

January 6, 2021

Shandong T&F Nonwoven Co., LTD % Ray Wang
General Manager
Beijing Believe-Med Technology Service Co., Ltd.
Rm. 912, Building #15, XiYueHui, No. 5, YiHe North Rd.,
FangShan District
Beijing, Beijing 102401
China

Re: K202594

Trade/Device Name: Medical Surgical Masks-Non Sterile

Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical apparel

Regulatory Class: Class II Product Code: FXX

Dated: December 3, 2020 Received: December 7, 2020

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 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 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,

CAPT Elizabeth Claverie, M.S.
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

510(k) Number (if known)

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

K202594	
Device Name Medical Surgical Masks-Non Sterile	
Indications for Use (Describe) The Medical Surgical Masks-Non Sterile is intended to be worth the transfer of microorganisms, body fluids, and particulate ma for use in infection control practices to reduce the potential expedisposable device(s), provided non-sterile.	terial. The Medical Surgical Masks-Non Sterile is intended
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 SEPARA	ATE 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:

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The assigned 510(k) Number: K202594

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:2021/01/06
- 2. Sponsor Identification

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3. Designated Submission Correspondent

Mr. Ray Wang

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Email: Ray. Wang@believe-med.com

4. Identification of Proposed Device

Trade Name: Medical Surgical Masks-Non Sterile

Common Name: Mask, Surgical

Regulatory Information

Classification Name: Mask, Surgical

Classification: 2 Product Code: FXX

Regulation Number: 878.4040 Review Panel: General Hospital

Indication for use Statement:

The Medical Surgical Masks-Non Sterile is intended to be worn to protect both the patient and healthcare personnel from the transfer of microorganisms, body fluids, and particulate material. The Medical Surgical Masks-Non Sterile 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(s), provided non-sterile.

Device Description

The Medical Surgical Masks-Non Sterile is intended to be worn to protect both the patient and healthcare personnel from the transfer of microorganisms, body fluids, and particulate material. The Medical Surgical Masks-Non Sterile 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(s), provided non-sterile.

The proposed device(s) are *White color*, and *Flat Pleated* type mask, utilizing *Ear Loops'* way for wearing, and they all have *Nose Piece* design for fitting the facemask around the nose.

The proposed device(s) are manufactured with three layers, the inner and outer layers are made of polypropylene non-woven fabric, and the middle layer is made of polypropylene melt-blown fabric.

The Medical Surgical Masks-Non Sterile is held in place over the user's mouth and nose by two elastic ear loops welded to the facemask. The elastic ear loops are made with 30% polyamide and 70% polyurethane.

The nose piece contained in the proposed device(s) is in the layers of the facemask to allow the user to fit the facemask around their nose, which is made of polypropylene and iron wire.

The proposed device(s) are sold non-sterile and are intended to be single-use, disposable devices.

5. Identification of Predicate Device(s)

Predicate Device

K153496

Disposable Surgical Face Mask Xiantao Rayxin Medical Products Co., ltd.

6. Non-Clinical Test Conclusion

Applied Standards List:

- ➤ 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 F2100-19, Standard Specification For Performance Of Materials Used In Medical Face Masks.
- ASTM F1862-17, Standard Test Method For Resistance Of Medical Face Masks To Penetration By Synthetic Blood (Horizontal Projection Of Fixed Volume At A Known Velocity)
- ➤ MIL-M-36945C, Method 1 Military Specifications: Surgical Mask disposable;
- ➤ 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;
- ASTM F2299-03, Stand 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;
- > Bench Testing for the performance of Dimensions.

Test Result Summary:

Title of the Test	Purpose of the Test	Acceptance criteria and	Results
		source of references	
In Vitro	Verify the Biological performance	No cytotoxicity effect as the	Under the conditions of
Cytotoxicity	of proposed device	test method of ISO	the study, not cytotoxicity
		10993-10	effect
Skin Irritation	Verify the Biological performance	No irritation effect as the	Under the conditions of
	of proposed device	test method of ISO 10993-5	the study, not an irritant
Skin Sensitization	Verify the Biological performance	No sensitization effect as the	Under conditions of the
	of proposed device	test method of ISO 10993-5	study, not a sensitizer.
Fluid Resistance	Verify the fluid resistance	120 mmHg as the test	120 mmHg
	performance of proposed device	method of ASTM F1862	
Particulate	Verify the Particulate filtration	≥98% as the test method of	≥99%
Filtration Efficiency	efficiency performance of proposed	ASTM F2299	
	device		
Bacterial Filtration	Verify the bacterial filtration	≥98% as the test method of	≥99%
Efficiency	efficiency performance of proposed	ASTM F2101	

	device		
Differential	Verify the differential pressure	< 6.0mmH2O/cm ² as the test	<4.8 mmH2O/cm ²
Pressure (Delta P)	performance of proposed device	method of MIL-M-36945C	
Flammability	Verify the flammability	Class 1 as the test method of	Class 1
	performance of proposed device	16 CFR 1610	
Dimensions	Verify the Physical specifications of	Length: 17.5 cm ±5mm	Meet the acceptance
	proposed device	Width: 9.5 cm±5mm	criteria
		Length of loop: 17 cm±5mm	
		Length of Nosepiece: 10	
		cm±5mm	

7. Clinical Test Conclusion

No clinical study is included in this submission.

