

HEALTH  
SCIENCES  
AUTHORITY

DECEMBER 2018

# PRODUCT REGISTRATION SUBMISSION GUIDE

E-Submission Guide for General Medical Devices for  
ASEAN CSDT and IMDRF ToC based Submissions in  
MEDICS



## CONTENTS

1. INTRODUCTION.....	3
1.1 Purpose .....	3
1.2 Background.....	3
1.3 Scope.....	3
2. SUBMISSION GUIDELINES .....	3
2.1 MEDICS application form.....	3
2.1.1 Submissions based on CSDT.....	3
2.1.2 Submissions based on IMDFR nIVD ToC .....	4
2.2 Submitting responses to Input request queries via MEDICS .....	4
2.3 Reference documents.....	4
3. TABLE 1 – SUMMARY OF SUBMISSION REQUIREMENTS.....	5

## **1. INTRODUCTION**

### **1.1 Purpose**

This document is intended to provide guidance on submission of a product registration dossier to HSA via the Medical Device Information and Communication System (MEDICS). This guide specifies the appropriate modules in MEDICS for uploading of the corresponding sections of the CSDT or IMDRF ToC dossier.

### **1.2 Background**

Product registration applications for medical devices are submitted online to HSA and may be compiled and prepared from the ASEAN Common Submission Dossier Template (CSDT) or the International Medical Device Regulators Forum (IMDRF) Non-In Vitro Diagnostic Medical Device Market Authorization Table of Contents (nIVD MA ToC) from the medical device manufacturer.

Applications must be submitted online to HSA via MEDICS. The technical dossier and supporting documents shall be submitted in softcopy in MEDICS.

### **1.3 Scope**

This document applies to general medical devices only.

## **2. SUBMISSION GUIDELINES**

### **2.1 MEDICS application form**

The technical dossier and supporting documents are to be submitted under the 'Dossier & Supporting Document(s)' section of the MEDICS application form. This section of the application form comprises several modules for uploading the documents.

To facilitate review of the pre-market application, applicants shall ensure that the relevant section of the dossier and supporting documents are uploaded correctly under each module. Document file names should also be meaningful and provide some indication of their content.

The "MEDICS application form" column in TABLE 1 lists the various modules in the 'Dossier & Supporting Document(s)' section of the MEDICS application form and includes a brief description of the expected contents to be uploaded under each of the modules.

#### **2.1.1 Submissions based on CSDT**

Please refer to "CSDT TR-01" column of TABLE 1 to determine which sections of the CSDT are to be uploaded under each module in MEDICS.

### 2.1.2 Submissions based on IMDRF nIVD ToC

Please refer to “IMDRF nIVD ToC” column of TABLE 1 to determine which sections of the ToC are to be uploaded under each module in MEDICS.

## 2.2 Submitting responses to Input request queries via MEDICS

To facilitate identification and review of information uploaded onto MEDICS in response to queries raised during the evaluation process, a written response to each input request query shall be provided. If additional documents are submitted to support your response, please indicate the relevant file name(s) in your response. Responses to an input request may be included under ‘Applicant’s Response’ section in MEDICS, or consolidated into a separate document for submission to HSA.

## 2.3 Reference documents

Product Registration Submission	Document	Location
Based on the ASEAN CSDT	GN-17: Guidance on Preparation of a Product Registration Submission for General Medical Devices using the ASEAN CSDT  TR-01: Contents of a Product Registration Submission for General Medical Devices using the ASEAN CSDT	<a href="http://www.hsa.gov.sg">www.hsa.gov.sg</a>
Based on the nIVD MA ToC	IMDRF Non-In Vitro Diagnostic Medical Device Market Authorization Table of Contents (nIVD MA ToC)	<a href="http://www.imdrf.org">www.imdrf.org</a>

**3. TABLE 1 – SUMMARY OF SUBMISSION REQUIREMENTS**

**Legend:**

F	Full evaluation route
A	Abridged evaluation route
E	Expedited evaluation route
I	Immediate registration route

