MDR Classification Document

Mapping of Requirements

Medical Device Regulation (MDR)	Document Section
Annex VIII	(All)

Related documents:

- Intended Use
- SOP Product Certification and Registration

Summary

Product:	(enter content)
Version:	(enter content)
Classification:	(enter content)
Rule:	(enter content)

Chapter 1: Applicable Definitions

You will need to carefully check and fill out all rows below. Some rows are pre-filled for applicability under the assumption of a stand-alone software medical device. However, this is quite an essential document and you're better off checking twice.

1. Duration of Use

Term	Definition	Applicable
Transient	Normally intended for continuous use for less than 60 minutes.	
Short term	Normally intended for continuous use for not more than 30 days.	
Long term	Normally intended for continuous use for more than 30 days.	

2. Invasive and Active Devices

Definition	Applicable
2.1 Body orifice means any natural opening in the body, as well as the external surface of the eyeball, or any permanent artificial opening, such as a stoma.	No
2.2 Surgically invasive device means:(a) an invasive device which penetrates inside the body through the surface of the body, including through mucous membranes of body orifices with the aid or in the context of a surgical operation; and(b) a device which produces penetration other than through a body orifice.	No
2.3 Reusable surgical instrument means an instrument intended for surgical use in cutting, drilling, sawing, scratching, scraping, clamping, retracting, clipping or similar procedures, without a connection to an active device and which is intended by the manufacturer to be reused after appropriate procedures such as cleaning, disinfection and sterilization have been carried out. 2.4 Active therapeutic device means any active device used, whether alone or in combination with other	No
devices, tosupport, modify, replace or restore biological functions or structures with a view to treatment or alleviation of anillness, injury or disability. 2.5 Active device intended for diagnosis and monitoring means any active device used, whether alone or in combination with other devices, to supply information for detecting, diagnosing, monitoring or treating physio logical conditions, states of health, illnesses or congenital deformities.	

Definition Applicable

2.6 Central circulatory system

means the following blood vessels: arteriae pulmonales, aorta ascendens, arcus aortae, aorta descendens to the bifurcatio aortae, arteriae coronariae, arteria carotis communis, arteria carotis externa, arteria carotis interna, arteriae cerebrales, truncus brachiocephalicus, venae cordis, venae pulmonales, vena cava superior and vena cava inferior.

2.7 Central nervous system means the brain, meninges and spinal cord.

2.8 Injured skin or mucous membrane means an area of skin or a mucous membrane presenting a pathological change or change following disease or a wound.

Chapter 2: Implementing Rules

Rules Applicable **3.1** Application of the Yes classification rules shall be governed by the intended purpose of the devices. 3.2 If the device in question is intended to be used in combination with another device, the classification rules shall apply separately to each of the devices. Accessories for a medical device and for a product listed in Annex XVI MDR shall be classified in their own right separately from the device with which they are used.

- 3.3 Software, which drives a device or influences the use of a device, shall fall within the same class as the device. If the software is independent of any other device, it shall be classified in its own right. **3.4** If the device is not intended to be used solely or principally in a specific part of the body, it shall be considered and classified on the basis of the most critical specified use.
- 3.5 If several rules, or if, within the same rule, several sub-rules, apply to the same device based on the device's intended purpose, the strictest rule and sub-rule resulting in the higher classification shall apply.

Rules Applicable

3.6 In calculating the duration referred to in Section 1, continuous use shall mean:(a) the entire duration of use of the same device without regard to temporary interruption of use during a procedure or temporary removal for purposes such as cleaning or disinfection of the device. Whether the interruption of use or the removal is temporary shall be established in relation to the duration of the use prior to and after the period when the use is interrupted or the device removed; and(b) the accumulated use of a device that is intended by the manufacturer to be replaced immediately with another of the same type.

3.7 A device is considered to allow direct diagnosis when it provides the diagnosis of the disease or condition in question by itself or when it provides decisive information for the diagnosis.

Chapter 3: Classification Rules

4.) Non-Invasive Devices

Rule 1 All non-invasive devices are classified as class I, unless one of the rules set out hereinafter applies.

Rules

Rule 2All non-invasive devices intended for channelling or storing blood, body liquids, cells or tissues, liquids or gases for the purpose of eventual infusion, administration or introduction into the body are classified as class IIa:— if they may be connected to a class IIa, class IIb or class III active device; or— if they are intended for use for channelling or storing blood or other body liquids or for storing organs, partsof organs or body cells and tissues, except for blood bags; blood bags are classified as class IIb.In all other cases, such devices are classified as class I.

No

Rule 3All non-invasive devices intended for modifying the biological or chemical composition of human tissues or cells, blood, other body liquids or other liquids intended for implantation or administration into the body are classified as class IIb, unless the treatment for which the device is used consists of filtration, centrifugation or exchanges of gas, heat, in which case they are classified as class IIa.All non-invasive devices consisting of a substance or a mixture of substances intended to be used in vitro in direct contact with human cells, tissues or organs taken from the human body or used in vitro with human embryosbefore their implantation or administration into the body are classified as class III.

