

況を放置することは本末転倒と言わざるを得ない。

日本の高い技術を医療に応用できる環境整備を図り、また疲弊している医療機器産業と経済の活性化のためにも思い切った改革が必要である。これに対する具体的な方針は昨年、著者の編著で出版した「いのちを守る医療機器、なぜ患者に届かない：日刊工業新聞社」に詳述した。医療機器産業は、まさに今、国民が最も関心を持っている景気対策の要になる可能性が高いのである。幸い、本書を読んだ政治家たちが、超党派で我々から詳しく意見を聞いてくれた。その結果、薬事法改正の中で医療機器法を独立させて取り組むという閣議決定が平成 24 年 7 月 10 日に行われた。残念ながら、政局の混乱で進捗のスピードが落ちている。しかしすべてが未だ、出発点に立ったばかりで本当の取り組みはこれからである。

#### 「海外の事情」

アメリカや EU では前述した医薬品と異なる医療機器の特殊性が行政にも明確に認識されていて審査承認制度も政策もすべて医療産業を振興し、かつ最新技術を搭載した医療機器が迅速に安全に医療現場や患者のもとに届くようにデザインされている。アメリカ食品医薬品局（FDA）は政府機関であるがその審査・認証システムは時間がかかり、非効率で必要以上に厳しいとの批判を受けてきた。これを受けてアメリカ議会は次々と新しい法律を通して、問題点の是正を図って来ていて審査承認のスピードも非常に改善してきている（SMDA、FDAMA、MDUFMA 等）。

一方、EU では CE マークと呼ばれる第三者認証制度(民間認証機関 (Notified Body) による認証)で運営されていて、純粋に安全に関わる重要事項にのみ行政に関わる仕組みになっている。こうした民間認証機関のスタッフたちはプロ中のプロで、著者が日本代表として関わっている ISO/TC 121（麻酔・集中治療領域の機器）会議にも各国から民間認証機関スタッフも参加している。TC121 はクラスⅡに加えてクラスⅢの高度管理医療機器に関する 100 余りにのぼる規格を作成しているが、民間認証機関スタッフは非常に専門的な知識、経験に基づいて貢献してくれている。この背景にはこれら民間認証機関は国家機関 (Competent Authority) によって認証機関に対する ISO/IEC の要求事項 (ISO17021) を満たしているかどうか毎年厳しく監査されていることがある。

一方、日本では現在 13 の第三者認証機関が業務を行っているがこうした要求事項に基づいて認可された認証機関でないためにその質は様々で前述の EU の民間認証機関の日本支社 (NSI, TUV など) の他に日本でしか業務を行っていないものもあり、安全の観点からも問題がある。また、PMDA の医療機器に関する審査承認業務体制についても批判も少なくない。

従って日本で ISO/IEC 規格の直接活用と第三者認証を推し進める重要条件として以下の

提言をしたい。

●医療機器を医薬品から分離してその特徴にあった医療機器法を成立させる。

●第三者認証機関は ISO13485 の認証審査に関して、適切な認定機関による ISO17021 の認定を受けている認証機関であることを明確にする。更に EU の Competent authority や Health Canada の法的観点からの認定審査も受けて審査を実施している認証機関であればより信頼性がある。

●ISO17021 の適用に際しては、IAF MD9：2011（医療機器品質マネジメントシステムにおける JIS Q 17021 適用のための IAF 基準文書）に準拠した活動が維持されている認証機関であることを条件とする。

●ISO17021 の要件を徹底させるためにはPMDA 自身がこれを率先して満たして審査官の質の高さを世に示して範とすることが是非とも必要と考える。

●さらに理想は PMDA の医療機器審査部門を独立行政法人から民営第三者認証機関に移行させて日本の第三者認証機関のレベルをリードする役を果たさせることが望ましい。

以上は ISO/IEC 規格の直接活用を促進するには審査承認制度を取り巻く環境の整備を抜本的に変えなければその目的を達成するのが困難であるという観点からの提言である。これまで述べてきた医療機器に関する日本の閉塞状況を打開するためにも俯瞰的な立場から制度改革を行っていくことは避けて通れない。この大きな問題に正面から取り組む姿勢なくしては我が国の第三者認証のクラスⅢへの拡大と ISO/IEC 規格の直接活用の試みは出発点から躓くことになろう。

#### 参考文献

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- 2) 大村昭人 「医療立国論」日刊工業新聞社 2007年5月発行.

