

# INDONESIA

## *Medical Devices Regulation*

By **ISMIYATI SURATA**

Senior Health Administrator

Team Work Coordinator for Certification and Inspection of Production Facility

Directorate of Medical Devices Post Market Control

Ministry of Health



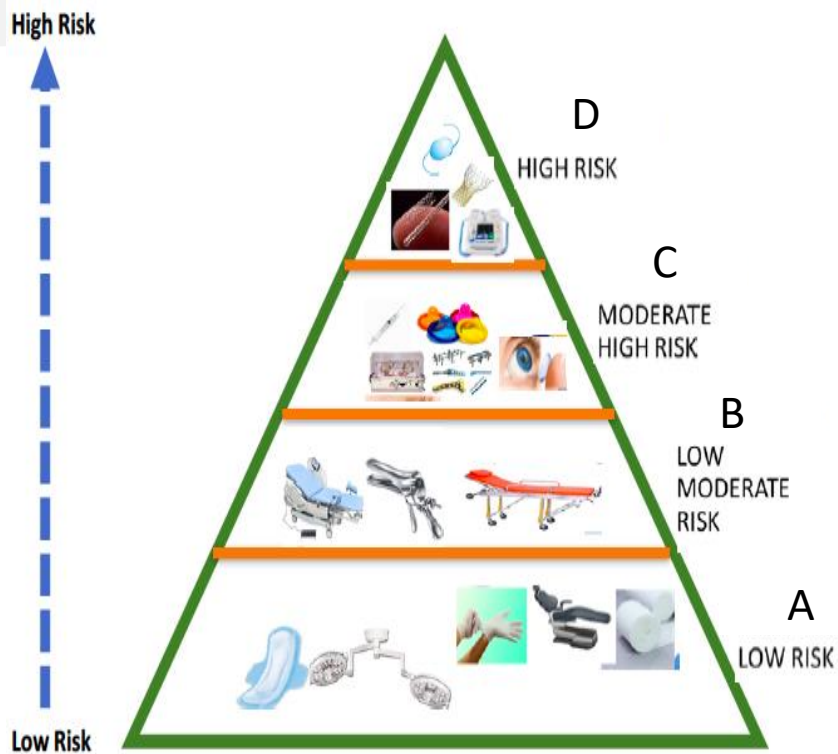
27<sup>th</sup> GHWP Annual Meeting and 27<sup>th</sup> GHWP TC Meeting, 27<sup>th</sup> – 30<sup>th</sup> Nov 2023  
Shanghai International Convention Center

**BerAKHLAK**  
Berorientasi Pelayanan Akuntabel Kompeten  
Harmonis Loyal Adaptif Kolaboratif

**#bangga  
melayani  
bangsa**



# Medical Device Registration and Classification



## AMDD Rule

<https://regalkes.kemkes.go.id>

Directorate for Production and Distribution of Medical Devices

- ✓ All class of medical devices must be registered at MoH before distribute in Indonesia
- ✓ Registration process is carried out via national single system for licencing all business purposes at Indonesia that called Online Single Submission (OSS – <https://oss.go.id>) that is integrated with MoH online system
- ✓ Validity period of marketing licence is in accordance to the term of the appointment letter from principal, maximum of 5 years

MoH Regulation No. 62 Year 2017 regarding Marketing Licence of Medical Device and Household Health Product

MoH Regulation No.14 Year 2021 regarding Standards for business activities and products in risk-based business licensing in the health sector

Simplification and acceleration process for certain medical devices (Class A) since Januari 2022 → notification route

# List of Medical Devices

## (Notification Route)

- 1 Arm sling
- 2 Body waste receptacle
- 3 Cane
- 4 Cane, crutch, and walker tips and pads.
- 5 Cold pack.
- 6 Crutch
- 7 Dental floss
- 8 Elastic bandage
- 9 Flotation cushion
- 10 Hernia support
- 11 Hot or cold disposable pack
- 12 Hot/cold water bottle
- 13 Ice bag
- 14 Limb orthosis
- 15 Manual breast pump
- 16 Manual toothbrush
- 17 Mechanical wheelchair
- 18 Mechanical walker
- 19 Medical adhesive tape and adhesive bandage (NON STERILE)
- 20 Medical disposable bedding
- 21 Medical insole
- 22 Moist heat pack.
- 23 Nipple shield
- 24 Nonresorbable gauze/sponge for external use (NON STERILE)
- 25 Ophthalmic eye shield
- 26 OTC Denture cleanser
- 27 Patient scale
- 28 Protective garment for incontinence.
- 29 Scented or scented deodorized menstrual pad
- 30 Stand-on patient scale
- 31 Teething ring
- 32 Therapeutic massager
- 33 Truncal orthosis
- 34 Unscented menstrual pad

# Product Registration Timeline & Fees

Risk Class	Local	Imported	Notification	Fees
Class A	10 days	15 days	7 days	IDR 1,500,000
Class B	20 days	30 days	-	IDR 3,000,000
Class C	20 days	30 days	-	IDR 3,000,000
Class D	30 days	45 days	-	IDR 5,000,000

