Asian Harmonization Working Party
WORKING TOWARDS MEDICAL DEVICE HARMONIZATION IN ASIA

DRAFT OF PROPOSED DOCUMENT

Title:	Labelling for In Vitro Diagnostic Medical Devices
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Preface

This document is produced by the Asian Harmonization Working Party, based on the Global Harmonization Task Force Final Document GHTF/SG1/N70: 2011 of GHTF Study Group 1. The document is intended to provide non-binding guidance for use in the regulatory system of In Vitro Diagnostic (IVD) medical devices, and has been subject to consultation throughout its development.

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1.0 Introduction

The objective of the Asian Harmonization Working Party (AHWP) is to encourage convergence at the worldwide level in the evolution of regulatory systems for medical devices, including IVD medical devices in order to protect the public health by those regulatory means considered the most suitable.

This document has been developed to encourage and support global convergence of regulatory systems. It is intended for use by Regulatory Authorities (RAs), Conformity Assessment Bodies (CABs) and industry, and will provide benefits in establishing, in a consistent way, an economic and effective approach to the control of medical devices in the interest of public health. It seeks to strike a balance between the responsibilities of RA to safeguard the health of their citizens and their obligations to avoid placing unnecessary burdens upon the industry.

Labelling[1] serves to identify a device and its manufacturer, and to communicate information on safety, use and performance. It is intended for users of IVD medical devices, both professional and lay persons, as appropriate, and for relevant third parties. RAs require and specify information that manufacturers are expected to incorporate in the labelling when the device is placed onto the market. The GHTF published guidance on this subject entitled GHTF/SG1/N70: 2011 Label and Instructions for Use for Medical Devices. The AHWP has adapted this document and intends to maintain it as a working document.

Work Group 2 of the AHWP Technical Committee has prepared this guidance document. Comments or questions should be directed to the Chair of AHWP Work Group 2 whose contact details may be found on the AHWP web page (http://www.ahwp.info/).

2.0 Rationale, Purpose and Scope

2.1 Rationale

Consistent worldwide requirements for IVD medical device labelling would provide significant benefits to the manufacturers, users, patients and RAs. They can reduce the gaps between jurisdictions, decrease the cost of regulatory compliance and allow patients earlier access to new technologies and treatments.

[1] Some regional and national regulations use the term ‘information supplied by the manufacturer’ rather than ‘labelling’. This document uses the term ‘labelling’.

2.2 Purpose

To provide guidance to manufacturers and RAs on the content of the labelling in order to provide users, both professional and lay persons, as appropriate, patients, and/or any relevant third parties with information such as:

- the device's identity;
- the identity of the manufacturer;
- the device's intended use/purpose;
- how the device should be used, maintained and stored;
- any residual device risks, warnings, limitations or contraindications;
- the device's performance.

Whilst also promoting:

- labelling commensurate with the technical knowledge, experience, education or training of intended users;
- consistent use of terminology;
- use of symbols;
- the avoidance of prescriptive country-specific requirements for text, content, or format of labelling that offers no benefit to the device user or, where applicable, the patient.

2.3 Scope

This document applies to primary and secondary labels (e.g. component and kit label), and instructions for use (IFU), for all products that fall within the definition of IVD medical device in the AHWP document "*Definition of the Terms 'Medical Device' and 'In Vitro Diagnostic (IVD) Medical Device'*".

Advertising and promotional materials are outside the scope of this document.

3.0 References

ISO 15223-1-2016 Medical Device Symbols to be used with medical device labels, labelling and info to be supplied

ISO 18113-1:2009 In vitro diagnostic medical devices -- Information supplied by the manufacturer (labelling) -- Part 1: Terms, definitions and general requirements

ISO 18113-2:2009 In vitro diagnostic medical devices -- Information supplied by the manufacturer (labelling) -- Part 2: In vitro diagnostic reagents for professional use

ISO 18113-3:2009 In vitro diagnostic medical devices -- Information supplied by the manufacturer (labelling) -- Part 3: In vitro diagnostic instruments for professional use

ISO 18113-4:2009 In vitro diagnostic medical devices -- Information supplied by the manufacturer (labelling) -- Part 4: In vitro diagnostic reagents for self-testing

