules and lung masses from chest X-ray images
19	R3.12.9	Chest X-ray pneumonia detection engine DoctorN Et JLK-CRP	Doctor Inc. Net	Radiographic evidence of infectious pneumonia from chest radiographs Assisting labeling of possibilities with three levels of confidence
20	R3.12.24	HOPE Life Mark-CAD Image Analysis Support Program for COVID-19	Fujitsu Japan Limited	3 levels of confidence to assist in the display of the potential imaging findings from X-ray CT images in COVID-19 pneumonia

3rd Government-Industry Dialogue for the Creation of Innovative Medical Devices

November 28, 2022

EBC Medical Devices and IVD Committee

Medical Fee Committee and Pharmaceutical Affairs Committee

2. Medical DX - Expansion to support system of telemedicine and medical monitoring

1. Current Status - Telemedicine Support System

- Online medical consultations, which were delayed compared to overseas, have been expanded as an emergency response to COVID-19, improving convenience for patients. Further expansion is expected. In particular, **the diagnosis and treatment of Doctor to Doctor by remote control** overseas is globalizing and spreading. On the other hand, in Japan, diagnosis is only a tool for instruction of operation by remote communication. Ex.: Only ordering from the doctor at the outside facility to the operating technician at the facility where the device is installed

- Utilization of these technologies is consistent with improving the quality of medical care, ensuring its accessibility, and maximizing therapeutic effects through active involvement with patients who need treatment. In the social issues such as population decline and a decrease in the number of surgeons, telesurgery will contribute to the standardization of high-quality medical care, and in addition, it will contribute to public welfare by improving medical standards. It is also expected to have the effect of promoting technological development in related fields in Japan.

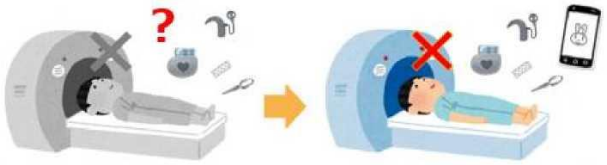
- Therefore, it will greatly contribute to the shortage of doctors in Japan and the standardization of medical care.

2. Current Status - eHealth and Related

- Although digital health (eHealth) is not progressing as compared to Europe, its development is expected, and in Japan, the expansion of PHR to medical care has been stipulated as a basic policy (HONEBUTO) medical DX. Related to this is the utilization and sharing of patient information. In particular, sharing information for patients with implanted medical devices can be a challenge.

Request ; Further promotion of telemedicine and digital health

- Although deregulation is progressing toward the realization of telemedicine, we ask that you continue to discuss deregulation, etc., toward concrete realization in clinical settings.
  (Ex.: D-D operation/manipulation support system of remote treatment, D-D imaging support system of remote diagnostics etc.)
- In order to realize eHealth, we would like to set up a forum for joint consultations between the public and private sectors so that concrete actions can be taken.
- Integration of implantable medical device information into systems: It is expected that information such as the patient notebook will be incorporated into my number card.



MRI examinations of patients with implanted devices such as cochlear implants, cerebral aneurysm clips, and coronary artery stent are sometimes performed without specifying the material or manufacturer, as the patient's declaration of examination is ambiguous.

Medical DX Integrating Information on Implanted Medical Devices to My Number Cards

System to confirm the information of implanted devices at medical institutions nationwide

A system to confirm the information of implantable medical devices at medical institutions nationwide in order to avoid accidents at the time of emergency or MRI imaging, or when changing hospitals Please expand the scope of information subject to My Number card registration to include information on implantable devices

Implantable device information | Patient notebook | Patient record book **MRI** card

System to allow viewing of own implantable device information

Access by citizens and patients to their own information on implanted devices via PCs, smartphones, etc. ・ A system that enables use

Patient notebook | Patient record book **MRI** card

Digital Tracking of Designated Medical Devices

When medical devices are collected, the medical institution inquires about the implantable device information from the lot number (information included in UDI) published by the company to the operator, and the operator responds to the patient information online. From the viewpoint of privacy protection, it is possible to limit the database of patient information in companies.

Implantable device information