

Kenpax International Limited % Ray Wang General Manager Beijing Believe-Med Technology Service Co.,Ltd Rm.912, Building #15, XiYueHui, No.5, YiHe North Rd. FangShan District, BeiJing, 102401 China

Re: K222151

Trade/Device Name: Sterilization Wrap Regulation Number: 21 CFR 880.6850 Regulation Name: Sterilization Wrap

Regulatory Class: Class II

Product Code: FRG

Dated: February 17, 2023 Received: February 21, 2023

## Dear Ray 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.

March 23, 2023

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 requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part

K222151 - Ray Wang Page 2

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-reportingcombination-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-devices/medical-device-safety/medical-device-reportingmdr-how-report-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/medicaldevices/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-regulatoryassistance/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,

Eileen Digitally signed by Eileen Cadel -S Cadel -S Date: 2023.03.23

Colin O'Neill, M.B.E.

**Assistant Director** 

DHT6B: Division of Spinal Devices OHT6: Office of Orthopedic Devices Office of Product Evaluation and Quality Center for Devices and Radiological Health

for

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.

510(k) Number (if known) K222151

Device Name Sterilization Wrap

#### Indications for Use (Describe)

The wrap is intended to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s) until used up to 365 days post sterilization.

Sterilization Wrap is intended to be used to enclose another medical device that is to be sterilized by a health care provider using:

- a) 100% ethylene oxide (EO) with a concentration of 725 735 mg/l at 131°F/55°C and 40%-80% relative humidity for 60 minutes.
- b) Exhausting the EO gas vacuum depth: 157 mBar to 160 mBar
- c) Aeration time: 12 hours d) Aeration temperature: 55°C
- e) Aeration pressure: 841 mBar to 864 mBar

Suggestions for the packaging content are given in table, A single layer of wrapping needs to be packaged in two sheets.

Table: Wrap Model Recommendations

Series (product family)	Product Code	Size: Length x Width (Inch)	Layers of sheet	Color	Basic Weight (g/m2)	Enclosed Medical Device	Maximum Recommended Wrapped Package Content Weights (lb)
DWI 000	BW1015	15*15	Dual	White + Blue	340 + 340	Very light weight package (For example: Huck towels)	0.78
BW1000  -	BW1024	24*24	Dual	White + Blue			2.96
	BL1012	12*12	Single	Blue		Very light weight package (For example: Huck towels)	0.37
	BL1015	15*15	Single	Blue			0.78
BL1000	BL1018	18*18	Single	Blue	34g		L,11
	BL1020	20*20	Single	Blue			2.32
	BL1024	24*24	Single	Blue	1-		2.98
D1U200A	BW3024	24*24	Dual	White + Blue		Light to moderate weight package (for example: Huck towels, Fluid-resistant	7.5
BW300	BW3036	36*36	Dual	White + Blue	65g + 65g	table cover, General use medical instruments)	9

BL4000	BL4018	18*18	Single	Blue	70g	Moderate to heavy weight package (for example: Tray liners, Lumens, General use medical instruments).  Maximum two lumens in one pack, each with minimum inner diameter of 3 mm ID and maximum length of 400mm.	3.5
	BW5024	BW5024 24*24 Dual White + Blue		Heavy weight package (for example: Tray liners, Lumens, General use medical	6		
BW5000	BW5036	36*36	Dual	White + Blue	70g + 70g	instruments)  Maximum two lumens in one pack, each	9.5
	BW5048	48*48	Dual	White + Blue		with minimum inner diameter of 3 mm ID and maximum length of 400mm.	17
	BW6036	36*36	Dual	White + Blue		Very heavy weight package (for example: Tray liners, Lumens, General use medical instruments).  Maximum two lumens in one pack, each with minimum inner diameter of 3 mm ID and maximum length of 400mm.	10
	BW6045	45*45	Dual	White + Blue	88g + 88g		23
	BW6048	48*48	Dual	White + Blue			25

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)				

#### CONTINUE ON A SEPARATE PAGE IF NEEDED.

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The assigned 510(k) Number: K222151

# 510(k) Summary

This 510(k) Summary of 510(k) safety and effectiveness information is being submitted in accordance with requirements of SMDA 1990 and Title 21, CFR Section 807.92.

