

PSB/MDED Notification No. 1225-1

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December 25, 2025

To: Director-General of the Prefectural Health Department (Bureau)

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

Director of the Compliance and Narcotics Division,
Pharmaceutical Safety Bureau, Ministry of Health,
Labour and Welfare
(official seal omitted)

Timing of Product Replacement after Approval (Certification) of Partial Changes in Approved
(Certified) Items for In Vitro Diagnostics and Regenerative Medical Products

Regarding timing of product replacement after approval or certification (hereinafter referred to as “approval, etc.”) of partial changes in approved or certified items (hereinafter referred to as “partial changes”) for in vitro diagnostics and regenerative medical products, handling has been conventionally specified in the “Setting of Timing of Product Replacement after Approval (Certification) of Partial Changes in Approved (Certified) Items for In Vitro Diagnostics and Regenerative Medical Products as well as Method of Submission” (PSEHB/MDED Notification No. 0920-1 and PSEHB/CND Notification No. 0920-12, dated September 20, 2018, jointly of the Medical Device Evaluation Division and Compliance and Narcotics Division, Pharmaceutical Safety and Environmental Health Bureau, Ministry of Health, Labour and Welfare [MHLW], hereinafter referred to as “Former Notification”), which is intended to allow marketing authorization holders to release pre-change products for a certain period of time after partial changes by instructing them to set the timing of replacement.

Now, handling of product replacement after partial changes is specified as provided below, in view of the actual handling practices to date and from the viewpoint of ensuring a stable supply. Please understand the content and ensure that relevant companies under your jurisdiction are thoroughly informed.

Please note that duplicate copies of this notification will be sent to the Chief Executive of the Pharmaceuticals and Medical Devices Agency (PMDA), the President of the Federation of Pharmaceutical Manufacturers' Associations of JAPAN, the President of the Japan Association of Clinical Reagents Industries, the Chairperson of the Japan Federation of Medical Devices Associations, the Chairperson of the American Medical Devices and Diagnostics Manufacturers' Association in Japan, the Chairperson of the Medical Equipment & Diagnostics Committee of the European Business Council in Japan, the Representative Director of the Forum for Innovative Regenerative Medicine, the Chairman of the Medical Technology Association of Japan, the President of the Japan Pharmaceutical Manufacturers Association, and the Representative of the Association of Registered Certification Bodies for Pharmaceuticals and Medical Devices.

Handling under this notification will apply to partial change applications submitted on and after the date of issuance of this notification. Of note, this notification supersedes the Former Notification.

1. For partial changes in the matters separately listed below (hereinafter referred to as “Manufacturing method, etc.” or simply “Process”) for each category of in vitro diagnostics and regenerative medical products, even after approval, etc. of an application for the above changes, products that have been manufactured according to the pre-change manufacturing method, etc. and meet the conditions of the pre-change approval (certification) certificate may be released until they run out. In this case, the field for an applicable major item (applicable item for in vitro diagnostics) in a partial change application form should have a statement at its end, such as “Even after approval (certification) of the relevant partial changes, pre-change products will be released until they run out.”

(1) In vitro diagnostics

[Scope of application]

“Shape, structure, and principle,” “Reactive ingredient(s),” “Product specifications,” “Manufacturing method,” and “Storage conditions and shelf life” fields

[Outside of the scope of application]

“Name,” “Intended use,” and “Method of use” fields

(2) Regenerative medical products

[Scope of application]

“Shape, structure, ingredients, quantities, or nature,” “Manufacturing method,” “Specifications and testing methods,” and “Storage and shelf life” fields

[Outside of the scope of application]

“Name,” “Indication or performance,” and “Dosage and administration or method of use” fields

2. The “Period until products meeting the pre-change approval (certification) certificate run out” is defined as a period until either of the following time points, whichever comes later, in principle. If products manufactured according to the pre-change manufacturing method, etc. need to be released owing to unavoidable circumstances on or after that time, consultation with the Medical Device Evaluation Division should be conducted in advance.
 - 1) When all the products manufactured or manufactured under instructions according to the pre-change manufacturing method, etc. before the partial changes are released;
 - 2) When all the products manufactured using intermediate products (e.g., active substances, intermediates, subdivided bulk products) manufactured or manufactured under instructions according to the pre-change manufacturing method, etc. before the partial changes are released; and
 - 3) When all the products using test kits, parts, or other components that were purchased for use in the pre-change manufacturing method, etc. before the partial changes are released.
3. Release of products manufactured according to the pre-change manufacturing method, etc. should be documented for each lot to clarify that the lot is based on the pre-change manufacturing method, etc.
4. In principle, release of the products manufactured according to a manufacturing method, etc. not approved as an integral process, such as the process with a part of the partial changes applied, is not allowed.
5. If the partial changes are made to correct quality defects, release of the products manufactured according to the pre-change manufacturing method, etc. is not allowed.