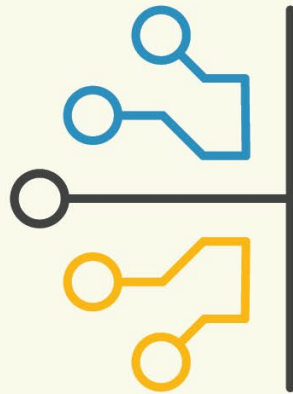


Welcome to



**EMERGING
TECHNOLOGIES**
CONFERENCE at Advanced Textiles® **EXPO**



Medical Product vs. Device

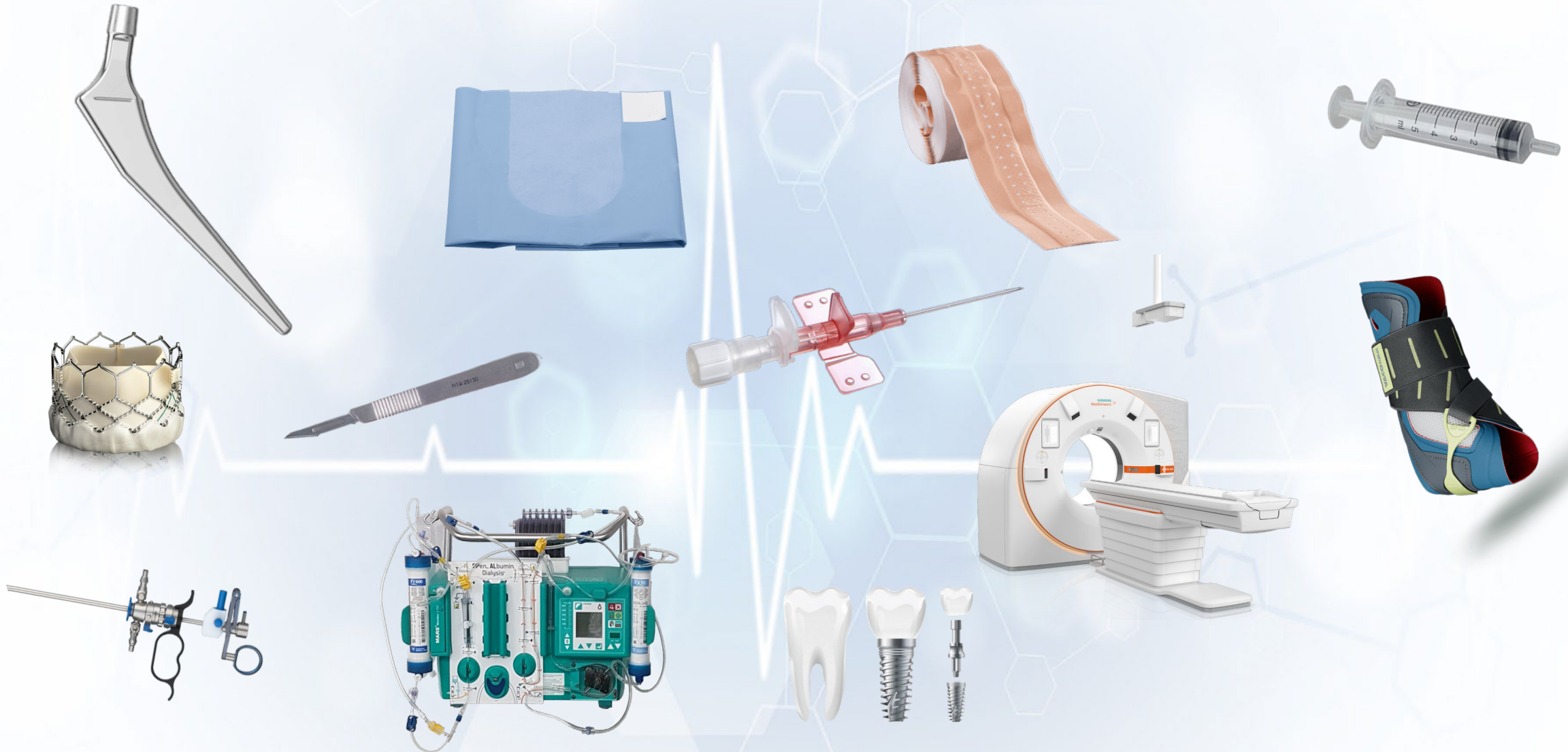
A look behind the scenes



HOHENSTEIN
MEDICAL

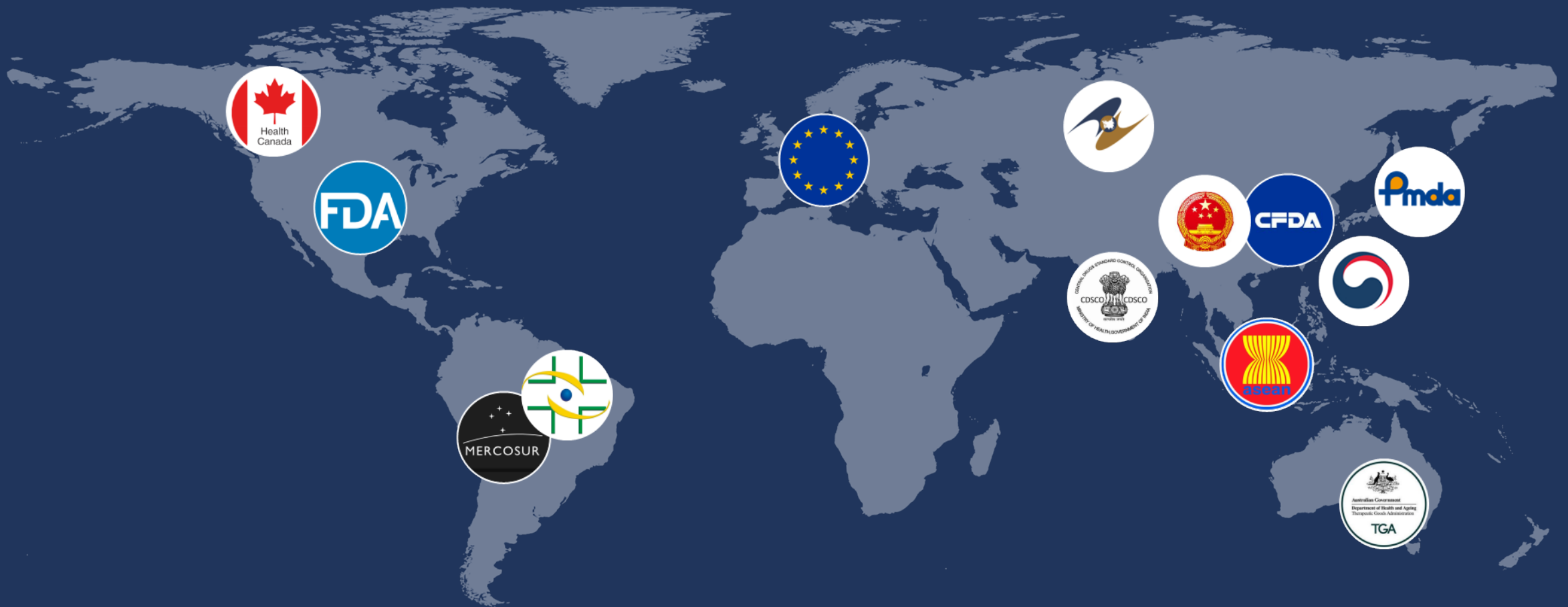


The Complex World of Medical Devices



Global Regulations

Medical Devices



Medical device or not?

It's all about the intended use.

FDA Definition "Device"

U.S. Food and Drug Administration

An instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent, or other similar or related article, including a component part or accessory which is:

- recognized in the official National Formulary, or the United States Pharmacopoeia, or any supplement to them,
- **intended for use** in the diagnosis of disease or other conditions, or in the **cure, mitigation, treatment, or prevention** of disease in man or other animals, or
- intended to **affect the structure or any function of the body** of man or other animals
- does not achieve its primary intended purposes through chemical action within or on the body of man or other animals and which is not dependent upon being metabolized for the achievement of its primary intended purposes

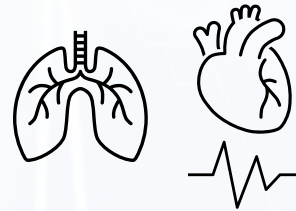
Does NOT include software
