

To: Directors of Health Departments (Bureaus) of Prefectural Governments

Director of the Medical Device Evaluation Division,  
Pharmaceutical Safety and Environmental Health Bureau,  
Ministry of Health, Labour and Welfare  
(Official seal omitted)

**Points to Consider for Preparation of Attached Data to Application Form  
for Marketing Approval of Reprocessed Single-use Medical Devices**

The Ministry of Health, Labour and Welfare (MHLW) previously published information concerning various points to consider regarding the treatment and preparation of data attached to marketing approval applications for medical device products in the Ministerial Notification entitled, “Points to Consider for Preparation of Attached Data to Application Form for Medical Device Marketing Approval” (PFSB/MDRMPE Notification No. 0120-9, by the Director of the Medical Device and Regenerative Medicine Product Evaluation, Pharmaceutical and Food Safety Bureau, MHLW, dated January 20, 2015 (hereinafter, the “Medical Device Attached Data Notification”).

We have now also prepared guidance concerning the treatment of data attached to marketing approval applications for reprocessed single-use medical devices, as provided below. We request your cooperation in circulating the information contained in this Notification to marketing authorization holders (MAHs), etc. under your supervision.

Please note that copies of this Notification will be sent to the Chief Executive of the Pharmaceuticals and Medical Devices Agency (PMDA), the Chairperson of the Japan Federation of Medical Devices Associations, the Chairperson of the Medical Devices and Diagnostics Subcommittee of the American Medical Devices and Diagnostics Manufacturers’ Association in Japan, and the Chairperson of the Medical Devices and Diagnostics Committee of the European Business Council in Japan.

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The structure of attached data and points to consider for each application item are as provided in the appendix and related previous Ministerial Notifications. In addition, for further information regarding the basic concepts of attached data, general points to consider, and the handling of attached data in joint development projects, applicants should refer to Sections 1, 2, and 4 of the Medical Device Attached Data Notification, respectively. For information concerning the interconnections between the Appendix Table 1 of “Applications for Medical Device Marketing Approval” (PFSB Notification No. 1120-5, by the Director-General of the Pharmaceutical and Food Safety Bureau, MHLW, dated November 20, 2014) and each item of the Appendix of this Ministerial Notification, applicants should refer to the Attachments of the Medical Device Attached Data Notification.

## Appendix

Structure of data attached to applications for marketing approval of reprocessed single-use medical devices (R-SUDs) and points to consider for each application item

### 1. Product Overview

#### 1.1 Summary of Product Characteristics

Applicants shall provide a brief description of the product in question adhering to Appendix Format 1 specified in the Medical Device Attached Data Notification.

#### 1.2 Developmental History

(1) Applicants must shall provide a summary of the design and development of the proposed product in terms of the background leading to the decision to proceed with development of the proposed product and the decision to prepare and submit an application for approval. This prose description should be written with a clear and concise structure and should cover the following items for each proposed product:

[1] Describe concisely the development concept for of the proposed product. Explain the development concept by describing the state of general clinical use of the original equipment manufacturer's (OEM's) single-use medical device (SUD) as well as the intent and background of the development of the proposed product.

[2] Explain any and all assessment activities related to the proposed R-SUD performed at each stage of the design and product development processes (initiation of the design development, application and authorization status of the OEM's SUD and R-SUD in foreign countries, determination of design requirements based on reverse engineering, design verification, design validation, and design changes in development process). Applicants should also clearly and succinctly discuss any current or planned risk management measures. Applicants should also explain in this section all items that are necessary for evaluating the quality, durability, reliability, safety, intended use(s) or indication(s), performance, and clinical benefit(s) with respect to use of the proposed product.

In the event that a problem is discovered during the design and product development processes, or a change is made to the original plan, then explain the nature of and reason for the problem or change, and the justification for the action taken (e.g., only some of the variations of the OEM's SUD are remanufactured, and consequently the intended use(s) and target patients are limited; replacement components are used in some of the proposed product from the viewpoints of cleaning and durability).

[3] In the case of an application for approval of partial changes in approved matters for marketing of R-SUDs, applicants must include background information such as the rationale for such changes.