Rules	Applicable
Rule 4 All non-invasive	No
devices which come into	
contact with injured skin	
or mucous membrane are	
classified as:— class I if	
they are intended to be	
used as a mechanical	
barrier, for compression	
or for absorption of	
exudates;— class IIb if	
they are intended to be	
used principally for	
injuries to skin which	
have breached the dermis	
ormucous membrane and	
can only heal by	
secondary intent;— class	
Ha if they are principally	
intended to manage the	
micro-environment of	
injured skin or mucous	
membrane; and— class	
Ha in all other cases. This	
rule applies also to the	
invasive devices that	
come into contact with	
injured mucous	
membrane.	

5.) Invasive Devices

No

Rule 5 All invasive devices with respect to body orifices, other than surgically invasive devices, which are not intended for connection to an active device or which are intended for connection to a class I active device are classified as:— class I if they are intended for transient use;— class IIa if they are intended for short-term use, except if they are used in the oral cavity as far as the pharynx, in an ear canal up to the ear drum or in the nasal cavity, in which case they are classified as class I; and—class IIb if they are intended for long-term use, except if they are used in the oral cavity as far as the pharynx, in an ear canal up to the ear drum or in the nasal cavity and are not liable to be absorbed by the mucous membrane, in which case they are classified as class IIa.All invasive devices with respect to body orifices, other than surgically invasive devices, intended for connection to a class IIa, class IIb or class III active device, are classified as class IIa.

Rule 6 All surgically invasive devices intended for transient use are classified as class IIa unless they:— are intended specifically to control, diagnose, monitor or correct a defect of the heart or of the central circulatory system through direct contact with those parts of the body, in which case they are classified as class III;— are reusable surgical instruments, in which case they are classified as class I;— are intended specifically for use in direct contact with the heart or central circulatory system or the central nervous system, in which case they are classified as class III; are intended to supply energy in the form of ionising radiation in which case they are classified as class IIb; have a biological effect or are wholly or mainly absorbed in which case they are classified as class IIb; or— are intended to administer medicinal products by means of a delivery system, if such administration of a medicinal product is done in a manner that is potentially hazardous taking account of the mode of application, in which case they are classified as class IIb.

Rule 7All surgically invasive devices intended for short-term use are classified as class IIa unless they:— are intended specifically to control, diagnose, monitor or correct a defect of the heart or of the central circulatory system through direct contact with those parts of the body, in which case they are classified as class III;— are intended specifically for use in direct contact with the heart or central circulatory system or the central nervous system, in which case they are classified as class III;are intended to supply energy in the form of ionizing radiation in which case they are classified as class IIb; have a biological effect or are wholly or mainly absorbed in which case they are classified as class III;— are intended to undergo chemical change in the body in which case they are classified as class IIb, except if the devices are placed in the teeth; or— are intended to administer medicines, in which case they are classified as class IIb.

Rule 8 All implantable devices and long-term surgically invasive devices are classified as class IIb unless they:— are intended to be placed in the teeth, in which case they are classified as class IIa;— are intended to be used in direct contact with the heart, the central circulatory system or the central nervous system, in which case they are classified as class III;— have a biological effect or are wholly or mainly absorbed, in which case they are classified as class III; are intended to undergo chemical change in the body in which case they are classified as class III, except if the devices are placed in the teeth;— are intended to administer medicinal products, in which case they are classified as class III; are active implantable devices or their accessories, in which cases they are classified as class III;— are breast implants or surgical meshes, in which cases they are classified as class III;— are total or partial joint replacements, in which case they are classified as class III, with the exception of ancillary components such as screws, wedges, plates and instruments; or— are spinal disc replacement implants or are implantable devices that come into contact with the spinal column, in which case they are classified as class III with

the exception of

6.) Active Devices

Rules Applicable

Rule 9 All active therapeutic devices intended to administer or exchange energy are classified as class IIa unless their characteristics are such that they may administer energy to or exchange energy with the human body in a potentially hazardous way, taking account of the nature, the density and site of application of the energy, in which case they are classified as class IIb.All active devices intended to control or monitor the performance of active therapeutic class IIb devices, or intended directly to influence the performance of such devices are classified as class IIb.All active devices intended to emit ionizing radiation for therapeutic purposes, including devices which control or monitor such devices, or which directly influence their performance, are classified as class IIb.All active devices that are intended for controlling, monitoring or directly influencing the performance of active implantable devices are classified as class III.

Rule 10 Active devices intended for diagnosis and monitoring are classified as class IIa:— if they are intended to supply energy which will be absorbed by the human body, except for devices intended to illuminate the patient's body, in the visible spectrum, in which case they are classified as class I;— if they are intended to image in vivo distribution of radiopharmaceuticals; or— if they are intended to allow direct diagnosis or monitoring of vital physiological processes, unless they are specifically intended for monitoring of vital physiological parameters and the nature of variations of those parameters is such that it could result in immediate danger to the patient, for instance variations in cardiac performance, respiration, activity of the central nervous system, or they are intended for diagnosis in clinical situations where the patient is in immediate danger, in which cases they are classified as class IIb.Active devices intended to emit ionizing radiation and intended for diagnostic or therapeutic radiology, including interventional radiology devices and devices which control or monitor such devices, or which directly influence their performance, are

classified as class IIb.

