

# QMD Services

## IVDR-Update



# QMD Services

**Am Weg durch den Fristen-Dschungel der Regulatorik**



1

Überblick  
*Aktuelle IVDR-Fristen*

2

Die  
*Rolle von EURLs*  
seit 1.10.2024

3

Ein paar  
*Insights und Tipps*  
*aus der Praxis*



# QMD Services

Benannte Stelle  
gemäß **Regulation (EU) 2017/746 (IVDR)** und  
**Regulation (EU) 2017/745 (MDR)**





**in Florian Heffeter**

- Seit über 20 Jahre im Gesundheitswesen tätig
- Medizininformatik & Medizinrecht
- Notfallmedizin, MedTech-Industrie, Innovations- u. Strategieberatung
- Seit Mai 2024 CEO der QMD

**QMD HoNB**



**in Anni Koubek**

- Gründungs-CEO der QMD seit 2018
- Physikerin
- Österreichische Vorreiterin für Qualitätsmanagement in der Medizintechnik
- Ehem. Scientific Director FH Joanneum



Wir sind... **1**

... von nur

**12**

Benannten Stellen  
in der Europäischen Union

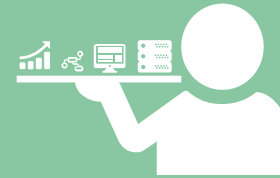
gemäß beiden Normen:

**MDR &  
IVDR**





# MDR Angebot der QMD



## I CODES REFLECTING THE DESIGN AND INTENDED PURPOSE OF THE DEVICE

A ACTIVE DEVICES															B NON-ACTIVE DEVICES																												
MDA 0101	MDA 0102	MDA 0103	MDA 0104	MDA 0201	MDA 0202	MDA 0203	MDA 0204	MDA 0301	MDA 0302	MDA 0303	MDA 0304	MDA 0305	MDA 0306	MDA 0307	MDA 0308	MDA 0309	MDA 0310	MDA 0311	MDA 0312	MDA 0313	MDA 0314	MDA 0315	MDA 0316	MDA 0317	MDA 0318	MDN 1101	MDN 1102	MDN 1103	MDN 1104	MDN 1201	MDN 1202	MDN 1203	MDN 1204	MDN 1205	MDN 1206	MDN 1207	MDN 1208	MDN 1209	MDN 1210	MDN 1211	MDN 1212	MDN 1213	MDN 1214

Code Coverage for Annexes IX(I), IX(II) and XI(A)

\*) Scope under conditions

## II HORIZONTAL CODES

Specific characteristics													Specific technology													
MDS 1001	MDS 1002	MDS 1003	MDS 1004	MDS 1005	MDS 1006	MDS 1007	MDS 1008	MDS 1009	MDS 1010	MDS 1011	MDS 1012	MDS 1013	MDS 1014	MDT 2001	MDT 2002	MDT 2003	MDT 2004	MDT 2005	MDT 2006	MDT 2007	MDT 2008	MDT 2009	MDT 2010	MDT 2011	MDT 2012	MDT 2013

Code Coverage for Annexes IX(I), IX(II) and XI(A)

Code Limited coverage (aseptic processing, ethylene oxide gas sterilisation (EOG), moist heat sterilisation, radiation sterilisation)

(For full description of codes see [COMMISSION IMPLEMENTING REGULATION \(EU\) 2017/2185](#) Annex I

Immer aktuell: das **QMD-Scope Statement** auf [NANDO](#)

## i QMD bietet zusätzliche Services gemäß:

- Artikel 16 (MDR und IVDR): Importeure
- Artikel 22: Systeme und Behandlungseinheiten
- Artikel 117: Medizinprodukte mit Arzneimittelkomponenten als integralen Bestandteil



Seit 14. Mai 2024  
die einzige  
Benannte Stelle  
unter MDR in  
Österreich

# IVDR Angebot der QMD



## I CODES REFLECTING THE DESIGN AND INTENDED PURPOSE OF THE DEVICE

Blood Grouping	Tissue T	Cancer	HumGen	Infections/Immune	Non-infectious pathologies	Control	Class A
IVR 0101	IVR 0102	IVR 0103	IVR 0104	IVR 0105	IVR 0106	IVR 0201	IVR 0202
IVR 0301	IVR 0302	IVR 0401	IVR 0402	IVR 0403	IVR 0501	IVR 0502	IVR 0503
IVR 0504	IVR 0505	IVR 0506	IVR 0601	IVR 0602	IVR 0603	IVR 0604	IVR 0605
IVR 0606	IVR 0607	IVR 0608	IVR 0609	IVR 0701	IVR 0702	IVR 0801	IVR 0802
IVR 0803							