(2) To describe the background of the design and development of the application product, applicants shall prepare their submissions in reference to the following major points:

[1] For background matters describing the period up to the initiation of the design and development of the proposed product:

a) Describe the current state of general clinical use of the OEM's SUD concisely as well as the intent, history, and rationale for the design and development of the product proposed as a R-SUD.

b) If only a part of the OEM's SUD is subjected to reprocessing, or if the R-

SUD is designed to have a structure partially different from that of the OEM's SUD, provide a summary of differing components (hereinafter, "summary of differences"), and explain the relationship of the differences to the concept of design and development.

- [2] If an applicant takes advantage of face-to-face consultations offered by PMDA, that applicant should prepare their product description in reference to the guidance provided during such consultation, and also attach copies of the official transcripts of all consultations referred to as reference materials.
- [3] In the case of an application for approval of partial changes in approved matters for marketing of R-SUDs, applicants must include background information such as the rationale for such changes.
- [4] Summary of the design specifications of the proposed product as well as matters to consider when evaluating such specifications
  - a) Describe how the design specifications of the proposed product have been determined based on the concept of design and development (including entries in the "Performance and Safety Specifications" column under Section of 3-6 ,(1), (2) and (4) of the "Points to Consider for Preparation of Application Form for Marketing Approval of Reprocessed Single-use Medical Devices" (PSEHB/MDED Notification No. 0816-3, by the Director of the Medical Device Evaluation Division, Pharmaceutical Safety and Environmental Health Bureau, MHLW, dated August 16, 2017; hereinafter, the "Remanufactured Medical Device Application POC Notification").
  - b) Explain technical requirements of the OEM's SUD, and describe the differences from technical requirements of the proposed product and the reasons specifically, if any.
  - c) Describe specifically the differences from the OEM's SUD, using illustrations, numerical figures of the technical requirements relevant to the differences, and similar, as necessary.
  - d) Describe actions taken, if any, to evaluate the design specifications of the proposed product (technical requirements) from the viewpoint of safety risk management.
  - e) Describe whether any standards or specifications were consulted and then applied to the design specifications to ensure product safety.
- [5] Matters related to results from verification that the design specifications ensure the quality, efficacy, and safety of the proposed product
  - a) Provide a concise summary of the steps taken to verify and validate the device design, including the results of verification trials returning the anticipated figures.
  - b) Prepare a figure that includes the start and end dates (month/day/year) of each study in a chronological format for design verification and validation. In principle, specimens used in each study shall be the same devices as the OEM's SUD or the proposed product. If a device different from the OEM's SUD or the proposed product is used as a study specimen, describe a change history of the specimens and summary of the changes additionally.
  - c) If the medical device was developed jointly, applicants should prepare a chart describing the allocation of tasks (name(s) of participating or affiliated companies, application type, and allocation of work tasks). Task allocation may be incorporated into the timeline figure described item (5)b above.
  - d) Discuss matters related to the realization of the design concept and development milestones.

### 1.3 Comparison with Similar Medical Device Products

Compare the proposed product with the OEM's SUD such that reasons for determination of their practical comparability, the existence of differences, and extent of such differences can be clarified. If the OEM's SUD that conforms to the approval standards or certification standards is used as a raw material, explain their comparability by comparing matters stipulated in the approval standards or certification standards, structure, and use method. If a comparison with a similar medical device that is in essence comparable to the OEM's SUD is necessary in order to demonstrate equivalence with the OEM's SUD, applicants must justify the comparator choices and describe that such assessment was done as a comparison with the OEM's SUD. Note that differences of the proposed product shall not be beyond the scope of the acceptable differences that ensure comparability with the properties and functions of the OEM'. In addition, applicants must update this column with the latest information wherever possible according to the table below, in consideration of the device's clinical usefulness.