## 4.2 まとめ

- 医療機器産業界の中でも各分野によって、ISO/IEC 規格の翻訳 JIS 作成に関する状況・考え方が大きく異なることが判明した。画像診断の分野のように、安全規格が中心で、ISO/IEC 規格をそのまま国内でも使えるように国際会議において文書をまとめることが可能であり、翻訳 JIS を IDT として定めている医療機器分野がある一方、ISO/IEC 規格と国内環境との間に違いがあり、翻訳 JIS を MOD とせざるを得ない場合もあった。後者の場合、日本国内の環境（試験時の湿度等）を考慮した修正、既存品を考慮した寸法などの修正、国内で普及している試験方法を考慮した試験方法の追加・変更、薬事法の規定に適合させるために必要な規定の追加などがあり、ISO/IEC 規格を直接引用することが適切ではないと考えられるケースや、認証基準に ISO/IEC 規格が直接引用されると、当該医療機器を販売できなくなる医療機器分野もあり得る。よって、特定の時期を設定して、すべての医療機器について同時に、ISO/IEC 直接活用への移行を宣言することは現実的ではなく、ISO/IEC 規格の直接活用を進めるべき分野もあれば、ISO/IEC 規格の直接引用ではなく今後も JIS 化を引き続き行うべき分野もある。
- MOD のうち、保健衛生上重要な変更を行ったものは少なかった。
- 海外での規制で国際規格を使う経過措置取り組み状況は、欧米において、明確なルール(どのような組織で、どのようなプロセスで、どのタイミングで、いつから使うか)を定めており、社会的に認知されており、公表してから3年～8年の移行期間を定めている。薬事法で JIS 規格を使う場合、告示基準のように強制的なポジションであるが、欧米では、規制で使う規格は強制ではない、一つの手段として用いられている。日本企業の国際競争力を保つためには、国際規格をもっとスピーディに規制での利用ができるように考慮すべきである。
- ISO/IEC 規格を認証基準で直接引用する場合、国内向けの翻訳版を作成するか否かについての議論は行われたが、結論はだせなかった。現状として、日本規格協会が販売している和英対訳版があるが、必ずしも必要な規格がすべて翻訳されているわけではない。関係企業が数社しかないような寡占分野の製品規格の場合、ISO/IEC 規格の翻訳版を作成する必要はないが、ある程度多くの企業が関係する製品規格の場合には翻訳版を作成することが望ましく、多数の企業が関係する準水平規格のような場合には引き続き JIS 化が必要であるとの意見があった。
- 輸出品を扱う企業は、旧版翻訳 JIS 及び新版 ISO/IEC 規格を、使い分けているようである。
- 本研究課題は、国内の医療機器規制制度の中での問題であり、関連する国内規制制度の問題点も、頻繁に話題に上った。

## 5. 提言

ここに、本研究班として意見の一致を見た、ISO/IEC 規格の認証基準への直接活用に関する提言を記載する。

提言 1. 最新の国際規格等と整合性を図る観点から、現時点で ISO/IEC 規格の直接引用が可能な画像診断分野に限定して、認証基準として、最新の ISO/IEC 規格を JIS に加えて引用する運用の試行を開始すべき。

提言 2. 提言 1 の試行において、直接引用における課題を抽出するとともに、それと並行して、ISO/IEC 規格をより国内において導入しやすくするための ISO/IEC 規格策定への積極的な参画などの施策を産官学で推進すべき。

### 【ISO/IEC 規格の認証基準への直接活用の利点】

- (1) JIS 化時に行われることがあった修正がないため、より国際統合化を反映した規制とすることができる。
- (2) 主に各医療機器分野の団体で行っていた JIS 化の過程を省略でき、それに使われていた、コスト、労力を削減できる。
- (3) JIS 化に要する時間が不要となり、ISO/IEC 文書の改訂をタイムリーに国内規制に反映させることができる。
- (4) 国際規格の改訂時に取り込まれた科学技術水準の進展による恩恵を、迅速に医療機器産業界に伝達でき、国際市場での時差を短縮し、医療機器産業の活性化に貢献できる。

### 【ISO/IEC 規格の認証基準への直接活用での問題点】

- (1) 認証基準に引用した ISO/IEC 規格に間違い等ある場合もあり、規制で用いる ISO/IEC 規格の選定プロセスが必要ではないか。
- (2) 国内の規制環境上又は医療機器使用環境上、ISO/IEC 規格を直接使用できない場合についても、上記(1)の選定プロセスで対応できるのではないか。
- (3) ISO/IEC 規格の翻訳の作成は、必要であれば、規格の内容を最も理解している審議団体が行うのが適切と考えられるが、著作権及び費用の問題が残る。
- (4) JIS 化までの繋ぎとして、最新版の ISO/IEC 規格の認証基準への直接引用を行うか、将来的に JIS 化も行わない前提での ISO/IEC 規格の直接引用を行うか、考え方の整理が必要ではないか。
- (5) 現在の認証基準で引用する JIS において、改正前の JIS を使用できる期間(経過措置期間)を JIS 本文の「適用範囲」の中で記載しているが、これは特例的な措置であるため、ISO/IEC 規格へはこの記載はできないため、行政側は移行措置期間を別途指何らかの方法で指定する必要が生じる。

