

EU COMPETENT AUTHORITY VIGILANCE SYSTEM ACCEPTANCE

In an effort to harmonize vigilance reporting in the EU, the European Commission published Meddev document 2.12/1 rev. 5, based on the Global Harmonization Task Force November 2006 vigilance guidance document.

However, Meddev documents are not legally binding and QNET device experts realized a need to determine if all EU Competent Authorities were willing to accept incident reports based on Meddev 2.12/1 rev.5, and decided to contact all for a response to two simple questions during January 2008.

The majority of the Competent Authorities responded very quickly and volunteered 'different' requirements in their country, only five countries ignored repeated requests. Below please find the response to both questions from each country, stated in their own words.

| EU | Q.1:Please advise if | Q.2: Can | Special |
|--------------------|--|---|--------------|
| And | you accept incident | Manufacturer's | requirements |
| EFTA States | reports based on | Report Form be | |
| | Meddev 2.12/1 rev. 5 | filed | |
| | | electronically? | |
| | . 12 | | |
| Austria | No reply to emails. Website not in English. | | |
| | | | |
| Belgium | Do accept but the timeframe for reporting is different in Belgian legislation (superseding Meddev guidelines), namely immediately (which means as soon as possible after the incident/near-incident where a medical device is involved in known and not after complete investigation). | Can send all files electronically BUT according to Belgian legislation, incident/near-incident reports and safety information and FSCA concerning AIMD must be sent by certified mail. In any case we do fax an acknowledgement receipt once the reference number is generated by our database. | |

| Bulgaria | Yes | Email | May also send hard copy or fax |
|-------------------------|--------------------------------------|---------------------------|--|
| Cyprus | Yes | Email | |
| Czech Republic | Yes | Email | |
| Denmark | Yes | Yes - web submission form | 8 |
| Estonia | No reply | | |
| Finland | Yes | Email | 265 |
| France | Yes | No | Hard copy or fax |
| Germany | Yes | Email | Plus hard copy or fax |
| Greece | Yes | Email | |
| Hungary | Yes | Email | |
| Iceland (EFTA) | Yes | Email | Requires both hard copy and email |
| Ireland | Yes | Email | |
| Italy | Yes | Email | Indicate in email if hard copy will follow |
| Latvia | No reply | | |
| | 000 | | |
| Liechtenstein (EFTA) | No reply – Website not in English | | |
| Lithuania | Yes | Email | Email, fax or post |
| Luxemburg | Yes | Email | |
| Malta | Yes | Email | |
| Netherlands | Yes | Email | Do not repeat by fax or regular mail |
| Norway (EFTA) | Yes | Email | Accepts e-mail, fax or regular mail. |
| Poland | Yes | Email | |

| Portugal | Yes | Email | |
|--------------------------------|---------------------------------------|---|--|
| | | | |
| Romania | No reply – Website not in English. | | |
| Slovenia | Yes | Email | |
| 0.0.0.0 | | | |
| Slovakia | Yes | Email | |
| Spain | Yes | Email | and/or fax also acceptable |
| Sweden | Yes | Email | E-mail preferred. Telephone and fax reports are acceptable but must be confirmed by hard-copy mail |
| Switzerland (EFTA) | Yes | Email | Fax also acceptable |
| Turkey (Candidate State) | No | Email | Hard copy and Fax also acceptable |
| | | • | |
| United Kingdom | Yes | Yes- Web submission form after registering. | E-mail, fax or post also acceptable |
| | | | |

Manufacturers revision of their vigilance procedures, in accordance with the Meddev. 2.12/1 rev. 5 will meet the requirements of the amended medical device directive.

Companies should be aware that the EU Competent Authorities will be sharing incident reports not only with all EU countries, but also with other parts of the world with whom they have agreements, i.e. USA, Canada, Far East (Taiwan, Hong Kong, Singapore), Australia.

This emphasizes the need for manufacturers to develop and use consistent compliance intelligence to meet regulatory requirements worldwide. The Global Harmonization Task force is working hard towards that goal which QNET tracks diligently.

Our 'Doing It Once' compliance service provides guidance on developing consistency in accordance with US, EU and Canadian regulations.

Subject to change without notice.

Compiled from information provided by the Competent Authorities.

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