Formulaire de notice d'information de sécurité (field Safety Notice)

Field Safety Notice

Commercial name of the affected products:

Family	Device Name	Reference
A-CP Kits Family	A-CP-Kit-3	A-CP-3
	A-CP-Kit-3	A-CP-3 USA
	A-CP-Kit-3 (20ml)	A-CP-3-20
RegenKit-BCT Family	RegenACR-C Plus	R-ACR C/BA
	RegenACR-C Extra	R-ACR C2/B
	RegenKit-BCT-1	RK-BCT-1
	RegenKit-BCT-1	RK-BCT-1 USA
	RegenKit-BCT-2 Plus	RK-BCT-2A
	RegenKit-BCT-3	RK-BCT-3
	RegenKit-BCT-3	RK-BCT-3 USA
	RegenKit-BCT-T	RK-BCT-T

FSCA-identifier FSCA-2022-05-16-A

Type of action *Product quarantine*

Please note that this action only applies to specific product codes and does not affect all product codes and LOTs of Regen Lab products.

Date: August 2nd 2022

Attention to: *QA Responsibles, Warehouse Managers, Physicians, Hospitals, Clinics, Pharmacists and Healthcare professionals who received the concerned products.*
This notice should be forwarded to all those who need to be aware of it within your organization and to maintain the awareness over the appropriate defined period.

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Details on affected devices:
Are concerned by this quarantine specific product codes of class IIb devices:

Product Code	Lot Number
A-CP-3	059
A-CP-3 USA	031 032 033 034 036 037 038 039 040 041 042 043 044 048 050 051 053 054 055
A-CP-3-20	047
R-ACR C/BA	141 142
R-ACR C2/B	138 139
RK-BCT-1	086 087
RK-BCT-1 USA	085
RK-BCT-2A	030
RK-BCT-3	301 302 303 305 306 307 308 309 310 311
RK-BCT-3 USA	300 304
RK-BCT-T	015

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Description of the problem:

At the beginning of May 2022, French customers have reported several cases of patient's inflammatory reaction after Platelet-Rich Plasma (PRP) injection characterized by pain and/or joint effusion. Transient inflammatory reaction is identified as expected undesirable side-effects of the PRP injection as mentioned in our risk analysis and clinical report evaluation. These cases have only been reported following an intra-articular injection into the knee, and have generally resolved spontaneously, or have required medical treatment in several case. The analysis of the synovial fluid did not reveal any infection.

The medical follow-up of the patients stops when the inflammatory reaction due to the injection of PRP disappears, there is no need for additional follow-up. No particular follow-up is necessary for patients without inflammatory reaction following an injection of PRP.

From systematic literature searches conducted to identify all published data pertaining to RegenKits, it was found that side effects associated with the use of PRP for a large variety of medical use were minor and were of short duration. These reactions were of mild to moderate severity, localized to the treated area, transient, resolved spontaneously, or required the intake of medical treatment. Globally, when risks of use of PRP and other plasma-derived products prepared with RegenKits are compared to other conventional treatments according to the medical use, the use of RegenPRP is still associated with a lower risk profile.

The incriminated lots of tubes have been investigated. Some particles in the sodium citrate solution, with an irregular appearance of the separator gel and the presence of a white layer on the surface of the gel have been observed. (Note: the separator gel is used for the blood separation, it makes a physical barrier between the red blood cells and the Platelet Rich Plasma. Only the plasma is reinjected to the patient, the gel is not).

An investigation on concerned tubes was performed on this potential degradation of the gel.

After an internal investigation led with manufacturing documentation and reference samples, this issue seems to be due to a combination of factors during manufacturing.
If one of these factors is absent, the visual defect does not appear, suggesting this combination to be the contributory cause of the visual defect on the separator gel, and, consequently, to the patient's inflammatory reaction. The first reported customer complaints involve RK-BCT-3, batch number 302, manufactured in January 2022. Before January 2022, this combination was not used for BCT references.