Code Coverage for Annexes IX(I), IX(II) and XI

## II HORIZONTAL CODES

Specific	Technologies	Product verification	Laboratory & Clinical disciplines
IVS 1001	IVT 2001	IVP 3001	IVD 4001
IVS 1002	IVT 2002	IVP 3002	IVD 4002
IVS 1003	IVT 2003	IVP 3003	IVD 4003
IVS 1004	IVT 2004	IVP 3004	IVD 4004
IVS 1005	IVT 2005	IVP 3005	IVD 4005
IVS 1006	IVT 2006	IVP 3006	IVD 4006
IVS 1007	IVT 2007	IVP 3007	IVD 4007
IVS 1008	IVT 2008	IVP 3008	IVD 4008
IVS 1009	IVT 2009	IVP 3009	IVD 4009
IVS 1010	IVT 2010	IVP 3010	IVD 4010
	IVT 2011	IVP 3011	IVD 4011
		IVP 3012	IVD 4012
		IVP 3013	
		IVP 3014	

Code Coverage for Annexes IX(I), IX(II) and XI

Code Limited coverage (aseptic processing, ethylene oxide gas sterilisation (EOG), moist heat sterilisation, radiation sterilisation)

(For full description of codes see [COMMISSION IMPLEMENTING REGULATION \(EU\) 2017/2185](#) Annex II

Immer aktuell: das **QMD- QMD-Scope Statement** auf [NANDO](#)

## QMD bietet zusätzliche Services gemäß:

- Artikel 16 (MDR und IVDR): Importeure
- Artikel 22: Systeme und Behandlungseinheiten



**Seit 14. Mai 2024  
die einzige  
Benannte Stelle  
unter MDR in  
Österreich**



# QMD Services

Am Weg durch den Fristen-Dschungel der Regulatorik

**AKTUELLE FRISTEN**



# Relevant dates: Transition to MDR and IVDR \*

\*) As per current status of published official information on May, 31<sup>st</sup>, 2024.  
Dates may be subject to change due to revision of regulations in the future.

MDR

**26 May 2024**

End of transition period for *legacy devices* with MDD certificates

**26 May 2026**

End of derogation for *Class III custom made implantable devices*

**Q2-Q4 2027 EUDAMED**

Period for Actor, Vigilance, Market Surveillance and CI/PS modules.

**31 December 2027**

Extended transition period ends for *Class III and non-exempt Class IIb implantable devices*

**31 December 2028**

Extended transition period ends for all other *Class III and Class IIb, IIa, Is and Class Ir and Im* devices that are a higher class under MDR

IVDR

**1 October 2024**

Mandatory to involve Reference Laboratory (EURL) for *Class D* devices.

**26 May 2025**

End of transition period for *Class D legacy devices* with IVDD certificates

**26 May 2026**

End of transition period for *Class C products* in extended transition period

**26 May 2027**

End of transition period for *Class B and Class A sterile devices* in extended transition period

**Q4 2027-Q2 2029 EUDAMED**

Period for UDI/Device Registration and Notified Body & Certificates Module.

