

February 10, 2020

United Consortium Marlent Perez Quality Specialist 29000 N. Hancock Pkwy. Valencia, CA 91355

Re: K192203

Trade/Device Name: JO for Him H2O Gel Original Personal Lubricant

Regulation Number: 21 CFR 884.5300

Regulation Name: Condom

Regulatory Class: II Product Code: NUC Dated: January 6, 2020 Received: January 8, 2020

Dear Marlent Perez:

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 https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm 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>.

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

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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 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); 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 https://www.fda.gov/medical-device-problems.

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

Sincerely,

Monica D. Garcia, Ph.D.
Acting Assistant Director
DHT3B: Division of Reproductive,
Gynecology and Urology Devices
OHT3: Office of GastroRenal, ObGyn,
General Hospital and Urology 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

510(k) Number (if known)

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2020 See PRA Statement below.

K192203			
Device Name			
JO for Him H2O Gel Original Personal Lubricant			
Indications for Use (Describe)			
JO for Him H2O Gel Original Personal Lubricant is a personal lubricant for penile, anal and/or vaginal application, intended to lubricate and moisturize, to enhance the ease and comfort of intimate sexual activity and supplement the body's natural lubrication. This product is compatible with natural rubber latex and polyisoprene condoms. This product is not compatible with polyurethane condoms.			
Type of Use (Select one or both, as applicable)			
Prescription Use (Part 21 CFR 801 Subpart D) Subpart C)			
CONTINUE ON A SEPARATE PAGE IF NEEDED.			

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.

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510(k) Summary – K192203

510(k) Owner: United Consortium

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Valencia, CA 91355

<u>Contact Person:</u> Marlent Perez

Quality Specialist

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<u>Summary Preparation Date:</u> February 7, 2020

<u>Trade Name:</u> JO for Him H2O Gel Original Personal Lubricant

<u>Common Name:</u> Personal Lubricant

<u>Device Identification:</u> Regulation Name: Condom

Regulation Number: 21 CFR 884.5300

Product Code: NUC (lubricant, personal)

Regulatory Class: Class II

Predicate Device: Product Name: Walgreens Personal Lubricating Jelly

510(k) Number: K080978

Manufacturer: Vast Resources

Product Code: NUC (lubricant, personal)

Device Class: Class II

The predicate device has not been subject to a design-related recall.

Device Description:

JO for Him H2O Gel Original Personal Lubricant is a clear/water white, viscous personal lubricant that is compatible with natural rubber latex and polyisoprene condoms. This product is not compatible with polyurethane condoms. This device is a non-sterile personal lubricant for penile, anal and/or vaginal application, intended to lubricate and moisturize, to enhance the ease and comfort of intimate sexual activity and supplement the body's natural lubrication.

This product is sold as an over-the-counter (OTC) product in 4 oz. and 8 oz. sizes provided in matte black, polyethylene (PE) tubes. These tubes are capped with silver, glossy, polypropylene (PP) flip tops. The individual tubes are hermetically sealed during



the production process.

This device is composed of Water (Aqua), Acrylates/C10-30 Alkyl Acrylate Crosspolymer, Glycerin, Methylparaben, Propylparaben, Hydroxyethylcellulose and Sodium Hydroxide.

The device specifications are listed in the table below:

Table 1: Device Specifications for JO for Him H2O Gel Original Personal Lubricant

Property	Specification
Appearance	Clear, viscous liquid
Color	Clear, water white
Odor	Odorless
Viscosity (cps) per USP <911>	38,000 cps to 75,000 cps
pH per USP <971>	5.25 to 7.50
Specific Gravity per USP <841>	0.980 to 1.200
Osmolality per USP <785>	600 to 900 mOsm/kg
Antimicrobial effectiveness per USP <51>	Meets USP <51> acceptance criteria for Category 2 products.
Total aerobic microbial count (TAMC) per USP <61> and <1111>	Less than 100 cfu/g
Total yeast and mold count (TYMC) per USP <61> and <1111>	Less than 10 cfu/g
Presence of Pathogens per USP <62>	Specification
Pseudomonas aeruginosa	Absent
Staphylococcus aureus	Absent
Salmonella/Shigella	Absent
Escherichia coli	Absent
Candida albicans	Absent

Indications for Use:

JO for Him H2O Gel Original Personal Lubricant is a personal lubricant for penile, anal and/or vaginal application, intended to lubricate and moisturize, to enhance the ease and comfort of intimate sexual activity and supplement the body's natural lubrication. This product is compatible with natural rubber latex and polyisoprene condoms. This product is not compatible with polyurethane condoms.

