

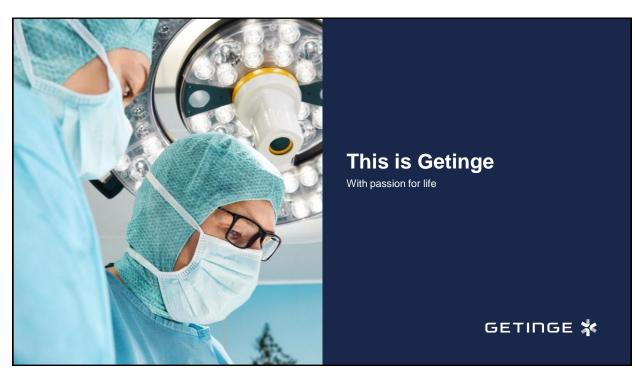
## **Lessons learned from MDR** implementation

Swedish MedTech Regulatory Summit Stockholm, 20 February 2020

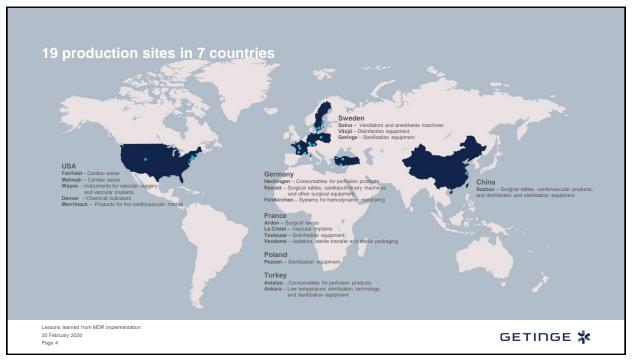
Management System Getinge Karl-Yngve Keck

Senior Director Program Office ACT & MDR Mikael K Johansson

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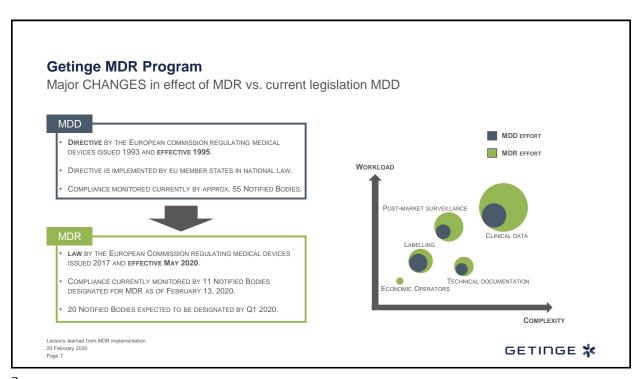