ISO 18113-5:2009 In vitro diagnostic medical devices -- Information supplied by the manufacturer (labelling) -- Part 5: In vitro diagnostic instruments for self-testing

ISO 80000-1:2009 Quantities and units -- Part 1: General

AHWP/WG2-WG1/F001:2016 *Definition of the Terms 'Medical Device' and 'In Vitro Diagnostic (IVD) Medical Device'*

AHWP/WG1a/F002:2013 (now restructured to WG2) *Essential Principles of Safety and Performance of IVD Medical Devices*

4.0 Definitions:

Intended use / purpose: Objective intent of an IVD manufacturer regarding the use of a product, process or service as reflected in the specifications, instructions and information supplied by the IVD manufacturer. [SOURCE: ISO 18113-1:2009]

NOTE: Intended use statements for IVD labelling can include two components: a description of the functionality of the IVD medical device (e.g., an immunochemical measurement procedure for the detection of analyte *"x"* in serum or plasma), and a statement of the intended medical use of the examination results.

Instructions for use: Information supplied by the manufacturer to enable the safe and proper use of an IVD medical device [SOURCE: ISO 18113-1:2009]

IVD medical device for self-testing:

Any device intended by the manufacturer to be used by lay persons. [Source adapted from GHTF/SG1/N45:2008]

Note: This includes devices used for testing services offered directly to lay persons.

IVD medical device for near-patient testing: Any device used in testing performed outside a laboratory environment by a healthcare professional not necessarily a laboratory professional, generally near to, or at the side of, the patient. [Source adapted from GHTF/SG1/N45:2008]

Label: Printed, written or graphic information placed on a medical device or its container [Source – ISO 18113-1:2009]

Labelling: Label, instructions for use, and any other information that is related to identification, technical description, intended purpose and proper use of the medical device, but excluding shipping documents [SOURCE: ISO 13485:2016]

Lay person: Individual that does not have formal training in a relevant field or discipline. [SOURCE: ISO 18113-1:2009]

NOTE: Includes the directions supplied by the manufacturer for the use, maintenance, troubleshooting and disposal of an IVD medical device, as well as warnings and precautions.

Performance study for an IVD medical device: A study undertaken to establish or confirm the analytical or clinical performance of an IVD medical device.

- Clinical performance: The ability of an IVD medical device to yield results that are correlated with a particular clinical condition/physiological state in accordance with target population and intended user.

- Analytical performance: The ability of an IVD medical device to detect or measure a particular analyte.

Unique device identification: The unique device identification is a series of numeric or alphanumeric characters that is created through a globally accepted device identification and coding standard. It allows the unambiguous identification of a specific medical device on the market. The unique device identification is comprised of the UDI-DI and UDI-PI. [SOURCE: IMDRF/UDI WG/N7FINAL:2013]

Note: The word "Unique" does not imply serialization of individual production units.

User: The person, either professional or lay, who uses a medical device. The patient may be the user.

5.0 General Principles

The primary purpose of labelling is to identify the IVD medical device and its manufacturer, and communicate safety and performance related information to the user, professional or lay, or other person, as appropriate. Such information may appear on the device itself, on packaging or as instructions for use. The following principles are recommended.

- The medium, format, content, legibility, and location of the label and instructions for use should be appropriate to the particular device and intended user, its intended purpose and the technical knowledge, experience, education or training of the intended user(s). In particular, instructions for use should be written in terms readily understood by the intended user and, where appropriate, supplemented with drawings and diagrams. Some devices may include separate information for the professional user and the lay person.
- The information required on the label, should be provided on the device itself. If this is not practicable or appropriate, some or all of the information may appear on the packaging for each unit, and/or on the packaging of multiple units of device.
- Where the manufacturer supplies multiple units of device to a single user and/or location, it may be sufficient to provide only a single copy of the instructions for use. In these circumstances, the manufacturer should provide further copies upon request.
- Instructions for use may not be needed or may be abbreviated for devices if they can be used safely and as intended by the manufacturer without any such instructions for use.
- Labels should be provided in a human readable format but may be supplemented by machine readable forms, such as radio-frequency identification (RFID) or bar codes.
- Instructions for use may be provided to the user either in paper or non-paper format (e.g. electronic). They may be supplied by various means either with the medical device or separate from it. Examples of other means are information displayed on a screen incorporated into the device, information downloaded from the manufacturer's website using the internet, and machine readable sources. The

means chosen should be appropriate for, and accessible to, the anticipated user population.