- (1) Select the appropriate items for comparison according to the properties of the proposed product. In particular, pay attention to the selection of items on specifications for the structure and principle, raw materials, efficacy, and safety to ensure an adequate comparison, although they are not necessarily the same as those for the OEM's SUD. Also, state the sources of data for the medical device used for the comparison. Or state the sources of information and data for the similar medical device used for the comparison, if applicable.
- (2) If the use-results evaluation stipulated in Article 23-2-9, Paragraph 1 of the Act on Securing the Quality, Efficacy, and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (Act No. 145 of 1960; hereinafter, the "Act") or re-examination stipulated in Article 14-4 of the Pharmaceutical Affairs Law before amendment according to the "Act for Partial Amendment of the Pharmaceutical Affairs Law" (Act No. 84 of 2013) is ended, enter the date (month/day/year) of the end.
- (3) If a comparative clinical trial (including blinded studies) has been conducted for the purpose of justifying a proposed expansion of product indications, in principle, applicants shall enter in the list the medical device(s) used as comparators with respect to medical device for which approval is sought, and in the Remarks field, state the type of comparative clinical trial and make a note to the effect that the medical device was used as a comparator in the study.
- (4) If changes proposed in the application for approval of partial changes in approved matters are not intended for particular differentiation from the pre-change product (in the case of application for approval of partial changes [application for approval of a partial change in shelf life] under Appendix 4. (1) of "Determination of Shelf life and Stability Studies of Medical Devices" [PFSB/ELD/OMDE Notification No. 0905001, by the Director of the Office of Medical Devices Evaluation, Evaluation and Licensing Division, Pharmaceutical and Food Safety Bureau, MHLW, dated September 5, 2008] or application for approval of partial changes in raw materials due to the circumstances of the raw material supplier), and include an appropriate note to such effect. In this case, make a comparison of the proposed product with the pre-changed R-SUD after the comparison with the OEM's SUD according to the below table.

Table. Information concerning differences between the application product and the original medical device

(Note 1)	Application product	OEM's SUD (or similar medical device(s))	Explanation of difference(s)
Generic name			
Brand name(s)			
Marketing authorization holder(s)			
Approval number			
Date of approval			
Intended use(s) or indication(s)			
Shape, structure			
Functional principle(s)			
Raw materials			
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Note 1: Select the appropriate comparison items according to properties of the application product such that any differences from similar medical device products can clearly understood.

#### 1.4 Status of Use in Foreign Countries and Regions

- (1) If the OEM's SUD related to the proposed product is reprocessed in one or more foreign countries (including information of R-SUDs controlled under different reprocessing regulation from Japan, such as reprocessing under contract with medical institutions in Europe), describe the environmental conditions under which remanufacturing operations are conducted in countries and regions such as the U.S. and Europe.
- (2) Regarding OEM's SUD and R-SUD, provide the names of the relevant countries and regions, brand name(s) used in these countries and regions, respective dates of authorization, intended use(s) or indication(s), years of the start of use, and approximate number of uses per year in a concise table format.
- (3) Regarding malfunctions related to use in foreign countries that have been reported by MAHs to regulatory authorities, applicants shall provide separate summaries of the types and frequencies of malfunctions related to the OEM's SUD and the R-SUD, in list format.
- (4) In the case of application for approval of partial changes in approved matters for marketing of R-SUDs, provide information about malfunctions of the product approved in Japan.
- (5) Describe the year and month of the survey.
- (6) In particular, if an approval decision is made in a country where the application was pending approval after an applicant's submission of attached data, in the event of a subsequent recall or similar regulatory action, or a revision to the reprocessing standards referred to by the applicant, such applicant shall promptly report this information in writing to the relevant applicant review manager.
- (7) Update the above information prior to the Expert Discussion where necessary.

#### 2. Conformity with Essential Standards

- (1) Provide a description of the specifications used to demonstrate conformity with the "Standards for Medical Devices Specified by the Minister of Health, Labour and

Welfare according to the Provisions of Article 41, Paragraph 3 of the Act on Securing the Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics” (MHLW Ministerial Notification No. 122 of 2005; hereinafter, the “Standards for Essential Requirements”) with the sources, year, and specification numbers included in list format.

- (2) List each of the essential requirements in table format, prepare a compliance checklist for each requirement, and describe the measures taken to ensure and maintain compliance. In the explanation, describe the applicability to the application device, any method(s) implemented to achieve compliance (if not applicable, the reason(s) for such noncompliance), identification of any specified documents, and corresponding attached data or document number(s) for each item specified in the Standards for Essential Requirements.
- (3) Use certificates of analysis or test results to indicate compliance with the Standards for Essential Requirements provided under “Section 4. Summary of Design Verification and Validation Documents,” “Section 6. Risk Management”, and “Section 7. Manufacturing Information”. Applicants shall also indicate where the test records or test results are provided for each item of the Standards for Essential Requirements.
- (4) Justify application of the specifications and standards used to demonstrate conformity with the Standards for Essential Requirements to the proposed product, and also indicate conformity with the Standards for Essential Requirements based on the test results obtained.
- (5) If there are no appropriate specifications or standards, explain the method of tests that are conducted to prove conformity with the Standards for Essential Requirements, and explain conformity with the Standards for Essential Requirements based on the obtained test results.
- (6) Declare that the proposed product is manufactured to conform to the Standards for Essential Requirements and Standards for Manufacturing Control and Quality Control for Medical Devices and *In Vitro* Diagnostics in writing and attach this document to the application form separately.