1. Date of Preparation: 23/03/2023

2. Sponsor Identification

## **KENPAX INTERNATIONAL LIMITED**

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Contact Person: Jerome Ren Position: QRA director Tel: 852-2-2722935

Email: JeromeRen@kenpax.cn

3. Designated Submission Correspondent

Mr. Ray Wang

### Beijing Believe-Med Technology Service Co., Ltd.

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Email: information@believe-med.com

4. Identification of Proposed Device

Trade Name: Sterilization Wrap Common Name: Sterilization Wrap

**Regulatory Information** 

Classification Name: Sterilization Wrap

Classification: 2 Product Code: FRG

Regulation Number: 21 CFR 880.6850 Review Panel: General Hospital

### Indication For Use Statement:

The wrap is intended to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s) until used up to 365 days post sterilization.

Sterilization Wrap is intended to be used to enclose another medical device that is to be sterilized by a health care provider using:

a) 100% ethylene oxide (EO) with a concentration of 725 - 735 mg/l at 131  $^{\circ}$ F/55 $^{\circ}$ C and 40%-80% relative humidity for 60 minutes.

b) Exhausting the EO gas vacuum depth: 157 mBar to 160 mBar

c) Aeration time: 12 hoursd) Aeration temperature: 55°C

e) Aeration pressure: 841 mBar to 864 mBar

Suggestions for the packaging content are given in table 1, A single layer of wrapping needs to be packaged in two sheets.

Table 1: Wrap Model Recommendations

Series (product family)	Product Code	Size: Length x Width (Inch)	Layers of sheet	Color	Basic Weight (g/m2)	Enclosed Medical Device	Maximum Recommended Wrapped Package Content Weights (lb)
DW1000	BW1015	15*15	Dual	White + Blue	24 + 24	Very light weight package (For	0.78
BW1000	BW1024	24*24	Dual	White + Blue	34g + 34g	example: Huck towels)	2.96
BL1000	BL1012	12*12	Single	Blue	34g	Very light weight package (For	0.37
	BL1015	15*15	Single	Blue		example: Huck towels)	0.78
	BL1018	18*18	Single	Blue	1		1.11
	BL1020	20*20	Single	Blue	=		2.32
	BL1024	24*24	Single	Blue	<u>-</u>		2.98
DW2000	BW3024	24*24	Dual	White + Blue	65 165	Light to moderate weight package (for example: Huck towels,	7.5
BW3000	BW3036	36*36	Dual	White + Blue	- 65g + 65g	Fluid-resistant table cover, General use medical instruments)	9
BL4000	BL4018	18*18	Single	Blue	70g	Moderate to heavy weight package (for example: Tray liners, Lumens, General use medical instruments).  Maximum two lumens in one pack, each with minimum inner diameter of 3 mm ID and maximum length of 400mm.	3.5

	BW5024	24*24	Dual	White + Blue		Heavy weight package (for example: Tray liners, Lumens, General use	6
BW5000	BW5036	36*36	Dual	White + Blue	70g + 70g	medical instruments) Maximum two lumens in one pack, each with	9.5
	BW5048	48*48	Dual	White + Blue	a +	minimum inner diameter of 3 mm ID and maximum length of 400mm.	17
	BW6036	36*36	Dual	White + Blue		Very heavy weight package (for example: Tray liners, Lumens, General use medical instruments).  Maximum two lumens in one pack,	10
BW6000	BW6045	45*45	Dual	White + Blue	88g + 88g		23
	BW6048	48*48	Dual	White + Blue		each with minimum inner diameter of 3 mm ID and maximum length of 400mm.	25

### 5. Device Description

Sterilization Wrap is single use, non-sterile provide. It is divided into single and double layers, with double layer edges closed by ultrasonic suture. The sterilization Wrap is made from 100% polypropylene spunbond- meltblown - spunbond (SMS), not made with natural rubber latex.

