New PAL
focusing on clinical evidence requirements in Japan
&
Clinical Requirements in EU

TÜV SÜD Japan Ltd.

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Jap

EU

Clinical Data / Clinical Evaluation

Japan

Clinical Investigations

Jap

EU

Clinical Data / Clinical Evaluation

i) The Literature Route, or

ii) The Clinical Investigation Route, or

iii) A combination of (i) & (ii)

Japan

Clinical Investigations

Jap

EU

Clinical Data / Clinical Evaluation

i)The Literature Route, or

ii)The Clinical Investigation Route, or

iii) A combination of (i) & (ii)

A manufacture must think which route is appropriate.

Japan

Clinical Investigations

A manufacture must decide if clinical investigation is legally required or not

Jap

1. Overview of requirements

Japan

Clinical investigations

Jap

Japan

Class 3 & 4 medical devices

Clinical investigations legally required

- **When a device is not identical with any approved devices**
- **When there are no approval criteria**

Japan

Class 2 “New medical devices”

Clinical investigations legally required

- **When the devices are categorized as “New medial devices”**

Jap

Japan

Normal Class 2 medical devices

No clinical investigations required

- **Demonstration of equivalence to existing medical devices**

Q1: Summarize when Clinical Investigations necessary?

A1: In general, new medical devices.

For example, or any medical devices whose nomenclature are not still defined

Jap

PAL Article 14

Application (form #22-3)

+ Attachments for detailed information (no form specified)

see Article 38-40 of

MHLW Ordinance, PAL Enforcement Regulations

Jap

❖ Application form

- ✓ Category
- ✓ General Name and Model Name
- ✓ Intended use, Medical effectiveness
- ✓ Construction
- ✓ Materials, components
- ✓ Specifications
- ✓ Instruction for use
- ✓ Production methods
- ✓ Expire date, Storage condition
- ✓ Manufacturing facility of the end product
- ✓ Manufacturing facility of materials
- ✓ Applicant

Jap

❖ Attachments

- ✓ Background of the development of the devices
- ✓ Specifications
- ✓ Stability and durability
- ✓ Compliance to essential principles
- ✓ Functions
- ✓ Labeling
- ✓ Risk Analysis
- ✓ Manufacturing processes
- ✓ **Clinical investigations**

Jap

❖ Clinical investigation documents attached to the approval application

- ✓ **Clinical Investigation Report**
- ✓ **Clinical Investigation Protocol**
- ✓ **Clinical Investigation Record Sheets for each trial (Sample is OK)**

Jap

What is GCP?

- ✓ **MHLW Ministerial Ordinance No.36, 2005 “Good Clinical Investigation Practice” (GCP)**
- ✓ **Requirements for documented procedures**
- ✓ **Requirements for safety tests in prior to C. I.**
- ✓ **Requirements for Protocol**
- ✓ **Requirements for the contracts with hospitals**
- ✓ **Clinical Trial In-Country Care Taker for foreign manufacturer**

Q2: Are Clinical Investigations in foreign countries be acceptable?

A2: Yes, but

- **Follow GCP (or equivalent)**
- **Evaluate & justify the difference of the patients' races**

Q3: Will English language Clinical Investigations data be accepted ?

A3: Yes, but

- **Attach Japanese translation (summary)**

Jap

2. Recommendation

In Japan

Jap

Japan

General consensus

It should be avoided as far as possible that clinical investigation results be rejected after the clinical investigation is done !

Jap

Japan

So, how a manufacturer may avoid rejection in Japan?

It is highly recommended that a meeting with the PMDA be held.

It must done at the protocol stage of the clinical investigation

Jap

Japan

If not ?

You must be a very challenging guy !

Jap

Japan

And then?

100% follow the agreements at the meeting

Japan

Any other recommendations ?

Avoid

- ✓ **Deviations form the GCP**
- ✓ **Safety tests not completed**
- ✓ **Unclear description of advantages from existing devises in the documents**

and

- ✓ **Show complete data package and prepare to make 20 minutes presentation at the meeting**

Jap

3. Overview of requirements

EU

Clinical data

Jap

EU

Clinical Data / Clinical Evaluation

Required for all classes medical devices

Technical Documentation must include Clinical Data

Jap

EU

Clinical Data / Clinical Evaluation

i) The Literature Route, or

ii) The Clinical Investigation Route, or

iii) A combination of (i) & (ii)

Jap

4. Recommendations / Expectation

In EU

Jap

EU

Recommendations?

Avoid typical rejections

#1 Clear deviations from MEDDEV 2.7.2 April 2003, especially in case of literature route

Jap

EU

Recommendations?

Avoid typical rejections

(continued)

For example?

A protocol is missing.

According to MEDDEV guidance, a protocol should be made before reviewing literatures

Jap

EU

Recommendations?

Avoid typical rejections

#2 Questionable equivalence of the evaluated medical device to device shown in the literature

Jap

EU

Recommendation?

Avoid typical rejections

#3 Wide applications of intended use with very limited applications shown in the clinical data

EU

Recommendation?

Avoid typical rejections

Others

- ✓ **Isolated case reports**
- ✓ **Random experiences**
- ✓ **A report lacking sufficient detail**
- ✓ **Unsubstantiated opinion**

Any question?