	MEDICS Application Form - Dossier & Supporting Document(s)	Reference technical documents		Class B			Class C & D			
		IMDRF nIVD ToC	CSDT TR-01	F	A	I	F	A	E	I
<b>1</b>	<b>Letter of authorization</b>									
	<ul style="list-style-type: none"> <li>Letter of Authorisation of Registrant by the Product Owner for all the products to be registered, using the latest template as per GN-15 <a href="#">Annex 1</a> Letter of Authorisation template</li> </ul>	CH1.13 Letter of Authorization	NA	✓	✓	✓	✓	✓	✓	✓
<b>2</b>	<b>Annex 2 List of Configurations</b>									
	<ul style="list-style-type: none"> <li>A copy of <a href="#">Annex 2</a> for GN17 and GN18 List of Configurations, including the complete list of configurations of medical devices subject to the submission. This is to be submitted in a Microsoft Excel file.</li> </ul>	CH1.05 Listing of Device(s)	4.2 Device Description	✓	✓	✓	✓	✓	✓	✓
<b>3</b>	<b>Proof of reference agency's approval(s)</b>									
	<ul style="list-style-type: none"> <li>Copies of approval letter(s) from each reference agency. For CE marked devices, the EU declaration of conformity by the product owner must be submitted, in addition to the EC certificate issued by the notified bodies.</li> </ul>	CH1.07 Free Sale Certificate/ Certificate of Marketing authorization	3. Executive Summary		✓	✓		✓	✓	✓
<b>4</b>	<b>Proof of marketing history in the reference agencies jurisdictions e.g. Invoice with date, proof of sale or a declaration on marketing history</b>									
	<ul style="list-style-type: none"> <li>Invoice with date, proof of sale or a declaration on Marketing history as per <a href="#">Annex 2</a> of GN-15, to be completed by the local Applicant</li> </ul>	NA	NA			✓ Only required for Condition 1			✓ Only required for ECR1	✓
<b>5</b>	<b>Declaration of no safety issues globally</b>									
	<ul style="list-style-type: none"> <li>Safety declaration template as per <a href="#">Annex 3</a> of GN-15, to be completed by the local Applicant</li> </ul>	NA	NA			✓			✓ Only required for ECR1	✓
<b>6</b>	<b>Executive Summary</b>									
	<ul style="list-style-type: none"> <li>Introductory descriptive information on the medical device, the intended use and indications for use of the device.</li> </ul>		3. Executive Summary	✓	✓	✓	✓	✓	✓	✓

	<ul style="list-style-type: none"> <li>Information on the use of the device, if any, such as targeted patient population, user profile (e.g. specific trained users), specific disease status or clinical condition (e.g. continuous monitoring in critically ill patients), mode of action (e.g. absorption profile) etc.</li> </ul>	<p>CH2.2 General Summary of Submission</p>								
	<ul style="list-style-type: none"> <li>If the medical device has any unique or novel feature or characteristic (e.g. nanotechnology, incorporates animal or microbial cells or tissues), a description must be provided.</li> </ul>	<p>CH2.6 Global Market History</p>								
	<ul style="list-style-type: none"> <li>Any high-level background information or details that the product owner wishes to highlight in relation to the device, its history or relation to other approved devices (e.g. predicate devices) or previous submissions (provides context to submission).</li> </ul>									
	<ul style="list-style-type: none"> <li>List of countries from HSA's reference regulatory agency jurisdictions where the medical device is marketed.</li> </ul>									
	<ul style="list-style-type: none"> <li>Date (accurate to MMYYYY) and country where the device was first introduced for commercial distribution, globally.</li> </ul>									
	<ul style="list-style-type: none"> <li>Registration status (i.e. submitted, not submitted, pending approval, rejected or withdrawn) and approved intended use and indications of the medical device in HSA's recognised reference agencies, in a tabular format as per <a href="#">TR-01</a>. If device is withdrawn/ rejected by any reference agencies, reason for rejection or withdrawal is to be provided.</li> </ul>									
	<ul style="list-style-type: none"> <li>Declaration from product owner that labelling, packaging and IFU of the device for sale in Singapore are identical or not identical to that approved by reference agency being used as the basis for evaluation route. If not identical, please provide a description of the differences.</li> </ul>									
	<ul style="list-style-type: none"> <li>If the subject device is different in any way (e.g. design, commercial name, specifications, intended use and indications for use) from those approved by the reference agencies, the differences should be described.</li> </ul>									
	<ul style="list-style-type: none"> <li>To include a summary of reportable adverse events (AEs) and field safety corrective actions (FSCAs) for the medical device since its first introduction on the global market, in a tabular format as per <a href="#">TR-01</a>.</li> </ul>									
	<ul style="list-style-type: none"> <li>For FSCAs that are 'open', provide a description of any analysis and/or corrective and preventive actions undertaken by the product owner.</li> </ul>									
	<ul style="list-style-type: none"> <li>If there have been no adverse events or FSCAs to date, provide an attestation from product owner on company letterhead, that there have been no adverse events or FSCAs since commercial introduction of the device globally.</li> </ul>									
<p>7</p>	<p><b>Essential Principles Checklist and Declaration of conformity</b></p>									

