

January 26, 2022

Rocamed SAM Tahiana Rasolofoniaina Regulatory Affairs Specialist 9 Avenue Albert II Monaco, Monaco 98000 Monaco

Re: K212868

Trade/Device Name: JFil® Ureteral Stents, JFil® ECO Kit
Regulation Number: 21 CFR§ 876.4620
Regulation Name: Ureteral Stent
Regulatory Class: II
Product Code: FAD
Dated: December 23, 2021
Received: December 29, 2021

Dear Tahiana Rasolofoniaina:

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 <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> 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 <u>Federal Register</u>.

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 <u>https://www.fda.gov/combination-products/guidance-regulatory-</u>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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</u>) and CDRH Learn (<u>https://www.fda.gov/training-and-continuing-education/cdrh-learn</u>). 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 (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</u>) for more information or contact DICE by email (<u>DICE@fda.hhs.gov</u>) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For Jessica K. Nguyen, Ph.D. Assistant Director DHT3B: Division of Reproductive, Gynecology and Urology Devices OHT3: Office of GastroRenal, ObGyn, General Hospital and Urology Devices Office of Product Evaluation and Quality Center for Devices and Radiological Health

## Indications for Use

510(k) Number *(if known)* K212868

Device Name JFil® Ureteral Stents, JFil® ECO KIT

Indications for Use (Describe)

The JFil® Ureteral Stents are used for temporary internal drainage of the ureteropelvic junction.

The stents may be placed using endoscopic techniques.

The stents are not intended as permanent indwelling devices, it is recommended that the indwelling time does not exceed 14 days.

Target population: adults only (greater than 21 years of age).

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

# 1. Submitter Information

| 510 (k) submitter:       | ROCAMED SAM                   |  |  |
|--------------------------|-------------------------------|--|--|
| Address:                 | 9 Avenue Albert II            |  |  |
|                          | 98000 Monaco                  |  |  |
|                          | MONACO (Principality of)      |  |  |
| Contact Person Name:     | Tahiana Rasolofoniaina        |  |  |
| Contact Title:           | Regulatory Affairs Specialist |  |  |
| Contact Person's email:  | tr@promepla.com               |  |  |
| Contact Person's Number: | (+377) 979-842-44             |  |  |
| Preparation date:        | January 25, 2022              |  |  |

# 2. Device Information

| Trade Name of the Device:<br>Common Name | JFil® Ureteral Stents, JFil® ECO KIT<br>Ureteral Stent |
|--|--|
| Classification Name:                     | Stent, Ureteral  |
| Classification Regulation:               | 21 CFR 876.4620  |
| Device Class:                            | II   |
| Review Panel                             | Gastroenterology/Urology                               |
| Product Code                             | FAD  |

# 3. Predicate Devices

| 510(k) number             | K030503                      | K173734                  |
|---------------------------|------------------------------|--------------------------|
| Owner                     | Boston Scientific Corp.      | Promepla SAM             |
| Trade name of the Device  | Polaris Loop Ureteral Stents | RocaJJ Soft Stents       |
| Classification Name       | Stent, Ureteral              | Stent, Ureteral          |
| Regulation Classification | 21 CFR 876.4620              | 21 CFR 876.4620          |
| Device Class              | 11                           | II                       |
| Panel                     | Gastroenterology/Urology     | Gastroenterology/Urology |
| Product Code              | FAD                          | FAD                      |

Both predicate devices have not been subjected to a design-related recall.

## 4. Device Description

The JFil® Ureteral Stents consist of a tube-like device that is inserted into the ureter to allow the passage of the urine in the treatment of ureteral injuries and ureteral obstructions. This polyurethane stent has a single loop on the proximal tip and a polypropylene-monofilament surgical thread on the distal tip. JFil stents are 6.0 or 7.0 French (Fr) in diameter and 8 or 16 cm in specified length. The stent is provided with a 63 cm length pusher and may include a Nitinol Guidewire in the kit. The pusher consists of a radio-opaque ring connected to a tubing, and is intended to allow pushing, placing, and releasing the stent inside the patient. This stents can only be used by trained professionals in a clinic or hospitals environment. The JFil Ureteral Stents are sterile and for single use only. The stents are also available in ECO-kits which do not include a guidewire. The stents can be removed cystoscopically by gently pulling on the surgical thread.

| Designation | Ø<br>(Fr) | Length<br>(cm) | Presence of guide | Designation of the product                  |  |
|-------------|-----------|----------------|-------------------|---|--|
| ROJV0708ST  | 6         | 8              | Yes               | JFil® – Ureteral Stent – 6Fr ; 8cm          |  |
| ROJV0716ST  | 6         | 16             | Yes               | JFil® – Ureteral Stent – 6Fr ; 16cm         |  |
| ROJV0708ST  | 7         | 8              | Yes               | JFil® – Ureteral Stent – 7Fr ; 8cm          |  |
| ROJV0716ST  | 7         | 16             | Yes               | JFil® – Ureteral Stent – 7Fr ; 16cm         |  |
| ROJV5708ST  | 7         | 8              | No                | JFil® ECO KIT, – Ureteral Stent – 7Fr ; 8cm |  |
| ROJV5716ST  | 7         | 16             | No                | JFil® ECO KIT – Ureteral Stent – 7Fr ; 16cm |  |

The models are described in the table below:

## 5. Intended Use

The JFil® Ureteral Stents are used for temporary internal drainage of the ureteropelvic junction.

