

# Update on Japanese medical device regulatory initiatives

Erika NORO

Reviewer

Office of Medical Device II

Pharmaceuticals and Medical device agency (PMDA), Japan



**Erika NORO, Ph. D.**

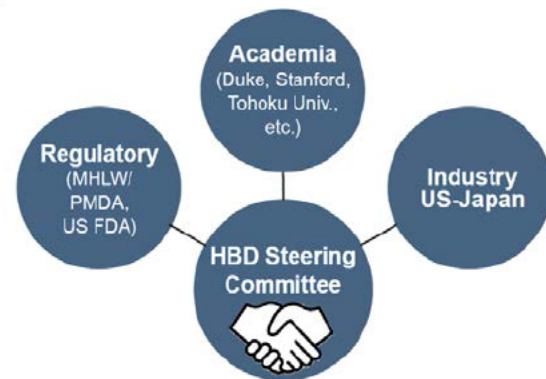
I have no relevant financial relationships

## Objectives of this presentation

One of the goals of Harmonization By Doing (HBD) activity is to promote efficient development through greater understanding of clinical and regulatory environments in the U.S. and Japan.



HBD members are trying to make and publish a scientific paper comparing the latest regulation system in the U.S. and Japan.







Focusing on Japanese regulatory systems and new initiatives,

## **1 Japanese medical device regulations**

## **2 Specific programs intended to promote innovation**

- ① SAKIGAKE designation system**
- ② Priority review for specific uses**
- ③ Conditional approval system**
- ④ Post-Approval Change Management Protocol (PACMP) for medical devices**
- ⑤ Others**

Classification	Class I	Class II	Class III	Class IV
Category	General MDs	Controlled MDs	Specially controlled MDs	
Premarket regulation	Self-declaration	Third party certification	MHLW approval (PMDA review)	
Example				
Post market safety (vigilance/surveillance)	PMDA and MHLW			

	<b>Generic medical devices</b>	<b>Improved medical devices</b>	<b>Brand-new medical devices</b>
<b>Device classification</b>	Class II-IV	Class II-IV	Class II-IV
<b>Performance requirements</b>	Substantial equivalence to a legally marketed medical device	Reasonable assurance of safety and effectiveness for the intended use	Reasonable assurance of safety and effectiveness for the intended use
<b>Pre-market clinical data?</b>	Unnecessary	Depending on improved points from approved devices	Necessary
<b>Post-market studies?</b>	Not typical	Not typical	Possible, depending on regulatory controls
<b>Targeted PMDA review time</b>	4 months	6-9 months	12 months