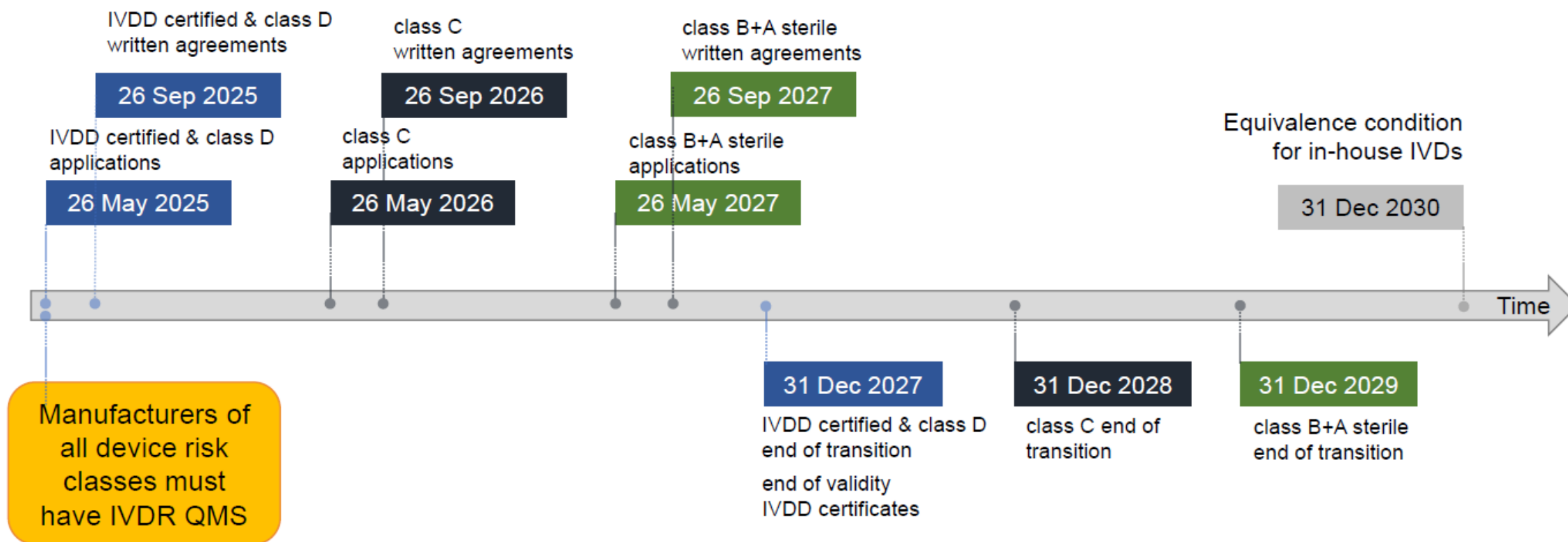
**EUDAMED**  
full mandatory use

Q2 2029

# Relevant dates: Transition to IVDR<sup>\*</sup>

acc. Regulation (EU) 2024/1860

<sup>\*</sup>) As per current status of published official information on June, 13<sup>th</sup>, 2024.  
Dates may be subject to change due to revision of regulations in the future.



Source:  European Commission



# Relevant dates: Transition to IVDR<sup>\*</sup>

acc. Regulation (EU) 2024/1860

*<sup>\*</sup>) As per current status of published official information on June, 13<sup>th</sup>, 2024.  
Dates may be subject to change due to revision of regulations in the future.*

## Summary of transitional deadlines described in RE (EU) 2024/1860

Device Class	IVDR compliant QMS	Officially applied to a NB	Signed written agreement with a NB	Transition deadline
IVDD certified devices <sup>*</sup>	26 May 2025	26 May 2025	26 September 2025	31 December 2027
Class D self-declared	26 May 2025	26 May 2025	26 September 2025	31 December 2027
Class C self-declared	26 May 2025	26 May 2026	26 September 2026	31 December 2028
Class B and A-Sterile self-declared	26 May 2025	26 May 2027	26 September 2027	31 December 2029

# Relevant dates: Transition to IVDR<sup>\*</sup>

acc. Regulation (EU) 2024/1860

<sup>\*</sup>) As per current status of published official information on June, 13<sup>th</sup>, 2024.  
Dates may be subject to change due to revision of regulations in the future.

## Which devices can benefit from the extended transition period?

Devices that meet the following criteria:

- Compliance with IVD Directive 98/79/EC;
- Compliance with the IVDR provisions related to PMS and vigilance;
- No significant changes can be made;
- Implementation of an IVDR compliant Quality Management System by 26th May 2025;
- A formal conformity assessment application is made with a notified body before:
  - 26 May 2025 (class D)
  - 26 May 2026 (class C)
  - 26 May 2027 (class B and class A sterile)
- A written agreement is in place between the manufacturer and notified body before:
  - 26 September 2025 (class D),
  - 26 September 2026 (class C) or
  - 26 September 2027 (class B and class A sterile).

*Note: The change of transitional provisions only applies to devices requiring the involvement of a notified body for their conformity assessment under IVDR.*

