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How is 3D Printing Revolutionizing the Medical Device Industry?

 Mark Levy, Partner, Eckert Seamans Cherin & Mellott, LLC
 Farah Tabibkhoei, Senior Litigation Associate, Reed Smith Richard Underwood, Manager, Exponent, Inc.
 Moderated by Janet Rozovics Gotttlieb, Executive Director, Medical Communications, Allergan, Inc.



What is Additive Manufacture?

additive manufacturing (AM), *n*—process of joining materials to make **parts** from 3D model data, usually **layer** upon layer, as opposed to subtractive manufacturing and formative manufacturing methodologies.

Subtractive Manufacture

"Traditional manufacturing methods" material is removed from a solid block Including: Milling, Casting, Turning, Drilling or Shaping



Additive Manufacture

The desired shape is acquired by successive addition of material layer by



http://www.prociminc.com/cnc-machining-tool-making-services.html

Why is Everybody so Excited?



Imagination is the limit!

Why Isn't Every Part 3D Printed?



Types of Additive Manufacturing



ISO and ASTM Identified 7 Categories

- Material Extrusion
- Vat Photopolymerization
- Material Jetting
 - Binder Jetting
 - Powder Bed Fusion
 - Directed Energy Deposition
 - Sheet lamination





https://www.3dnatives.com/en/additive-manufacturing-aerospace-growing-061220184/







Aerospace Design optimized to save weight

https://www.3dnatives.com/en/additive-manufacturing-aerospace-growing-061220184/

Construction Printed on site with reduced

labor requirements

Automotive Complex low volume part printed on demand



http://www.lasercutworks.com/show/3e-printed-footwear-under-armour-trainers/



products. Science translational medicine, 10(461), p.eaan6521.

Additive Manufacturing Paradigms

LOCALIZATION



Local Manufacture



Additive Manufacturing Paradigms





Mass CUSTOMIZATION Custom Production

Additive Manufact	uring Paradigms
Standard Designs	 Custom Designs
• Local Manufacture	Local Manufacture
	CUSTOMIZATION
 Standard Designs 	 Custom Designs

Additive Manufacturing Paradigms



CUSTOMIZATION







Additive Manufacturing Paradigms

CUSTOMIZATION



The

Future

OCALIZATION







HOW IS 3D PRINTING REVOLUTIONIZING THE MEDICAL DEVICE INDUSTRY?

Mark C. Levy, Esquire Partner Eckert Seamans Cherin & Mellott, LLC

Medical Devices: FDA Regulation in the Era of Technology and Innovation June 6, 2019



- "Additive Manufacturing of Medical Devices: An Interactive Discussion on the Technical Considerations of 3D Printing."
 - Public Workshop—October 8-9, 2014
 - Device manufacturers, AM companies, and academia
 - Five themes: materials, design, printing characteristics, physical and mechanical assessment of final devices, and biological considerations of final devices such as cleaning and sterility



Feedback from Workshop served as a basis for:

- "Technical Considerations for Additive Manufactured Medical Devices"
 - Guidance Issued December 5, 2017
 - (draft---May 10, 2016)

- Leap Frog Guidance—FDA's "initial thinking" re: "emerging technology"
- Does not address "Point of Care" device manufacturing
- Does not address biological, cellular, or tissue-based products
- Focus on technical aspects of AM
- Encourages use of Pre-Submission process

• "The effects of the different steps in the AM process can be seen in final device testing; however, determining the root cause of failures from manufacturing defects can be very difficult without a clear understanding of each step."



- Device Design
- Patient-Matched Device Design
 - Effects of Imaging
 - Anatomical matching via software
 - Necessity for data integrity, cybersecurity and protected health information

- Build volume
- Support material
- Slicing
- Build paths
- Validation of software

- Material controls
 - Starting material
 - Material reuse
- Post-processing
 - Heat treatment
 - Final machining, etc.
 - Process Validation and Acceptance

- <u>"Technical Considerations for Additive</u> <u>Manufactured Medical Devices</u>"
 - Webinar-1/10/18
 - <u>https://www.youtube.com/embed/ZbyU5c7IDOs</u>

FDA's Evolving Role in 3D Printing - Warning Letter

- Oxford Performance Materials, Inc.
 - 1/5/17
 - Cranial and maxillofacial implants
 - Failure to validate cleaning and sterilization
 - Failure to control recycled materials
 - Failure to maintain receipt, storage and handling procedures
 - Failure to control environmental conditions
 - Failure to document equipment maintenance –lack of documented cleaning records

FDA's Evolving Role in 3D Printing - Warning Letter

- Kelnyiam Global, Inc.
 - 5/10/17
 - Patient-specific cranial and maxillofacial implants
 - Failure to maintain design change procedures and approvals
 - Failure to evaluate complaints
 - Failure to validate process with verifiable results
 - Failure to establish procedures for incoming product

FDA's Evolving Role in 3D Printing - Warning Letter

- Failure to have management review of QS system
- Failure to have corrective and preventive actions procedures, e.g., training

Health Canada

- Guidance "Supporting Evidence for Implantable Medical Devices Manufactured by 3D Printing"
 - Effective 4/30/19
 - Pre-market Class 3 and 4 devices
 - Design, manufacturing, material control, device testing and labeling
 - Distinguishes patient-specific devices after criticism of first draft

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