(6) ISO/IEC 規格の直接引用により、安価な外国製品の輸入が増加する可能性も想定される。

## II. 資料

## 認証基準引用JIS一覧

NO.	引用回数	告示引用JIS規格	対応国際規格	技術的差異	現行国際規格
1	329	JIS T 0993-1:2012	ISO 10993-1:2009	MOD	ISO 10993-1:2009
2	189	JIS T 0601-1:1999	IEC 60601-1:1988 IEC 60601-1:1988/AMENDMENT 1:1993 IEC 60601-1:1988/AMENDMENT 2:1995	MOD	IEC 60601-1:2005
3	111	JIS T 6001:2012	ISO 7405:2008	MOD	ISO 7405:2008
4	17	JIS T 2003:2011	****		
5	17	JIS T 2009:2011	****		
6	15	JIS Z 4751-2-28:2008	IEC 60601-2-28:1993	IDT	IEC 60601-2-28:2010
7	15	JIS Z 4751-2-7:2008	IEC 60601-2-7:1998	IDT	IEC 60601-2-7:1998
8	14	JIS T 0601-1-3:2005	IEC 60601-1-3:1994	IDT	IEC 60601-1-3:2008
9	14	JIS Z 4703:1995	IEC 60336:1993 IEC 60522:1999 IEC 60601-2-28:1993 IEC 60613:1989	MOD	IEC 60336:2005 IEC 60522:1999 IEC 60601-2-28:2010 IEC 60613:2010
10	12	JIS T 2008:2011	****		
11	10	JIS C 1010-1:2005	IEC 61010-1:2001	MOD	IEC 61010-1:2010
12	10	JIS T 0601-1-1:2005	IEC 60601-1-1:2000	IDT	IEC 60601-1-1:2000
13	10	JIS T 0601-2-10:2005	IEC 60601-2-10:1987	MOD	IEC 60601-2-10:1987 IEC 60601-2-10 Amd.1 Ed. 1.0:2001 IEC 60601-2-10 Amd.1 Ed. 1.0 en Cor.1:2002
14	9	JIS T 0601-2-18:2005	IEC 60601-2-18:1996 IEC 60601-2-18:1996/AMENDMENT 1:2000	IDT	IEC 60601-2-18:2009
15	9	JIS T 2002:2006	****		
16	7	JIS T 6609-1:2005	ISO 9917-1:2003	MOD	ISO 9917-1:2007
17	6	JIS T 0601-2-37:2005	IEC 60601-2-37:2001 IEC 60601-2-37:2001/AMENDMENT 1:2004	IDT	IEC 60601-2-37:2007
18	6	JIS T 1553:2005	ISO 8600-1:1997 ISO 8600-3:1997 ISO 8600-4:1997	MOD	ISO 8600-1:2005 ISO 8600-3:1997 ISO 8600-4:1997
19	5	JIS Z 4751-2-44:2008	IEC 60601-2-44:2001 IEC 60601-2-44:2001/AMENDMENT 1:2002	IDT	IEC 60601-2-44:2009
20	4	JIS C 6950-1:2012	IEC 60950-1:2005	MOD	IEC 60950-1:2005
21	4	JIS T 0601-2-5:2005	IEC 60601-2-5:2000	IDT	IEC 60601-2-5:2009
22	4	JIS T 6609-2:2005	ISO 9917-2:1998	MOD	ISO 9917-2:2010
23	3	JIS C 9335-1:2003	IEC 60335-1:2001	MOD	IEC 60335-1:2010
24	3	JIS T 0601-2-203:2005	****		
25	3	JIS T 5907:2011	ISO 7785-2:1995	MOD	ISO 7785-2:1995
26	3	JIS T 6610:2005	ISO/FDIS 3107:2004	MOD	ISO 3107:2011
27	3	JIS T 7201-2-1:1999	ISO 5356-1:1996	MOD	ISO 5356-1:2004
28	2	JIS T 0601-2-201:2005	****		
29	2	JIS T 0601-2-202:2005	****		
30	2	JIS T 0601-2-205:2005	****		
31	2	JIS T 0601-2-206:2005	****		
32	2	JIS T 0601-2-207:2005	****		
33	2	JIS T 0601-2-208:2008	****		
34	2	JIS T 1115:2005	OIML R16-2:2002	MOD	OIML R16-2:2002
35	2	JIS T 1201-1:2011	IEC 60645-1:2001	MOD	IEC 60645-1:2012
36	2	JIS T 1205:2005	****		

