



Monday, February 05, 2018

Carl Zeiss Meditec Production, LLC.  
1040 South Vintage Avenue,  
Bldg. A  
Ontario, CA 91761-3631  
USA

## URGENT: MEDICAL DEVICE RECALL

### RE: Recall of Carl Zeiss Meditec AG 611P CT Lucia Intraocular Lenses | +19.5 D

Carl Zeiss Meditec Production, LLC is initiating a recall due to the detection of a potential labeling error made during the production of Carl Zeiss Meditec AG CT LUCIA 611P, +19.5D lenses. This resulted in a total of 57 Lenses that were potentially mislabeled with the incorrect diopter. Please find below the product description of the affected product(s):

#### Affected Product By This Recall:

**Product Name:** 611P CT LUCIA Posterior Chamber Hydrophobic Acrylic Lens  
**Model Number:** 611P CT LUCIA  
**Intended Use:** Carl Zeiss Lenses are intended for primary implantation in the posterior chamber in patients where a cataractous lens has been removed by cataract extraction. It is recommended that the use of the intraocular lens be initially limited to one eye. Use of the lenses is especially appropriate in patients who cannot tolerate contact lenses, those who would not be candidates for cataract spectacles, or for patients requiring an intraocular lens for occupational or other reasons.

**Device Class:** Class III  
**Classification Rule:** MDD 93/42/EEC Annex II, Section 4  
**EC Number:** CE 0257 (Registration Number 263168-MR2)  
**Part Number:** 003500-0026-383  
**Material Description:** CT LUCIA 611P Hydrophobic Lens  
**Diopter:** +19.5D  
**Serial Numbers Affected:**

3S1609150722	3S1609150738	3S1609150754	3S1609150770
3S1609150723	3S1609150739	3S1609150755	3S1609150771
3S1609150724	3S1609150740	3S1609150756	3S1609150772
3S1609150725	3S1609150741	3S1609150757	3S1609150773
3S1609150726	3S1609150742	3S1609150758	3S1609150774
3S1609150727	3S1609150743	3S1609150759	3S1609150775
3S1609150728	3S1609150744	3S1609150760	3S1609150776
3S1609150729	3S1609150745	3S1609150761	3S1609150777
3S1609150730	3S1609150746	3S1609150762	3S1609150778
3S1609150731	3S1609150747	3S1609150763	3S1609150779
3S1609150732	3S1609150748	3S1609150764	3S1609150780
3S1609150733	3S1609150749	3S1609150765	3S1609150781
3S1609150734	3S1609150750	3S1609150766	3S1609150782
3S1609150735	3S1609150751	3S1609150767	3S1609150783
3S1609150736	3S1609150752	3S1609150768	
3S1609150737	3S1609150753	3S1609150769	

**Recalling Firm and Recall Coordinator Information:**

**Company Name:** Carl Zeiss Meditec AG  
**CE Number:** CE 0257  
**Company Address:** Goeschwitzer Strasse 51 – 52, Jena, Germany 07745  
**Company Type:** Legal Manufacturer  
**Recall Coordinator Contact:** Owen J. Bry, Senior Quality Manager  
**Recall Coordinator Phone #:** 909.906.5119  
**Recall Coordinator Fax #:** 909.937.1088  
**Recall Coordinator Email:** owen.bry@zeiss.com

**Reason for Initiating the Voluntary Recall**

Carl Zeiss Meditec AG is initiating this action due to detection of a potential labeling error that may have resulted in a mislabeling of 57 units of 611P CT LUCIA Hydrophobic Lenses. It has been identified that a potential labeling mix-up may have caused finished product labeled as +19.5 Diopter to potentially contain a +34.0D intraocular lens.

Implantation of a mislabeled lens is considered to potentially cause a refractive power impairment. This likely may result in the need of an additional surgery which is based on the surgeon's discretion and expertise. This may include, but not limited to:

1. Explant of the lens if the patient has a high refractive surprise post-operatively
2. Piggyback lens implantation to correct the post-operative refractive surprise
3. Other technique the surgeon may need to perform due to patient history and pathology

These are all considered as a severe risk, with a high probability the surgeon may need to perform an additional surgery to correct the problem and prevent any injury from occurring.

**Date Identified:** January 22<sup>nd</sup>, 2018  
**Number of Complaints:** One (1)  
**Number of MDRs:** One (1)  
**Number of Reportable Incidents:** One (1)

Carl Zeiss Meditec Production, LLC has received a complaint, which was deemed as a reportable adverse event relating to this identified problem. This potential labeling error was discovered when the explanted lens was returned for analysis, measured and confirmed to be a +34.0D.

