

August 3, 2021

Zhejiang Hongyu Medicali Commodity CO., LTD % Ivy Wang Technical Manager Shanghai Sungo Management Consulting Company Limited 14th Floor, 1500# Central Avenue Shanghai, Shanghai 200122 China

Re: K211897

Trade/Device Name: Surgical Face Mask Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical Apparel

Regulatory Class: Class II Product Code: FXX Dated: June 21, 2021

Received: June 21, 2021

## Dear Ivy Wang:

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 <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> 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 <u>Federal Register</u>.

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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 and Part 809); 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 <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); 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 <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). 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 (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For Clarence W. Murray III, Ph.D.
Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control 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: 06/30/2023 See PRA Statement below.

610(k) Number ( <i>if known)</i> K211897	
Device Name Surgical Face Mask	
Indications for Use (Describe) The Surgical Face Mask is intended to be worn to protect both the microorganisms, body fluids and particulate material. This face n reduce the potential exposure to blood and body fluids. This is a second control of the potential exposure to blood and body fluids.	nask is intended for use in infection control practices to
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)

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

## \*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\*

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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# 510(K) Summary

## K211897

This summary of 510(K) safety and effectiveness information is being submitted in accordance with the requirement of 21 CFR 807.92.

Date prepared: August 3, 2021

# A. Applicant Information:

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## **Submission Correspondent:**

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Email: <a href="mailto:haiyu.wang@sungoglobal.com">haiyu.wang@sungoglobal.com</a> Secondary contact: Mr. Raymond Luo

Room 1401, Dongfang Building, 1500# Century Ave., Shanghai 200122, China

Tel: +86-21-68828050

Email: fda.sungo@gmail.com

## **B.** Subject Device Information:

Trade Name: Surgical Face Mask Common Name: SURGICAL MASK

Model: Ear Loops

## **Regulatory Information**

Classification Name: Surgical Face Mask

Classification: Class II Product code: FXX

Regulation Number: 878.4040 Review Panel: Surgical Apparel

#### C. Predicate device Information:

K182515

Surgical Face Mask

Wuhan Dymex Healthcare Co., Ltd.

## **Regulatory Information**

Classification Name: Surgical Face Mask

Classification: Class II
Product code: FXX

Regulation Number: 878.4040 Review Panel: Surgical Apparel

#### D. Indications for use of the device:

The Surgical Face Mask is intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. This face mask is intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device, provided non-sterile.

## E. Device Description:

The Surgical Face Masks are blue color, single use, three-layer, flat-folded masks with nose piece and ear loops. The blue colorant is polypropylene (PP) master batch.

The Surgical Face Masks are manufactured with three layers, the inner and outer layers are made of spun-bond polypropylene, and the middle layer is made of melt blown polypropylene filter.

The ear loops are held in place over the users' mouth and nose by two elastic ear loops welded to the facemask. The elastic ear loops are not made with natural rubber latex or fiberglass.

The nose piece in the layers of facemask is to allow the user to fit the facemask around their nose, which is made of Iron core coated with polypropylene resin.

The surgical face masks are sold non-sterile and are intended to be single use, disposable devices.

## F. Comparison with predicate device

Device	Proposed Device	Predicate Device	Result
510K #	K211897	K182515	-
Manufacturer	ZHEJIANG HONGYU MEDICALI	Wuhan Dymex Healthcare Co., Ltd.	-
	COMMODITY CO., LTD		
Model Name	SURGICAL FACE MASK	SURGICAL FACE MASK	Same
	Ear loops	Ear loops	
Classification	Class II Device, FXX (21	Class II Device, FXX (21 CFR878.4040)	Same
	CFR878.4040)		
Indication for use	The Surgical Face Mask is	The Surgical Face Masks are	Same
	intended to be worn to protect	intended to be worn to protect both	
	both the patient and	the patient and healthcare	
	healthcare personnel from	personnel from transfer of	