Regen Lab continues to actively monitor the affected products to confirm the level of severity and of frequency, namely if those inflammatory reactions resolve spontaneously or require the intake of medical treatment. Moreover, several tests, internal and external, to investigate the root cause of this visual anomaly have been performed.

Regen Lab takes place a quarantine of products and batch numbers which have the suspected defective combination (see table above). More instructions will be communicated in the future.

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Product Identification Procedure:
For a quarantine, the only way to identify affected products is by comparing product code and batch number to the quarantine product list (see table above).
See Annex 1 for example of package labeling that highlights the location of the product code and batch number on the device label which is located on the primary packaging. The product code (reference number) is preceded by the word "REF" and the batch number is preceded by word "LOT".

Advise on action to be taken by the distributor/user:
Our traceability shows that you have taken delivery of affected product. Please follow the steps below according to whether you are a distributor or an end-user in order to quarantine the affected product*:*

Actions to be taken by the distributor	Action to be taken by the end-user
1. *Please **immediately stop distributing** and quarantine all affected products.* 2. *Please complete and return the "Quarantine Response Form for Distributors" (page 6) **no later than August 19th 2022** to Mr. Jean-Baptiste Pignier (jpignier@regenlab.com) and Mr. Baptiste Laroche (blaroche@regenlab.com)* 3. *Inform and send the FSN to end-users **no later than August 19th 2022**.* *They must fill and return to you the "Quarantine Response Form for End-Users" (page 7).* *You must then return to Regen Lab the end-user FSN form **no later than August 19th 2022** to Mr. Jean-Baptiste Pignier (jpignier@regenlab.com) and Mr. Baptiste Laroche (blaroche@regenlab.com)* 4. *Your Regional contact will advise on suitable replacement stock.*	1. *Please **immediately stop using** and quarantine all affected products.* 2. *Please fill and return to your distributor the "Quarantine Response Form for End-Users" (page 7) **no later than August 19th 2022** to Mr. Jean-Baptiste Pignier (jpignier@regenlab.com) and Mr. Baptiste Laroche (blaroche@regenlab.com)* 3. *Quarantined products will be progressively replaced by Regen Lab SA.* 4. *Your Regional contact or Distributor will advise on suitable replacement stock.*

Thank you for your business and continued support. We sincerely apologize for any disruption this situation may cause to your organization.

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If you have any questions about these actions, please do not hesitate to contact:

- **For Sales and Logistic queries**
  - Mr. Alain Lecompte, alecompte@regenlab.com
- **For queries related to batch quarantine**
  - Mr. Baptiste Laroche, QA/RA Manager, blaroche@regenlab.com
  - Mr. Jean-Baptiste Pignier, PMS Manager, jpignier@regenlab.com

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The undersigns confirm that this notice has been notified to the appropriate Regulatory Agencies.

	Technical Director	QA/RA Manager	PMS Manager
Full name and signature			

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QUARANTINE RESPONSE FORM for DISTRIBUTORS

FIELD SAFETY NOTICE

PLEASE COMPLETE AND RETURN by Email

Distributor Name	
Distributor Address	

The following product codes have been distributed to your facility:

Product Code / REF No.	LOT N°	Quantity Delivered (pieces)

Please answer each of the following.

Have You Distributed the Product Further? ☐ NO ☐ YES

*If YES, have you notified down to your customers? ☐ NO ☐ YES

*If YES, have you quarantined the products from your customers? ☐ NO ☐ YES

*If NO explain why not:

☐ We have NO affected products

☐ We have the following affected products

Record quantity for each LOT to be quarantined (for partially used kits, indicate the number of non-used tubes or syringes):

Product Code / REF N°	LOT N°	Units on hand	Quarantined units

The QUARANTINE RESPONSE FORM for DISTRIBUTORS returned to Regen Lab
☐ YES ☐ NO

The QUARANTINE RESPONSE FORM for END-USERS returned to Regen Lab
☐ YES ☐ NO

FORM Completed and Returned From:

Name
Date
Signature

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QUARANTINE RESPONSE FORM for END-USERS

FIELD SAFETY NOTICE

PLEASE COMPLETE AND RETURN by Email to your Distributor

End-User Name	
Address	

The following product codes have been distributed to you:

Product Code	Lot Number	Expiration Date

Please answer each of the following.

