## **Australian Unique Device Identification (UDI)**

Medical devices

## **UDI** requirements

Australia's **Unique Device Identification (UDI) system** was formally introduced following changes to the <u>Therapeutic</u> Goods (Medical Devices) Regulations 2002 in March 2025.

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

- Place a UDI Carrier on the device label and all applicable higher levels of packaging, including the device itself, where applicable
- Submit UDI data to the Australian UDI Database (AusUDID) and link it to the applicable ARTG inclusion(s)
- Comply with any additional obligations that apply to specific device types.

For details on Australia's UDI requirements, see <u>UDI requirements guidance</u>.

## Scope of requirements

UDI requirements apply to selected medical device classifications.

| Device                      | UDI required? |  |  |  |
|-----------------------------|---------------|--|--|--|
| classification              |               |  |  |  |
| Class I                     | No            |  |  |  |
| Class Im (measuring)        | No            |  |  |  |
| Class Is (supplied sterile) | Yes           |  |  |  |
| Class IIa                   | Yes           |  |  |  |
| Class IIb                   | Yes           |  |  |  |
| Class III                   | Yes           |  |  |  |

# **Key dates**

UDI compliance is phased by device risk class over multiple years. Higher-risk devices will be first, followed by lower risk devices in later years.

| Requirement        | Class       | III | Class | Class  | Class  |
|--------------------|-------------|-----|-------|--------|--------|
|                    |             |     | IIb   | lla    | ls     |
| UDI Carrier on the | 1 July 2026 |     |       | 1 July | 1 July |
| label              |             |     |       | 2027   | 2028   |
| Submission of      | 1 July 2026 |     |       | 1 July | 1 July |
| UDI records        |             |     |       | 2027   | 2028   |
| Direct Marking     | 1 Jan       | 1.  | Jan   | 1 Jan  | 1 Jan  |
|                    | 2028        | 20  | 29    | 2029   | 2029   |

## **Specific devices**

Some devices have additional UDI requirements due to their design or intended use. It is important to review the UDI guidance to ensure you meet all applicable obligations for your devices.

#### Reusable devices

Reusable devices must be **Directly Marked** with the UDI in a way that can withstand normal use and reprocessing for the lifetime of the device.

#### Implantable devices

The UDI-Production Identifiers must include specific data elements depending on the type of device:

- for an active implantable device, the serial number
- for other implantable devices, the serial number or lot number in accordance with the manufacturer's quality management system.

### Components of a Surgical Loan Kit

SLKs are exempt at the **kit-level**, however **individual components** that are regulated as medical devices and in scope must comply with UDI requirements.

System or Procedure Packs (SOPPs)

SOPPs must comply if they contain **one or more inscope medical device.** Each component that is in scope must also meet UDI requirements.

Devices principally 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 medical devices sold in retail. Retailers are not required to keep records for over-the-counter sales.

### Multiple devices packaged together

When multiple devices are packaged together without individual labels or packaging, a Unit of Use Device Identifier (UoU DI) is required. It ensures traceability of each device unit, especially in clinical and inventory settings.

This is a **virtual identifier** used to represent each device in the package.

The UoU DI is **not displayed on the label**, but it must be submitted to the AusUDID.

#### Software

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

Accessories

Accessories must meet UDI requirements if they are:

- in scope of UDI requirements, and
- commercially available on their own.

### **Additional resources**

You can find resources that support your UDI implementation on the TGA's 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**

For additional support contact the UDI Support Team at UDI@health.gov.au.