		I	T	
		transfer of microorganisms,	microorganisms, body fluids and	
		body fluids and particulate	particulate material. These face	
		material. This face mask is	masks are intended for use in	
		intended for use in infection	infection control practices to reduce	
		control practices to reduce the	the potential exposure to blood and	
		potential exposure to blood	body fluids. This is a single use,	
		and body fluids. This is a single	disposable device(s), provided non-	
		use, disposable device,	sterile.	
		provided non-sterile.		
Des	Design Features Ear Loops, Flat-pleated, 3 layers Ear Loops, Flat-pleated, 3 layers		Ear Loops, Flat-pleated, 3 layers	Same
	Outer layer	Spunbond Polypropylene	Spunbond Polypropylene	Same
S	Inner layer	Spunbond Polypropylene	Spunbond Polypropylene	Same
Materials	Filter layer	Melt-blown Polypropylene	Melt-blown Polypropylene	Same
/ate	Nose wire	Iron core coated with	Malleable polyethylene wire	Different
_		polypropylene resin		
	Ear loops	Polyester + spandex	Spandex	Different
Cold	or	Blue	Yellow	Different
Dim	ension (Length)	ension (Length) 17.5cm±0.2cm 17.5cm±0.2cm		Same
Dimension (Width)		9.5cm±0.2cm	9.5cm±0.2cm	Same
Dimension		17cm±0.2cm	16.5cm±0.5cm	Similar
(Ear Loops)				
OTC use Yes		Yes	Yes	Same
Ste	rility	Non-Sterile	Non-Sterile	Same
Use	Single Use, Disposable Single Use, Disposable		Same	
AST	M F2100 Level	Level 3	Level 2	Different
Bio	compatibility			
Су	totoxicity	Under the conditions of the	Under the conditions of the	Same
, ,		study, the subject device extract	study, the subject device extract	
		was determined to be non-	was determined to be non-	
		cytotoxic	cytotoxic	
Irritation		Under the conditions of the	Under the conditions of the	Same
		study, the subject device	study, the subject device extract	
		extract was determined to be	was determined to be non-	
		non-irritant	irritant	
Se	ensitization	Under the conditions of the study,	Under the conditions of the study,	Same
		the subject device extract was	the subject device extract was	
		determined to be non-sensitizer	determined to be non-sensitizer	

The proposed device has different material of nose piece, ear loops and different color to the predicate device, while the proposed device has been tested and the test results shown that the material and color differences do not affect the safety of the proposed device.

The proposed device is similar in design, intended use, technological characteristics, and is composed of the same or similar components as the predicate device. The product proposed under this premarket notification

submission has the same or similar performance characteristics and conform to the same or similar standards. Differences of the penetration level between the Surgical Face Masks and predicate devices did not raise any new concerns regarding safety and effectiveness.

## **G.** Summary of Non-Clinical Test

Non-clinical tests were conducted to verify that the proposed device met all design specifications as was same to the predicate device. The test results demonstrated that the proposed device complies with the following standards and the requirements stated in the Guidance for Industry and FDA Staff: *Surgical Masks – Premarket Notification* [510(k)] *Submission* issued on March 5, 2004:

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Test Method	Purpose	Pass Criteria	Results
ASTM F2101-19 Standard TestMethod for Evaluating the Bacterial Filtration	The purpose of the test is to evaluate the Bacterial filtration efficiency (BFE) (%)	≥98%	3 lots tested with total 96 samples, 94/96 Passed at ≥99% /Pass
EN 14683: 2019, Annex C Medical face masks - Requirements and test methods according to ASTM F2100:2019	The purpose of the test is to evaluate the Different pressure (Delta-P)	<6.0 mmH <sub>2</sub> O/cm <sup>2</sup>	3 lots tested with total 96 samples, 92/96 Passed <4 mmH2O/cm <sup>2</sup> / Pass
ASTM F2299-03 Standard  Test Method for  Determining the Initial  Efficiency of Materials Used in Medical Face Masks to  Penetration by Particulates  Using Latex Spheres  according to  ASTMF2100:2019	The purpose of the test is to evaluate the Sub-micron particulate filtration efficiency at 0.1 micron, % (PFE)	≥98%	3 lots tested with total 96 samples, 96/96 Passed at ≥99% / Pass
ASTM F1862M-17 Standard Test Method for Resistance of Medical Face Masks to Penetration by Synthetic Blood (Horizontal Projection of Fixed Volume at a Known Velocity) according to ASTMF2100:2019for pass result	The purpose of the test is to evaluate the Resistance to penetration by synthetic blood, Minimum pressure in mmHg	Fluid resistant claimed at 160 mm Hg	3 lots tested with total 96 samples, 95 of 96 test articles passed at 160mmHg /Pass

			3 lots tested with total
16 CFR Part 1610 Standard for			96 samples,
the Flammability of Clothing according to ASTM F2100:2019	The purpose of the test is to evaluate the Flame spread	Class 1	96/96 Passed ≥3
			seconds burn Time-
			Class 1 /
			Pass

- Biocompatibility Testing According to ISO 10993-1:2009, the nature of body contact
  for the subject device is Surface Device category, Skin Contact and duration of
  contact is A-Limited (≤24h). The following tests for the subject device were
  conducted to demonstrate that the subject device is biocompatible and safe for its
  intended use:
  - 1) In vitro Cytotoxicity Test per ISO 10993-5:2009 Biological evaluation of medical devices- Part 5: Tests for in vitro cytotoxicity,
  - 2) Skin Sensitization Tests per ISO 10993-10:2010 Biological evaluation of medical devices— Part 10: Tests for irritation and skin sensitization,
  - 3) Skin Irritation Tests per ISO 10993-10:2010 Biological evaluation of medical devices— Part 10: Tests for irritation and skin sensitization.

## H. Summary of Clinical Test Conclusion

No clinical study is included in this submission.

#### I. Conclusion

The conclusion drawn from the nonclinical tests demonstrates that the subject device in 510(K) submission K211897, the Surgical Face Mask is as safe, as effective, and performs as well as or better than the legally marketed predicate device cleared under K182515.