(section 520(o)).

(Food, Drug & Cosmetic Act (FD&C Act)
Section 201(h))

Medical Device Classification

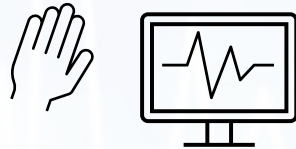
U.S.

Class 3
High risk



Implants
Stents
Pacemaker

Class 2
Moderate risk



Medical gloves
Defibrillator
Blood pressure monitor

Class 1
Low risk



Toothbrush
Hygiene products
Patches

EU Definition "Medical Device"

Medical Device Regulation (MDR)

Any instrument, apparatus, appliance, software, implant, reagent, material or other article intended by the manufacturer to be used, alone or in combination, for human beings for one or more of the following specific medical purposes:

- **diagnosis, prevention, monitoring, prediction, prognosis, treatment or alleviation of disease,**
- diagnosis, monitoring, treatment, alleviation of, or compensation for, an **injury or disability,**
- **investigation, replacement or modification of the anatomy or of a physiological or pathological process** or state,
- providing information by means of in vitro examination of specimens derived from the human body, including organ, blood and tissue donations,

and which **does not achieve its principal intended action by pharmacological, immunological or metabolic means**, in or on the human body, but which may be assisted in its function by such means.