☐ We have NO affected products in stock
☐ We have the following affected products

Record quantity for each LOT to be quarantined (for partially used kits, indicate the number of non-used tubes or syringes):

Product Code / REF N°	LOT N°	Units on hand	Units returned

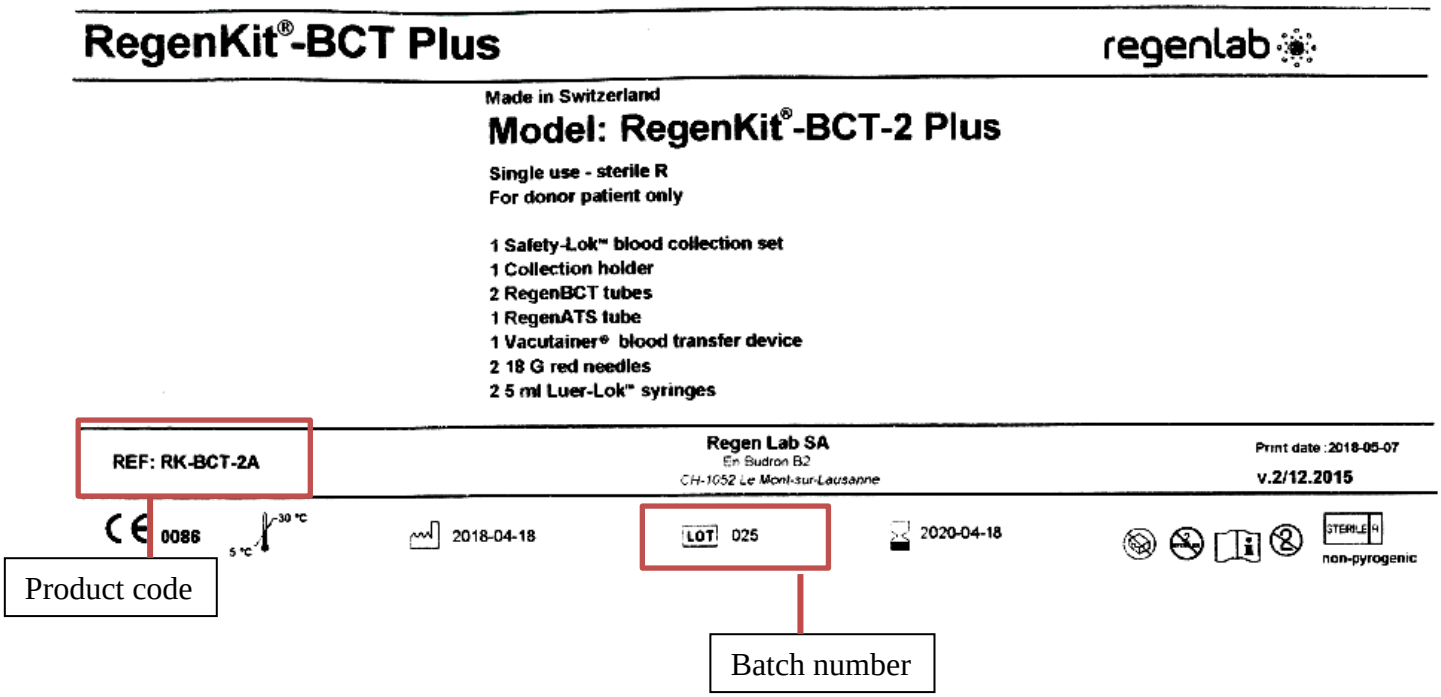
The FORM returned to the distributor
☐ YES ☐ NO

FORM Completed and Returned From:

Name
Date
Signature

Annex 1: Examples of Product Labelling

Labeling printed on Tyvek



Label on the folding box