



February 22, 2022

Medacta International SA
% Chris Lussier
Senior Director, Quality and Regulatory
Medacta USA
3973 Delp Street
Memphis, Tennessee 38118

Re: K203493

Trade/Device Name: MectaLock Suture Anchor Extension
Regulation Number: 21 CFR 888.3040
Regulation Name: Smooth or threaded metallic bone fixation fastener
Regulatory Class: Class II
Product Code: MBI
Dated: November 25, 2020
Received: November 27, 2020

Dear Chris Lussier:

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,

for

Laura C. Rose, Ph.D
Assistant Director
DHT6C: Division of Restorative, Repair
and Trauma Devices
OHT6: Office of Orthopedic Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K203493

Device Name

MectaLock Suture Anchor Extension

Indications for Use (Describe)

The MectaLock PEEK Suture anchors (size 4.5, 5.5 & 6.5 mm) are intended for use in arthroscopic or open surgical approaches:

- soft tissue refixation within the shoulder joint (i.e.: rotator cuff repair)

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.

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510(k) Summary

I. Submitter

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Contact Person: Stefano Baj, Regulatory and Compliance Director, Medacta International SA
 Applicant Correspondent: Chris Lussier, Senior Director of Quality and Regulatory, Medacta USA
 Date Prepared: November 25, 2020
 Date Revised: February 4, 2021

II. Device

Device Proprietary Name:	MectaLock Suture Anchor Extension
Common or Usual Name:	Suture Anchor
Classification Name:	Fastener, Fixation, Soft Tissue
Primary Product Code:	MBI
Regulation Number:	21 CFR 888.3040
Device Classification	II

III. Predicate Device

Substantial equivalence is claimed to the following primary predicate device:

- Arthrex PushLock Anchors, K101679, Arthrex, Inc

In addition, the following Reference device is referenced within the submission:

- MectaLock PEEK Suture Anchor, K190474, Medacta International SA

IV. Device Description

The MectaLock Suture Anchor Extension includes implantable devices used for soft tissue re-fixation (e.g. muscles, tendons, ligaments) composed of a PEEK anchoring component and an Ultra High Molecular Weight PolyEthylene (UHMWPE) non-absorbable braided suture.

Specifically, the devices subject of this submission are MectaLock PEEK Suture Anchors Ø4.5, Ø5.5 and Ø6.5 mm with short driver; a range extension of the already cleared MectaLock PEEK Suture Anchor (K190474).

Identically to the reference device cleared within K190474, the MectaLock Suture Anchor Extension implants are knotless devices provided mounted on the tip of a dedicated disposable driver which allows the surgeon to insert the anchor into a pilot hole, previously drilled in the desired position into the patient's bone. The surgeon must combine the anchor with the provided non-absorbable suture, packaged and included in the whole product's blister. The driver can be disposed immediately after the implant has been placed.

V. Indications for Use

The MectaLock PEEK Suture anchors (size 4.5, 5.5 & 6.5 mm) are intended for use in arthroscopic or open surgical approaches:

- soft tissue refixation within the shoulder joint (i.e.: rotator cuff repair)

VI. Comparison of Technological Characteristics

The MectaLock Suture Anchor Extension implants and the predicate device share the following characteristics:

- external shape and related interference mechanism;
- suture;
- disposable driver design;
- materials;
- biocompatibility;
- device usage;
- sterility; and
- packaging.

The MectaLock Suture Anchor Extension implants differ from the predicate device with respect to:

- anchors diameters; and
- suture engagement eyelet.

VII. Performance Data

Based on the risk analysis, design validation and performance testing were conducted to written protocols. The following validation and tests are being provided in support of the substantial equivalence determination:

Non-Clinical Studies

- *DESIGN VALIDATION*
 - MectaLock Suture Anchor Extension Design Validation Report – *Test Report A1* according to Design Validation Protocol M07.85.003 Nr. A1 and Evaluation forms
- *PERFORMANCE TESTING*
 - MR Safety evaluation - MectaLock PEEK Suture Anchors Range extension
 - Cyclic and load-to-failure properties of suture anchors test report according to Test Protocol IL 07.09.488 Rev.4 and Empa Test Report No. 5214'025'712/1e
- *PYROGENICITY*
 - Bacterial endotoxin test (LAL test) according to European Pharmacopoeia §2.6.14 (which is equivalent to USP chapter <85>)
 - Pyrogen test according to USP chapter <151> for pyrogenicity determination
 - The subject devices are not labeled as non-pyrogenic or pyrogen free.
- *BIOCOMPATIBILITY*
 - Biocompatibility assessment as per *ISO 10993* series and FDA Biocompatibility Guidance Document *Use of International Standard ISO 10993-1, "Biological evaluation of medical devices - Part 1: Evaluation and testing within a risk management process"*

Clinical Studies:

- No clinical studies were conducted.

VIII. Conclusion

Based on the information provided within this submission, the MectaLock Suture Anchor Extension implants are substantially equivalent to the identified predicate devices. Substantial equivalence has been demonstrated through a comparison of intended use, design and technological characteristics, as well as performance evaluations.