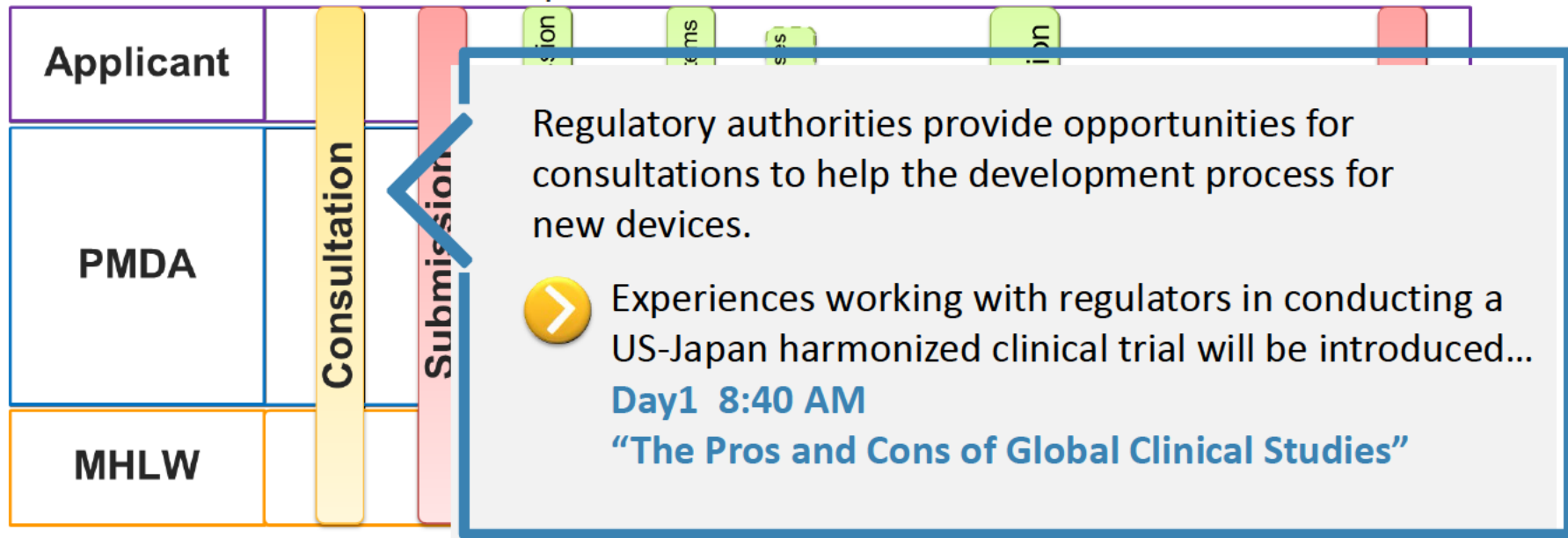


## Review process for approval in Japan



New medical device: 12 months

Improved medical device with clinical data: 9 months







## Specific programs intended to promote innovation

Following provisions are introduced for earlier approval of medical devices:

① **SAKIGAKE designation system**

---

② **Priority review for specific uses**

---

③ **Conditional approval system**

---

④ **Post-Approval Change Management Protocol (PACMP) for medical devices**

---

⑤ **Others**

---

# ① SAKIGAKE designation system

<b>Purpose</b>	Providing cutting edge treatments to Japanese patients in first place in the world.
<b>Designation criteria</b>	<ul style="list-style-type: none"> <li>① Innovativeness</li> <li>② Severity of disease</li> <li>③ Prominent effectiveness and safety</li> <li>④ Willingness to firstly development in Japan</li> </ul>
<b>Process</b>	<pre> graph LR     A[Clinical Trial (Exploratory/Confirmatory)] --&gt; B[Application]     B --&gt; C[Priority Review (PMDA)]     C --&gt; D[Approval (MHLW)]     D --&gt; E[Re-examination period (8 -10 years)]     B --- F[Priority Consultation/Assessment]     F --- G[6 months]     C --- H[Support by Concierge (PMDA)]             </pre>
<b>Advantages for manufacturers</b>	<ul style="list-style-type: none"> <li>✓ Prioritized consultation</li> <li>✓ Pre-application consultation</li> <li>✓ Prioritized review</li> <li>✓ Review partner system</li> </ul>

## ② Priority review for specific uses

<b>Purpose</b>	Promoting research and development of medical devices, which are not satisfied medical needs remarkably, such as pediatric medical devices.
<b>Designation criteria</b>	<ul style="list-style-type: none"> <li>① Products for pediatric use, AMR, etc.</li> <li>② Highly unmet medical needs</li> <li>③ Prominent effectiveness and safety</li> </ul>
<b>Process</b>	<pre> graph LR     A[Clinical Trial (Exploratory/Confirmatory)] --&gt; B[Application]     B --&gt; C[Priority Review (PMDA)]     C --&gt; D[Approval (MHLW)]     D --&gt; E[Re-examination period]     C --- F[Priority Consultation/Assessment]     C --- G[Research grants/tax treatment]     C --- H[9 months]             </pre>
<b>Advantages for manufacturers</b>	<ul style="list-style-type: none"> <li>✓ Prioritized review</li> <li>✓ Tax benefits and grants of subsidy for product development</li> <li>✓ An addition to the reimbursement price</li> </ul>