	<ul style="list-style-type: none"> <li>Essential Principles conformity checklist (EP checklist). The checklist of conformity to the Singapore Essential Principles is to be submitted. Alternatively, the checklist to EU or Australian Essential Requirements can be submitted.</li> <li><a href="#">GN-11</a> Declaration of Conformity (DOC). Alternatively, the EC or AU DOC can be submitted.</li> <li>List the standards that have been complied with in the design and manufacture (including sterilization) of the device, if this has not been provided in the EP checklist or DOC.</li> </ul>	<p>CH1.11.6 Declaration of Conformity</p> <p>CH3.3 Essential Principles (EP) Checklist</p> <p>CH3.4 Standards</p>	<p>4.1. Relevant Essential Principles and Method Used to Demonstrate Conformity</p> <p><b>NOTE:</b> Refer to <a href="#">GN-16</a> <i>Guidance on Essential Principles for Safety and Performance of Medical Devices</i> for more details.</p>	✓	✓		✓	✓	✓		
8	<b>Device description</b>										
	<ul style="list-style-type: none"> <li>A comprehensive description of the device including technology, functionalities and features. To include labelled pictorial representation (diagrams, photos, drawings) if applicable.</li> <li>Risk class and applicable classification rule for the medical device according to the Regulations.</li> <li>Product specifications including the version number of the software if applicable.</li> <li>List of medical device accessories intended to be used in combination with the devices. Accessories that can be sold separately should be identified and listed in the Annex 2 list of configurations if intended to be supplied in Singapore.</li> <li>Where safety and effectiveness data of similar or previous generation devices are used in the current submission, the following information is to be provided:                         <ul style="list-style-type: none"> <li>A list of such devices and specific information on the registration status of these devices with HSA are to be included (e.g. Device registration number).</li> <li>A comparison, preferably in a table, of the design, specifications and intended use/indications for use between the subject device in the current submission and the comparator devices (similar and/or previous generation). To include labelled pictorial representation (diagrams, photos, drawings) where necessary.</li> </ul> </li> </ul>	<p>CH2.4 Device Description</p> <p>CH2.5 Indications for Use and/or Intended Use and Contraindications</p>	<p>4.2 Device Description</p>	✓	✓	✓	✓	✓	✓	✓	