NO.	引用回数	告示引用JIS規格	対応国際規格	技術的差異	現行国際規格
37	2	JIS T 2001:2005	****		
38	2	JIS T 2107:2011	****		
39	2	JIS T 3209:2011	ISO 7864:1993	MOD	ISO 7864:1993
40	2	JIS T 3211:2011	ISO 8536-4:2004 ISO 8536-5:2004 ISO 8536-8:2004 ISO 8536-9:2004 ISO 8536-10:2004	MOD	ISO 8536-4:2010 ISO 8536-5:2004 ISO 8536-8:2004 ISO 8536-9:2004 ISO 8536-10:2004
41	2	JIS T 5908:2012	ISO 13294:1997	MOD	ISO 13294:1997
42	2	JIS T 5909:2005	ISO 11498:1997	MOD	ISO 11498:1997
43	2	JIS T 6127:2008	ISO 24234:2004	MOD	ISO 24234:2004
44	2	JIS T 7111:2006	ISO 5359:2000	MOD	ISO 5359:2008
45	2	JIS Z 4751-2-45:2006	IEC 60601-2-45:2001	IDT	IEC 60601-2-45:2011
46	2	JIS Z 4951:2004	IEC 60601-2-33:2002	IDT	IEC 60601-2-33:2010
47	1	JIS C 5512:2000	IEC 60118-0:1983 IEC 60118-1:1995 IEC 60118-7:1983 IEC 60118-5:1983 IEC 60118-11:1983 IEC 60118-12:1996 IEC 60126:1973 IEC 60711:1981	MOD	IEC 60118-0:1983 IEC 60118-0:1983/AMENDMENT 1:1994 IEC 60118-1:2005 IEC 60118-7:1983 IEC 60118-5:1983  IEC 60118-12:1996 IEC 60126:2006 IEC 60318-4:2010
48	1	JIS T 0601-2-2:2005	IEC 60601-2-2:1998	MOD	IEC 60601-2-2:2009
49	1	JIS T 0601-2-204:2005	****		
50	1	JIS T 0601-2-21:2005	IEC 60601-2-21:1994 IEC 60601-2- 21:1994/AMENDMENT 1:1996	MOD	IEC 60601-2-21:2009
51	1	JIS T 0601-2-3:2005	IEC 60601-2-3:1991 IEC 60601-2- 3:1991/AMENDMENT 1:1998	MOD	IEC 60601-2-3:2012
52	1	JIS T 0601-2-35:2005	IEC 60601-2-35:1996	IDT	IEC 60601-2-35:1996
53	1	JIS T 0601-2-40:2005	IEC 60601-2-40:1998	MOD	IEC 60601-2-40:1998
54	1	JIS T 0601-2-6:2005	IEC 60601-2-6:1984	MOD	IEC 60601-2-6:1984
55	1	JIS T 1140:2005	OIML R16-2:2002	MOD	OIML R16-2:2002
56	1	JIS T 1201-2:2000	IEC 60645-2:1993	MOD	IEC 60645-2:1993
57	1	JIS T 1303:2005	****		
58	1	JIS T 1506:2005	IEC 61266:1994	MOD	IEC 61266:1994
59	1	JIS T 1704:2008	ISO 7199:1996	MOD	ISO 7199:2009 ISO 7199:2009/AMENDMENT 1:2012
60	1	JIS T 2004:2011	****		
61	1	JIS T 2005:2011	****		
62	1	JIS T 2006:2011	****		
63	1	JIS T 2007:2011	****		
64	1	JIS T 2010:2011	****		
65	1	JIS T 3102:2005	****		
66	1	JIS T 3210:2011	ISO 7886-1:1993 ISO 7886-1 Col:1995	MOD	ISO 7886-1:1993 ISO 7886-1 Col:1995
67	1	JIS T 3212:2011	ISO 1135-4:2004	MOD	ISO 1135-4:2012
68	1	JIS T 3213:2011	****		
69	1	JIS T 3214:2011	****		
70	1	JIS T 3215:2011	****		
71	1	JIS T 3216:2011	****		
72	1	JIS T 3217:2011	ISO 3826-1:2003	MOD	ISO 3826-1:2003
73	1	JIS T 3219:2011	ISO 8536-11:2004	MOD	ISO 8536-11:2004
74	1	JIS T 3220:2011	****		
75	1	JIS T 3221:2011	****		



NO.	引用回数	告示引用JIS規格	対応国際規格	技術的差異	現行国際規格
76	1	JIS T 3222:2011	****		
77	1	JIS T 3223:2011	ISO 10555-5:1996 ISO 10555-5:1996/AMENDMENT 1:1999	MOD	ISO 10555-5:1996 ISO 10555-5:1996/AMENDMENT 1:1999
78	1	JIS T 3224:2011	****		
79	1	JIS T 3225:2011	****		
80	1	JIS T 3226-1:2011	ISO 11608-1:2000	MOD	ISO 11608-1:2000
81	1	JIS T 3226-2:2011	ISO 11608-2:2000	MOD	ISO 11608-2:2000
82	1	JIS T 3228:2011	****		
83	1	JIS T 3229:2011	****		
84	1	JIS T 3231:2011	ISO 15674:2001	MOD	ISO 15674:2009
85	1	JIS T 3232:2011	ISO 15675:2001	MOD	ISO 15675:2009
86	1	JIS T 3233:2011	ISO 6710:1995	MOD	ISO 6710:1995
87	1	JIS T 3234:2011	****		
88	1	JIS T 3235:2011	****		
89	1	JIS T 3236:2011	****		
90	1	JIS T 3237:2011	****		
91	1	JIS T 3238:2011	****		
92	1	JIS T 3239:2011	****		
93	1	JIS T 3240:2011	****		
94	1	JIS T 3241:2011	****		
95	1	JIS T 3242:2011	****		
96	1	JIS T 3243:2011	****		
97	1	JIS T 3244:2011	****		
98	1	JIS T 3245:2011	****		
99	1	JIS T 3246:2011	****		
100	1	JIS T 3247:2011	****		
101	1	JIS T 3248:2011	ISO 8638:2004	MOD	ISO 8638:2010
102	1	JIS T 3249:2011	ISO 10555-5:1996 ISO 10555-5:1996/AMENDMENT 1:1999	MOD	ISO 10555-5:1996 ISO 10555-5:1996/AMENDMENT 1:1999
103	1	JIS T 3251:2005	ISO 8836:2007	MOD	ISO 8836:2007
104	1	JIS T 3252:2007	****		
105	1	JIS T 3254:2007	****		
106	1	JIS T 3256:2007	****		
107	1	JIS T 3257:2007	****		
108	1	JIS T 3259:2007	ISO 14972:1998	MOD	ISO 14972:1998
109	1	JIS T 3260:2007	ISO 11070:1998	MOD	ISO 11070:1998
110	1	JIS T 3261:2007	ISO 11070:1998	MOD	ISO 11070:1998
111	1	JIS T 3262:2007	ISO 11070:1998	MOD	ISO 11070:1998
112	1	JIS T 3263:2007	****		
113	1	JIS T 3264:2007	****		
114	1	JIS T 3265:2007	****		
115	1	JIS T 3267:2007	ISO 11070:1998	MOD	ISO 11070:1998
116	1	JIS T 3268:2012	ISO 10555-1:1995 ISO 10555-1:1995/AMENDMENT 1:1999 ISO 10555-1:1995/AMENDMENT 2:2004 ISO 10555-2:1996 ISO 10555-3:1996 ISO 10555-4:1996	MOD	ISO 10555-1:1995 ISO 10555-1:1995/AMENDMENT 1:1999 ISO 10555-1:1995/AMENDMENT 2:2004 ISO 10555-2:1996 ISO 10555-3:1996 ISO 10555-4:1996
117	1	JIS T 3305:2007	****		
118	1	JIS T 3307:2007	****		
119	1	JIS T 3320:2011	****		
120	1	JIS T 3321:2008	****		
121	1	JIS T 3322:2011	****		