Predicate Device Comparison:

The table below lists the comparative indications for use and technological characteristics of the subject and predicate devices.

Table 2: Comparator Table for Subject Device – JO for Him H2O Gel Original Personal Lubricant and Predicate Device – Walgreens Personal Lubricating Jelly

Feature	JO for Him H2O Gel Original Personal Lubricant (K192203)	Walgreens Personal Lubricating Jelly (K080978)
Device Classification Name	Lubricant, Personal	Lubricant, Personal
Product Code	NUC	NUC



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Indications for Use	JO for Him H2O Gel Original	Walgreens Personal Lubricating
	Personal Lubricant is a personal	Jelly is a personal lubricant, for
	lubricant for penile, anal and/or	penile and/or vaginal application,
	vaginal application, intended to	intended to moisturize and
	lubricate and moisturize, to	lubricate, to enhance the ease and
	enhance the ease and comfort of	comfort of intimate sexual activity
	intimate sexual activity and	and supplement the body's
	supplement the body's natural	natural lubrication. It can ease
	lubrication. This product is	insertion of rectal thermometers,
	compatible with natural rubber	enemas and tampons. This
	latex and polyisoprene condoms.	product is compatible with latex
	This product is not compatible with	condoms.
	polyurethane condoms.	
Water soluble	Yes	Yes
Ingredients	Water (Aqua), Acrylates/C10-30	Water, Glycerin,
	Alkyl Acrylate Crosspolymer,	Hydroxyethylcellulose, Sodium
	Glycerin, Methylparaben,	Benzoate, Gluconolactone,
	Propylparaben,	Chlorhexidine Digluconate,
	Hydroxyethylcellulose, Sodium	Sodium Hydroxide
	Hydroxide	
Over the counter use	Yes	Yes
Sterile	No	No
Condom Compatibility	Latex, Polyisoprene	Latex
Biocompatibility Tested	Yes	Yes
Antimicrobial Tested	Yes	Yes
Shelf life	3 years	2 years

The subject and predicate device have similar indications for use. The indication for the subject device has been expanded to also include anal use. This change does not represent a new intended use as the primary intended use of this device is the same as the predicate device, i.e., lubrication of an orifice during intimate sexual activity. The subject and predicate devices have different technological characteristics, including different formulations, condom compatibility and shelf-life. The different technological characteristics of the subject device do not raise different types of safety and effectiveness questions.

Summary of Performance Data:

Biocompatibility

Biocompatibility studies, including Acute Systemic Toxicity, Vaginal Irritation Testing, Penile Irritation Testing, Cytotoxicity and Sensitization testing were performed in accordance with the 2016 FDA guidance document *Use of International Standard ISO 10993-1, "Biological Evaluation of Medical Devices – Part 1: Evaluation and testing within a risk management process"* and ISO 10993-1:2009 as follows:

- Cytotoxicity (ISO 10993-5:2009)
- Sensitization (ISO 10993-10:2010)
- Vaginal Irritation (ISO 10993-10:2010)



- Penile Irritation (ISO 10993-10:2010)
- Acute Systemic Toxicity (ISO 10993-11:2006)

The results of this testing demonstrated that the subject lubricant is only slightly cytotoxic, non-irritating, , non-sensitizing and non-systemically toxic.

Shelf-Life:

The subject device is a non-sterile personal lubricant with a three-year shelf-life in accordance with the results of a real time aging study. All device specifications listed in **Table 1** were tested at 0, 1, 2 and 3 years. The subject device met the device specifications at all time points.

Condom Compatibility:

The compatibility of the subject device with natural rubber latex, polyisoprene and polyurethane condoms was evaluated in accordance with ASTM D7661-10 Standard Test Method for Determining Compatibility of Personal Lubricants with Natural Rubber Latex Condoms. The results of this test indicated that JO for Him H2O Gel Original Personal Lubricant is compatible with natural rubber latex and polyisoprene condoms. This product is not compatible with polyurethane condoms.

Conclusion:

The results of the performance testing described above demonstrate that the JO for Him H2O Gel Original Personal Lubricant is as safe and effective as the predicate device and supports a determination of substantial equivalence.