# QMD Services

Am Weg durch den (Fristen-)Dschungel der Regulatorik

**EURLs**



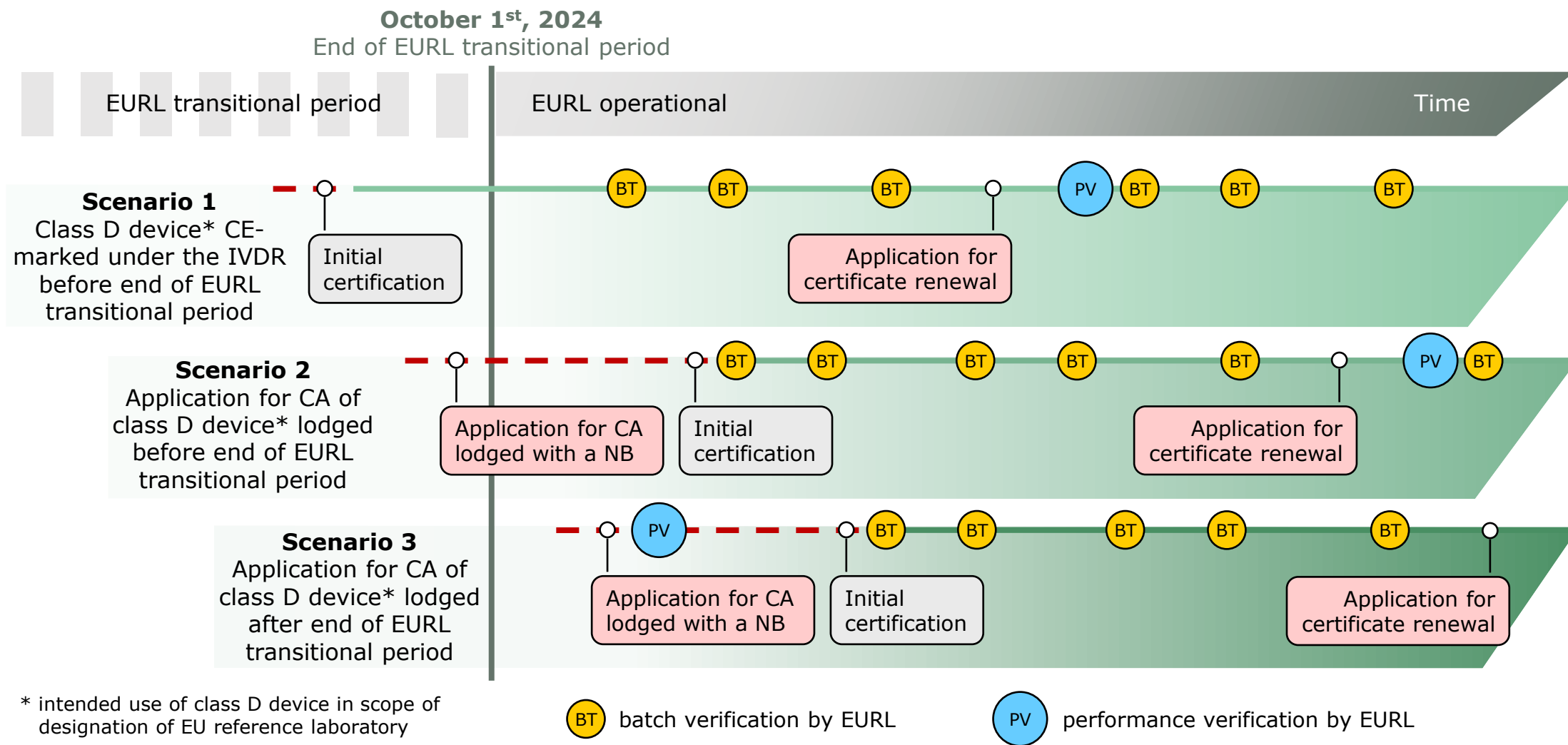


# European Reference Labs (EURL)

- Seit 1. Oktober 2024 sind EURLs für die Performance Evaluation von IVDs der Klasse D verpflichtend miteinzubeziehen!
  - Ende der „EURL Transitional Period“



# Class D IVD Devices: Transitional provisions for EURL performance verification and batch testing under the IVDR



\* intended use of class D device in scope of designation of EU reference laboratory

# Coverage of EURL Designations

- 5 European Union Reference Laboratories (EURLs) designated via Implementing Act 2023/2713 (December 2023)
- 4 categories of Class D devices covered
  - Hepatitis and retroviruses,
  - Herpesviruses,
  - Bacterial agents,
  - Respiratory viruses that cause life-threatening diseases.
- At the moment, no EURL has been designated for the remaining technical categories of Class D devices:
  - Arboviruses,
  - Haemorrhagic fever and other biosafety level 4 viruses,
  - Parasites,
  - Blood grouping.



# QMD Services

Am Weg durch den (Fristen-)Dschungel der Regulatorik

**BEWÄLTIGUNGSSTRATEGIEN IM PROZESS**



# Monitoring of the Availability of In Vitro Diagnostic Medical Devices in the EU



Gesundheit Österreich  
GmbH

[MD Availability Dashboard 1.3](#)