NO.	引用回数	告示引用JIS規格	対応国際規格	技術の差異	現行国際規格
122	1	JIS T 3323:2008	****		
123	1	JIS T 3324:2011	****		
124	1	JIS T 3351:2007	****		
125	1	JIS T 4207:2005	****		
126	1	JIS T 5701:2005	ISO 7494:1996	MOD	ISO 7494-2:2003
127	1	JIS T 5750:2009	****		
128	1	JIS T 5801:2005	ISO 10637:1999	MOD	ISO 10637:1999
129	1	JIS T 5906:2001	ISO 7785-1:1997	MOD	ISO 7758-1:1997
130	1	JIS T 5910:2005	ISO 15606:1999	MOD	ISO 15606:1999
131	1	JIS T 5911:2012	ISO 22374:2005	MOD	ISO 22374:2005
132	1	JIS T 6101:2005	****		
133	1	JIS T 6102:2005	****		
134	1	JIS T 6103:2005	****		
135	1	JIS T 6104:2005	****		
136	1	JIS T 6105:2011	****		
137	1	JIS T 6106:2011	****		
138	1	JIS T 6107:2011	****		
139	1	JIS T 6108:2005	****		
140	1	JIS T 6111:2011	ISO 9333:2006	MOD	ISO 9333:2006
141	1	JIS T 6113:2011	****		
142	1	JIS T 6114:2011	****		
143	1	JIS T 6115:1998	ISO 6871-1:1994	MOD	ISO 22674:2006
144	1	JIS T 6116:2000	****		
145	1	JIS T 6117:2011	ISO 9333:2006	MOD	ISO 9333:2006
146	1	JIS T 6118:2005	ISO 9693:1999	MOD	ISO 9693:1999 ISO 9693:1999/AMENDMENT 1:2005
147	1	JIS T 6121:2005	ISO 9693:1999	MOD	ISO 9693:1999 ISO 9693:1999/AMENDMENT 1:2005
148	1	JIS T 6122:2005	ISO 8891:1998	MOD	ISO 22674:2006
149	1	JIS T 6123:2005	ISO 16744:2003	MOD	ISO 22674:2006
150	1	JIS T 6124:2005	****		
151	1	JIS T 6125:2005	****		
152	1	JIS T 6126:2008	****		
153	1	JIS T 6130:2007	ISO 20795-1:2008	MOD	ISO 20795-1:2008
154	1	JIS T 6501:2005	ISO 20795-1:2008	MOD	ISO 20795-1:2008
155	1	JIS T 6504:1995	****		
156	1	JIS T 6505:2005	ISO 1563:1990	MOD	ISO 1563:1990
157	1	JIS T 6506:2005	ISO 3336:1993	MOD	ISO 22112:2005
158	1	JIS T 6507:1994	****		
159	1	JIS T 6511:2005	ISO 4824:1993	MOD	ISO 4824:2008
160	1	JIS T 6512:2005	ISO 1564:1995	MOD	ISO 1564:1995
161	1	JIS T 6513:2005	ISO 4823:2000	MOD	ISO 4823:2008
162	1	JIS T 6514:2005	ISO 4049:2000	MOD	ISO 4049:2009
163	1	JIS T 6515:2011	ISO 6877:2006	MOD	ISO 6877:2006
164	1	JIS T 6516:2005	ISO 9693:1999	MOD	ISO 9693:1999 ISO 9693:1999/AMENDMENT 1:2005
165	1	JIS T 6517:2011	ISO 10477:2004	MOD	ISO 10477:2004
166	1	JIS T 6518:2011	ISO 10477:2004	MOD	ISO 10477:2004
167	1	JIS T 6519:2000	****		
168	1	JIS T 6520:2000	ISO 10139-2:1999	MOD	ISO 10139-2:2009
169	1	JIS T 6521:2005	****		
170	1	JIS T 6522:2005	ISO 6876:2001	MOD	ISO 6876:2001
171	1	JIS T 6523:2005	ISO 4049:2000	MOD	ISO 4049:2009
172	1	JIS T 6524:2005	ISO/DIS 6874:2004	MOD	ISO 6874:2005
173	1	JIS T 6525-1:2005	****		
174	1	JIS T 6525-2:2005	****		
175	1	JIS T 6530:2009	ISO 15841:2006	MOD	ISO 15841:2006
176	1	JIS T 6531:2012	ISO 21606:2007	MOD	ISO 21606:2007