### 3. Description of Proposed Device Product

If there is information about the proposed product supplementary to the application form (\*), provide the concerned information in this section.

In the event that no such information exists, this section as a whole may be omitted.

- (\*) Applicable cases are as follows: Cases where supplementary items related to raw materials exist; cases where noteworthy information about accessory functions of an electronic medical device; and cases where a noteworthy distribution form is used in relation to remanufacturing (e.g. remanufactured products are distributed only to specific hospitals).

### 4. Summary of Proposed Product Design Verification and Validation Materials

Describe results of tests that have been conducted for design verification and validation on the proposed product to support the efficacy and safety of the device concisely in accordance with the following instructions and attach the test records to the application form separately. In addition,

- Certification bodies certified as compliant with the “General Requirements for the Competence of Calibration and Testing Laboratories” (ISO 17025) (published by the International Organization for Standardization) by an accreditation body, as a member of the International Laboratory Accreditation Cooperation (ILAC), or the Asia Pacific

Laboratory Accreditation Cooperation (APLAC).

- Certification bodies registered according to Article 57, Paragraph 1 of the Industrial Standardization Act (Act No. 185 of 1949) (hereinafter, “JNLA registration”)

If either of the above types of certification body has certified the compliance of the specifications, applicants may include a statement of such recognition with the conformity certificate attached.

- (1) For the “Summary” section, provide a list of the test items, test methods, test results, testing laboratory, data number, etc. of tests that have been conducted for design verification and validation on the proposed product to support the efficacy and safety of the device, and also provide an outline for each test.  
Also, state the rationale for the judgment that the test items performed are necessary and sufficient to evaluate efficacy and safety based on the levels of scientific and technical knowledge at the time of application.
- (2) In addition, in the “Summary” section, also discuss the relationship between the results of the tests to support efficacy and safety and the performance and safety specifications.
- (3) If an applicant chooses not to conduct tests that must normally be done for the original medical device, state the reason in the “Summary” section.
- (4) Testing is not necessarily required to verify and validate the design of the proposed product, and as such, explanation of the evaluation results will be acceptable only if a reasonable and scientific evaluation based on available information can be provided. The above shall not apply to verification tests necessary for ensuring the quality, efficacy, and safety specific to the R-SUD, such as the evaluation on removal of contamination by cleaning and degradation associated with reprocessing.
- (5) In principle, use the OEM’s SUD of the proposed product and proposed product as test specimens. If a device different from the proposed product is used as a test specimen, explain different parts (design specifications, steps related to reprocessing) and justify using the concerned device as the test specimen.
- (6) After the “Summary” section, provide a list of the test protocols and respective results, summarize the findings and conclusions drawn, and also include any necessary discussion. Use figures and tables to describe the test results, whenever possible.
- (7) Refer to the following major points to consider for each test. In addition, when establishing for setting of test protocols and measurement items for each test, refer to the related previous Ministerial Notifications. In addition, each test shall be executed with awareness of the degradation of properties of recyclable components associated with reprocessing so that the test can ensure that the device exhibits quality, efficacy, and safety comparable to that of the original medical device even after the maximum number of reprocessing cycles.

[1] Physicochemical Properties

If properties of a raw material affect the identity of the medical device (for instance, medical devices made of polymer materials), describe physical and chemical properties according to the properties of the material.

[2] Electrical Safety and Electromagnetic Compatibility

If the proposed product is an active electrical medical device, provide test results for electrical safety and electromagnetic compatibility.

[3] Biological Safety

If the proposed product is an R-SUD that is anticipated to come into direct or indirect contact with blood or other body fluids, evaluate the biological safety of the proposed product based on its differences from the OEM’s SUD. If a cleaning agent affects any property of any raw material used in the cleaning and

sterilization of recyclable components during reprocessing (limited to cases where performance of the finished product is not affected), the evaluation related to the impact shall be made.