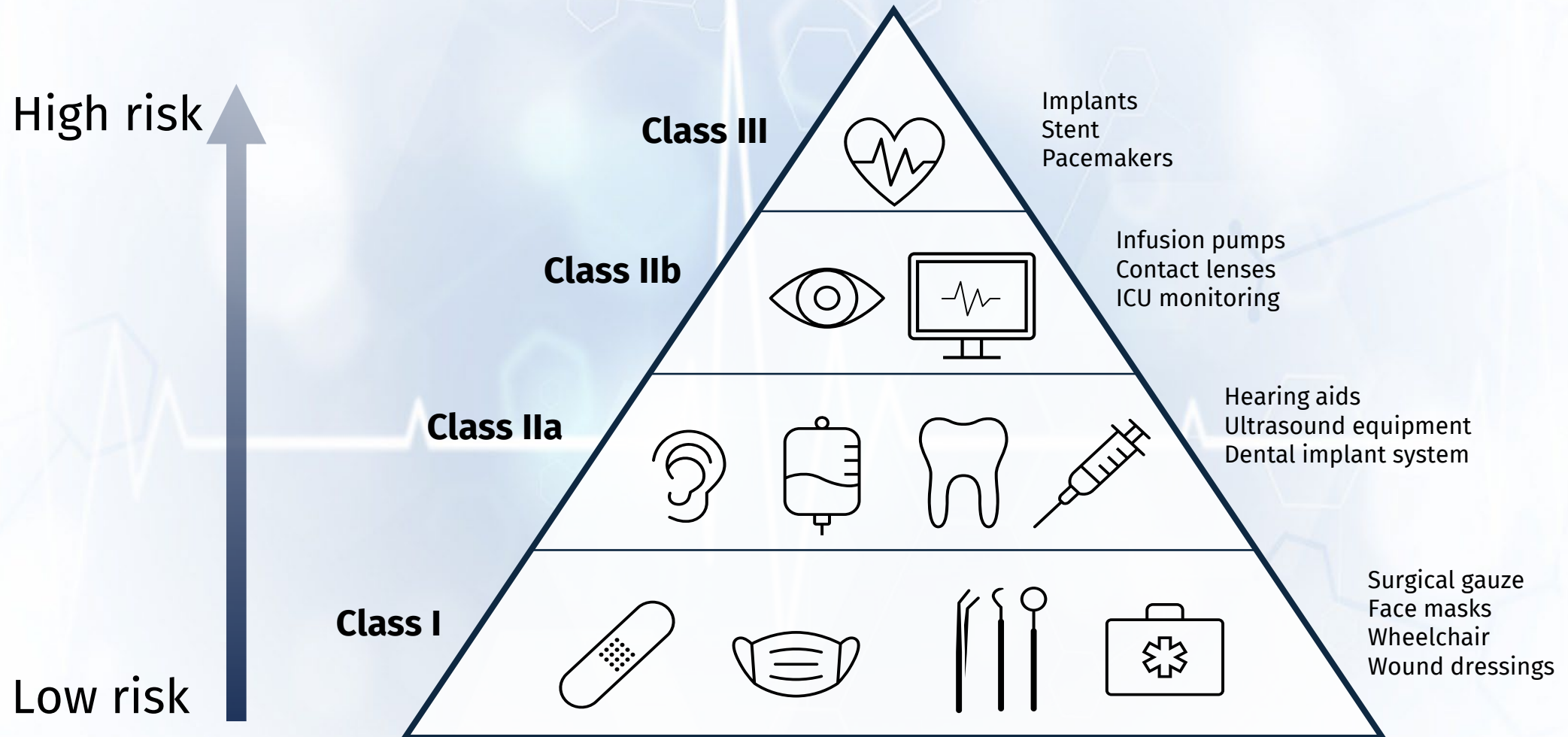


Includes software

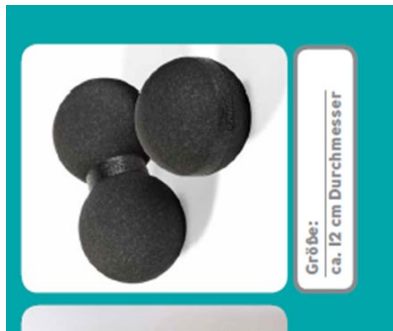
MDR 2017/745 (MDR) - Article 2

Medical Device Classification

EU



Medical Device – Yes or No?



fitness

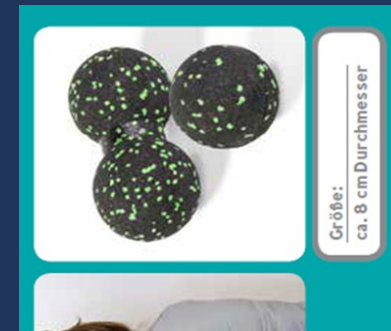
Massageball-Set

Punktuelle Selbstmassage und Faszientraining durch Einzel- und Peanutball.

- Zur punktuellen Massage des Bindegewebes
- Ermöglicht Selbstmassage von parallelen Muskelsträngen
- Steigert die Durchblutung und löst Verspannungen

- "Self-massage and training of tissues"
- "Enhances blood circulation and releases muscle tensions"

→ **Medical Device**



fitness

Massageball-Set

Punktuelle Selbstmassage durch Einzel- und Peanutball.

- Zur punktuellen Massage des Bindegewebes
- Ermöglicht Selbstmassage von parallelen Muskelsträngen
- Steigert das Wohlbefinden

- "Self-massage"
- "Improved well-being"

→ **NOT Medical Device**

Medical Device – US vs EU

US



Unscented Tampon

Reproductive, Gynecology and Urology
Devices (DHT3B)

→ **Medical Device Class 2**

Guidance Document (FDA-2020-D-0957)

EU



Menstrual Products

Hygiene Products

→ **NOT Medical Device**

Approval

FDA vs EU MDR

Different

- Classification system
- Submission process
- Labeling placed on medical devices
- Documentation & evaluation required

Both

Require quality management system

**It's a
Medical Device!**
Now What?

Prove it's safe.