- Where instructions for use are provided on a medium other than paper, the manufacturer should ensure the user has information on how to:
  a) view the instructions for use;
  b) access the correct version of the instructions for use; and
  c) obtain a paper version of the instructions for use, if needed.

  Note: the Regulatory Authority (RA) may set the conditions under which such non-paper format should be provided to guarantee a high level of protection of health. Those conditions may specify the types of devices that can use a non-paper format and the requirements the manufacturer needs to respect, such as, that the manufacturer should upon request provide a paper version of the instructions for use free of charge.
- Residual risks which are required to be communicated to the user and/or other person should be included as limitations, precautions or warnings in the labelling.
- The use of internationally recognised symbols[2] should be encouraged provided that device safety is not compromised by a lack of understanding on the part of the user. Where the meaning of the symbol is not obvious to the device user, e.g. for a newly introduced symbol, an explanation should be provided within the instructions for use.
- Numerical values shall be provided in units generally recognised by the intended users, preferably in accordance with ISO/IEC 80000-1:2009.

  EXAMPLES Values representing concentrations, contents, volumes, results, reference intervals, environmental parameters.
- Country specific requirements for the content of the labelling should be kept to the minimum and, where they currently exist, eliminated as the opportunity arises.

  Note: Where national legislation, such as customs status, trade agreements and the like, include requirements for additional documentation to accompany the IVD medical device, there may be an inconsistency between the additional documentation and the content of IVD medical device labelling described in this guidance document. An example is a customs requirement to indicate the ‘country

[2] Such as those found in ISO 15223-1:2016 *Medical devices -- Symbols to be used with medical device labels, labelling and information to be supplied -- Part 1: General requirements*, and IEC TR 60878:2015 Graphical symbols for electrical equipment in medical practice

of origin' of the IVD medical device which does not necessarily align with the address of the manufacturer indicated in the labelling according to Section 6.1(d) of this document.

- Provided that safe and correct use of the device is ensured, a RA may authorise labelling to be in one or more language(s) other than its national language(s).
- If different language versions are provided with the product, it is the manufacturer's responsibility to ensure that localized versions verified by competent person are provided.

Note: For additional requirements specific to IVD instruments see ISO 18113-3: 2009 and ISO 18113-5:2009

6.0 Label and Instructions for use for IVD Medical Devices

6.1 Content of the Label

The label should be printed and contain the following particulars which may appear on the IVD medical device itself, or on the packaging of each unit and/or component, if applicable, or on the packaging of multiple units of the device.

a) The name or trade name of the IVD medical device.

b) Where ~~not obvious~~appropriate, the details strictly necessary for a user to identify the IVD medical device and its use, e.g. 'HIV-1/HIV-2 Antibody Test' or 'Blood Glucose meter' or 'Blood Gas Analyzer'.

c) The identification number (e.g. catalogue number) of the IVD medical device.

d) The name and address of the manufacturer[3] in a format that is recognisable and allows the location of the manufacturer to be established[4].

e) For imported IVD medical devices, the name and postal address of either the authorised representative (AR), or importer or distributor established within the importing country/jurisdiction may be required. This information may be added by the AR, importer or distributor within the country of import, rather than be provided by the manufacturer, in which case, the additional label should not obscure any of the required manufacturer's labels.

f) An indication that the device is for in vitro diagnostic use.

[3] As defined in GHTF/SG1/N055:2009 *Definitions of the Terms Manufacturer, Authorised Representative, Distributor and Importer.*

[4] An abbreviated version of the address may be sufficient if the device is accompanied by instructions for use that provide a full address.

g) If the IVD medical device is intended for performance study, words to indicate that fact.

h) The batch code/lot number or the serial number of the IVD medical device preceded by the word LOT or serial number or an equivalent symbol, as appropriate, to allow post-market action to be taken if there is a need to trace or recall the IVD medical device. However for accessories, ~~this~~ which may be substituted with a control number and for software it should be substituted with a version number.

i) An unambiguous indication of the date until when the IVD medical device may be used safely, expressed at least as the year and month (e.g. on reagents or consumables), where this is relevant.

j) Where required by the local regulation, a unique device identifier shall be included :