The Model/Specifications as below:

Model / BW1000 BW3000 BW5000 BW6000 BL1000 BL4000 Specifications (in) 12\*12 BL1012 15\*15 BW1015 BL1015 BL4018 18\*18 BL1018 20\*20 BL1020 BW1024 BW3024 BW5024 BL1024 24\*24 36\*36 BW3036 BW5036 BW6036 45\*45 BW6045 48\*48 BW5048 BW6048 70g + 70g70g Basic weight (g/m<sup>2</sup>) 34g + 34g65g + 65g88g + 88g34g Color Blue + White Blue Dual layers Layer Single layer

Table 2: Model/Specifications of the sterilization wrap

### Note:

- a) BW series is double layer, Double Layer wrap comprised of one sheet of blue pigmented SMS fabric and one sheet of white pigmented SMS fabric that have been ultrasonically sealed on two opposing edges, BL series is single layer, Single Layer wrap comprised of a single sheet of blue pigmented SMS fabric.
- b) The specific model under the product series is expressed as series number and size, such as: 24\*24inch under the BW1000 series, the model is expressed as: BW1024.

# 6. Identification of Predicate Device(s)

Primary Predicate Device 510(k) Number: K181174

Product Name: Cardinal Health TM Sterilization Wrap

Manufacturer: Cardinal Health 200 LLC

Classification: 2 Product Code: FRG

Regulation Number: 21 CFR 880.6850

# 7. Technological Characteristics

Table 1 General Comparison

ITEM	Proposed Device	Predicate Device (K181174)	Remark
Intended Use	The wrap is intended to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s) until used up to 365 days post sterilization.  Sterilization wrap is intended to be used to enclose another medical device that is to be sterilized by a health care provider using:  a) 100% ethylene oxide (EO) with a concentration of 725 - 735 mg/l at 131°F/55°C and 40%-80% relative humidity for 60 minutes. b) Exhausting the EO gas vacuum depth: 157 mBar to 160 mBar c) Aeration time: 12 hours d) Aeration temperature: 55°C e) Aeration pressure: 841 mBar to 864 mBar	Cardinal Health <sup>TM</sup> Sterilization Wrap is intended to enclose another medical device that is to be sterilized by a health care provider using:  • Pre-vacuum steam at 270°F/132°C for 4 minutes  • Gravity steam at 250°F/121°C for 30 minutes  • 100% ethylene oxide (EO) with a concentration of 725-735 mg/L at 131°F/55°C and 40%-80% relative humidity for 60 minutes  • Advanced Sterilization Products (ASP) STERRAD® 100S System  • Advanced Sterilization Products (ASP) STERRAD® 200 System  • Advanced Sterilization Products (ASP) STERRAD® NX System, Standard and Advanced Cycles  • Advanced Sterilization Products (ASP) STERRAD® 100NX, Standard, Flex, Express, and DUO cycles  • Lumen, Non Lumen, and Flexible Cycles by the STERIS V-PRO® 1, V-PRO® 1 Plus, V-PRO® maX and V-PRO® 60 Low Temperature Sterilization Systems  • TSO3 STERIZONE® VP4 System Cycle 1  The wrap is intended to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s) until used.	Analyze 1
Product Code	FRG	FRG	SAME
Regulation Number	880.6850	880.6850	SAME
Prescription vs. OTC	OTC	OTC	SAME
Single Use Only vs. Reusable	Single Use only	Single Use only	SAME

## 510(k) Summary

Materials	Polypropylene fabric using SMS	Polypropylene fabric using SMS (spunboundmeltdown-spunbound)	SAME
	(spunboundmeltdown-spunbound)	production process	
	production process		
Chemical Properties	Polypropylene antistatic treatment	Polypropylene antistatic treatment	SAME
Device Design	Double Layer: Double Layer wrap comprised of	Dual layer, fold-over: Double layer wrap comprised of a single sheet of	Analyze 2
	one sheet of blue pigmented SMS fabric and one	blue pigmented SMS fabric that has been folded over in half and	111111111111111111111111111111111111111
	sheet of white pigmented SMS fabric that have	ultrasonically sealed to itself on the three nonfolded edges	
	been ultrasonically sealed on two opposing		
	edges	Dual Layer: Double layer wrap comprised of two separate sheets of	
	Single Layer: Single Layer wrap comprised of	blue pigmented SMS fabric that have been ultrasonically sealed on two opposing edges	
	a single sheet of blue pigmented SMS fabric		
		Single Layer: Single layer wrap comprised of a single sheet of blue pigmented SMS fabric	
		Two Color: Double layer wrap comprised of one sheet of blue pigmented SMS fabric and one sheet of green pigmented SMS fabric that have been ultrasonically sealed on two opposing edges	
Color	Dual Layer: Blue + White	Dual Layer: Blue + green	Analyze 3
	Single Layer: Blue	Single Layer: Blue	