Biocompatibility

ISO 10993 Definition:

The ability of a device material to **perform** with an **appropriate host response** in a specific situation.

- Direct and/or indirect **contact with the body**
- Is my material biocompatible?

EU MDR Obligation

ANNEX II, CHAPTER 6.1

manufacturers to evaluate the biocompatibility of their device materials and to document the results
MDR, Annex II, Chapter 6.1.

- ISO 10993: Biological evaluation of medical devices
- ISO 18562: Biocompatibility of gas pathway contacting devices

Ensuring Biological Safety of Medical Devices

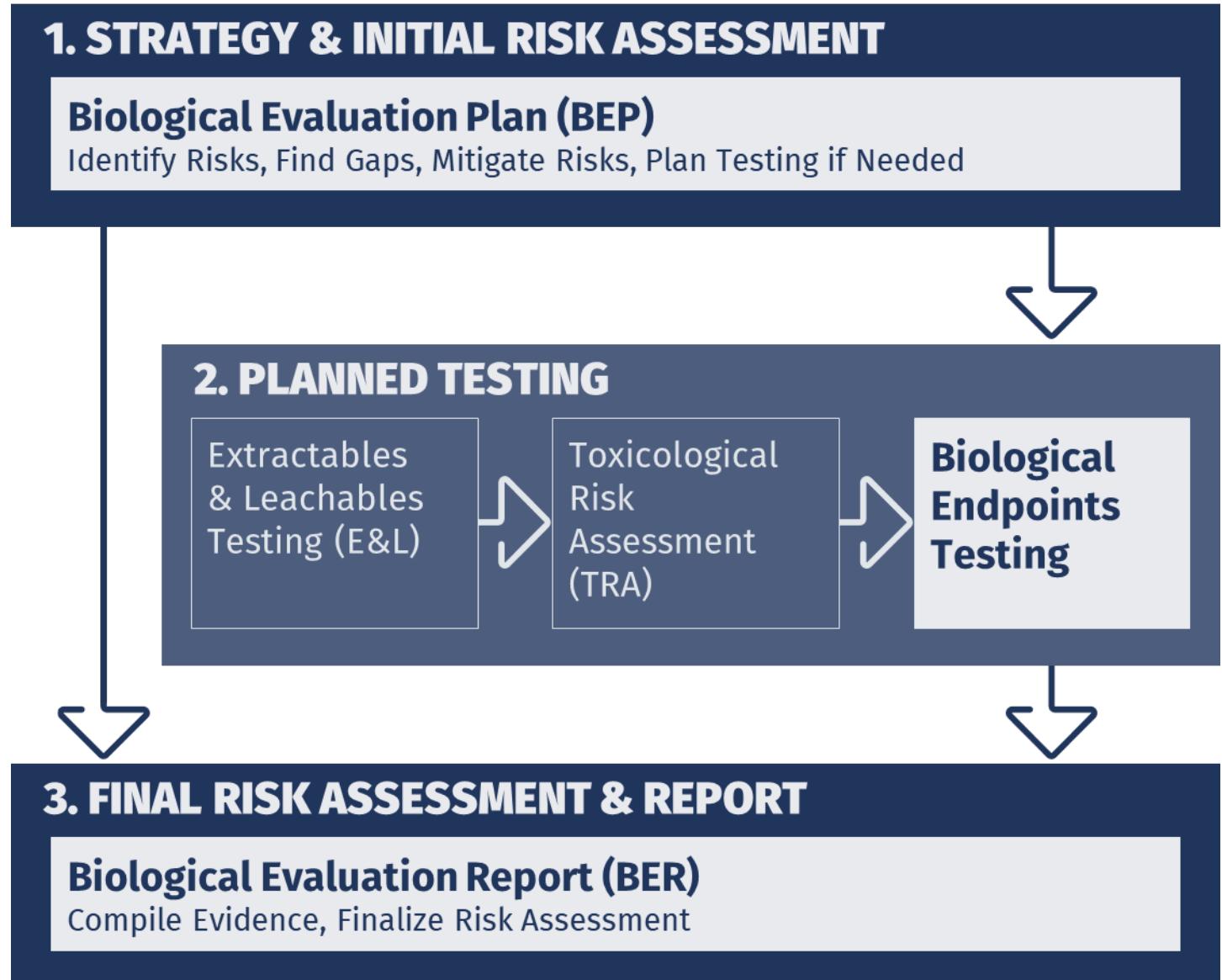
INDIRECT CONTACT

Gas pathways
(ISO 18562)

DIRECT & INDIRECT CONTACT

Extractables & Leachables
(ISO 10993)

Medical Device Biocompatibility Process



Targeting vs. Screening

Why do both exist?

Targeting

The Specific Search

- Search for specific substance
- Often specific limits (w/w)
- Use of external reference substance
- Qualitative & quantitative results

Is substance X present in concentration C?

