September 20, 2016

Novadaq Technologies Inc.
Jen Pendlebury
Director of Regulatory Affairs
8329 Eastlake Drive, Unit 101
Burnaby, British Columbia
Canada V5A 4W2

Re: K161792
  Trade/Device Name: Pinpoint Endoscopic Fluorescence Imaging System
  Regulation Number: 21 CFR 876.1500
  Regulation Name: Endoscope and Accessories
  Regulatory Class: Class II
  Product Code: GCJ, IZI
  Dated: August 25, 2016
  Received: August 26, 2016

Dear Jen Pendlebury:

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. 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 Part 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR Parts 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. 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 http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely,

Christopher J. Ronk -S

For Binita S. Ashar, M.D., M.B.A., F.A.C.S.
Director
Division of Surgical Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure
Indications for Use

The PINPOINT Endoscopic Fluorescence Imaging System is indicated for use to provide real time endoscopic visible and near-infrared fluorescence imaging.

The PINPOINT System enables surgeons to perform minimally invasive surgery using standard endoscope visible light as well as visual assessment of vessels, blood flow and related tissue perfusion, and at least one of the major extra-hepatic bile ducts (cystic duct, common bile duct or common hepatic duct), using near-infrared imaging.

Fluorescence imaging of biliary ducts with the PINPOINT System is intended for use with standard of care white light, and when indicated, intraoperative cholangiography. The device is not intended for standalone use for biliary duct visualization.

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

- [x] 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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Section 6 - 510(k) Summary

This 510(k) summary of safety and effectiveness information is submitted in accordance with the requirements of 21 CFR § 807.92.

Trade Name: PINPOINT Endoscopic Fluorescence Imaging System
Device Model Number: PC9000
Common Name: Endoscope Video Imaging System
Classification: 21 CFR § 876.1500
Classification Name: Laparoscope, General & Plastic Surgery; Angiographic X-ray System
Product Code: GCJ; IZI
Classification: Class II
Manufacturer: Novadaq Technologies Inc.
8329 Eastlake Drive, Unit 101
Burnaby, British Columbia
Canada V5A 4W2
Contact Name: Jen Pendlebury
Director of Regulatory Affairs
Tel: (905) 629-3822 ext. 205
Fax: (905) 249-0656
Date 510(k) Summary Prepared: June 29, 2016
Predicate Devices: PINPOINT Endoscopic Fluorescence Imaging System (K150956)
(Novadaq Technologies Inc.)

Device Description:
The PINPOINT Endoscopic Fluorescence Imaging System (PINPOINT, PINPOINT System) is comprised of an endoscopic video processor/ illuminator (VPI) which is capable of providing visible and near-infrared illumination to a surgical laparoscope, surgical laparoscopes optimized for visible (VIS) and near-infrared (NIR) illumination and imaging, a camera head that is also optimized for visible and near-infrared imaging, and a flexible light guide cable. The following laparoscope models are included as part of the PINPOINT System: SC9100, SC9101, SC9104, SC9130, SC9131, SC9134, SC9144, SC9504, SC9534 and SC9544. These are the major components of the PINPOINT System.

During surgical procedures, PINPOINT may be operated to provide visualization similar to that provided by conventional imaging systems used in surgical endoscopy. The area of interest is illuminated with visible light from the illuminator and the resulting reflected light is imaged by the
camera and displayed on the video monitor. When used with the VIS-only laparoscopes, the System is only capable of the conventional mode of visualization described herein.

To provide NIR fluorescence imaging, PINPOINT is used with the imaging agent, indocyanine green (ICG). The patient is injected with ICG imaging agent. The ICG fluoresces when illuminated through the laparoscope with NIR excitation light from the VPI, and the fluorescence response is then imaged with the camera, processed and displayed on an HD video monitor.

When used with a VIS/NIR laparoscope, PINPOINT can operate to provide illumination and imaging of both visible light and ICG fluorescence images simultaneously.

Proposed Indications for Use of the PINPOINT System:
The PINPOINT Endoscopic Fluorescence Imaging System is indicated for use to provide real time endoscopic visible and near-infrared fluorescence imaging.

The PINPOINT System enables surgeons to perform minimally invasive surgery using standard endoscope visible light as well as visual assessment of vessels, blood flow and related tissue perfusion, and at least one of the major extra-hepatic bile ducts (cystic duct, common bile duct or common hepatic duct), using near-infrared imaging.

Fluorescence imaging of biliary ducts with the PINPOINT System is intended for use with standard of care white light, and when indicated, intraoperative cholangiography. The device is not intended for standalone use for biliary duct visualization.

Summary of Technological Characteristics of the PINPOINT System and Predicate Device
Based on the technological characteristics and fundamental scientific premise, the PINPOINT System (PC9000) has been determined to be substantially equivalent to the predicate device, the PINPOINT Endoscopic Fluorescence Imaging System (K150956). Both systems use the same technology and mode of imaging to provide real-time endoscopic visible and NIR fluorescence imaging during minimally invasive surgical procedures. These systems utilize the same mode of imaging – visible and near infrared fluorescence imaging, with ICG as the imaging agent, used in the hospital operating room. All of these systems have the same integral components – a light source console and a light cable for outputting light, a camera control unit for processing NIR and VIS light images, a coupler attached to the laparoscope and a camera head, and a laparoscope for VIS and NIR light illumination and imaging. The proposed PINPOINT laparoscopes are substantially equivalent to the existing PINPOINT laparoscopes (K150956) with minor modification to provide users with an alternative laparoscope.

Non-Clinical Performance Testing of the PINPOINT System
The PINPOINT System was designed and developed by Novadaq Technologies Inc. (NOVADAQ), in accordance with the applicable requirements and standards to establish performance and safety of the device. Device safety and performance were verified by tests conducted by NOVADAQ and accredited third party laboratories.

The PINPOINT System was tested in accordance with IEC 60601-1:2012 Medical Electrical Equipment – Part 1: General requirements for basic safety and essential performance. IEC 60601-1-2:2007 Medical Electrical Equipment – Part 1-2: General requirements for safety – Collateral standard: Electromagnetic compatibility – Requirements and tests conformance testing was also conducted on the PINPOINT System and test results showed that PINPOINT conforms
to the applicable requirements. PINPOINT was also tested in accordance with IEC 60601-2-18:2009 *Medical Electrical Equipment – Part 2: Particular requirements for the basic safety and essential performance of endoscopic equipment*, and has demonstrated conformance to the standard. Conformance of PINPOINT with IEC 60825:2007 *Safety of laser products – Part 1: Equipment classification and requirements* was assessed by Underwriters Laboratories Inc. (UL) and showed that PINPOINT is a Class 3R laser device with internal maximum Class 4 laser radiation.

Animal testing using a porcine model validated the *in vivo* fluorescence imaging capability of the PINPOINT System.

**Conclusions**

It has been demonstrated in this Special 510(k) submission that the proposed modification to the PINPOINT System is substantially equivalent to the predicate device in terms of safety, effectiveness and performance. This determination is based on the proposed and predicate devices having the same indications for use, technological characteristics and principle of operation. The device modification to the PINPOINT Endoscopic Fluorescence Imaging System outlined in this summary raises no issues related to its safety and effectiveness.