	<ul style="list-style-type: none"> <li>A list of all materials in direct or indirect contact with the patient or user is to be provided. Where there are specific concerns related to the material safety (e.g. impurities or residue levels), additional information on the quality and safety of such materials may be required (e.g. conformity to relevant material standards, Certificate of Analysis).</li> </ul>									
9	<b>Design verification and validation documents including</b> <ul style="list-style-type: none"> <li>• <b>Preclinical studies e.g. physical test data, biocompatibility studies, animal studies and software verification and validation studies</b></li> <li>• <b>Metrological requirements</b></li> <li>• <b>Sterilisation validation (if applicable)</b></li> <li>• <b>Shelf-life studies and projected useful life</b></li> </ul>									
	<ul style="list-style-type: none"> <li>Evidence supporting the physical or mechanical properties of the subject device</li> </ul>	CH3.5 Non-clinical Studies	4.3 Summary of Design Verification and Validation Documents	✓ Detailed reports	✓ Summary	✓ Sterilisation validation for Sterile devices only	✓ Detailed reports	✓ Summary	✓ Summary	✓ Software verification and validation studies for standalone medical mobile applications only
	<ul style="list-style-type: none"> <li>Evidence supporting electrical safety and electromagnetic compatibility. For example, if a device is claimed to meet the requirements of IEC 60601-1 and IEC 60601-1-2, summary test reports and/or certificates are to be submitted for verification of conformance to these standards.</li> </ul>	CH3.6 Non-clinical Bibliography				Software verification and validation studies for standalone medical mobile applications only				
	<ul style="list-style-type: none"> <li>Specify the version of the software to be supplied.</li> </ul>	CH3.7 Expiration Period and Package Validation								
	<ul style="list-style-type: none"> <li>An overview of all verification, validation and testing performed for the software both in-house and in a simulated or actual user environment prior to final release.</li> </ul> <p><b>NOTE:</b> <i>The version tested must be clearly identified and should match the release version of the software, otherwise to provide justification.</i></p>	CH3.8 Other non-clinical Evidence								
	<ul style="list-style-type: none"> <li>All unresolved anomalies in the release version of the software should be summarized, along with a justification for acceptability (i.e. the problem, impact on safety and effectiveness, and any plans for correction of the problems).</li> </ul>									
	<ul style="list-style-type: none"> <li>Studies supporting biocompatibility and assessing toxicology. If biocompatibility tests that are recommended by ISO 10993 were not performed, adequate justification must be provided.</li> </ul>									
	<ul style="list-style-type: none"> <li>Sterilisation validation report, EO residuals report (if applicable), and evidence of on-going sterilisation validation</li> </ul>									
	<ul style="list-style-type: none"> <li>Description and purpose of the biological material or derivate used in the medical device and in the manufacturing process of the medical device.</li> </ul>									
	<ul style="list-style-type: none"> <li>Risk assessment pertaining to the biological materials, which should include information on the process validation to substantiate that manufacturing and screening procedures are in place to minimize biological risks, in particular, with regard to viruses and other transmissible agents.</li> </ul>									



	<ul style="list-style-type: none"> <li>▪ Certificate of Suitability (CEP) for biological material that bears TSE (Transmissible Spongiform Encephalopathy) risk. If CEP is not available or not applicable, to include additional information on the evidence of proper sourcing and processing of the biological material or derivate, such as certificates that support the safety of materials of biological origin (e.g. certificate of abattoir inspection, Certificates of Analysis)</li> </ul>									
	<ul style="list-style-type: none"> <li>▪ Specify the claimed shelf life or projected useful life of the device.</li> </ul>									
	<ul style="list-style-type: none"> <li>▪ Evidence that support the product stability and package integrity over the claimed shelf-life. If applicable, both real time and accelerated stability studies are to be submitted. If real time aging has not been performed, adequate justification must be provided.</li> </ul>									
	<ul style="list-style-type: none"> <li>▪ Pre-clinical animal studies (e.g. implantation) as applicable to the device</li> </ul>									
	<ul style="list-style-type: none"> <li>▪ Evidence to support the cybersecurity of connected medical devices such as wireless enabled, internet-connected and network-connected devices. For example, but not limited to:                             <ul style="list-style-type: none"> <li>○ Cybersecurity vulnerabilities and risks analysis</li> <li>○ Cybersecurity control measures</li> <li>○ On-going plans, processes or mechanisms for surveillance, timely detection and management of the cybersecurity related threats during the useful life of the device, especially when a breach has been detected.</li> </ul> </li> </ul>									
10	<b>Proposed Device Labelling</b>									
	<ul style="list-style-type: none"> <li>▪ Primary and secondary labels in their original colour for the device and its accessories as applicable.</li> </ul>	CH5.02 Product/Package Labels	4.4 Device Labelling	✓	✓	✓	✓	✓	✓	✓
	<ul style="list-style-type: none"> <li>▪ If representative labels are provided, variable fields on the artwork must be highlighted, and ranges of values for the variable fields should be indicated.</li> </ul>	CH5.03 Package Insert/ Instructions for Use	<b>NOTE:</b> Refer to <a href="#">GN-23</a> <i>Guidance on Labeling for Medical Devices for more details.</i>							
	<ul style="list-style-type: none"> <li>▪ Copy of the IFU to be supplied in Singapore for the device and its accessories as applicable.</li> </ul>	CH5.04 e-labelling								
	<ul style="list-style-type: none"> <li>▪ Indicate format of the IFU to be supplied with every medical device e.g. paper or electronic.</li> </ul>	CH5.06 Physician Labelling CH5.06 Patient Labelling								