NO.	引用回数	告示引用JIS規格	対応国際規格	技術的差異	現行国際規格
177	1	JIS T 7201-1:1999	ISO 5358:1992	MOD	ISO 5358:1992
178	1	JIS T 7201-3:2005	ISO 5362:2000	MOD	ISO 5362:2006
179	1	JIS T 7201-4:2005	ISO 5367:2000	MOD	ISO 5367:2000
180	1	JIS T 7202:1989	****		
181	1	JIS T 7208-2:2005	ISO 10079-2:1999	MOD	ISO 10079-2:1999
182	1	JIS T 7209:2007	ISO 8359:1996	MOD	ISO 8359:1996
183	1	JIS T 7211:2005	ISO 23328-1:2003	IDT	ISO 23328-1:2003
184	1	JIS T 7212:2005	ISO 23328-2:2002	IDT	ISO 23328-2:2002
185	1	JIS T 7221:2011	ISO 5361:1999	MOD	ISO 5361:1999
186	1	JIS T 7224:1993	ISO 5361-4:1987	MOD	ISO 5361-4:1987
187	1	JIS T 7227:2011	ISO 5366-1:2000 ISO 5366-3:2001	MOD	ISO 5366-1:2000 ISO 5366-3:2001
188	1	JIS T 7312:2005	ISO 8612:2001	MOD	ISO 8612:2009
189	1	JIS T 7322:2005	****		
190	1	JIS T 7323:2005	****		
191	1	JIS T 7324:2005	****		
192	1	JIS T 7328:2005	****		
193	1	JIS T 7329:2008	****		
194	1	JIS T 9107:2005	ISO 10282:2002	MOD	ISO 10282:2002
195	1	JIS T 9111-1:2000	ISO 4074-1:1996	MOD	Date of withdrawal: 2002-03-14 ISO 4074:2002
196	1	JIS T 9301:2005	****		
197	1	JIS Z 4821-1:2002	ISO 2919:1999	IDT	ISO 2919:2012

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## FINAL DOCUMENT

### Global Harmonization Task Force

**Title:** Role of Standards in the Assessment of Medical Devices

**Authoring Group:** Study Group 1 of the Global Harmonization Task Force

**Date:** 5 March 2008

A handwritten signature in black ink, appearing to read 'L. Kessler', is written over a horizontal line.

Larry Kessler, GHTF Chair

This document was produced by the Global Harmonization Task Force, a voluntary international group of representatives from medical device regulatory authorities and trade associations from Europe, the United States of America (USA), Canada, Japan and Australia.

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## Table of Contents

1.0	Introduction.....	4
2.0	Rationale, Purpose and Scope.....	5
2.1	Rationale .....	5
2.2	Purpose.....	5
2.3	Scope.....	5
3.0	References.....	5
4.0	Definitions.....	6
5.0	General Principles.....	7
5.1	Recognition of Standards.....	7
5.2	Revision of Recognised Standards.....	8
5.3	Changes to the Recognition Status .....	8
5.4	Use of Recognised Standards when Designing and Supplying Medical Devices both during and after the Transition Period.....	9
5.5	Status of Devices Designed using the Superseded Version of the Recognised Standard and Supplied before the end of the Transition Period.....	9
5.6	Alternatives to Recognised Standards .....	9
5.7	Technical Documentation .....	10

## **Preface**

The document herein was produced by the Global Harmonization Task Force, a voluntary group of representatives from medical device regulatory authorities and the regulated industry. The document is intended to provide non-binding guidance for use in the regulation of medical devices, and has been subject to consultation throughout its development.

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## 1.0 Introduction

The objective of the Global Harmonization Task Force (GHTF) is to encourage convergence at the global level in the evolution of regulatory systems for medical devices in order to facilitate trade whilst preserving the right of participating members to address the protection of public health by those regulatory means considered the most suitable.

The primary way in which the Global Harmonization Task Force (GHTF) achieves its goals is through the production of harmonized guidance documents suitable for implementation or adoption by member Regulatory Authorities, as appropriate taking into account their existing legal framework, or by nations with developing regulatory programmes. Eliminating differences between jurisdictions decreases the cost of gaining regulatory compliance and allows patients earlier access to new technologies and treatments.

This guidance document is one of a series that together describe a global regulatory model for medical devices. It describes the role of technical standards to demonstrate a device conforms to essential safety and performance principles. The GHTF published guidance on this subject entitled *GHTF/SG1/N012:2000 Role of Standards in the Assessment of Medical Devices*. It applied to the majority of medical devices but not to in vitro diagnostic (IVD) medical devices.

This document supersedes that previous version. It has been changed to:

- extend the scope to include in vitro diagnostic medical devices; and
- provide guidance on the use of recognised standards that have been revised or replaced.