Last Update: 6.7.2024

Select stakeholder

Notified Bodies (NBs) ▼

Select date of survey

03/23

06/23

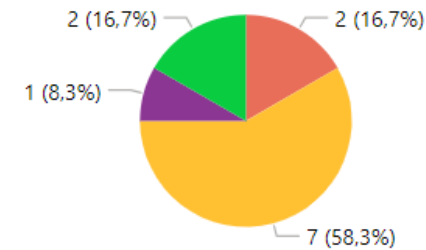
10/23

02/24

100

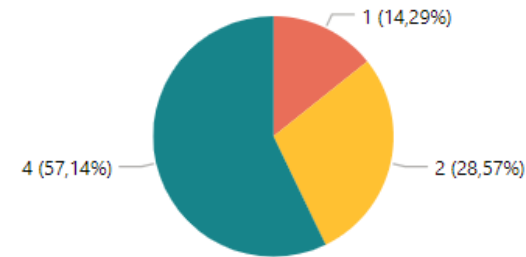
Response rate of survey in %

## Completeness of applications in number of notified bodies (IVDR)



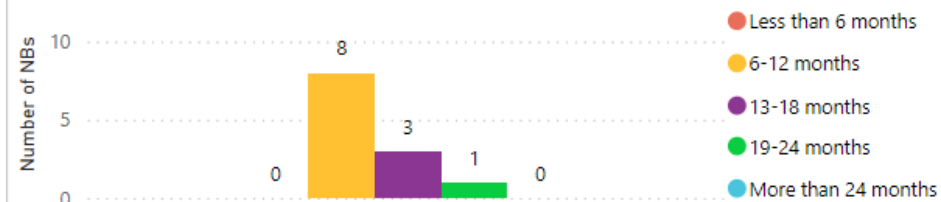
- Less than 25 %
- 25-50 %
- 51-75 %
- More than 75 %

## Number of applications refused by reason (IVDR)

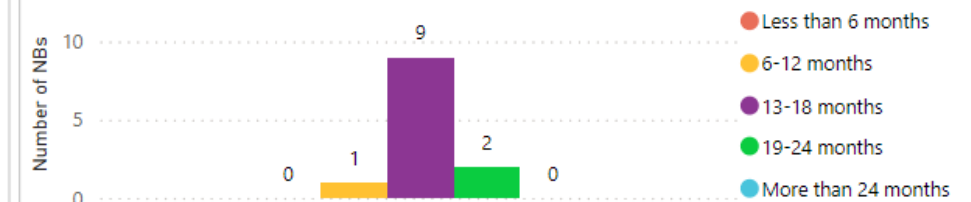


- Application not complete
- Wrong qualification of product/classification of device
- Wrong conformity assessment procedure
- Outside the scope of notified body's designation
- Insufficient notified body resources
- Other reasons

## Time needed to issue QMS certificate only (IVDR)



## Time needed to issue QMS and product certificates (IVDR)

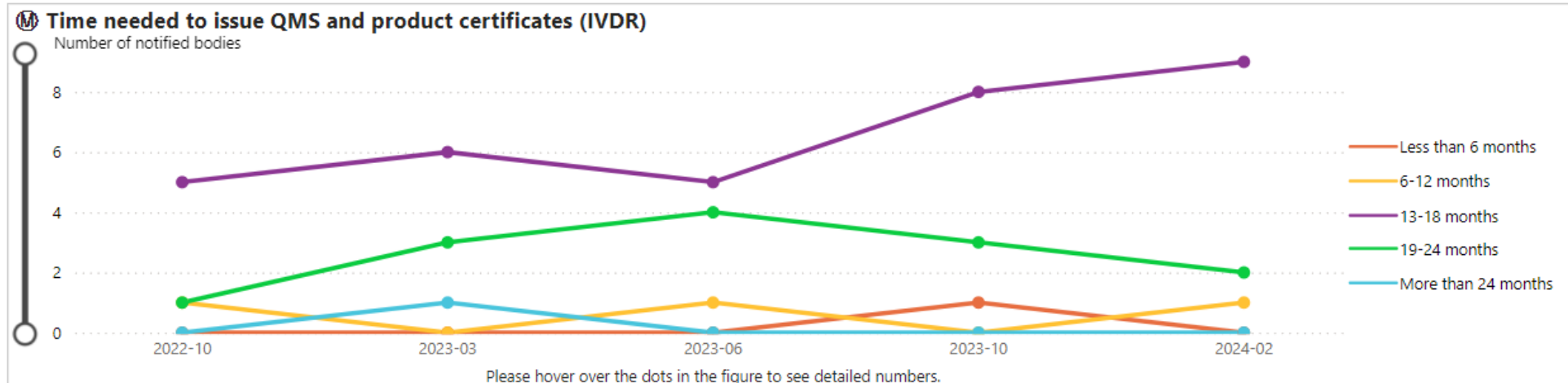
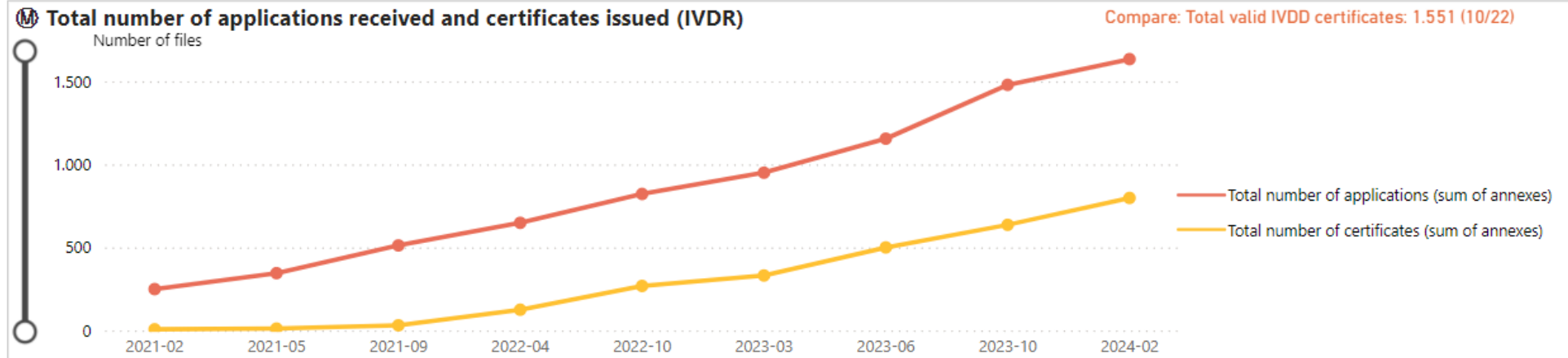