### ③ Conditional approval system

<b>Purpose</b>	Accelerating patient access to medical devices with particularly serious medical needs.
<b>Designation criteria</b>	<ul style="list-style-type: none"> <li>① Severity of disease</li> <li>② Prominent effectiveness and safety</li> <li>③ Confirmatory clinical trials are not feasible</li> <li>④ A certain degree of efficacy/safety is confirmed</li> </ul>
<b>Process</b>	<pre> graph LR     A[Clinical Trial Exploratory] --&gt; B[Application]     B --&gt; C[Priority Review PMDA]     C --&gt; D[Approval MHLW]     D --&gt; E[Re-examination period]     B --- B1[Cooperation with academia]     C --- C1[9 months]     E --- E1[Cooperation with academia]     E --- E2["-Implementation of post-marketing risk management measures&lt;br&gt;-Data collection to confirm use results, long-term performance"]             </pre> <p>The process flowchart shows the following steps and associated activities:</p> <ul style="list-style-type: none"> <li><b>Clinical Trial (Exploratory)</b> leads to <b>Application</b>.</li> <li><b>Application</b> leads to <b>Priority Review (PMDA)</b>, which includes <b>Cooperation with academia</b> and <b>Planning of post-marketing risk management</b>.</li> <li><b>Priority Review (PMDA)</b> leads to <b>Approval (MHLW)</b>, with a duration of <b>9 months</b>.</li> <li><b>Approval (MHLW)</b> leads to the <b>Re-examination period</b>, which includes <b>Cooperation with academia</b> and <b>Implementation of post-marketing risk management measures</b> (including data collection to confirm use results and long-term performance).</li> </ul>
<b>Advantages for manufacturers</b>	✓ Mitigate the burden of clinical development before approval application

# CRT23 ④ Post-Approval Change Management Protocol (PACMP) for medical devices

<b>Purpose</b>	To enable continuous improvements through product lifecycle.
<b>Designation criteria</b>	<ul style="list-style-type: none"><li>① Changes of size, performance, manufacturing method, etc.</li><li>② Agreement on predictability and transparency in terms of the requirements and studies needed to implement a change</li></ul>
<b>Process</b>	<pre>graph LR; A[Plan for application expansion] --&gt; B[Submission of PACMP]; B --&gt; C[confirm]; C --&gt; D[Data collection based on the protocol]; D --&gt; E[Change request]; E --&gt; F[Check (PMDA)]; F --&gt; G[Change Approval]; G --&gt; H[Application expansion];</pre>
<b>Advantages for manufacturers</b>	<ul style="list-style-type: none"><li>✓ By checking the change management protocol in the review process this enables swifter approval of partial changes of already approved matter within the planned range and to continuously improve the specifications of the medical devices.</li><li>✓ The PACMP is expected to be applied to AI medical devices which are continuously improved by machine learning.</li></ul>

## 1. Utilization of Registry Data

- **Basic principles on Utilization of Registry for Applications**

(<https://www.pmda.go.jp/files/000240810.pdf>)

- **Points to Consider for Ensuring the Reliability in Utilization of Registry Data for Applications**

(<https://www.pmda.go.jp/files/000240811.pdf>)

## 2. Utilization of performance evaluation test using existing medical information

- **Handling on performance evaluation test for diagnostic medical devices using existing medical information without additional invasive/intervention procedures**

(<https://www.pmda.go.jp/files/000243890.pdf>) (Japanese only)

② Priority review for specific uses

➤ **Day2 8:10 AM**

**“HBD For Children – Promotion of Pediatric Device Development and Access”**

④ Post-Approval Change Management Protocol (PACMP) for medical devices

➤ **Day2 10:30 AM**

**“Digital Health and Artificial Intelligence”**

⑤ Others -Utilization of Registry Data-

➤ **Day1 10:30 AM**

**“Practice Approaches to Applying Real-World Clinical Evidence”**

- Japan has introduced several novel regulatory programs intended to support the appropriate evaluation of innovative medical devices.
- The new system is expected to facilitate development of and access to novel medical devices by balancing pre-/post-market requirements.
- We would like to provide device developers and other stakeholders with insight into potentially beneficial opportunities to pursue global device development strategies by leveraging regulatory synergies in each region.





# Thank you for your kind attention.

If you have any questions, please contact us.

[hbd.contact@pmda.go.jp](mailto:hbd.contact@pmda.go.jp)

[HBD\\_children@pmda.go.jp](mailto:HBD_children@pmda.go.jp)

