

Sneak Peek

*Design Control and Risk Management
For Combination Products*



James Pink

Health Sciences and Medical
Devices Consultant



ONLINE
TRAINING

SYMMETRIC

Design plan - inputs

01

	Pen Injector	Transdermal Patch	Metred dose inhaler
Regulatory requirements FDA / EU / Guidance	US Product code NSC ISO 7864 ISO 9626 ISO 23908	US Product code QIX	US Product code QKS
Product Standards <ul style="list-style-type: none">• International / EU / Consensus (US) / 510K data• Industry standards	SO 11608-4	?	ISO 20072 ISO 27427
Process / Material Standards	ISO 20069 USP39_NF34<85> ISO 10993-1, 5, 10 ISO 11608-2 ASTM F1929098 ISTA 3A	ISO 20069 ISO 11135	ISO 20069
	Risk analysis	Risk analysis	Risk analysis

Design Input

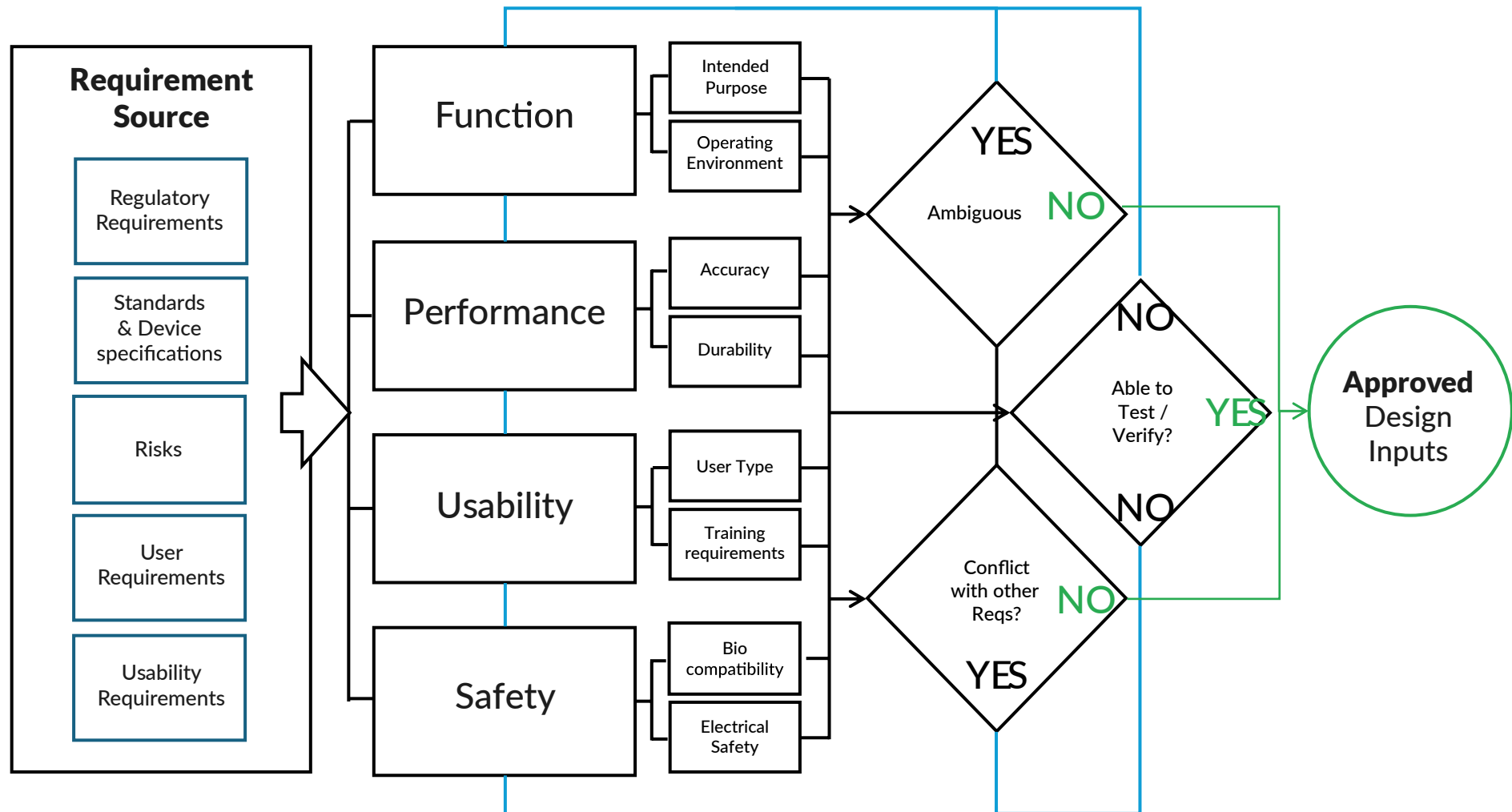


Figure 3 : Determining sources of requirements and translating to approved design input

Requirements – best practice



Objective	Example
Provide the source of the requirement	Standard number and clause, marketing, risk management activity
Be specific	Component / Phase / User step
Use imperatives	Shall or Must
Ensure the requirement is testable	Describe an expected outcome i.e. compliance to a standard test method.
Structure the requirement to be consistent	ID, Type, Component, Phase, Output etc
Don't be subjective	Avoid words like “normal, strengthen, enhance, user-friendly”. Opt for precise and measurable terms.

Risk management in combination products

- **Failure to actuate, use-related failures**

The purpose of this letter is to inform you that the administration of EpiPen® 0.3 mg and EpiPen Jr® 0.15 mg Auto-Injectors and the authorized generic versions (referenced collectively as EpiPen in the remainder of this letter) may be delayed or prevented during an emergency due to:

1. Device failure from spontaneous activation caused by using a sideways force to remove the blue safety release.
2. Device failure from inadvertent or spontaneous activation due to a raised blue safety release
3. Difficulty removing the device from the carrier tube.
4. Certain identified use errors.



Registration

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