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**510(k) SUMMARY**

**MAY 23 2008**

This Summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR§807.92

**The assigned 510(k) number is:**

**Submitter's identification:**

Internacional Farmacéutica, S.A. de C.V.  
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C.P. 04040 México, D.F.  
Contact:  
Mr. Alejandro von Mohr, General Director  
Phone: (52 55) 55 44 87 60 to 62 ext. 227, 219  
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US Contact:  
Mr. Alan P. Schwartz  
55 Northern Boulevard  
Great Neck, New York 11021  
Phone: 516-482-9001  
Fax: 516-482-0186

Date Summary prepared: May 31, 2007

**Trade Name of the Device:**

Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone)  
Surgical Sutures

**Common or Usual Name:**

Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures

**Classification of Device:**

Class II in 21 CFR § 878.4493, Absorbable poly(glycolide/lactide) Surgical Suture

**Classification Panel:**

General & Plastic Surgery Devices Panel

**Product Code:**

GAM

**Predicate Devices:**

Monocryl\* (poliglecaprone 25) Suture  
(K960653 and K964072)

**Device Description**

Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Suture are synthetic absorbable sterile monofilament surgical sutures composed from a copolymer of glycolide and epsilon-caprolactone. This product is offered as undyed or dyed with an FDA listed color additive, D&C Violet No. 2.

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**Intended Use:**

Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures are indicated for use as absorbable sutures in general soft tissue approximation and/or ligation, but not for use in cardiovascular or neurological tissues, microsurgery or ophthalmic surgery.

**Summary of Technological Characteristics, comparison to predicate device**

Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures have similar technological characteristics as the predicate device. Like the predicate device, Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures are sterile, monofilament synthetic absorbable surgical sutures that conform to the requirements of United States Pharmacopoeia (USP), except for diameter, and Mexican United States Pharmacopoeia, Medical Devices Supplement (FEUM) for absorbable surgical sutures. The poly(glycolide-co-epsilon-caprolactone) material used for both "new" and "predicate" medical devices is commonly used in surgical applications and has been proven to be biocompatible. *In-vivo/in vitro* testing was provided showing that the device performed as intended and as claimed.

**Discussion of Clinical Test Performed:**

No clinical trials were conducted.

**Conclusions**

Based on the technological characteristics and physical properties of the Poly(glycolide-co-epsilon-caprolactone) sutures, the description, the intended use of the device and conformance with the following performance standards like:

USP 30

ISO 9001 and ISO 13485

FDA Guidance for Surgical Suture 510(k)

Internacional Farmaceutica believes that the subject devices demonstrate a substantial equivalence to the predicate devices and are safe and effective for their intended use.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

**MAY 23 2008**

Internacional Farmaceutica S.A. de C.V.  
% mdi Consultants, Inc.  
Mr. Alan P. Schwartz  
55 Northern Boulevard  
Great Neck, New York 11021

Re: K072863

Trade/Device Name: Atramat<sup>®</sup> PGC25 Poly(glycolide-co-epsilon-caprolactone) surgical sutures

Regulation Number: 21 CFR 878.4493

Regulation Name: Absorbable poly(glycolide/L- lactide)surgical suture

Regulatory Class: II

Product Code: GAM

Dated: May 01, 2008

Received: May 22, 2008

Dear Mr. Schwartz:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such 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); 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 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



Mark N. Melkerson  
Director  
Division of General, Restorative  
and Neurological Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

K072863

ATTACHMENT # 3

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510(k) Number (if known):

Device Name: Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures

Indications for Use:

Atramat® PGC25 Poly(glycolide-co-epsilon-caprolactone) Surgical Sutures are indicated for use as absorbable sutures in general soft tissue approximation and/or ligation, but not for use in cardiovascular or neurological tissues, microsurgery or ophthalmic surgery.

Prescription use X  
(Per 21 CFR 801.109)

Over-The Counter Use \_\_\_\_\_  
OR (Optional Format 1-2-96)

PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Neil R. P. Opler for xxx  
(Division Sign-Off)

Division of General, Restorative,  
and Neurological Devices

510(k) Number K072863