



April 6, 2022

Hubei Wanli Protective Products Co. Ltd
% Ivy Wang
Technical Manager
Shanghai SUNGO Management Consulting Company Limited.
Room 1401, Dongfang Building, 1500# Century Avenue
Shanghai 200122
China

Re: K214085
Trade/Device Name: Disposable Medical Mask
Regulation Number: 21 CFR 878.4040
Regulation Name: Surgical Apparel
Regulatory Class: Class II
Product Code: FXX
Dated: February 28, 2022
Received: March 1, 2022

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 <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 Federal Register.

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); 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-devices/medical-device-safety/medical-device-reporting-mdr-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/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>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Brent Showalter, Ph.D.
Assistant Director
DHT6B: Division of Spinal Devices
OHT6: Office of Orthopedic Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K214085

Device Name

Disposable Medical Mask

Indications for Use (Describe)

The Disposable Medical Masks are intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. These face masks are intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non-sterile.

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.

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.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services
Food and Drug Administration
Office of Chief Information Officer
Paperwork Reduction Act (PRA) Staff
PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

510(K) Summary

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

Date of summary prepared: 2021-11-30

A. Applicant:

Name: Hubei Wanli Protective Products Co., Ltd.

Address: Yuanshi, Ganhe, Xiantao, Hubei, China

Contact: Andy Wen

Title: System Specialist

Tel: 0086-728-3227299

Email: sale01@hbwanli.com

Submission Correspondent:

Primary contact: Ms. Ivy Wang

Shanghai SUNGO Management Consulting Co., Ltd.

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

Tel: +86-21-58817802

Email: haiyu.wang@sungoglobal.com

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. Device:

Trade Name: Disposable Medical 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:

K210150

Disposable Medical Mask

Hubei Wanli Protective Products Co., Ltd.

D. Indications for use of the device:

The Disposable Medical Masks are intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. These face masks are intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non-sterile.

E. Device Description:

The Disposable Medical Masks are single use, three-layer, flat –folded masks with ear loops and nose clip.

The Disposable Medical Masks are manufactured with three layers, the inner and outer layers are made of non-woven 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 strings welded to the facemask. The ear loops are made of 17cm spandex elastic strings(performance of the spandex elastic: Tensile strength \geq 100N; Elasticity \geq 2.8times; Breaking tension \geq 100N)

The nose clip in the layers of facemask is to allow the user to fit the facemask around their nose, which is not touch with the users' skin directly.

The Disposable Medical Masks will be provided in blue. The Disposable Medical Masks are sold non-sterile and are intended to be single use, disposable devices.

F. Technological Characteristics Comparison Table

The proposed device is totally the same with the predicate device, only differ in the claim of ASTM LEVEL.

Provided below is a comparison of the proposed device with the predicate device

Table 1 General Comparison

Device	Proposed Device	Predicate Device	Result
510K #		K210150	-
Manufacturer	Hubei Wanli Protective Products Co., Ltd.	Hubei Wanli Protective Products Co., Ltd.	-
Model Name	Disposable Medical Mask	Disposable Medical Mask	Same
Classification	Class II Device, FXX (21 CFR878.4040)	Class II Device, FXX (21 CFR878.4040)	Same
Intend use	The Disposable Medical Masks are intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. These face masks are intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non-sterile.	The Disposable Medical Masks are intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. These face masks are intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non-sterile.	Same
Design Features	Ear Loops, Flat-pleated, 3 layers	Ear Loops, Flat-pleated, 3 layers	Same

Materials	Outer facing layer	Non-woven Spun-bond Polypropylene	Non-woven Spun-bond Polypropylene	Same
	Inner facing layer	Non-woven Spun-bond Polypropylene	Non-woven Spun-bond Polypropylene	Same
	Filter layer	Melt-blown Polypropylene	Melt-blown Polypropylene	Same
	Nose wire	aluminum strip	aluminum strip	Same
	Ear loops	Spandex elastic	Spandex elastic	Same
Color	Blue	Blue	Same	
Dimension (length)	175mm±5mm	175mm±5mm	Same	
Dimension (width)	95 mm±5mm	95 mm±5mm	Same	
OTC use	Yes	Yes	Same	
Sterility	Non-Sterile	Non-Sterile	Same	
Use	Single Use, Disposable	Single Use, Disposable	Same	
ASTM F2100 Level	Level 1	Level 2	Different	
Biocompatibility (ISO10993)	Non-Cytotoxic, Non-Sensitizing, Non-Irritating	Non-Cytotoxic, Non-Sensitizing, Non-Irritating	Same	
Fluid Resistance Performance ASTM F1862	32 out of 32 per lot pass at 120 mmHg, 3 non-consecutive lots tested	32 out of 32 per lot pass at 120 mmHg, 3 non-consecutive lots tested	Same	
Particulate Filtration Efficiency ASTM F2299	> 98%	> 98%	Same	
Bacterial Filtration Efficiency ASTM F2101	99.9%	99.9%	Same	
Differential Pressure (Delta P) EN 14683 Annex C	< 4.0mmH ₂ O/cm ²	< 4.0mmH ₂ O/cm ²	Same	
Flammability 16 CFR 1610	Class 1	Class 1	Same	

Different Analysis:

The proposed device has different ASTM LEVEL claim to the predicate device, but the performance testing was conducted and the test results showed that the proposed device can meet the requirements of ASTM F2100-19. Therefore, the difference do not affect the safety and effectiveness of the proposed device.

G. Non-Clinical Test Conclusion

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:

- 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
- ASTM F2100, Standard Specification for Performance of Materials Used In Medical Face Masks
- ASTM F1862, Standard Test Method for Resistance of Medical Face Masks To Penetration by Synthetic Blood (Horizontal Projection of Fixed Volume At A Known Velocity);
- EN 14683, Medical Face Masks—Requirements and Test Methods;
- ASTM F2101, Standard Test Method for Evaluating the Bacterial Filtration Efficiency (BFE) Of Medical Face Mask Materials, Using A Biological Aerosol of Staphylococcus Aureus;
- ASTM F2299, Standard test method for determining the initial efficiency of materials used in medical face masks to penetration by particulates using latex spheres;
- 16 CFR 1610, Standard for the Flammability of clothing textiles;

Test Methodology	Purpose	Acceptance Criteria: ASTM F2100 Level 1	Result
Fluid Resistance	The purpose of the performance testing is to demonstrate the functionality of the subject device.	29 out of 32 per lot pass at 80 mmHg	Pass 32 out of 32 pass at 120 mmHg, 3 lots
Particulate Filtration Efficiency		$\geq 95\%$	Pass >98%
Bacterial Filtration Efficiency		$\geq 95\%$	Pass 99.9%
Differential Pressure		$< 5.0\text{mmH}_2\text{O}/\text{cm}^2$	Pass $< 4.0\text{mmH}_2\text{O}/\text{cm}^2$
Flammability		Class 1	Pass Class 1
Cytotoxicity	The purpose of the testing is to demonstrate the safety of the subject device.	Non-cytotoxic	Under the conditions of the study, the device is non-cytotoxic.
Irritation		Non-irritating	Under the conditions of the study, the device is non-irritating.
Sensitization		Non-sensitizing	Under the conditions of the study, the device is non-sensitizing

H. Clinical Test Conclusion

No clinical study is included in this submission.

I. Conclusion

The conclusions drawn from the nonclinical tests demonstrate that the subject device is as safe, as effective, and performs as well as or better than the legally marketed predicate device K210150.