

Response ID ANON-CBS3-RZAS-B

Submitted to Consultation: Proposed changes to the IVD medical device classifications and definitions
Submitted on 2025-03-17 17:48:30

Introduction

What is your name?

Name:
Alex Leung

What is your email address?

Email:
[REDACTED]

What is your organisation?

Organisation:
Hologic

Responding to this Consultation

Question 1(a): Do you agree with the proposals to change the Australian classification rules and principles that have an impact on approved products (as specified in the first Section of the paper), noting the changes are reflective of the regulatory scrutiny based on the associated health risks?

Respond to the question 1a:

Yes.

Question 1(b): If no, which of the proposed changes do you not agree with? Please provide your reasons.

Respond to the question 1b:

Question 1(c): Are there any other classification rules and principles, relating to the IVD medical devices, that need to be considered as part of this proposal?

Respond to the question 1c:

No.

Question 2(a): Do you agree with the proposals to adopt certain terminology in the Australian classification rules that have no impact on approved products (as specified in Appendix A of the paper), noting the changes are to improve clarity?

Respond to the question 2a:

Yes

Question 2(b): If no, which of the proposed changes do you not agree with? Please provide your reasons.

Respond to the question 2b:

Question 2(c): Do you agree the proposed changes in Appendix A of the paper, would not result in any impact on existing ARTG entries of IVD medical devices?

Respond to the question 2c:

Yes

Question 2(d): Are there any other classification rules, relating to the IVD medical devices, that need to be considered as part of this proposal?

Respond to the question 2d:

No

Question 3(a): Do you agree with the proposal to amend the Australian definitions as specified in Appendix B of the paper?

Respond to the question 3a:

Agree

Question 3(b): If no, which of the proposed changes do you not agree with? Please provide your reasons.

Respond to the question 3b:

Question 3(c): Are there any other definitions, relating to the IVD medical devices, that need to be considered as part of this proposal?

Respond to the question 3c:

No

Question 4(a): Do you agree with the proposal to apply a 6-month transition period after the EU IVDR transition timelines for the proposed Australian amendments to take effect?

Respond to the question 4a:

No

Question 4(b): Provide reasons for your position.

Respond to the question 4b:

6 months is too short. There are potentially a lot of changes coming such as UDI, MDVP, AI. 12 to 18 months transition is reasonable as sponsors will not get more resources to implement these transitions, we need to do it properly rather than rushing it.

Question 5: Do you consent to your response being made publicly available on the TGA's Consultation Hub website? Please indicate your publishing preferences.

I consent to my submission being published, including both my name and my organisation's name

Question 6: If you consent to your submission being published, are there parts that you do not want published? Please specify which part(s). Please note – your contact email address and/or phone number will not be published with your submission.

Respond to the question 6:

None