**Volume of Product Affected:**

**Total Quantity Produced:** 57 Units  
**# of Units Sold:** 33 Units  
**# of Units Still in Stock:** 24 Units  
**# of Customers Sold To:** Please See Attachment 1 - Consignee List  
**User-Level of Distribution:** User Level (i.e. surgery center(s), hospital(s), etc.)  
**Area(s) of Distribution:** Austria | Finland | France | Germany | Italy | Spain | United Kingdom | Sweden | Switzerland

**Health Hazard Evaluation**

*Description of potential health hazard:*

A potential labeling error resulted in the mislabeling of 57 units of 611P CT LUCIA Hydrophobic Lenses. It has been identified that a potential labeling mix-up has caused +19.5 Diopter lenses to possibly contain +34.0D intraocular lenses.



*Factors that may have caused or contributed to the adverse event or potential health hazard:* Product labeling error within production at the manufacturing site may occur during the final diopter verification before loading the lens into the injector assembly and/ or during final packaging of the device. Additionally, the operators are required to follow general line clearance process with respect to all products to eliminate any potential product mix-up. However, if this is not followed it may lead to product mix-up.

*Use related or human performance contributing factors:*

There are no human factors from the surgeon or nurse which would contribute to this risk.

*Likelihood of Occurrence:*

Rare – This is determined as rare due to the fact that only One (1) recorded complaint has been noted to have cause a myopic (-) refractive outcome, post-surgery. The root cause of the problem has been identified to a labeling error within the production process, which makes the likelihood high as well.

*Probability of Injury Occurring:*

Likely – The labeling error which has been identified to potentially have been caused in our production process and has led to lenses being labeled with the wrong diopter is extremely likely to cause injury. This is due to the fact that implantation of the wrong diopter will result in the need for additional medical intervention.

*Severity of the Injury:*

Moderate – As implantation of the wrong diopter will result in unwanted (- or +) refractive outcomes that will cause optical complications. These impairments are considered significant but temporary as they are reversible with additional surgery to correct.

## **Recall Strategy**

<b>Recall Level:</b>	End-User (Hospital/Surgery Centers)
<b>Method of Notification:</b>	Mail, E-Mail, and Facsimile
<b>Mail to be Sent By:</b>	Overnight

### **Actions to be performed by the Sales and Service Centers (SSC):**

1. ***Immediately*** trace the status and location of all serial numbers listed above.
2. ***Immediately*** contact ***ALL*** customers by Phone, Mail and E-Mail asking them to quarantine the product and ***DO NOT*** implant the product.
3. ***Immediately*** contact ***ALL*** customers by Phone, Mail and E-Mail and provide the Customer Notification Letter provided.
4. Keep record of customer notifications performed for the following information:
  - a. Date of Contact
  - b. Form of Contact (Phone, E-mail, Mail, ZEISS Sales Rep. Visit)
  - c. Person spoke with (if by Phone or Visit)
  - d. Traceability Information (i.e. email communication and/or tracking number of Customer Notification Forms)
  - e. Return Goods Authorizations issued to Customer (if applicable)
5. Customers shall be required to complete the Customer Reply Form (see Customer Notification Letter) and return a signed copy back to the SSC and/or ZEISS Sales Representative.

NOTE 1: Every attempt shall be made by the SSC or ZEISS Sales Representative to make contact with the customer and reconcile all sold/shipped lenses. (SSC)



NOTE 2: If the ZEISS Sales Representative is able to confirm via telephone or in person the status of all serial numbers shipped to the customer, they may complete the Customer Reply Form and send it back for the customer.

6. The Sales and Service Centers shall send all Customer Reply Forms back to Carl Zeiss Meditec Production, LLC to the following Recall Coordinators:

**Recall Coordinator Information**

Owen J. Bry, Sr. Quality Manager  
Email: [owen.bry@zeiss.com](mailto:owen.bry@zeiss.com)  
Phone: +1 909.906.5119

Aileen Sanchez, Complaint Manager  
Email: [aileen.sanchez@zeiss.com](mailto:aileen.sanchez@zeiss.com)  
Phone: +1 909.906.5165

**Returning Affected Product:**

All product which is returned to the SSC, shall be immediately shipped to the address below:

Carl Zeiss Meditec AG  
REF: FCA\_COCE09\_2018-01  
Attn. Claudia Minke  
Max-Dohrn-Strasse 8-10  
10589 Berlin, Germany

**Effectiveness Checks of the Recall**

Both the SSC and CoCe (manufacturing site) are responsible for checking the effectiveness of the recall until all product has been reconciled. Customer Reply forms must be obtained from ALL customers which have been sold the 611P CT LUCIA Hydrophobic Lenses listed on page 1 and 2 of this letter.

Carl Zeiss Meditec Production, LLC will schedule *Monthly* meetings with each SSC Quality Manager to receive an update on the status of the recall.