8. Substantially Equivalent (SE) Comparison

Table 1 General Comparison

Proposed Device K202594	Predicate Device K153496	Remark
The Medical Surgical Masks-Non Sterile	The Disposable Surgical Face Masks are	SAME
is intended to be worn to protect both the	intended to be worn to protect both the	
patient and healthcare personnel from the	patient and healthcare personnel from	
transfer of microorganisms, body fluids,	transfer of microorganisms, body fluids	
and particulate material. The Medical	and particulate material. These face masks	
Surgical Masks-Non Sterile is intended for	are intended for use in infection control	
use in infection control practices to reduce	practices to reduce the potential exposure	
the potential exposure to blood and body	to blood and body fluids. This is a single	
fluids. This is a single-use, disposable	use, disposable device(s), provided	
device(s), provided non-sterile.	non-sterile.	
Ear Loops, Flat Pleated, 3 layers	Ear Loops, Tie-On, Flat Pleated, 3 layers	SAME
polypropylene non-woven fabric	Spun-bond polypropylene	Analysis
polypropylene melt-blown fabric	Melt blown polypropylene filter	
polypropylene non-woven fabric	Spun-bond polypropylene	
PP + iron wire	Malleable aluminum wire	
polyamide and polyurethane	Polyester	
White	Blue	Analysis
17.5 cm +/- 5mm	17.5 cm +/- 1cm	Similar
9.5 cm +/- 5mm	9.5 cm +/- 1cm	1
Yes	Yes	SAME
Yes	Yes	SAME
No	No	SAME
Level 2	Level 2	SAME
	The Medical Surgical Masks-Non Sterile is intended to be worn to protect both the patient and healthcare personnel from the transfer of microorganisms, body fluids, and particulate material. The Medical Surgical Masks-Non Sterile 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(s), provided non-sterile. Ear Loops, Flat Pleated, 3 layers polypropylene non-woven fabric polypropylene melt-blown fabric polypropylene non-woven fabric PP + iron wire polyamide and polyurethane White 17.5 cm +/- 5mm Yes Yes No	The Medical Surgical Masks-Non Sterile is intended to be worn to protect both the patient and healthcare personnel from the transfer of microorganisms, body fluids, and particulate material. The Medical Surgical Masks-Non Sterile 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(s), provided non-sterile. Ear Loops, Flat Pleated, 3 layers polypropylene mon-woven fabric polypropylene mon-woven fabric polypropylene non-woven fabric polypropylene non-woven fabric polypropylene non-woven fabric polygropylene non-woven fabric polygropylene mon-woven fabric polygropylene hon-woven

Table 2 Performance Characteristic Comparison

ITEM	Proposed Device	Predicate Device	ASTM F2100	Remark
	K202594	K153496	Requirements for	
			Level 2 Classification	
Fluid Resistance	120 mmHg	120 mmHg	120 mmHg	SAME
Performance ASTM				
F1862				
Particulate Filtration	≥99%	98.46%	≥ 98%	
Efficiency ASTM				
F2299				
Bacterial Filtration	≥99%	98.7%	≥ 98%	
Efficiency ASTM				
F2101				
Differential Pressure	< 4.8 mmH2O/cm ²	4.2 mmH2O/cm ²	< 6.0 mmH2O/cm ²	

(Delta P)				
MIL-M-36954C				
Flammability	Class 1	Class 1	Class 1	SAME
16 CFR 1610				

Table 3 Biocompatibility Comparison

ITEM	Proposed Device K202594	Predicate Device K153496	Remark
Cytotoxicity	Under the conditions of the study, not cytotoxic	Comply with ISO 10993-5	SAME
Irritation	Under the conditions of the study, not an irritant	Comply with ISO 10993-10	SAME
Sensitization	Under conditions of the study, not a sensitizer.		SAME

Analysis:

The Medical Surgical Masks-Non Sterile is substantially equivalent to the Xiantao Rayxin Medical Products Disposable Surgical Face Mask. Based on the nonclinical tests performed, the subject device is as safe, as effective, and performs as well as the legally marketed predicate device, Disposable Surgical Face Mask cleared under K153496.

9. Substantially Equivalent (SE) Conclusion

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