Sterilization	100% ethylene oxide (EO) with a concentration	Pre-vacuum steam at 270°F/132°C for 4 minutes Gravity steam at	Analyze 4
	of 725- 735 mg/L at 131°F/55°Cand 40%- 80%		
	relative humidity for 60 minutes	250°F/121°C for 30 minutes	
		100% ethylene oxide (EO) with a concentration of 725- 735 mg/L at	
		131°F/55°Cand 40%- 80% relative humidity	
		for 60 minutes	
		Advanced Starilization Duedvets (ASD) STEDD AD@ 100S System Advanced	
		Advanced Sterilization Products (ASP) STERRAD® 100S System Advanced	
		Sterilization Products (ASP) STERRAD® 200 System	
		Advanced Sterilization Products (ASP) STERRAD® NX System, Standard and	
		Advanced Cycles	
		Advanced Sterilization Products (ASP) STERRAD® 100NX, Standard,	
		Flex, Express, and DUO cycles	
		Lumen, Non-Lumen, and Flexible Cycles in the STERIS	
		V-PRO® 1, V-PRO® 1 Plus, VPRO® maX and VPRO® 60 Low	
		Temperature Sterilization Systems	
		TSO3 STERIZONE® VP4 System Cycle 1	
Maximum Wrapped	EO: up to 25 pounds	Pre-vacuum Steam: 3 to 25 pounds	SAME

# 510(k) Summary

Package Content		Gravity Steam: 3 to 25 pounds	
Weights			
		EO: 3 to 25 pounds	
		STERRAD® 100S: 3 to 9.7 pounds	
		STERRAD® 200: 9.12 pounds	
		STERRAD® NX: 10.7 pounds STERRAD®	
		100NX: 10.7 pounds	
		STERIS V-PRO® 1, VPRO® 1 Plus and VPRO® maX: 3 to	
		9.1 pounds	
		STERIS V-PRO® 60: 3 to 12 pounds	
		STERIZONE® VP4: 3 to 25 pounds	
Models/ Dimensions	12 in×12 in, 15 in×15 in, 18 in×18 in, 20 in×20	12 in×12 in, 15 in×15 in, 18 in×18 in, 20 in×20 in, 24 in×24	Analyze 5
	in, 24 in×24 in, 36 in×36 in, 45 in×45 in ,48	in, 30 in×30 in, 36 in×36 in, 40 in×40 in, 45 in×45 in, 48 in×48 in,54 in×54 in,	
	in×48 in	60 in×60 in, 54 in×72 in, 54 in×90 in	
Product Shelf life	I year	Not obtained	Analyze 6
Maintenance of	365 days	365 days	SAME
Sterility			

## Analyze 1

Proposed Device (Sterilization Wrap) is intended to be used to enclose another medical device that is to be sterilized by a health care providerusing:

100% ethylene oxide (EO) with a concentration of 725 - 735mg/l at 131°F/55°C and 40%-80% relative humidity for 60 minutes.

The Predicate Device allow more sterilize method. But the sterilize method of the Predicate Device includes the sterilize method of Proposed Device. And they are all intended to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s) until used.

In addition, the proposed Device has been validated for sterilant Penetration and Sterilization Efficacy in accordance with ANSI AAMI ISO 11135:2014, The result show Negative for growth. Maintenance of package sterility meet requirement.

So, it could be considered as the proposed device has same intend use with equivalent device.