Customers which the SSC has tried to make contact with to obtain information on the status of the lenses affected may be deemed out of business, if three (3) consecutive letters, e-mails and facsimiles go unanswered. Three (3) final attempts shall be made by the SSC to contact the customer by last known phone number. The use of search engines should be used to identify customers which may have moved facilities, or changed phone numbers. If all of these attempts have resulted in the customer not providing a documented response to any forms of initial contact, the SSC may be able to identify these customers as out of business in future recall effectiveness communication

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Medical Technology Business Group

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[Owen.Bry@zeiss.com](mailto:Owen.Bry@zeiss.com)



## Attachment 1: Consignee List of Affected Customers

Material	Material Description	Serial Number	Customer	Country
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150733	Privatklinik Maria Hilf GmbH Radetzkystr. 35 Klagenfurt, Austria 9020	Austria
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150753	Privatklinik Maria Hilf GmbH Radetzkystr. 35 Klagenfurt, Austria 9020	Austria
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150745	Carl Zeiss Finland (FI) – SSC	Finland
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150747	Carl Zeiss Finland (FI) – SSC	Finland
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150755	Mehiläinen Oy Pohjoinen Hesperiankatu 17 00260 Helsinki, FI	Finland
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150757	Päijät-Hämeen Hyvinvointikuntayhtym Keskussairaalankatu 7 15850 Lahti, FI	Finland
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150749	Clinique du Val de Loire Château de Mirandol, 37360 Beaumont-la-Ronce, France	France
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150759	Clinique des 2 Caps 80 Avenue des Longues Pièces, 62231 Coquelles, France	France
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150777	Clinique des 2 Caps 80 Avenue des Longues Pièces, 62231 Coquelles, FR	France
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150722	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150735	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150736	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150737	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150739	Augentagesklinik Oranienburg Breite Str. 7, 16515 Oranienburg, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150751	Gemeinschaftspraxis Wily-Brandt-Platz 2d 2h 44532 Lunen, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150752	Evangelisches Fahrner Str. 133 47169 Duisburg, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150754	Evangelisches Fahrner Str. 133 47169 Duisburg, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150756	Städtisches Klinikum Freisestr. 9/10 38118 Braunschweig, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150763	Evangelisches Fahrner Str. 133 47169 Duisburg, DE	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150764	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150765	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150766	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150768	Carl Zeiss Meditec – SSC	Germany



Material	Material Description	Serial Number	Customer	Country
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150769	Carl Zeiss Meditec – SSC	Germany
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150774	Augentagesklinik Alt-Moabit 101B, 10559 Berlin, Germany	Switzerland
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150761	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150762	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150767	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150773	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150723	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150724	Life Cronos srl Via Cosimo Il Vecchio, 2/10, 50139 Firenze FI, Italy	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150725	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150726	Azienda Sanitaria Prov.le di Corso Gelone 17 Siracusa, Italy 96100	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150727	La Maddalena SpA Casa di Cura Via S.Lorenzo 312/D Palermo, Italy 90146	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150729	Azienda Sanitaria Prov.le di Corso Gelone 17 Siracusa, Italy 96100	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150730	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150731	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150732	Carl Zeiss S.p.A. (IT) – SSC	Italy
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150775	Carl Zeiss Meditec Production, LLC	CoCe 09
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150776	Carl Zeiss Meditec Production, LLC	CoCe 09
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150742	Carl Zeiss Meditec Iberia S.A. – SSC	Spain
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150743	Carl Zeiss Meditec Iberia S.A. – SSC	Spain
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150728	Aveny Ögonklinik AB Plan 3, Kungssportsavenyen 33, 411 36 Göteborg, Sweden	Sweden
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150734	Dorset County Hospital NHS Williams Ave, Dorchester DT1 2JY, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150738	East Kent Hospitals University NHS	UK



Material	Material Description	Serial Number	Customer	Country
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150740	West Suffolk Hospitals NHS Trust Hardwick Ln, Bury Saint Edmunds IP33 2QZ, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150741	Kettering General Hospital NHS Rothwell Rd, Kettering NN16 8UZ, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150744	Luton & Dunstable Hospital NHSFT The L&D Hospital NHS Foundation Trust, Lewsey Rd, Luton LU4 0DZ, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150746	SDV Ltd. - Evolution Busin Prk	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150748	Leicestershire Consultan 376 London Road , Great Britain LE 2 2PN	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150750	Optegra Manchester Eye Hospital One Didsbury Point, 2 The Avenue, Manchester M20 2EY, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150758	Royal Devon and Exeter Hospital Barrack Rd, Exeter EX2 5DW, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150760	Axminster Hospital Chard Street, Axminster EX13 5DU, United Kingdom	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150770	SDV Ltd. - Evolution Busin Prk	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150771	Optegra Manchester Eye Hospital One Didsbury Point, 2 The Avenue, Manchester M20 2EY, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150772	Optegra Manchester Eye Hospital One Didsbury Point, 2 The Avenue, Manchester M20 2EY, UK	UK
003500-0026-383	CT LUCIA 611P TIP 2.0 DPT 19.5	3S1609150778	Optegra Yorkshire Eye Hospital 937 Harrogate Rd, Bradford BD10 0RD, UK	UK