Indonesia implemented Good Registration Management for the process → Good Review Practice and Good Submission Practice

After submit the registration, applicant only has 1 time opportunity to give additional data within 10 days (class A, B, and C) and 15 days (class D) after got feedback from the evaluator team

**The product registration process is conducted by MoH**

*Directorate for Production and Distribution of Medical Devices*



# Product Registration Requirements → AMDD

## FORM A. ADMINISTRATIVE DATA

1. Business Licence (NIB)
2. Medical Device Distributor License issued by MoH which is still valid (for local and import product distributor)
3. Power of Attorney (Letter of Authorization) as sole agent or sole distributor which authorize to register the medical device from the principal/factory of origin and have to legalize by the local Indonesian Embassy (KBRI)
4. Certificate of Free Sale (CFS) from Regulatory Authority
5. Certification and document mentioning conformity standard of product, requirement of safety, effectiveness, and quality system in design and manufacturing process (ISO 9001, ISO 13485, CE Certificate), CPAKB
6. Executive Summary contains of information about marketing history, mechanism of the product, indication, formula, and history of product usage
7. Standard and declaration of conformity against the standard on the production/manufacturing of medical device
8. Patent certificate/ Brand name registration letter and Declaration of no objection to release the brand name/ Declaration of no objection to release the agency
9. Statement Letter of truth and accurate document

## FORM B. PRODUCT INFORMATION

1. Explanation
2. Description and feature of Medical Device
3. Intended Use
4. Indication
5. Instruction for use
6. Contra indication (if any)
7. Warning(if any)
8. Caution (jif any)
9. Potential Adverse event (if any)
10. Alternative therapy (if any)
11. Material
12. Manufacturer Information (if any)
13. Production Process

## FORM C. SPECIFICATION & QUALITY ASSURANCE

1. Functional characteristics and specification of the medical device technical performance.
2. Additional information of device characteristics which are not yet included in the previous part.
3. Summary of design verification and document validation
4. Pre Clinical studies
5. Test result of software validation (if applicable).
6. Result of the research on any device containing biologic material.
7. Clinical Evidence and Clinical Evaluation
8. Risk Analysis
9. Result of Risk Analysis
10. Specification and/or requirement of raw material
11. Specification of packaging (Diagnostic product)
12. Provide data of analysis result and or clinical test (specificity, sensitivity and stability) for reagent or in-vitro diagnostic product
13. Provide analysis test result/clinical test result and device safety

## FORM D. INSTRUCTION FOR USE

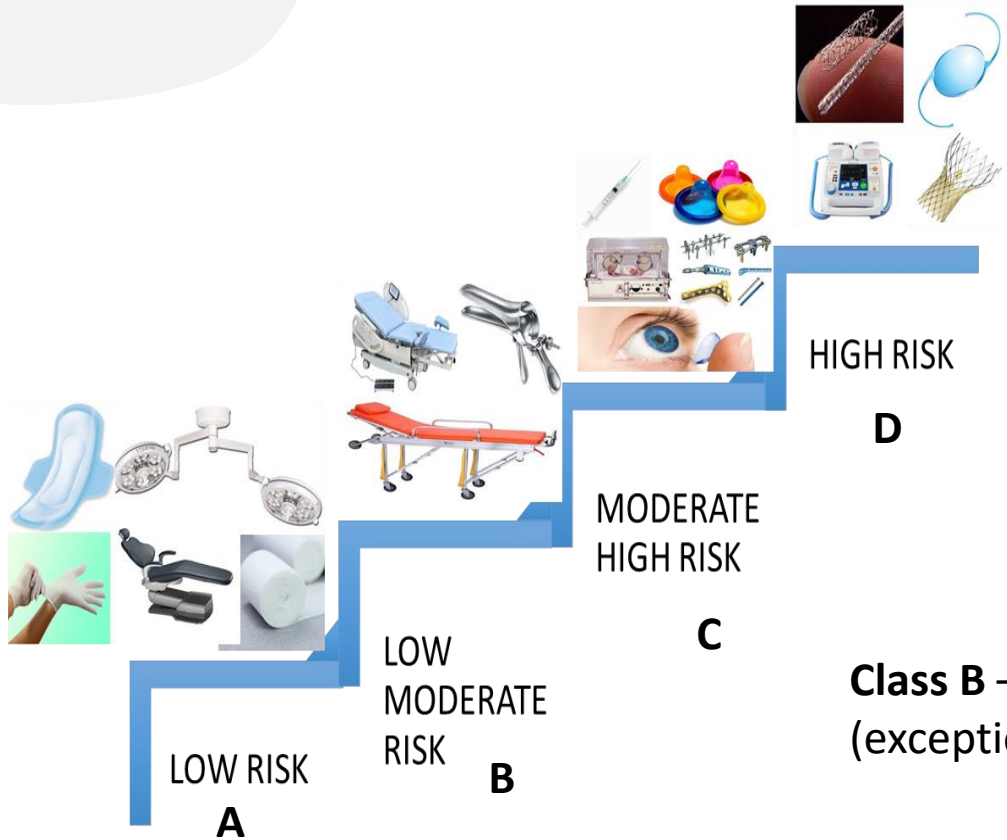
1. Labelling Artwork
2. Explanation on symbols are used in packaging and labeling
3. Instruction for use, raining material & guidance of installation and its maintenance
4. Lot numbering System
5. List of accesories (if any)

