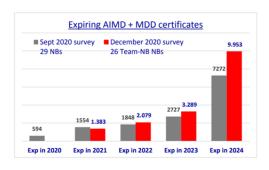


Main challenges with EU MDR

Increased workload for NB

· Transition process form directives to regulations





Source: https://www.team-nb.org/wp-content/uploads/2021/04/Team-NB-MD-Sector-Survey-PressRelease-20210414.pdf

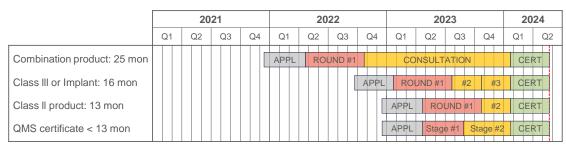
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Main challenges with EU MDR

Increased time to marked due to increased times for QMS and product certifications



Application to start review

Review Round #1

Round #2/#3/Consultation

Certification

Note: Data based on times from several of the larger Notified Bodies

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Main challenges with EU MDR

Increased time to marked due to increased times for QMS and product certifications

Process steps	Drug consultation	Class III	Class IIa, IIb
Application to start of review	4 months	4 months	4 months
Review Round 1	6 months	6 months	6 months
Round 2 / Consultation	15 months	3 months	3 months
Round 3	N/A	3 months	N/A
Certification	4 months	4 months	4 months
Total time from TD submission	25 months	16 months	13 months

Note: Data based on times from several of the larger Notified Bodies

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Main challenges with EU MDR

Last time to apply and submit TD to meet 2020-05-26 deadline

Type of submission	Last day for application	Last day for TD submission
Combination product	2021-12-15	2022-04-26
Class III or Implant	2022-09-26	2023-01-26
Class II products	2022-12-15	2023-04-26
QMS certificate	2022-12-15	N/A

Note: Data based on times from several of the larger Notified Bodies

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Main challenges with EU MDR Increased NB costs for MDR vs MDD

Type of Activity	Price per hour	Increased time*	Increased cost*
ISO 13485 certification	+ 0%	+ 0%	+ 0%
MDR audit	+ 30%	+ 10%	+ 33%
MDSAP and MDR audit	+ 20%	+ 10%	+ 22%
TD review per product	+ 40%	+ 25%	+ 50%

^{*}Depends on quality of documentation and handling of findings

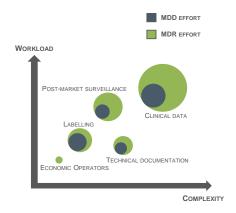
Note: Data based on times from several of the larger Notified Bodies

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Main challenges with EU MDR

Increased workload between MDD and MDR



Workload per discipline:

- 25% R&D
- 25% RA/QA
- 10% Clinical
- · 40% Clinical studies
- · Clinical studies mainly related to class III and implantable products

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Summary

Time is of essence

In order to have class II and class Ix products CE-marked in time my recommendation is to:

- 1. April 2022 Establish contact with NB
- 2. August 2022 (3 months + vacation)
 - a) Confirm product codes
 - b) That the NB supports the product codes
 - c) Establish an overall submission plan
- 3. 15 December 2022 last day to submit applications for all products

If you have problems meeting these deadlines, you should consider which part of your product portfolio to prioritize.

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