# Monitoring of the Availability of In Vitro Diagnostic Medical Devices in the EU



[MD Availability Dashboard 1.3](#)

Last Update: 6.7.2024



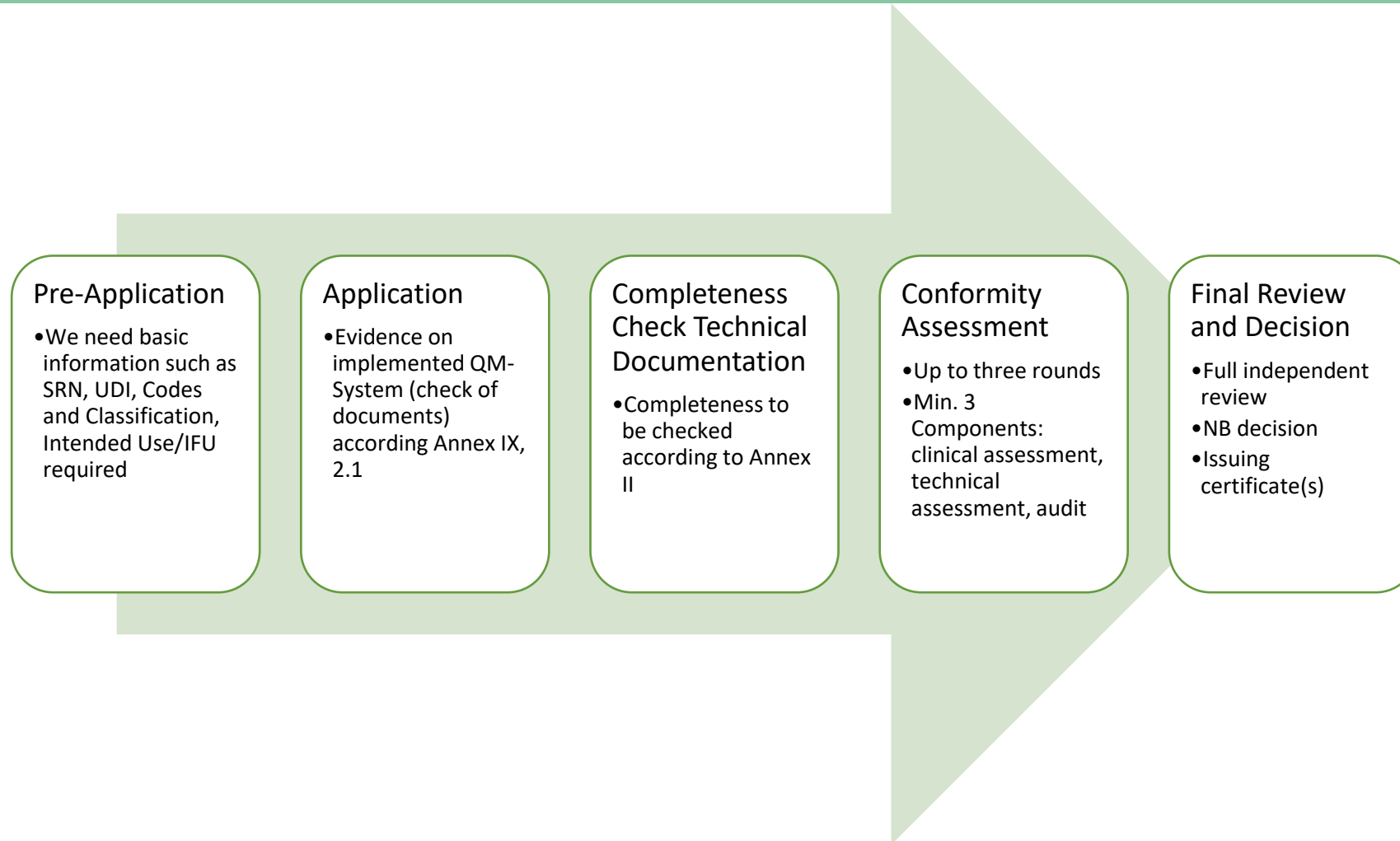


# Some notes on process specifics

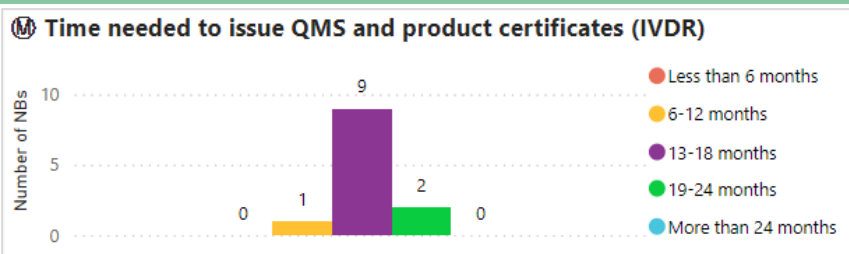


- All notified bodies follow the same rules
- There is rough agreement on duration of different phases of conformity assessment (Team NB Code-of-Conduct)