## FORM E. POST MARKET EVALUATION

1. SOP for product complaint handling, recall, vigilance, etc



# Product Registration Requirements



**Class D** – Complete all form A, B, C, D, and E

**Class C** – Complete Form A, B, D, and E. Form C (exception C4, C7, C8, and C9)

**Class B** – Complete Form B, D and E. Form A (exception A6). Form C (exception C4, C7, C8, C9 and C10).

**Class A** – Complete Form B, D and E. Form A (exception A6). Form C (exception C4, C7, C8, C9 and C10).

# Quality Management System



## Medical Devices Industry

- Mandatory to implement Good Manufacturing Practice MD Guidance, which develop by MOH adopted from ISO 13485:2016
- A technical responsible person who already has GMP-MD training certificate
- MoH Regulation No. 20 Year 2017 regarding GMP-MD Guidance
- MoH Regulation No. 14 Year 2021

## Medical Devices Distributor

- Mandatory to implement Good Distribution Practice MD Guidance
- A technical responsible person who already has GDP-MD training certificate
- MoH Regulation No. 4 Year 2014 regarding GDP-MD Guidance
- MoH Regulation No. 14 Year 2021

**The certification process (including audit) is conducted by MoH**

*[Https://sertifikasialkes.kemkes.go.id](https://sertifikasialkes.kemkes.go.id)*

*Directorate for Medical Device Post Market Control*



# STRENGTHENING POST MARKET CONTROL



## Product Sampling & Testing

- ✓ Routine done by MoH
- ✓ On September 2023, MoH released announcement that marketing licence holder of certain medical devices require post market testing and reported to MoH every 2 years



## Post Market Surveillance

Marketing licence holder required to report any adverse events and product recall



## Facility Inspection

Routine inspection at production and distribution facility to ensure the compliance with standards and regulation



## Advertising Control

MoH Regulation No. 76 year 2017 regarding Advertising of Medical Devices and Household Health Products

## Reporting System



### E-report

National Reporting System of MD Production and Distribution, mandatory to report every 6 months



### E-watch

National Reporting System of MD Adverse Events – synchronized with hospital information system, currently integrate with patient safety reporting



### Mobile Alkes

A mobile application to search for product information, marketing licence number, companies and also make reports/complaints regarding Medical Devices and household health products



# List of Medical Devices

(Post market in country testing)

Group of Product	Type of Product	Type of Testing
Sterile Non electromedical device	All sterile products	Sterility test
	Sterile Gauze	Sterility test & Fluorescence test
Sterile Non electromedical Products with needle	Disposable syringe, IV Cannula, IV Catheter, Wing needle, Fistula Needle, Infusion set with needle,	Sterility test & needle sharpness test
Electromedical device	USG, Continuous Ventilator, Infusion Pump, Syringe Pump	Electrical safety and performance test
Non Sterile Non electromedical device	Condom	Burst test, leak test
Diagnostic in Vitro	Rapid Diagnostic Test (HIV, Syphilis, Hepatitis, and Dengue)	Sensitivity Test, Specificity Test

*Xie Xie*  
*Terima Kasih*  
*Thank You*



[farmalkes.kemkes.go.id](http://farmalkes.kemkes.go.id)



[farmalkes](https://www.facebook.com/farmalkes)



[@farmalkes](https://www.instagram.com/@farmalkes)



[@farmalkes](https://www.twitter.com/@farmalkes)



[farmalkesTV](https://www.youtube.com/farmalkesTV)

# About Speaker

## Ismiyati, S.Si., Apt., M.Si

Senior Health Administrator - Team work coordinator for certification and inspection of Production Facility

Directorate of Medical Devices Post Market Control

Directorate General of Pharmaceuticals & Medical Devices

Ministry of Health Indonesia

E-mail : ismiyati.surata@gmail.com

### Working Experience at MoH

- 2006 – 2012 Reviewer of Medical Devices – Directorate of Production and Distribution of Medical Devices
- 2012 – 2015 Head of Section of Medical Devices Product Standardization - Directorate of Production and Distribution of Medical Devices
- 2016 – 2018 Head of Section of Domestic Medical Devices Product – Directorate of Medical Devices Evaluation
- 2019 – 2020 Head of Section for Certification, Directorate of Medical Devices Post Market Control
- 2020 – 2021 Coordinator for Standardization and Certification, Directorate of Medical Devices Post Market Control
- 2022 – now Senior Health Administrator, Team Work Coordinator For Certification And Inspection of Production Facility, Directorate of Medical Devices Post Market Control