This document is intended for use by Regulatory Authorities, Conformity Assessment Bodies and industry, and will provide benefits in establishing, in a consistent way, an economic and effective approach to the control of medical devices in the interest of public health.

Regulatory Authorities that are developing regulations or amending existing ones are encouraged to consider the adoption of this guidance and the principles it embodies, as this will help to reduce the diversity of schemes worldwide and facilitate the process of harmonization.

The regulatory requirements of some countries may not, at this time, align fully with this guidance.

This guidance document has been prepared by Study Group 1 of the Global Harmonization Task Force (GHTF). Comments or questions about it should be directed to the Chair of GHTF Study Group 1 whose contact details are available on the GHTF website.

Note: Where GHTF guidance documents are cited within this text, their titles are italicised for clarity.

## 2.0 Rationale, Purpose and Scope

### 2.1 Rationale

International consensus standards are a tool for harmonizing regulatory processes to assure the safety, quality and performance of medical devices. This document provides guidance on the use of standards by a manufacturer when demonstrating the device conforms to relevant essential safety and performance principles.

### 2.2 Purpose

To:

- encourage and support the development of international consensus standards for medical devices that may serve to demonstrate conformity with the *Essential Principles of Safety and Performance of Medical Devices* (hereafter referred to as 'Essential Principles');
- encourage manufacturers to conform with appropriate international standards;
- persuade Regulatory Authorities to introduce a mechanism for recognising standards that provide manufacturers with a method of demonstrating conformity with the GHTF harmonized Essential Principles;
- support the concept that in general, the use of standards is voluntary and manufacturers have the option to select alternative solutions to demonstrate their medical device meets the relevant Essential Principles.

### 2.3 Scope

This document applies to all products that fall within the definition of a medical device that appears within the GHTF document *Information Document Concerning the Definition of the Term 'Medical Device'*, **including** those used for the *in vitro* examination of specimens derived from the human body.

## 3.0 References

GHTF/SG1/N29:2005 *Information Document Concerning the Definition of the Term 'Medical Device'*.

GHTF/SG1/N40:2006 *Principles of Conformity Assessment for Medical Devices*.

GHTF/SG1/N41:2005 *Essential Principles of Safety and Performance of Medical Devices*.

GHTF/SG1/N11:2008 *Summary Technical Documentation for Demonstrating Conformity to the Essential Principles of Safety and Performance of Medical Devices (STED)*.



## 4.0 Definitions

**Conformity assessment:** the systematic examination of evidence generated and procedures undertaken by the manufacturer, under requirements established by the Regulatory Authority, to determine that a medical device is safe and performs as intended by the manufacturer and, therefore, conforms to the *Essential Principles of Safety and Performance of Medical Devices*.

**Conformity Assessment Body (CAB):** a body engaged in the performance of procedures for determining whether the relevant requirements in technical regulations or standards are fulfilled. A CAB is authorized to undertake specified conformity assessment activities by a Regulatory Authority that will ensure performance of the CAB is monitored and, if necessary, withdraw designation.

**Regulatory Authority (RA):** A government agency or other entity that exercises a legal right to control the use or sale of medical devices within its jurisdiction, and may take enforcement action to ensure that medical products marketed within its jurisdiction comply with legal requirements.

**Risk:** Combination of the probability of occurrence of harm and the severity of that harm. (*ISO/IEC Guide 51:1999*)

**Standard:** Document, established by consensus and approved by a recognised body, that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context.

**NOTE:** Standards should be based on the consolidated results of science, technology and experience, and aimed at the promotion of optimum community benefits. (*ISO/IEC Guide 2:2004, definition 3.2*)

**Basic standard (also known as horizontal standard):** Standard indicating fundamental concepts, principles and requirements with regard to general safety and performance aspects applicable to all kinds or a wide range of products and/or processes (e.g., standards concerning risk management, clinical investigation and the quality management system for the manufacture of medical devices).

**Group standard (also known as semi-horizontal standard):** Standard indicating aspects applicable to families of similar products and/or processes making reference as far as possible to basic standards (e.g., standards concerning sterile medical devices, electrically-powered medical devices, stability of IVD reagents).

**Product standard (also known as vertical standard):** Standard indicating necessary safety and performance aspects of specific products and/or processes, making reference, as far as possible, to basic standards and group standards (e.g., standards for infusion pumps, for anaesthetic machines or for blood glucose meters for self testing).

**Recognised standard:** Standard deemed to offer the presumption of conformity to specific Essential Principles of Safety and Performance.

## 5.0 General Principles

International standards, such as basic standards, group standards and product standards, are a tool for harmonizing regulatory processes to assure the safety, quality and performance of medical devices. Standards represent the opinion of experts from all interested parties, including industry, regulators, users and others.