Screening

The General Search

- Search for "all" substances
- Individual limits (AET)
- Use of surrogate standards
- Semi-qualitative & -quantitative results
 - Challenge: "Unknowns"

Are substances above limit A present?

Chemical Analysis

Target Analysis with RSL

Restricted Substance List (RSL)

Substance-specific limits



Selected Medium

Suitable extraction medium



Extraction



Analytical Testing

Suitable analysis device with reference standard

ICP-MS,
GC-MS,
HPLC-MS



—	□
—	□
—	□
—	□



Chemical Screening

ISO 10993-18



**Analytical Evaluation
Threshold**

Product-specific
AET Calculation



**Selected
Medium**

polar,
semi-polar,
non-polar



Extraction
24-72 h



**Analytical Testing
+ Database Matching**

ICP-MS,
GC-qTOF,
HPLC-qTOF



**List Substances
Above AET**
Not Pass/Fail

Chemical Screening

Diverse Techniques for Diverse Questions

ISO 10993-12/18

Gas chromatography

TDS-MS; HS-MS;
GS-MS/MS; GC-QTOF

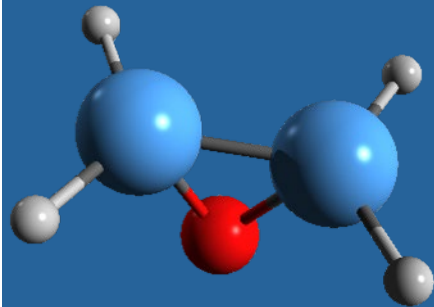
Liquid chromatography

LC-QTOF; LC-MS; LC-MS/MS

Inductively coupled plasma
ICP-MS

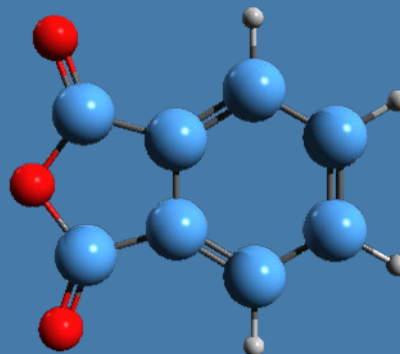
(V)VOC Screening

(Very) Volatile
Organic
Substances



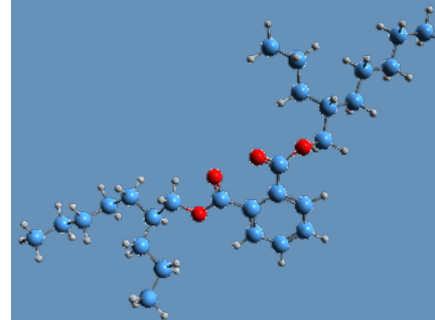
SVOC Screening

Semi-volatile
Organic
Substances



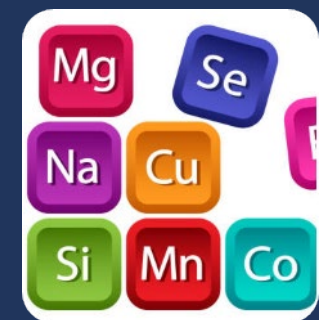
NVOC Screening

Non-volatile
Organic
Substances



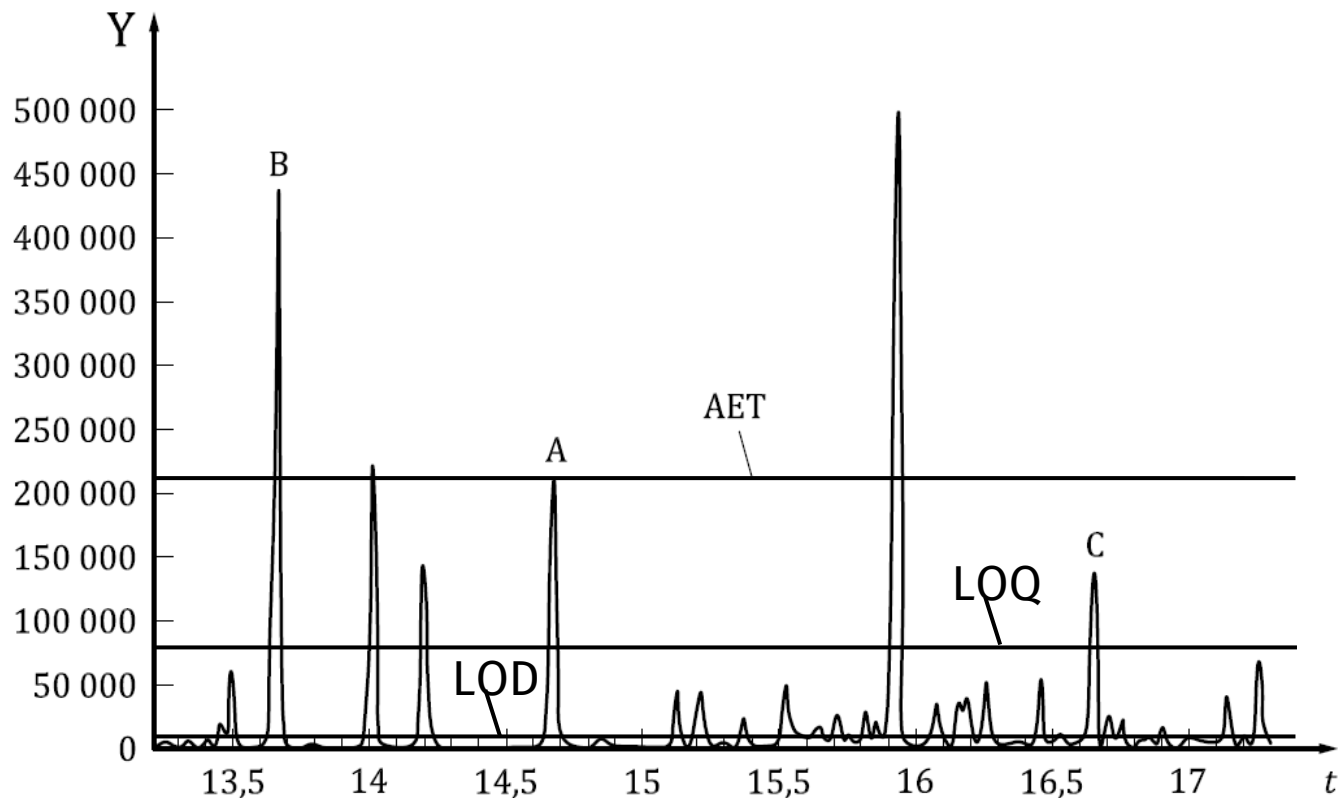
ICP

Elements & Metals



From Chemistry to Toxicology

- A Translation Tool



AET

Analytical Evaluation Threshold

Value above which detected substances **must be evaluated** toxicologically

$$AET = \frac{DBT \cdot \frac{A}{BC}}{UF}$$

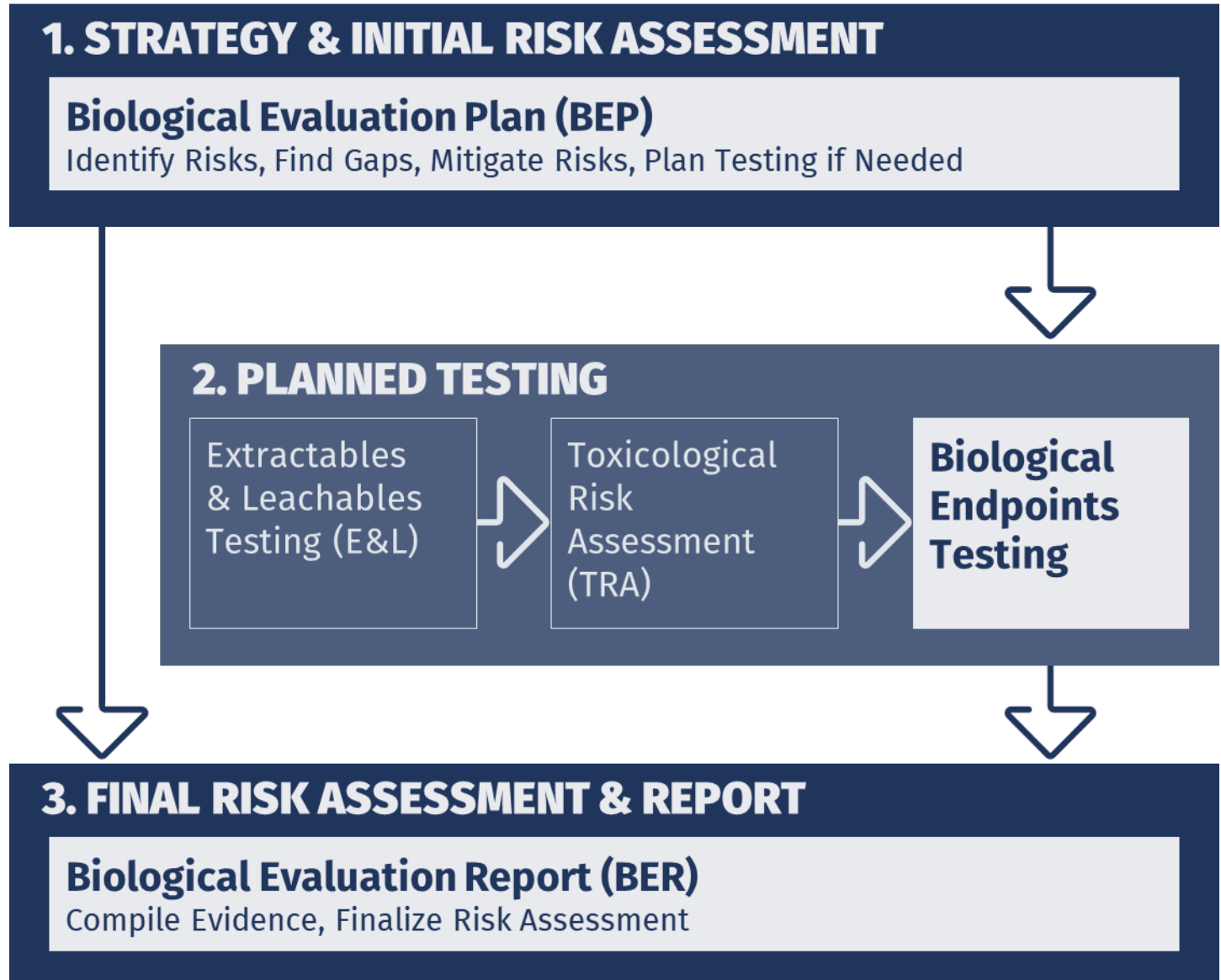
Toxicological Risk Assessment

Are there any hazards?