The stents may be placed using endoscopic techniques.

The stents are not intended as permanent indwelling devices, it is recommended that the indwelling time does not exceed 14 days.

Target population: adults only (greater than 21 years of age).

### 6. Comparison of The Technological Characteristics with Predicate Devices:

| Device & Predicate<br>Trade name<br>(Applicant) | Device under<br>evaluation<br>JFil® Ureteral<br>Stents<br>(Rocamed) | Primary Predicate<br>- K030503<br>Polaris™ Loop<br>Ureteral Stents<br>(Boston<br>Scientific) | Secondary Predicate<br>- K173734 RocaJJ<br>Soft Ureteral Stents<br>(Promepla) |
|---|---|--|---|
| Regulation Number                               | 876.4620  | 876.4620   | 876.4620  |
| Regulation Name                                 | Stents, Ureteral  | Stents, Ureteral   | Stents, Ureteral  |
| Product Code                                    | FAD   | FAD  | FAD   |
| Classification                                  | Class II  | Class II   | Class II  |
| Stent Type                                      | Single J Stent  | Single J Stent   | Double J Stent  |

| Intended Use<br>Conditions | -Surgical suite<br>in a hospital<br>environment<br>- Medical facilities<br>-Under aseptic<br>conditions<br>(clothing, sterile<br>surgical gloves,<br>and a controlled<br>atmosphere) |    | The use conditions for the<br>device are a surgical suite<br>in a hospital environment.<br>Ureteral stents are handled<br>by surgeons under aseptic<br>conditions (clothing, sterile<br>surgical gloves, and a<br>controlled atmosphere).<br>They will be placed for a<br>length of time specified by<br>the urologist surgeon. |                                    | - Surgical suite in a<br>hospital environment<br>- Medical facilities<br>- Under aseptic<br>conditions<br>(clothing, sterile<br>surgical gloves,<br>and a controlled<br>atmosphere) |
|----------------------------|--|----|---|------------------------------------|---|
| Prescription of use        | Sale by or on the order of a physician   |    | Sale by or on the order of a physician  |                                    | Sale by or on the order of a physician  |
| Reuse Status               | Single Use   |    | Single Use  |                                    | Single Use  |
| Sterilization              | Ethylene oxide (EO)  |    | Ethylene oxide (EO)   |                                    | Ethylene oxide<br>(EO)  |
| Size (Fr)                  | 6/7  |    | 5/6/7/8   |                                    | 4,8/6/7/8   |
| Length (cm)                | 8  | 16 | 16  | 10/12/14/18 /20/22/<br>24/26/28/30 | 24/26/28/30   |
| Stent type                 | Simple J   |    | Simple J  |                                    | Double J  |
| Renal loop                 | Pigtail loop   |    |   | Pigtail loop                       | Pigtail loop  |
| Bladder loop               | Suture thread  |    | Suture loop   |                                    | Pigtail loop  |
| Suture<br>material         | Polypropylene  |    | Polypropylene   |                                    | Polypropylene   |
| Guidewire<br>Compatibility | 0.035"   |    | 0.038"  |                                    | 0.035"  |
| Ink Mark                   | No   |    | Yes   |                                    | Yes   |
| Shelf-life                 | 3 Years  |    | Unknown   |                                    | 3 Years   |
| Radiopacity                | Yes  |    | Yes   |                                    | Yes   |
| Placement                  | Placed using<br>endoscopic<br>techniques   |    | placement endoscopically<br>or<br>fluoroscopically  |                                    | Placed using<br>endoscopic<br>techniques  |
| Indwelling time            | 14 days  |    |   | 14 days                            | 6 days  |

As evidenced by the above table, both the subject and the predicate devices have the same intended use, but the subject and predicate devices have different technological characteristics. However, these differences do not raise different questions of safety or effectiveness and the testing mentioned below showed that the subject is substantially equivalent with the predicates.

### 7. Performance Data

### Performance Data – Bench

In support of this premarket notification, Rocamed conducted the following bench performance testing –

- Drainage capacity, Per ASTM F623-99, "Standard Performance Specification for Foley Catheter"
- Curl strength
- Tensile and elongation/yield strength
- Shelf life validation

All bench testing results confirmed that the products described in this submission met the necessary specification.

#### **Biocompatibility Testing**

Biocompatibility of the subject stents was confirmed per ISO 10993-1, "Biological evaluation of medical devices - Part 1: Evaluation and testing within a risk management process". The device met the requirements.

### 8. Conclusion

Based on the information presented in this submission, it can be concluded that the subject device is substantially equivalent to the predicates.