[4] Radiation Safety

If the proposed medical device product is a radiological device, evaluate radiological safety profile.

[5] Mechanical Safety

Describe any mechanical safety evaluations performed.

[6] Stability and Durability

Evaluate the overall stability and durability of the proposed product and establish a suitable storage method and shelf life based on the results of these evaluations. For the evaluations in question, perform tests under accelerated conditions as appropriate in consideration of materials degradation in the recyclable components due to use in medical institutions, stains left by blood or other bodily fluids, and specific reprocessing processes (including those related to product transportation, disassembly, cleaning, and sterilization).

Attach stability data on material deterioration in terms component and overall strength based on real-time testing conditions and discuss whether product performance can be ensured. In the event that a safety evaluations is conducted without adhering to the above evaluation methodology because data concerning device component degradation is already available, state the justification for determination that such safety evaluation is necessary and adequate.

[7] Performance

Evaluate the product performance metrics required to realize the intended use(s) or indications in terms of application product's comparability to the OEM's SUD and provide the results.

In addition, evaluate the items concerning recyclable components to be described in the "Performance and Safety Specifications" section under Section 3-6 of the Reprocessed Medical Device Application POC Notification. This section should include each of the following items:

- a) Results of evaluations conducted to validate methods of cleaning/sterilizing recyclable components (i.e., rationale for determination of worst-case contamination conditions arising from the method of use of the OEM's SUD, rationale for the selection of cleaning agents and cleaning procedures, rationale for determination of sterilization protocol, and the rationale for determination of the specifications and test methods for cleaning/sterilization and corresponding test results)
- b) Justification of test results and test methods for the identification of raw materials used in recyclable components
- c) Method of identifying changes in the OEM's SUD that may affect the quality, efficacy and safety of a subsequently R-SUD, if any, and corresponding explanation(s)

[8] Method of Use

Describe the intended method(s) of use within the scope of those specified for the OEM's SUD.

5. Package Insert (draft)

- (1) If the proposed product is a medical device designated by the Minister of Health, Labour and Welfare under Article 63-3 of the Act, attach the draft product package insert to this section. In addition, prepare a package insert (draft) in accordance with



Note 5 of the “Points to Consider for Reprocessed Single-use Medical Devices” (Joint PSEHB/MDED Notification No. 0731-8, PSEHB/SD Notification No. 0731-5, and PSEHB/CND Notification No. 0731-1, by the Director of the Medical Device Evaluation Division, Pharmaceutical Safety and Environmental Health Bureau, MHLW; the Director of the Safety Division, Pharmaceutical Safety and Environmental Health Bureau, MHLW; and the Director of Compliance and Narcotics Division, Pharmaceutical Safety and Environmental Health Bureau, MHLW, dated July 31, 2017).

- (2) For statements included in the “WARNINGS” section, “CONTRAINDICATIONS” column, and “PRECAUTIONS” section in the draft package insert, explain the rationale for their inclusion in these sections based on results of nonclinical and clinical studies, published literature, package inserts of similar medical devices, or results obtained in conjunction with safety risk management measures implemented.
- (3) With respect to the following types of products, under the “Enforcement of Specially Controlled Medical Devices, Controlled Medical Devices and General Medical Devices Specified by the Minister of Health, Labour and Welfare pursuant to Article 2, Paragraphs 5-7 of the Act on Securing the Quality, Efficacy, and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (Ministerial Notification) and Designated Medical Devices requiring Special Handling and Maintenance as Specified by the Minister of Health, Labour and Welfare pursuant to Article 2, Paragraph 8 of the Act on Securing the Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (Ministerial Notification)” (PFSB Notification No. 0720022, by the Director-General of the Pharmaceutical and Food Safety Bureau, MHLW, dated July 20, 2004):
  - Proposed products that are designated as Class IV medical devices; or
  - Proposed products that are designated as Class III medical devices intended to be implanted or indwelled in the human body, where a malfunction of which is deemed to present a relatively high risk of endangering the patient’s life;applicants shall:

Compare the draft package insert with those of similar medical device products and R-SUDs approved in the countries and regions where the proposed product is intended to be marketed, identify differences in statements included in the “WARNINGS”, “CONTRAINDICATIONS” and “PRECAUTIONS” sections, as well as in the package inserts used in the countries and/or regions in which the entity(ies) involved in the design and development of the proposed product are based, and lastly explain the rationale for the inclusion of each differing statement. In addition, applicants shall provide as attachments the package inserts used in this comparison. Preparing Japanese-language translations of these materials is not necessary, with the exception of portions related to the above rationale explanation(s).