To achieve harmonization, the following principles are recommended:

- RAs and industry should encourage, support and contribute to the development of international standards that may be useful in demonstrating conformity of medical devices with the Essential Principles<sup>1</sup>.
- RAs should encourage the use of international standards<sup>2</sup>.
- RAs should establish a mechanism for recognizing international standards to provide manufacturers with a method of demonstrating conformity with the Essential Principles. This mechanism should also include a procedure for withdrawal of recognition. Preference should be given to standards developed in accordance with principles of procedural transparency, and rules that require public comment, periodic revisions, and the consideration and resolution of all the public comments.
- If a manufacturer chooses not to apply a recognised standard in part or in full, then this is acceptable if conformity with the Essential Principles can be demonstrated by another means.
- It is preferable for harmonization purposes to use international standards but RAs should be prepared also to accept the use by manufacturers of global<sup>3</sup>, national, regional or industry standards as a means of demonstrating conformity.
- Standards Bodies developing or revising standards for use with medical devices should consider the suitability of such standards for demonstrating conformity with the Essential Principles and should identify which of the Essential Principles they satisfy.
- Standards should represent the generally acknowledged state of technology and practice. However, the preference for the use of recognised standards should not discourage the use of new technologies. Not all devices, or elements of safety and/or performance, may be addressed by recognised standards, especially for new types of devices and emerging technologies.

### 5.1 Recognition of Standards

RAs should provide a method for the recognition of international voluntary standards and for public notification of such recognition. The process of recognition may vary from country to country. The method should include a mechanism of periodic review and realignment of nationally recognised standards to the international standards. Recognition

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<sup>1</sup> International standards that may be useful in demonstrating conformity with the Essential Principles may be found in overview documents published by international standards organizations e.g., ISO/TR 16142:2006.

<sup>2</sup> This includes situations where an international standard has been adopted as a national standard.

<sup>3</sup> Standards that, while not being international standards, have gained acceptance in many parts of the World.

may occur by periodic publication of lists of standards that a RA has found will meet the Essential Principles.

Persons intending to market medical devices should obtain information from the relevant RA through official publications on recognised standards.

The use of standards by the manufacturer is voluntary. The term “recognised standard” does not imply that such a standard is mandatory (see also Section 5.7).

Conformity with recognised standards may be used by the manufacturer to demonstrate conformity with the relevant Essential Principles and/or specific premarket or post-market requirements of the RA. When used, the manufacturer should identify the version and date of the relevant recognised standard(s) in its technical documentation.

## 5.2 Revision of Recognised Standards

A revision of recognised standards may occur, for example, in the following circumstances:

- a requirement in a specific standard is determined to be inadequate to ensure conformity to a specific Essential Principle;
- one or more of the Essential Principles has changed,
- changes in the state of technology or accepted practice necessitate revising the technical specifications in the standard.

## 5.3 Changes to the Recognition Status

The RA may cease to recognise a standard for various reasons, such as:

- safety concerns identified through post-market surveillance activities or user experience;
- the availability of a revised version of the standard.

Where the RA considers that, for safety reasons, a recognised standard ceases to give a presumption of conformity to the Essential Principles and a revised version has yet to become available, the RA should fix a date, which may be immediate, after which the standard will no longer give a presumption of conformity to an Essential Principle(s), and publish the withdrawal of recognition in accordance with its procedures for public notification of recognition of standards.

When withdrawing recognition of a standard for reasons other than safety, the RA should fix a date after which the standard will no longer give a presumption of conformity to an Essential Principle(s). When setting such a date, the RA should establish a transition period that should be adequate to allow manufacturers to respond in an appropriate manner. In such circumstances, the transition period should normally be in the order of 3 years. Depending upon the extent and nature of the revision, this transition period may be adapted, as appropriate. The RA should publish this information in accordance with its procedures for public notification of recognition of standards.

#### **5.4 Use of Recognised Standards when Designing and Supplying Medical Devices both during and after the Transition Period**

During the transition period both the prior and the revised version of the recognised standard give presumption of conformity with the Essential Principles, consequently either may be used when designing or supplying medical devices to the end user.

After the transition period, only the revised version of the recognised standard gives presumption of conformity with relevant Essential Principles. However, manufacturers may choose to use the superseded version of the recognised standard despite the loss of the presumption of conformity to the Essential Principles and may continue to design and/or supply medical devices to the end user according to the superseded standard. In such cases, in order to demonstrate that the medical device conforms to all relevant Essential Principles, the manufacturer is required to justify its decision to use the superseded standard through documented risk assessment, and take any risk mitigation action as appropriate.

The manufacturer's decision may be subject to review by a RA/CAB.

#### **5.5 Status of Devices Designed using the Superseded Version of the Recognised Standard and Supplied before the end of the Transition Period**

Where a medical device was designed according to the superseded version of the recognised standard to demonstrate conformity with one or more relevant Essential Principles and is either in the distribution chain or has been supplied to the end user before the end of the transition period, the manufacturer is not required to take any action unless there are safety implications, in which case the manufacturer should implement a risk mitigation strategy and take appropriate action to address these safety concerns.

#### **5.6 Alternatives to Recognised Standards**

The use of standards is voluntary. Manufacturers should have the option to select alternative solutions to demonstrate their medical device meets the relevant Essential Principles. Manufacturers may use "non-recognised" standards, in whole or in part, or other methods. Alternative means of demonstrating conformity with the Essential Principles may include, for example:

- national and international standards that have not been given the status of a "recognised standard" by the Regulatory Authority;
- industry agreed methods;
- internal manufacturer standard operating procedures developed by an individual manufacturer;
- other sources that describe the current state of technology and practice related to performance, material, design, methods, processes or practices.

The acceptability of such other solutions should be justified and may be subject to review by the RA/CAB, as appropriate.