

THE ROLES & RESPONSIBILITIES IN THE SUPPLY CHAIN FOR MEDICAL DEVICES: Safety, Performance and Conformity Assessment Throughout the Total Product Life Cycle

Datuk Dr M S Pillay, AHWP



INTRODUCTION

- Assuring medical device safety requires oversight of the use of medical devices
- All elements of control from design through disposal are required to be put in place to ensure continued safety and performance throughout total life cycle
- Different parties are involved



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TOTAL PRODUCT LIFE CYCLE

Manufacturing, import, packaging, labelling, storage, tracking, surveillance/vigilance

Advertising, distribution, transportation, storage, tracking

Installation, usage, maintenance, surveillance/vigilance, incident reporting



ROLES & RESPONSIBILITIES OF MANUFACTURER/AUTHORIZED REPRESENTATIVE

- Ultimate regulatory responsibility
- To ensure safety and performance of medical devices are maintained throughout total life cycle of the device
- Well addressed in many GHTF documents
- **Issues: Training of users and 3rd Party Service Providers**



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ROLES & RESPONSIBILITIES OF DISTRIBUTOR/RETAILER

- To ensure safety, quality and performance of medical devices are maintained throughout the distribution chain
- This includes storage, transportation, distribution, installation



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ROLES & RESPONSIBILITIES OF DISTRIBUTOR/RETAILER

- **Issues:**
 - Storage, transportation & tracking of device
 - Communication channel with manufacturer/retailer/user
 - Good Distribution Practise
 - Quality of service
 - Regulatory control, standards, guidelines



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ROLES & RESPONSIBILITIES OF USER

- To ensure medical devices are used in accordance to the intended use in accordance with the specifications
- To ensure continued safety and performance of medical devices from the point of installation through to disposal
- To ensure the device is decommissioned and disposed accordingly



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ROLES & RESPONSIBILITIES OF USER

- **Issues:**
 - Usage of device, no misuse
 - Installation, testing & commissioning
 - Maintenance by 3rd Party service provider
 - Safety of patients, users & public
 - Competency of user & maintenance staff
 - Performance monitoring
 - Adverse event reporting
 - Device Tracking
 - Disposal
 - Regulatory control, standards, guidelines



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Manufacturing, import,
packaging, labelling, storage,
tracking, surveillance/vigilance

Advertising,
distribution,
transportation,
storage, tracking

Installation, usage,
maintenance, surveillance/
vigilance, disposal, incident
reporting

MANUFACTURER/AUTHORIZED
REPRESENTATIVE

DISTRIBUTOR
/RETAILER

USER, MANUFACTURER,
3RD PARTY SERVICE
PROVIDER

PRE-MARKET

PLACEMENT
ON-MARKET

POST-
MARKET

TO ENSURE SAFETY AND PERFORMANCE OF MD THROUGHOUT TOTAL LIFE CYCLE:

Do we need to include retailer, user and 3rd party service provider and their respective activities into the scope of MD regulation??



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