## 6. Risk Management

Provide an outline of the risk management implemented for the proposed product in accordance with JIS T14971 “Medical Devices - Application of Risk Management to Medical Devices” or its source, ISO14971 “Medical devices - Application of risk management to medical devices”. Provide the explanation about risk management of the proposed product presented by the facility engaged in design and development selected under Note 1. (1) [1] a of “Handling of Manufacturing Business for Medical Devices and *In Vitro* Diagnostics” (PFSB/MDRMPE Notification No. 1003-1, by the Director of the Medical Device and Regenerative Medicine Product Evaluation, Pharmaceutical and Food Safety Bureau, MHLW,

dated October 3, 2014). In addition, applicants (MAHs) shall evaluate the content and provide additional discussion.

#### 6.1 Implementation status of risk management

Provide an outline of the risk management activities in a table format concisely in terms of the organizations and documents used as references.

#### 6.2 Hazard leading to safety actions

Provide matters on which risk reduction actions have been taken from a safety viewpoint in the risk management of the proposed product.

(1) If there is a hazard which is related to the proposed product (including ones related to the OEM's SUD and similar medical devices) and on which safety measures have been required by MHLW, provide results from risk analysis on the concerned hazard (including implemented risk reduction actions where necessary) in a table format concisely.

(2) If applicants is a manufacturer in Japan, and a relevant self-inspection notification has been issued before the design and development, the risk analysis may take the hazard indicated in the concerned notification into account.

On the other hand, if the relevant notification is issued after the design and development, or if the proposed product is a medical device designed and manufactured in foreign countries, note that additional discussions are required in this section even at the stage where the risk management for design and development has been completed.

In this case, the marketing authorization holder or manufacturer shall have proper discussions based on results from the risk management implemented for design and development and provide the content in the above table format concisely.

(3) If the risk management for design and development leads to the judgment that the residual risk is not acceptable according to the criteria for risk acceptability established in the product risk management plan (RMP), provide the content and the reason for the final judgment that the benefit of the concerned medical device in intended use exceeds the overall residual risk.

### 7. Manufacturing Information

Of the items included in the "Performance and Safety Specifications" section of the application for marketing approval, applicants shall provide descriptions of inspection procedures (including inspection items executed before and after procedures such as cleaning and sterilization, disassembly, and assembly related to the reprocessing process), while adhering to the guidelines provided in Appendix Format 2 of the Medical Device Attached Data Notification. To facilitate understanding efficiently, use the process chart in the "Manufacturing Method" section in the application form. If there is information concerning the manufacturing process and manufacturing sites that is supplementary to the information contained in the application form, provide such information in this section.

#### 7.1 Sterilization Method

This section covers sterilization validation procedures implemented with respect to finished products, as well as validation of the sterilization and cleaning methods applied to recyclable components during the component recycling process described in Section 4 of this notification.

(1) Provide descriptions of the implementation status of any and all procedures implemented to validate sterilization protocols. Attach a written declaration of

validation to ensure the sterility assurance level (SAL) provided in the application form. Declare any and all sterilization conditions applied, such as sterilization parameters mentioned in the declaration.

- (2) If the proposed product is subjected to ethylene oxide sterilization, provide test results concerning residual ethylene oxide and ethylene chlorohydrin following sterilization, and attach each results report separately.
- (3) If a bovine-derived material is used, state the country of origin of the raw material, the body part, processing method, and, as necessary, information on the bovine spongiform encephalopathy (BSE) data and other information that is necessary from a perspective of ensuring quality and safety.

In addition, when using human or animal-derived raw materials, applicants shall provide a clear description of the origin and reliability of the donor/procurement source (including details of any donor screening protocols implemented), and describe any tests performed to evaluate and/or validate any methods implemented to remove or inactivate the presence of viruses, prions, or other pathogens during the manufacturing process.

#### 8. Clinical Evidence

Identify the medical device(s) used in clinical studies as either the OEM's SUD or R-SUD. For others, refer to Appendix 1-8. of the Medical Device Attached Data Notification.