		CH5.07 Technical/Operator Manual									
<b>11</b>	<b>Clinical evidence</b>										
	<ul style="list-style-type: none"> <li>A clinical evaluation report reviewed and signed by an expert in the relevant field that contains an objective critical evaluation of all of the clinical data submitted in relation to the device. Clinical evidence may include clinical literature review, clinical experience (e.g. registries and post market surveillance reports), and clinical investigation.</li> </ul>	CH4.2 Overall Clinical Evidence Summary  CH4.5 Other Clinical Evidence	4.3.2. Clinical Evidence  <b>NOTE:</b> Refer to <a href="#">GN-20</a> Guidance on Clinical Evaluation for more details.	If applicable	If applicable	If applicable	✓	✓	✓	If applicable	
<b>12</b>	<b>Risk Analysis</b>										
	<ul style="list-style-type: none"> <li>Risk analysis describing the risks identified, severity of harm and probability of occurrence including the mitigation measures. A risk management report to substantiate that all known and foreseeable risks have been reasonably mitigated and the residual risks have been reduced or controlled to an acceptable level is to be submitted.</li> </ul>	CH3.2 Risk Management	4.5 Risk Analysis	✓	✓		✓	✓	✓		
<b>13</b>	<b>Manufacturing Information (sites name and address)</b>										
	<ul style="list-style-type: none"> <li>Name and address for all manufacturing and sterilisation sites (including contract manufacturers and contract sterilisers).</li> </ul>	CH6A.3.2 General Manufacturing Information	4.6. Manufacturer Information	✓	✓	✓	✓	✓	✓	✓	
<b>14</b>	<b>Proof of QMS - E.g.: ISO13485 Certificate, Conformity to US FDA Quality System Regulations or Japan MHLW Ordinance 169</b>										
	<ul style="list-style-type: none"> <li>ISO 13485 certificates are to be provided for manufacturing and sterilisation sites of finished devices.</li> </ul>	CH1.06 Quality Management System, Full Quality System or Other Regulatory Certificates	4.6. Manufacturer Information	✓	✓	✓	✓	✓	✓	✓	
	<ul style="list-style-type: none"> <li>For sites without ISO 13485 certification, comparable audit reports for the actual site e.g. US FDA Quality Systems Regulations or Japan MHLW Ordinance 169 can be submitted.</li> </ul>										
<b>15</b>	<b>Manufacturing Process - Flow Chart</b>										
	<ul style="list-style-type: none"> <li>Manufacturing process flow diagram.</li> </ul>	CH6B.6.3 Production and service controls information	4.6. Manufacturer Information	✓			✓	✓	✓		
<b>16</b>	<b>Other document, please specify</b>										
	<ul style="list-style-type: none"> <li>Information on previous regulatory decisions (e.g. withdrawals or rejections by HSA) for the devices</li> </ul> <b>NOTE:</b> You may be required to provide the previous submission or registration information where necessary.	CH1.09 Pre-Submission Correspondence and	NA	If applicable	If applicable	If applicable	If applicable	If applicable	If applicable	If applicable	

	<ul style="list-style-type: none"> <li>▪ Information on any ongoing AE or FSCA reported to HSA for the subject device.</li> </ul>	Previous Regulator Interactions								
	<ul style="list-style-type: none"> <li>▪ Justification for an unmet clinical need</li> </ul> <p><b>NOTE:</b> <i>Applicable for Priority Review Scheme Route 1</i></p>									

# HEALTH SCIENCES AUTHORITY

Health Products Regulation Group  
Blood Services Group  
Applied Sciences Group

[www.hsa.gov.sg](http://www.hsa.gov.sg)

## Contact Information:

Medical Devices Branch  
Medical Devices Cluster  
Health Products Regulation Group  
Health Sciences Authority

11 Biopolis Way, #11-03 Helios  
Singapore 138667  
[www.hsa.gov.sg](http://www.hsa.gov.sg)  
<https://crm.hsa.gov.sg/event/feedback>