#### Analyze 2

The product design are similar, the structure is divided into double layer wrap and single layer wrap, the material are all SMS fabric .Double Layer wrap have been ultrasonically sealed on two opposing edges. The design of the Predicate Device includes our device. The difference is that the color of the Dual Layer swap is different.

Proposed Device was tested for package integrity and biocompatibility before and after sterilization, and the test results met the requirements, the safety and performance of the product can be ensured. so the color difference does not affect the safety and effectiveness of the device.

#### Analyze 3:

The dual Layer color of proposed device and predicate device is different. Proposed Device was tested for package integrity and biocompatibility before and after sterilization, and the test results met the requirements, the safety and performance of the product can be ensured. So the color difference does not affect the safety and effectiveness of the device.

### Analyze 4

There are more sterilization methods for Predicate Device, but the sterilization methods including the sterilization method of Proposed Device -EO sterilization, Proposed Device has been validated for sterilant Penetration and Sterilization Efficacy in accordance with ANSI AAMI ISO 11135:2014, The result show Negative for growth, Maintenance of package sterility meet requirement, the safety and performance of the product can be ensured. So the difference does not affect the safety and effectiveness of the device.

### Analyze 5

The Dimensions of Proposed Device are included in the Predicate Device Dimensions. Dimensions meet ISO 11607:2019, therefore, this difference will not affect the substantially equivalency.

## Analyze 6

The Shelf life 1 year of proposed device has been verified in accordance with ASTM F 1980. After 1 year of accelerated aging, the proposed device performance meets the requirements and has no significant change from 0 year's test results, the safety and performance of the proposed device can be ensured.

### Conclusion:

According to the above analysis, our device has minor different from the predicate device, but the difference does not affect the safety and effectiveness of the device. So, the proposed device is determined to be substantially equivalency with predicate device.

Table 2 Performance Comparison

ITEM	Acceptance criteria	Proposed Device	Predicate Device (K181174)	Remark
Sterilant Penetration and	Achieving a 10 <sup>-6</sup> sterility	Negative for growth	Negative for growth	SAME
Sterilization Efficacy	assurance level			
Maintenance of	Maintain sterility for up	Negative for growth	Negative for growth	SAME
package sterility	to 365 Days			
Residuals	Meet ISO 10993-7,	Meet ISO 10993-7	Meet ISO 10993-7	SAME
Biocompatibility	Meet ISO 10993	Meet ISO 10993	Meet ISO 10993	SAME

## 510(k) Summary

Material Compatibility, ASTM	Compatible to EO	Compatible	Compatible	SAME
F2101-19, Bacterial Filtration	sterilization process			
Efficiency				
ASTM D5034-09 (2017), Tensile				
Strength				
ASTM D3786/ D3786M -18,				
Bursting Strength AATCC 127-				
2018, Water				
Resistance: Hydrostatic Pressure Test				
ASTM D737-18, Air Permeability ASTM				
D3776/ D3776M-20, Mass				
per Unit Area				
ASTM D5587-15 (2019), Tearing				
Strength,				
DIN 58953-6: 2016, Microbial				
Barrier Test				

## 8. Performance data

# 8.1 Physical properties testing

Item	Standards	Acceptance criteria	Before EO sterilization result	After EO sterilization result	Results summary
-Tensile Strength	ASTM D 5034 -09 (2017)		Passed	Passed	
-Bursting Strength	ASTM D3786/D3786M-18		Passed	Passed	
-Water Resistance Hydrostatic Pressure Test	AATC127-18	Complies with the	Passed	Passed	The physical properties testing of before and after
- Air permeability	ASTM D737-18	selected physical	Passed	Passed	EO sterilization meet the
-Mass per Unit Area	ASTMD37776/D3776M-20	properties	Passed	Passed	acceptance criteria and
- Tearing strength	ASTM D5587-15		Passed	Passed	demonstrated passing
-Dimension	ISO 11607:2019		Passed	Passed	results.
- lint generation testing	EN 13795-1:2019	Coefficient of linting log 10 ≤ 4.0	≤4.0	≤4.0	

