Australian Unique Device Identification (UDI)

In vitro diagnostic (IVD) medical devices

UDI requirements

The **Unique Device Identification (UDI) system** was formally introduced into the <u>Therapeutic Goods (Medical Devices) Regulations 2002</u> in March 2025.

To comply, sponsors and manufacturers must meet 3 key requirements:

- Placement of a UDI Carrier on the device label and all applicable higher levels of packaging, including the device itself where applicable
- Submission of UDI data to the Australian UDI Database (AusUDID) in the form of a UDI record
- Compliance with any additional obligations that apply to specific device types, such as reusable devices.

For a full list of UDI requirements, see <u>UDI requirements guidance</u>.

Scope of requirements

UDI requirements apply to some IVD classifications.

IVD classification	UDI required?		
Class 4	Yes		
Class 3	Yes		
Class 2	Yes		
Class 1	Partial*		
	*Instrument/analyser IVDs (GMDN		
	Code CT943) and Software IVDs		
	(GMDN Code CT944)		
In house IVDs	No		

Key dates

UDI compliance for IVDs is phased over multiple years. Compliance begins with high-risk devices, followed by lower risk devices over later years.

Requirement	Class 4	Class 3	Class 2	Class 1
UDI Carrier	1 July 2028		1 July 2029	
on the label				
Submission of	1 July 2028		1 July 2029	
UDI records				
Direct	1 July	2029	1 July	2030
Marking				

Specific devices

Software

UDI requirements apply to IVDs that are **software** or **incorporate software**.

Accessories

Accessories included in an IVD kit do not require a separate UDI if the kit itself has a UDI.

Systems

If an IVD system includes test reagents or accessories that are a higher classification than the instrument and are commercially available on their own, they must be listed separately in the AusUDID.

IVD kits

UDIs are allocated to:

- The kit itself
- Components regulated as devices and sold separately
- Replacement parts, whether single use or reusable.

IVDs sold in retail

The point-of-sale packaging must include:

- UDI-DI in Automatic Identification Data Capture (AIDC) form and either Human Readable Interpretation (HRI) or non-HRI form
- Production information in human readable (non-HRI) form.

All higher levels of packaging must include:

Full UDI (UDI-DI and UDI-PI) in both AIDC and HRI.

Direct Marking is not required for IVDs sold in retail.

Retailers are not required to keep records for the overthe-counter sales.

AusUDID - GMDN codes

Each UDI record in the AusUDID can include up to 2 GMDN codes.

ARTG GMDN Code

This is the GMDN code from the ARTG inclusion that is linked to the UDI record. It may be a GMDN Collective Term or Preferred Term Code.

Manufacturer GMDN Code

This is the Preferred Term Code specified by the manufacturer. It is only visible to the sponsor supplying the IVD and is not publicly displayed.

Additional resources

You can find resources to support you implementing UDI on the UDI Hub.

Introductory resources

- Unique Device Identification (UDI) hub | Therapeutic Goods Administration (TGA)
- About UDI in Australia | Therapeutic Goods Administration (TGA)
- UDI: Information for sponsors and manufacturers | Therapeutic Goods Administration (TGA)

AusUDID resources

- The Australian UDI Database for sponsors and manufacturers | Therapeutic Goods Administration (TGA)
- UDI: Resources and technical documents | Therapeutic Goods Administration (TGA)

Regulatory resources

- Complying with the Unique Device Identification requirements for medical devices | Therapeutic Goods
 Administration (TGA)
- Complying with the Unique Device Identification timeframes for medical devices | Therapeutic Goods

 Administration (TGA)
- Therapeutic Goods Legislation Amendment (Australian Unique Device Identification Database and Other Measures) Regulations 2025 | Therapeutic Goods Administration (TGA)

Support

Contact the UDI Support Team at UDI@health.gov.au.