- Our special approach of service delivery:
  - Intense and personal communication throughout the whole process
  - We charge a pre-application and an application fee – advance payment for intense preparation effort in that phase
  - We offer structured dialog, starting with pre-application
  - We cannot offer any consultancy!

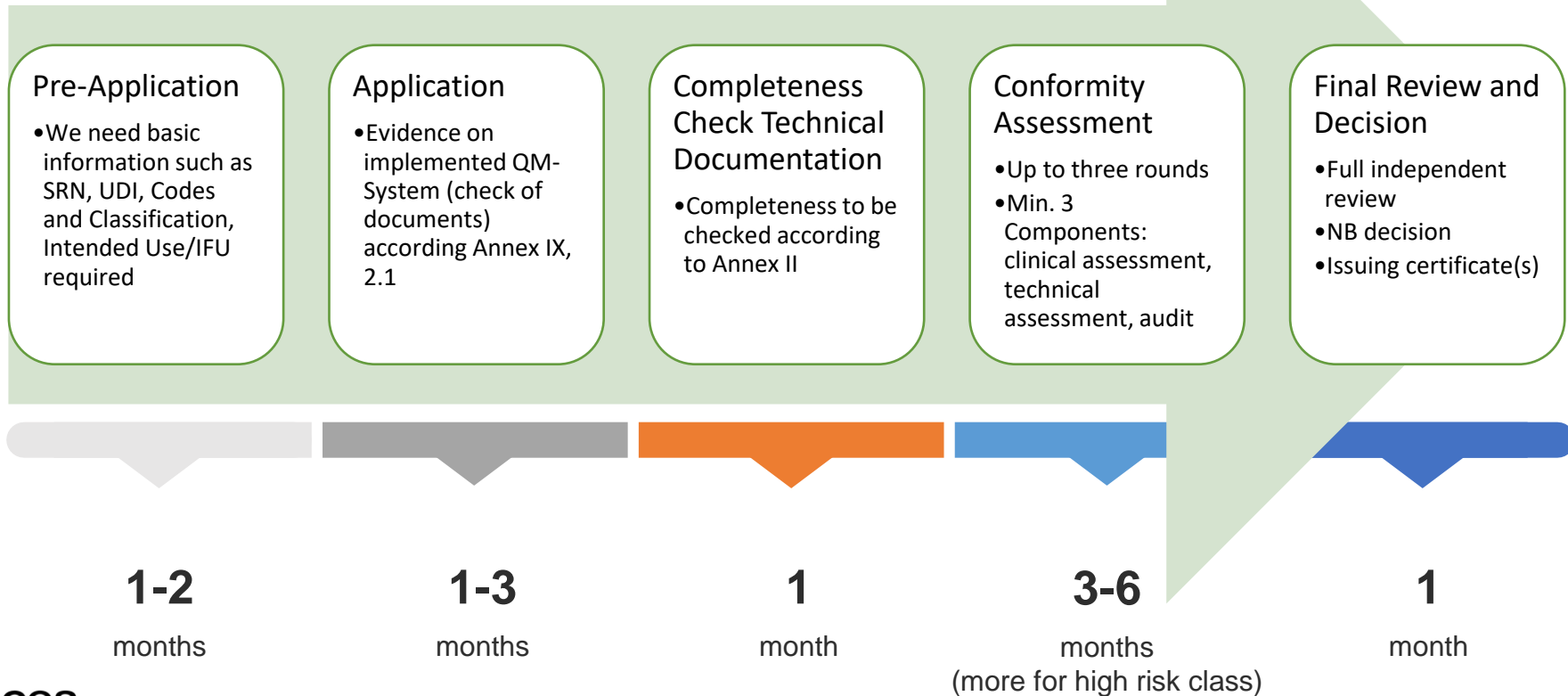
# Overview of our conformity assessment process



