NEW EU MEDICAL DEVICE REGULATION (MDR)
NOTIFIED BODY OPINION

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OBJECTIVES

• What is a Combination Product?
• Current EU regulation of Combination Products
• New MDR – notified body opinion
• Impact of Article 117 & key assumptions
• Summary
WHAT IS A COMBINATION PRODUCT?

• Combination of a drug and device
• Principle Mode of Action (PMOA) either device or drug


Note: The labelling on these images may not be representative of the regional labelling requirements
HOW ARE COMBINATION PRODUCTS REGULATED IN THE EU?

- No definition of ‘Combination Product’ in the EU

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<td>Non-integral, co-packaged drug and device. CE marked</td>
<td>Single integral drug-device. No CE mark</td>
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A NEW REGULATION – MEDICAL DEVICE REGULATION

Current:
Medical Device Directive (MDD) 93/42/EEC

Future:
Medical Device Regulation (MDR) 2017/745

• MDR ‘applied’ – 26th May 2020
ARTICLE 117 OF THE MDR (2017/745)

• Medical Device Regulation amends the Medicinal Products Directive (2001/83/EC)

• Article 117

In Annex I to Directive 2001/83/EC, point 12 of Section 3.2. is replaced by the following:
WHAT IS ARTICLE 117?

• Two paragraphs

• For drug-device combination provide:
  – A device CE Certificate
  OR
  – A Notified Body Opinion (NBO) in conformity with GSPR*

• Submit within MAA

* General Safety and Performance Requirements (GSPR)
WHAT DOES THIS MEAN FOR PHARMA?

– Work with a designated Notified Body

– Obtain a NBO on single integral DDC products

But what does this mean in reality?
MANY QUESTIONS TO BE ADDRESSED
WHAT IS IN SCOPE? (ART. 117)

• Single integral delivery devices
  – E.g. device pre-filled with medicine
WHEN IS ART. 117 APPLICABLE?

• No grandfathering so theoretically 26th May 2020

• As per EMA Q&A:
  – Art. 117 is not applicable for licensed products (legacy)
    • No retrospective NBO

• NBO triggered for significant device change or new device
WHAT WILL NOTIFIED BODIES REQUIRE?

• Relevant Annex I GSPRs checklist?
  
• Device Technical Documentation
  – Incl. relevant supporting data
CLINICAL EVALUATION?

• Some confusion as Clinical Evaluation removed from GSPR

• However, expectation is to provide some level of clinical evidence (Art 5(3) and 61)
  – Scientific Literature, pull data from drug clinical trial – no discrete device investigation
  – Clinical Evaluation

• But **risk based approach** must apply
  – Well-established verses novel
WHAT ABOUT LABELLING?

• Labelling falls under the medicines legislation (2001/83/EC)

Assumption:
• The labelling GSPRs not applicable
  – E.g. symbols
HOW TO HANDLE LIFE CYCLE MANAGEMENT?

• Notified Body reassessment likely required for **significant change** to the device
  • Impact device safety or performance?

• Guidance needed to define ‘significant change’
  – NB and NCA/EMA definitions to align

• Open question – when is a variation triggered?
  – Does current variation guideline require updating?
WHAT TO SUBMIT TO THE MEDICINES REGULATORS?

- Notified Body Opinion document

- Where?
  - eCTD
  - Module 3
  - Suggestion: Regional (3.2.R)
PREPARATIONS UNDERWAY...

• Internal gap assessment against current processes
  – New SOP and templates

• Engage in external discussions with NB, EMA and Industry Working Groups
  – Two reflection papers on Art. 117
  – RAPS Regulatory Focus article
SUMMARY

• NBO required for single integral drug-delivery devices – May 2020

• Many questions to be addressed

• **Engagement** needed between industry, NBs and medicines regulators
  • Harmonised approach
Thank you

Any questions?

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