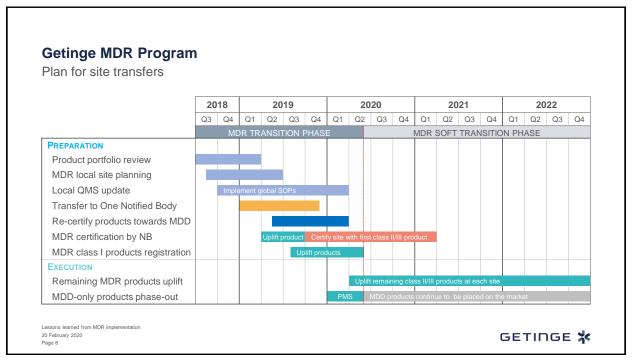






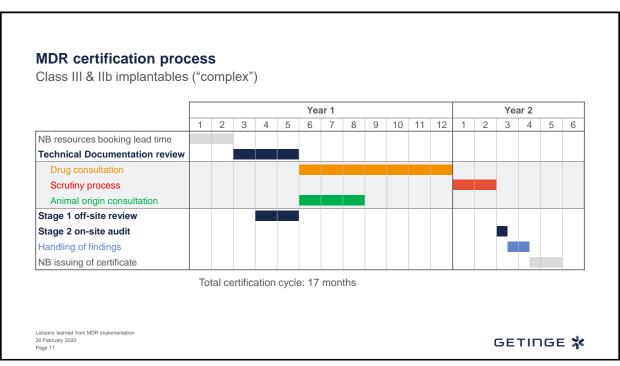


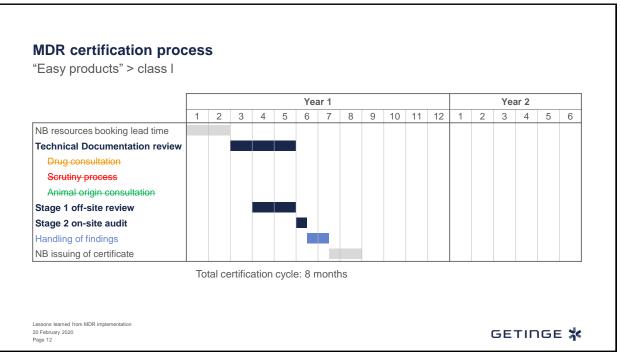
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## **Technical Documentation review**

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## Takeaways from the MDR certification

Technical Documentation review

- · Additional documents were requested:
  - IFUs
  - Product risk management: All
  - Traceability matrices
  - Packaging types/descriptions



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### Takeaways from the MDR certification

Technical Documentation review

- High focus during review and detailed questions related to:
  - Functional Safety
    - New concept. The Notified Body requested details on singlefault safety that goes beyond ISO 14971, IEC 60601 etc.
  - Cvbersecurity
    - Increased focus from the Notified Body compared to previous (MDD) reviews.



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# Stage 1 off-site review

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### Takeaways from the MDR certification

Stage 1 off-site review

- The Notified Body requested Getinge to send the QMS procedures that cover a specified list of topics.
- Based on the received questions from the Stage 1 review focused on:
  - Internal Audit on the MDR implementation
  - Implementation of Person Responsible for Regulatory Compliance (PRRC)
  - Handling and implementation of Economic Operators
  - Clinical Evaluation and Clinical Investigations
  - Risk Management and Cybersecurity



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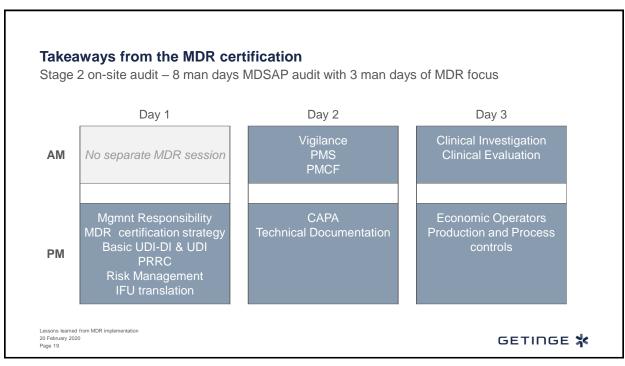
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# Stage 2 on-site audit

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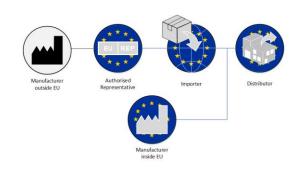


### Takeaways from the MDR certification

Stage 2 on-site audit

### Special considerations

- Outsourced processes, including distributors, importer and authorised representative.
- A formal management sign-off of the completion of the MDR implementation.
- A justification of the level of liability insurance that is sufficient based on product risk classes.



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### Takeaways from the MDR certification

Stage 2 on-site audit

#### Recommendations

- Use internal audits as evidence of compliance and as basis for the formal management sign-off of the completion of the MDR implementation.
- Prepare a presentation and walkthrough of the processes of the largest changes, i.e. PMS, Clinical evaluation and Clinical investigation.
- Be prepared to motivate your interpretations and adaptations during the audit.

### Caveat

The upcoming audits may be tougher, as there will be clarifications and guidance released from the commission and the Notified Body will be more experienced.

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