## 8.2 Sterilization Validation

Item	Standards	Acceptance criteria	Test Result	Results summary
EO Sterilization Validation	ANSI AAMI ISO 11135:2014	Achieving a 10 <sup>-6</sup> sterility assurance	Negative for growth	Pass
		level		
Residuals	ISO 10993-7:2008	Meet ISO 10993-7:2008	None detected	Pass

365 Days Maintenance of	AATCC 127-18	Maintain sterility for up to 365 Days	Negative for growth,	Pass
Sterility Validation -EO	ASTM F 2101-19		Sterilization Wrap was	
Sterilization	ASTM D 5034 -09 (2017)		capable of maintenance	
	ASTM D3786/D3786M-18		of sterility for 365 days.	
	AATC127-18			
	ASTM D737-18			
	ASTMD37776/D3776M-20			
	ASTM D5587-15			
	ISO 11607:2019			
Microbial barrier test	ISO 11607:2019	Product has good anti-bacterial	Negative for growth	Pass
		permeability of the packaging material		
		in the microbial barrier test.		

# 8.3 Shelf Life Testing

Item	Standards	Acceptance criteria	Test Result	Results summary
Shelf Life Testing	ASTM F 2101-19	Shelf Life 1 year.	After 1 year of accelerated aging,	Passed
	ASTM D 5034 -09 (2017)		the proposed device performance	
	ASTM D3786/D3786M-18		meets the requirements and has no	
	AATC127-18		significant change from 0 year's	
	ASTM D737-18		test results.	
	ASTMD37776/D3776M-20			
	ASTM D5587-15			
	ISO 11607:2019			

### 8.4 Biocompatibility Testing

Item	Standards	Acceptance criteria	Before EO sterilization result	After EO sterilization result	Results summary
Cytotoxicity	ISO 10993-5: 2009	Non-cytotoxic	Non-cytotoxic	Non-cytotoxic	Pass
Irritation	ISO 10993-10:2010	Non-irritant	Non-irritant	Non-irritant	Pass
Sensitization	ISO 10993-10:2010	Non-sensitizer	Non-sensitizer	Non-sensitizer	Pass

#### 9. Non-Clinical Test Conclusion

Non clinical tests were conducted to verify that the proposed device met all design specifications as was Substantially Equivalent (SE) to the predicate device. The test results demonstrated that the proposed device complies with the following standards:

- ANSI AAMI ISO 11135:2014 Sterilization of health care products Ethylene oxide Requirements for development, validation and routine control of a sterilization process for medical devices.
- > ISO 10993-5: 2009 Biological Evaluation Of Medical Devices -- Part 5: Tests For In Vitro Cytotoxicity
- ➤ ISO 10993-10: 2010 Biological Evaluation Of Medical Devices Part 10: Tests For Irritation And Skin Sensitization.
- ➤ ISO 10993-7:2008 Biological evaluation of medical devices Part 7: Ethylene oxide sterilization residuals
- AATCC 127-18 Test Method for Water Resisitance: Hydrostatic Pressure
- > ISO 11607:2019 Packaging for terminally sterilized medical devices
- ASTM D5587-15 Standard Test Method for Tearing Strength of Fabrics by Trapezoid Procedure
- > ASTM D5034-09 Standard Test Method for Breaking Strength and Elongation of Textile Fabrics (Grab Test)
- ASTM D737-18 Standard test method for air permeability
- ASTM D3776/D3776M Standard test method for mass per unit area (weight) of fabric
- ASTM D3786/D3786M-18 Standard test method for Bursting Strength of Textile Fabrics-Diaphragm Bursting Strength Tester Method
- ASTM F2101-19 Standard Test Method for Evaluating the Bacterial Filtration Efficiency (BFE) of Medical Face Mask Materials, Using a Biological Aerosol of Staphylococcus aureus
- ➤ United States Pharmacopeia < 71 >
- > EN 13795-1:2019 Surgical clothing and drapes- Requirements and test methods. Part 1:Surgical drapes and gowns

## 10. Clinical Test Conclusion

No clinical study is included in this submission.

## 11. Conclusion

Based on the nonclinical tests performed, the subject device is as safe, as effective, and performs as well as or better than the legally marketed predicate device, Cardinal Health TM Sterilization Wrap cleared under K181174.