# Typical time-lines



Quelle: [EU MD Availability Dashboard](#) (02/24)





# General Tipps for swift process



- For each phase:
  - Prepare the requested information complete and according to instructions
  - We will give you clear guidance, but we know this is tedious
- **All iterations lead to**
  - delays on our side, as we cannot keep our planned project slots
  - higher costs for re-checks
  - longer time to market for your product

“Your technical documentation can make or break your conformity assessment process.” – *Some Director Quality & Regulatory Affairs for MDR*



# SMEs power MedTech Innovation in Europe



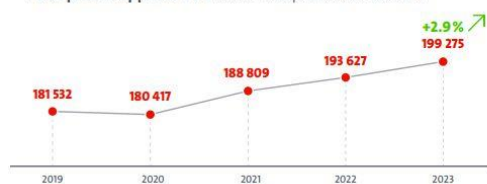
epo.org/patent-index2023

## TRENDS IN PATENTING

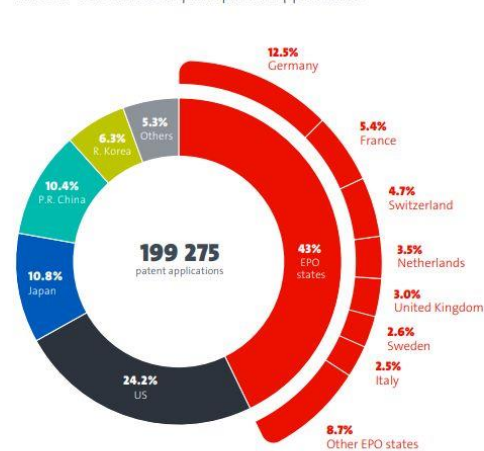
# 2023

Europe is an **attractive technology market** for European and international companies

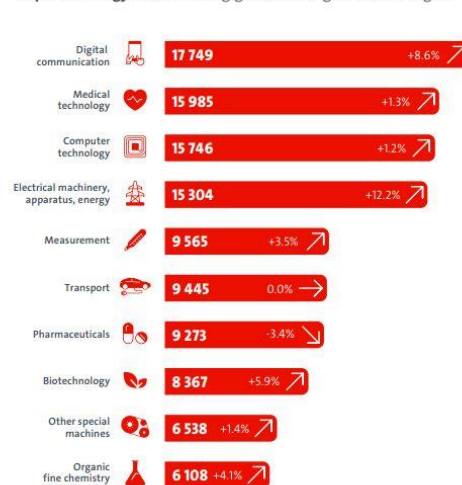
Total patent applications at the European Patent Office



**Countries of origin:** The 39 member states of the EPO account for over 43% of all European patent applications



**Top technology fields:** Strong growth in digital technologies



There are more than 37,000 medical technology companies in Europe. The highest number of them are based in Germany, followed by Italy, the UK, Poland, Sweden and Switzerland. Small and medium-sized companies (SMEs) make up around 90% of the medical technology industry, the majority of which employs less than 50 people (small and micro-sized companies)<sup>5</sup>.



**37,000**  
medical technology  
companies in Europe  
**90% SMEs**



# Innovative products...

...get certified  
with **QMD!**



[QMDservices.com](https://QMDservices.com)



# Bleiben wir in Verbindung



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