January 19, 2021

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

Re: K203485
Trade/Device Name: SnugFit All-Suture Anchor
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,

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

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2020
See PRA Statement below.

510(k) Number *(if known)*

K203485

Device Name

SnugFit All-Suture Anchor

Indications for Use *(Describe)*

The SnugFit All-Suture Anchor is intended for use in arthroscopic or open surgical approaches for fixation of soft tissue to bone in the hip and shoulder in the following procedures:

- Hip: acetabular labral repair
- Shoulder: glenoid labrum repair; rotator cuff repair, biceps tendon 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.

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

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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, Director of Quality and Regulatory, Medacta USA
Date Prepared: November 25, 2020
Date Revised: January 19, 2021

II. Device

Device Proprietary Name:	SnugFit All-Suture Anchor
Common or Usual Name:	Soft Tissue Fixation Device
Classification Name:	Fastener, Fixation, Non-degradable, 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:

- JuggerKnot Soft Anchors, K150768, Biomet Manufacturing Corp.

The following has been identified as a secondary predicate device:

- MectaLock All-Suture Anchor, K193461, Medacta International SA

In addition, the following reference devices are referenced within the submission:

- MectaLock PEEK Suture Anchor, K190474, Medacta International SA

IV. Device Description

The SnugFit All-Suture Anchor is an implantable device indicated for the treatment of hip and shoulder instability (Size 1) and shoulder rotator cuff repair and biceps tenodesis (Size 2).

The SnugFit All-Suture Anchor is a knotted device composed entirely of sutures, made of ultra-high molecular weight polyethylene (UHMWPE) and polyester (PET) specifically arranged and braided to

create an anchoring point within the bone after its deployment. The sutures that compose the anchor, are also used to secure soft tissues to a supporting structure (i.e. bone).

The SnugFit All-Suture Anchors are provided EtO sterile with a 5 years shelf life.
The sterile, individually packaged, devices consist of the all-suture anchor and a disposable stainless steel driver with a plastic handle. The all-suture anchor is provided pre-loaded on the disposable driver.

The SnugFit All-Suture Anchors are available in six (6) different configurations depending on anchor size (size 1 and size 2), driver length (long and short), and typology of preloaded sutures.

V. Indications for Use

The SnugFit All-Suture Anchor is intended for use in arthroscopic or open surgical approaches for fixation of soft tissue to bone in the hip and shoulder in the following procedures:

- Hip: acetabular labral repair
- Shoulder: glenoid labrum repair; rotator cuff repair, biceps tendon repair

VI. Comparison of Technological Characteristics

The SnugFit All-Suture Anchor and the predicate device share the following characteristics:

- anchor deployment and fixation mechanism;
- disposable driver design;
- materials;
- biocompatibility;
- device usage;
- sterility; and
- packaging.

The SnugFit All-Suture Anchor differs from the predicate device with respect to:

- anchor sizes; and
- preloaded sutures.

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*

- SnugFit All-Suture Anchor Design Validation Report – *Test Report A1* according to Design Validation Protocol M07.85.003 Nr. A1 and Evaluation forms

- *PERFORMANCE TESTING*
  - MR Safety evaluation - SnugFit All-Suture Anchor
  - Cyclic and load-to-failure properties of SnugFit All-Suture Anchor - *Test Report A2* according to Test Protocol IL 07.09.575 Rev.1 and Empa Test Report No. 5214025866_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 evaluation*

Clinical Studies:

- No clinical studies were conducted.

VIII. Conclusion

Based on the information provided within this submission, the SnugFit All-Suture Anchor is 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.