- **List** all detected substances above AET
- Gather **toxicological data** from literature/database
- Determine **max tolerable exposure** (tolerable intake, TI)
 - If unknown, use threshold of toxicological concern (**TTC**)
- Estimate patient **exposure** (daily amount released)
- Calculate **margin of safety** (MoS): $TI / \text{Exposure}$
 - $MoS > 1$ (“acceptable”)
 - $MoS < 1$ (further data/risk management required)



Risk Control Gap Analysis



Risk Analysis

Determination of relevant endpoints for evaluation

Use of International Standard ISO 10993-1, "Biological evaluation of medical devices - Part 1: Evaluation and testing within a risk management process"

Guidance for Industry and Food and Drug Administration Staff

Document issued on: September 8, 2023.

Table A.1: Biocompatibility Evaluation Endpoints

Medical device categorization by			Biological effect												
Category	Nature of Body Contact	Contact Duration	Cytotoxicity	Sensitization	Irritation or Intracutaneous Reactivity	Acute Systemic Toxicity	Material-Mediated Pyrogenicity	Subacute/Subchronic Toxicity	Genotoxicity	Implantation	Hemocompatibility	Chronic Toxicity	Carcinogenicity	Reproductive/Developmental Toxicity#	Degradation@
	Contact	A – limited (<24 h) B – prolonged (>24 h to 30 d) C – long term (> 30 d)													
Surface device	Intact skin	A	X	X	X										
		B	X	X	X										
		C	X	X	X										
	Mucosal membrane	A	X	X	X										
		B	X	X	X	X	O	X		X					
		C	X	X	X	X	O	X	X	X		X			
	Breached or compromised surface	A	X	X	X	X	X								
		B	X	X	X	X	X	X		X					
		C	X	X	X	X	X	X	X	X		X	X		

Risk Management – Biological Endpoints

Implementing Smart Biocompatibility Lab Strategies

Systemic Toxicity
(10993-11)

CMR
Carcinogenic, Mutagenic,
& Reprotoxic Substances
(10993-3)

Local Toxicity
(10993-23, -10)

Immunotoxicity
(10993-20)

Hemocompatibility
(10993-4)

Cytotoxicity
(10993-5)

Physical properties
e.g., particles (10993-22)

Implantation Effects
(10993-6)

Morphology
(10993-19)