Yes

Rule 11 Software intended to provide information which is used to take decisions with diagnosis or therapeutic purposes is classified as class IIa, except if such decisions have an impact that may cause:— death or an irreversible deterioration of a person's state of health, in which case it is in class III; or— a serious deterioration of a person's state of health or a surgical intervention, in which case it is classified as class IIb.Software intended to monitor physiological processes is classified as class IIa, except if it is intended for monitoring of vital physiological parameters, where the nature of variations of those parameters is such that it could result in immediate danger to the patient, in which case it is classified as class IIb. All other software is classified as class I.

Rules	Applicable

Rule 12 All active devices intended to administer and/or remove medicinal products, body liquids or other substances to or from the body are classified as class IIa, unless this is done in a manner that is potentially hazardous, taking account of the nature of the substances involved, of the part of the body concerned and of the mode of application in which case they are classified as class

 $Rule\ 13\,\mathrm{All}$ other active devices are classified as class I.

7.) Special Rules

Rule 14 All devices No incorporating, as an	Rules	Applicable
integral part, a substance which, if used separately, can be considered to be a medicinal product, as defined in point 2 of Article 1 of Directive 2001/83/EC, including a medicinal product derived from human blood or human plasma, as defined in point 10 of Article 1 of that Directive, and that has an action ancillary to that of the devices, are classified as class III. Rule 15 All devices used for contraception or prevention of the transmission of sexually transmitted diseases are classified as class IIb, unless they are implantable or long term invasive devices, in which case they are classified as class III.	incorporating, as an integral part, a substance which, if used separately, can be considered to be a medicinal product, as defined in point 2 of Article 1 of Directive 2001/83/EC, including a medicinal product derived from human blood or human plasma, as defined in point 10 of Article 1 of that Directive, and that has an action ancillary to that of the devices, are classified as class III. Rule 15 All devices used for contraception or prevention of the transmission of sexually transmitted diseases are classified as class IIb, unless they are implantable or long term invasive devices, in which case they are classified as	

Rules	Applicable
Rule 16 All devices	No
intended specifically to	
be used for disinfecting,	
cleaning, rinsing or,	
where appropriate,	
hydrating contact lenses	
are classified as class	
IIb.All devices intended	
specifically to be used for	
disinfecting or sterilising	
medical devices are	
classified as class IIa,	
unless they are	
disinfecting solutions or	
washer-disinfectors	
intended specifically to	
be used for disinfecting	
invasive devices, as the	
end point of processing,	
in which case they are	
classified as class IIb.This	
rule does not apply to	
devices that are intended	
to clean devices other	
than contact lenses by	
means of physical action	
only.	N
Rule 17 Devices	No
specifically intended for	
recording of diagnostic	
images generated by	
X-ray radiation are	

classified as class IIa.

Rules	Applicable
Rule 18 All devices manufactured utilizing tissues or cells of human or animal origin, or their derivatives, which are non-viable or rendered non-viable, are classified as class III, unless such devices are manufactured utilizing tissues or cells of animal origin, or their derivatives, which are non-viable or rendered non-viable and are devices intended to come into contact with intact skin only.	No
Rule 19 All devices incorporating or consisting of nanomaterial are classified as:— class III if they present a high or medium potential for internal exposure;— class III if they present a low potential for internal exposure; and— class IIa if they present a negligible potential for internal exposure.	No

Rules	Applicable
Rule 20 All invasive	No
devices with respect to	
body orifices, other than	
surgically invasive	
devices, which are	
intended to administer	
medicinal products by	
inhalation are classified	
as class IIa, unless their	
mode of action has an	
essential impact on the	
efficacy and safety of the	
administered medicinal	
product or they are	
intended to treat	
life-threatening	
conditions, in which case	
they are classified as class	
IIb.	

Rule 21 Devices that are composed of substances or of combinations of substances that are intended to be introduced into the human body via a body orifice or applied to the skin and that are absorbed by or locally dispersed in the human body are classified as: class III if they, or their products of metabolism, are systemically absorbed by the human body in order to achieve the intended purpose;— class III if they achieve their intended purpose in the stomach or lower gastrointestinal tract and they, or their products of metabolism, are systemically absorbed by the human body;— class Ha if they are applied to the skin or if they are applied in the nasal or oral cavity as far as the pharynx, and achieve their intended purpose on those cavities; and—class IIb in all other cases.

Rules	Applicable
Rule 22 Active	
therapeutic devices with	
an integrated or	
incorporated diagnostic	
function which	
significantly determines	
the patient management	
by the device, such as	
closed loop systems or	
automated external	
defibrillators, are	
classified as class III.	

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