April 6, 2021

CarboFix Orthopedics Ltd.
Hila Wachsler-Avrahami
Regulatory Affairs
11 Ha'hoshlim St.
Herzeliya, 4672411
Israel

Re: K210716
Trade/Device Name: CarboClear X Pedicle Screw System, CarboClear X Navigated Instruments
Regulation Number: 21 CFR 888.3070
Regulation Name: Thoracolumbosacral Pedicle Screw System
Regulatory Class: Class II
Product Code: NKB, OLO
Dated: March 7, 2021
Received: March 10, 2021

Dear Hila Wachsler-Avrahami:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part

801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Colin O'neill -S

Colin O'Neill, M.B.E.
Assistant Director
DHT6B: Division of Spinal Devices
OHT6: Office of Orthopedic Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2023
See PRA Statement below.

510(k) Number *(if known)*

K210716

Device Name

CarboClear® X Pedicle Screw System

Indications for Use *(Describe)*

The CarboClear® X Pedicle Screw System is intended to restore the integrity of the spinal column even in the absence of fusion for a limited time period in patients with advanced stage tumors involving the thoracic and lumbar spine in whom life expectancy is of insufficient duration to permit achievement of fusion.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services
Food and Drug Administration
Office of Chief Information Officer
Paperwork Reduction Act (PRA) Staff
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DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2023
See PRA Statement below.

510(k) Number *(if known)*

K210716

Device Name

CarboClear® X Navigated Instruments

Indications for Use *(Describe)*

CarboClear® X Navigated Instruments are intended to be used during the preparation and placement of CarboClear® X Pedicle Screws during spinal surgery to assist the surgeon in precisely locating anatomical structures. CarboClear® X Navigated Instruments are designed for use with the Medtronic StealthStation® System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as vertebra, can be identified relative to a CT or MR based model, fluoroscopy images, or digitized landmarks of the anatomy.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

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CARBOFIX ORTHOPEDICS LTD.

510(k) Summary

CarboFix Orthopedics Ltd.

CarboClear® X Pedicle Screw System, CarboClear® X Navigated Instruments

Applicant Name

CarboFix Orthopedics Ltd.
11 Ha'hoshlim St., Herzeliya 4672411, Israel
Tel: +972 9 9511511, Fax: +972 9 9548939

Contact Person

Hila Wachsler-Avrahami
CarboFix Orthopedics Ltd.
11 Ha'hoshlim St., Herzeliya 4672411, Israel
Tel: +972 9 9511511, Fax: +972 9 9548939

Date Prepared

March 7, 2021

Trade/Proprietary Name

1. CarboClear® X Pedicle Screw System
2. CarboClear® X Navigated Instruments

Common Name

1. Pedicle Screw System
2. Stereotaxic Instrument

Regulation Number and Device Class

1. Class II; 21 CFR §888.3070
2. Class II; 21 CFR §882.4560

Product Code, Regulatory Description and Review Panel

1. NKB; Thoracolumbosacral pedicle screw system; Orthopedic
2. OLO; Stereotaxic Instrument; Orthopedic

Predicate Devices

Primary Predicate Device:

1. CarboClear® X Pedicle Screw System (CarboFix Orthopedics Ltd.; K203317)
2. CarboClear® navigated Instruments (CarboFix Orthopedics Ltd.; K201251)

Additional Predicate Devices:

1. ***For CarboClear® X Pedicle Screw System:***
   - CD HORIZON® Spinal System (Medtronic Sofamor Danek; K981676 and more)
   - S4® Spinal System (Aesculap Spine; K130291 and more)
   - Click's System (Synthes (DePuy Spine); K992739 and more)
   - Mesa Spinal System (K2M; K052398 and more)
   - CarboClear® Pedicle Screw System (CarboFix Orthopedics Ltd.; K173487, K182377, K201926)

2. ***For CarboClear® X Navigated Instruments:***
   - Medtronic Navigated Instruments (Medtronic Sofamor Danek; K153442 and more)

Reference Device (*for CarboClear X® Pedicle Screw System*):

- Piccolo Composite Nailing System (CarboFix Orthopedics Ltd.; K151010)

Intended Use/Indications for Use

1. ***CarboClear® X Pedicle Screw System***

The CarboClear® X Pedicle Screw System is intended to restore the integrity of the spinal column even in the absence of fusion for a limited time period in patients with advanced stage tumors involving the thoracic and lumbar spine in whom life expectancy is of insufficient duration to permit achievement of fusion.

2. ***CarboClear® X Navigated Instruments***

CarboClear® X Navigated Instruments are intended to be used during the preparation and placement of CarboClear® X Pedicle Screws during spinal surgery to assist the surgeon in precisely locating anatomical structures. CarboClear® X Navigated Instruments are designed for use with the Medtronic StealthStation® System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as vertebra, can be identified relative to a CT or MR based model, fluoroscopy images, or digitized landmarks of the anatomy.

System Description

1. *CarboClear® X Pedicle Screw System*

The CarboClear® X Pedicle Screw System is composed of implants in various dimensions, used to build a spinal construct; and of a set of instruments, intended to assist in the insertion and placement of the implants.

The implants include pedicle screws, rods, a set screw and transverse connectors. They are made of carbon fiber-reinforced polyetheretherketone (CFR-PEEK). The threaded portion of the pedicle screws is encased within a thin titanium shell, and includes a small tantalum marker.

The implants are supplied sterile, and are intended for single use.

2. *CarboClear® X Navigated Instruments*

CarboClear® X Navigated Instruments are reusable, manually operated, instruments, including probes, bone taps and a screwdriver. These instruments are intended to be used with the Medtronic StealthStation® Navigation System, to assist surgeons in precisely locating anatomical structures for preparation and placement of CarboClear® X Pedicle Screws during spinal surgery.

Purpose of Submission

Modification to the previously cleared CarboClear® X Pedicle Screw System (K203317) and CarboClear® Navigated Instruments (K201251).

Performance Data and Substantial Equivalence

1. *CarboClear® X Pedicle Screw System*

The intended use, design, material, dimensions, technological characteristics, and principles of operation of the subject CarboClear® X Pedicle Screw System and CarboClear® X Navigated Instruments are substantially equivalent to those of their predicate devices.

Performance characteristics for CarboClear® X Pedicle Screw System included tests according to ASTM F1717 and ASTM F1798.

Design validation activities for CarboClear® X Navigated Instruments included engineering analysis - comparative dimensional measurements for the subject and predicate navigated screwdriver to demonstrate substantial equivalence to the predicate device.

The results of the tests and analyses, as applicable, are comparable to those of the respective predicate devices, demonstrating substantially equivalent performance of the subject devices.

Conclusion

Based on the information provided in this Premarket Notification, the subject CarboClear® X Pedicle Screw System and CarboClear® X Navigated Instruments are substantially equivalent to their predicate devices.