Cytotoxicity

ISO 10993-5



Extraction
24 h



Challenge Living Cells
72 h



< 30%
Dead Cells

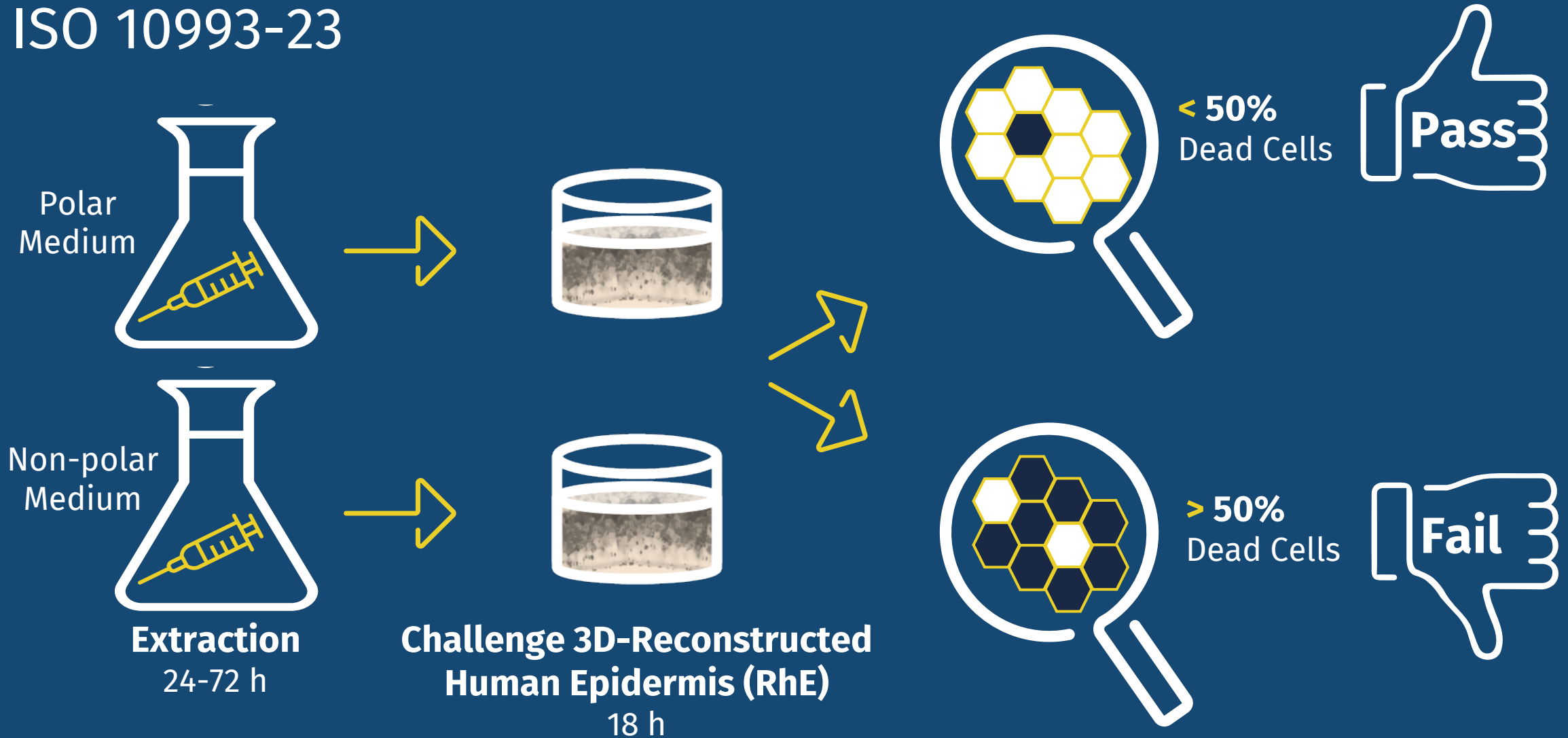


> 30%
Dead Cells



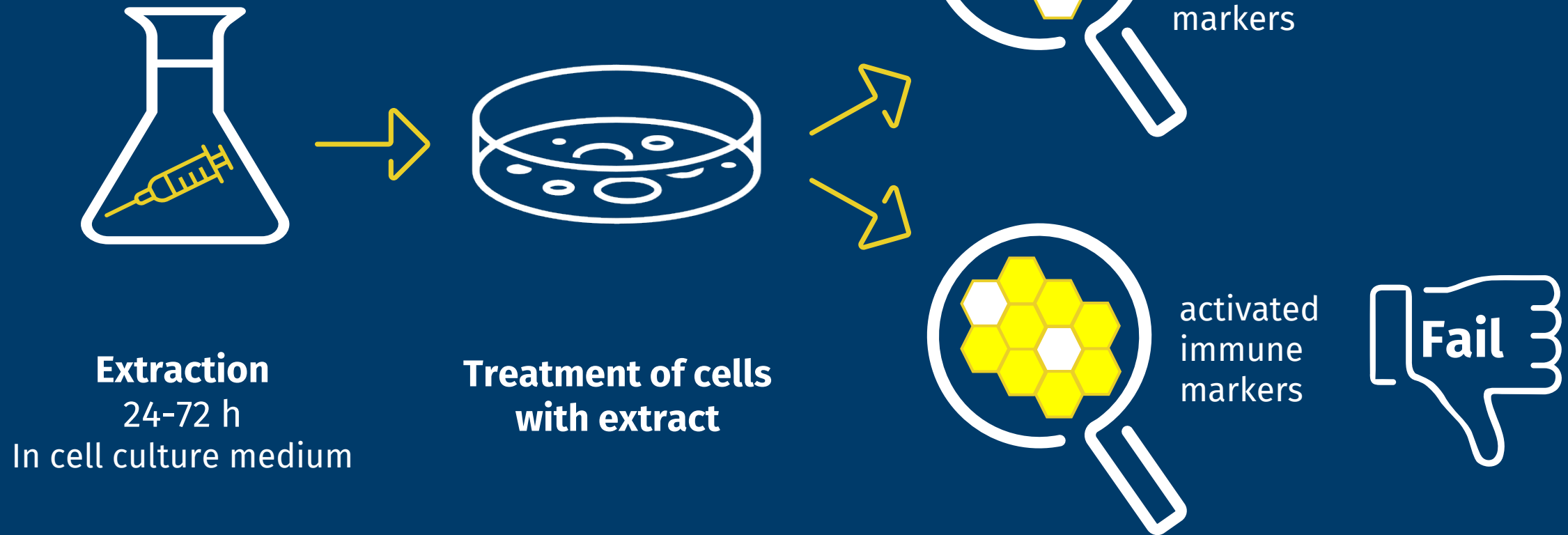
Skin Irritation

ISO 10993-23



Skin sensitization (in vitro)

ISO 10993-10 Annex C



Medical device or not?

It's all about the intended use.

Questions?

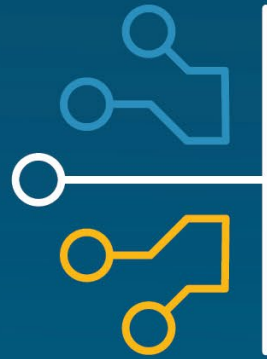
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SCAN FOR
CONTACT DETAILS





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See you next year!

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