NOTE : The unique device identifier on the immediate container label may not be the same as the unique device identifier on the outer container. Refer to applicable regulations and issuing agencies for requirements.

k) For instruments, where there is no indication of the date until when it may be used safely, the year of manufacture. This year of manufacture may be included as part of the batch or serial number, provided the date is clearly identifiable.

l) Where relevant, an indication of the net quantity of contents, expressed in terms of weight or volume, numerical count, or any combination of these or other terms which accurately reflect the contents of the package.

m) An indication of any special storage and/or handling condition that applies.

n) If the IVD medical device is supplied as sterile, an indication of its sterile state and the sterilization method.

o) Warnings or precautions to be taken that need to be brought to the immediate attention of the user or any other person (e.g. ‘CAUTION – LASER’ or ‘CONTAINS POTENTIALLY INFECTIOUS MATERIAL’) and appropriate caution symbols. More detailed information may appear in the instructions for use.

p) Where relevant, if the IVD medical device is intended for single use and there is a potential risk of re-use, (e.g. test strips), an indication of that fact.

q) If the IVD medical device is used for presentation or demonstration purposes only, an indication of that fact. That indication may be added by the AR, importer or

distributor within the country of import, rather than be provided by the manufacturer.

r) IVD medical device kits include individual reagents and articles that may be made available as separate IVD medical devices. In this situation, these IVD medical devices should comply with the label content in this section.

s) If the device is intended for self-testing or near-patient testing, an indication of that fact.

t) Where rapid assays are not intended for self-testing or near-patient testing, the explicit exclusion hereof.

u) The label for devices for self-testing shall bear the following particulars:

(i) the type of specimen(s) required to perform the test (e.g. blood, urine or saliva);

(ii) the need for additional materials for the test to function properly;

(iii) contact details for further advice and assistance (e.g. manufacturer, help line, AR, website);

v) The name of devices for self-testing shall not reflect an intended purpose other than that specified by the manufacturer (e.g. the name of a test for cholesterol should not imply detection of heart disease)

w) Performance claims should not be misleading.

6.2 Content of the IFU

The instructions for use should contain the following particulars:

a) The name or trade name of the IVD medical device.

b) The identification number (e.g. catalogue number) of the IVD medical device.

c) The IVD medical device's intended use/purpose:

- what is detected;
- its function (e.g. screening, monitoring, diagnosis or aid to diagnosis, prognosis, prediction companion diagnostic);
- the specific disorder, condition or risk factor of interest that it is intended to detect, define or differentiate;
- whether it is automated or not;
- whether it is qualitative or quantitative;
- the type of specimen(s) required (e.g. serum, plasma, whole blood, tissue biopsy, urine); and

- testing population.

d) An indication that it is for in vitro diagnostic use.

e) If the IVD medical device is intended for performance study, words to indicate that fact.

f) The intended user, as appropriate (e.g. laboratory professional, healthcare provider or lay person).

g) Test principle.

h) A description of the reagent, calibrators and controls and any limitation upon their use (e.g. suitable for a dedicated instrument only).

Note: IVD medical device kits include individual reagents and articles that may be made available as separate IVD medical devices. In this situation, where appropriate, these IVD medical devices should comply with the instructions for use content in this section.

i) An indication of the net quantity of contents, expressed in terms of weight or volume, numerical count, or any combination of these or other terms which accurately reflect the contents of the package and a list of materials required but not provided.

j) For IVD medical devices intended for use together with other medical devices, including IVD medical devices, and/or general purpose equipment

- information to identify such devices or equipment, in order to obtain a safe and valid combination,

and/or

- information on any known restrictions to combinations of medical devices, equipment and software.

k) An indication of any special storage (e.g. temperature, light, humidity, etc.) and/or handling conditions that apply.

l) In use stability which may include, the storage conditions, and shelf life following the first opening of the primary container, together with the storage conditions and stability of working solutions, where this is relevant.

m) If the IVD medical device is supplied as sterile, instructions in the event of the sterile packaging being damaged before use.

n) Information that allows the user or any other person to be informed of any warnings, precautions, measures to be taken and limitations of use regarding the IVD medical device. This information should cover, where appropriate, but not limited to:

- warnings, precautions and/or measures to be taken in the event of malfunction of the IVD medical device or its degradation as suggested by changes in its appearance that may affect performance;
- warnings, precautions and/or measures to be taken in regards to the exposure to reasonably foreseeable external influences or environmental conditions, such as magnetic fields, external electrical and electromagnetic effects, electrostatic discharge, laser, radiation associated with diagnostic or therapeutic procedures, pressure, humidity, or temperature;
- warnings, precautions and/or measures to be taken in regards to the risks of interference posed by the reasonably foreseeable presence of the device during specific diagnostic investigations, evaluations, therapeutic treatment or use (e.g. electromagnetic interference emitted by the device affecting other equipment);
- warnings, precautions and/or measures related to materials incorporated into the IVD medical device that are carcinogenic, mutagenic or toxic, or could result in sensitisation or allergic reaction;
- warnings, precautions and/or measures related to potentially infectious material that is included in the IVD medical device.

o) Where relevant, requirements for special facilities (e.g. clean room environment) or special training (e.g. radiation safety), or particular qualifications of the device user.

p) Conditions for collection, handling, and preparation of the specimen.

q) Details of any preparatory treatment or handling of the IVD medical device before it is ready for use (e.g. reconstitution, calibration, etc.).

r) The information needed to verify whether the IVD medical device is properly installed and is ready to perform safely and as intended by the manufacturer, together with, where relevant:

- details of the nature, and frequency, of preventative and regular maintenance (including cleaning and disinfection);
- identification of any consumable components and how to replace them;
- information on any necessary calibration to ensure that the IVD medical device operates properly and safely during its intended life span;
- methods of mitigating the risks encountered by persons involved in installing, calibrating or servicing IVD medical devices, e.g. contaminated surfaces.

s) Where relevant, recommendations for quality control procedures.

t) The metrological traceability of values assigned to calibrators and trueness-control materials, including identification of applicable reference materials and/or reference measurement procedures of higher order.

u) Assay procedure including calculations and interpretation of results and where relevant if any confirmatory testing should be considered.

v) Analytical performance characteristics, such as sensitivity, specificity, and accuracy (which is a combination of trueness and precision).

w) Where relevant, clinical performance characteristics, such as diagnostic sensitivity and diagnostic specificity.

x) Where relevant, reference intervals.

y) Information on interfering substances or limitations (e.g. visual evidence of hyperlipidaemia or haemolysis, age of specimen/sample) that may affect the performance of the assay.

z) Warnings or precautions to be taken related to the disposal of the device, its accessories, and the consumables used with it, if any. This information should cover, where appropriate:

- infection or microbial hazards (e.g. consumables contaminated with potentially infectious substances of human origin);
- environmental hazards (e.g. batteries or materials that emit potentially hazardous levels of radiation);
- physical hazards (e.g. explosion).

aa) For IVD medical devices intended for use by lay persons, the circumstances when the user should consult with a healthcare professional. Advice shall be given on actions to be taken in the case of all results (positive, negative or indeterminate), based on the IVD examination results taking into account the possibility of incorrect results (false positive or false negative results) and taking into account the test limitations Information shall be provided as to any known factors which could affect the test result such as test environment, age, gender, menstruation, infection, exercise, fasting, diet or medication.

a. The information shall include a statement directing the user not to make any decision of medical relevance without first consulting his or her healthcare provider.

EXAMPLE Information regarding the degree to which a negative result excludes or does not exclude the possibility of exposure to, or infection with, a particular organism.

b. For devices intended for self-testing used for the monitoring of a previously diagnosed existing disease or condition, the information shall specify that the patient should only adapt the treatment if he has received the appropriate training to do so.

c. The results should be expressed and presented in a way that is readily understood by the intended user.

bb) Where relevant, a bibliography.

cc) The name and address of the manufacturer in a format that is recognisable and allows the location of the manufacturer to be established, together with a telephone number and/or fax number and/or website address to obtain technical assistance.

dd) Date of issue or latest revision of the instructions for use and, where appropriate, an identification number.

ee) Any requirement for special facilities, or special training, or particular qualifications of the IVD medical device user and/or third parties.

ff) For devices that incorporate electronic programmable systems, including software, or software that are devices in themselves, minimum requirements concerning hardware, IT networks characteristics and IT security measures, including protection against unauthorised access, necessary to run the software as intended.