

December 29, 2021

Thai Rubber Gloves Co., Ltd % Manoj Zacharias Consultant Liberty Management Group Ltd. 75 Executive Dr. STE 114, Aurora, Illinois 60504, USA

Re: K213073

Trade/Device Name: Latex Examination Powder Free Gloves Regulation Number: 21 CFR 880.6250 Regulation Name: Latex Exmamination Powder Free Gloves Regulatory Class: Class I, reserved Product Code: LYY Dated: November 30, 2021 Received: November 30, 2021

Dear Manoj Zacharias:

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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

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

Sincerely,

For Clarence 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

Indications for Use

510(k) Number *(if known)* K213073

Device Name Latex Examination Powder Free Gloves

Indications for Use (Describe)

Latex Examination Powder Free Gloves are disposable devices intended for medical purpose that is worn on the examiner's hand to prevent contamination between patient and examiner.

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 K213073

AS REQUIRED BY: 21CFR§807.92

A. APPLICANT INFORMATION

510(K) Owner's Name	THAI RUBBER GLOVES CO., LTD.
Address	680 MOO 2 BANBUENG – KLAENG
	RD., NONGYAI CHONBURI 20190
	THAILAND.
Phone	+66-2-1306356, +66-38-168613
Fax	+66-2-1306357
E-mail	chalongkwan@thaitex.com
	info@thairubbergloves.com
Contact Person	Miss Chalongkwan Wongsasuthikul
Designation	Managing Director
Contact Number	+66-2-1306356
Contact Email	chalongkwan@thaitex.com
Date Submitted	29 December 2021

B. DEVICE IDENTIFICATION

Name of the device	Latex Examination Powder Free Gloves
Product proprietary or trade name	Goody Gloves / Wincare / TBG Gloves
Common or usual name	Latex examination powder free gloves
Classification name	Latex Patient Examination Glove
Device Classification	Class-1
Product Code	LYY
Regulation Number	21 CFR 880.6250
Review Panel	General Hospital

C. PREDICATE DEVICE

Predicate Device	Hi-Care Thai Gloves Co. Ltd.		
510(k) Number	K202377		
Regulatory Class	Class 1		
Product code	LYY		

Reference Device	JR Engineering & Medical Technologies (M) SDN.BHD.
510(k) Number	K192329
Regulatory Class	Class 1
Product code	LYY

D. DESCRIPTION OF THE DEVICE:

Latex Examination Powder Free Gloves are manufactured to meet all the current specifications listed under the ASTM Specification D3578-19, Standard Specification for Rubber Examination Gloves. They are made from Natural Rubber Latex. These gloves are Natural in color (No color added) and are powder free, non-sterile, ambidextrous and single use only.

Latex Examination Powder Free Gloves with sizes X-Small, Small, Medium, Large and X-Large are included in the submission.

E. INDICATIONS FOR USE OF THE DEVICE:

Latex Examination Powder Free Gloves are disposable devices intended for medical purpose that is worn on the examiner's hand to prevent contamination between patient and examiner.

F. SUMMARY OF THE TECHNOLOGICAL CHARACTERISTICS OF THE DEVICE COMPARED TO THE PREDICATE DEVICE

CHARACTERSTICS	STANDARDS	DE	DEVICE PERFORMANCE			
		PREDICATE	REFERENCE	SUBJ	SUBJECT	
510(k) Number		K202377	K192329	K213	073	
Name of device		Palm Care Latex Examination Powder Free Gloves	Blue Latex Examination Powder Free Gloves	Latex Exa Powder Fre		
Dimensions- Length	ASTM D3578-19	Length > 230	Length > 230	Length >	230 mm	Similar
		mm	mm	Size	Average	
				X-Small	245	
				Small	244	
				Medium	247	
				Large	240	
				X-Large	247	
Dimensions- Width	ASTM D3578-19	Width Min	Width Min	Width 95+	-/-10 mm	Similar
		95+/- 10 mm	95+/- 10 mm	(for medi	um size)	
		(for medium	(for medium	Size	Average	
		size)	size)	X-Small	77	
				Small	80	
				Medium	92	
				Large	101	
				X-Large	110	

CHARACTERSTICS	STANDARDS	DEVICE PERFORMANCE				Comparison
		PREDICATE	REFERENCE	SUBJ	ЕСТ	-
510(k) Number		K202377	K192329	K2130	73	7
Physical Properties- Tensile Strength	ASTM D3578-19	B <u>efore</u> <u>Ageing</u> Tensile	B <u>efore</u> Ageing Tensile	Before Ageing Tensile Strength > 18 MPa		Similar
		Strength > 18 MPa	Strength > 18 MPa	Size	Ac tual value	
				X-Small	26.2]
				Small	25.0	
				Medium	24.0	
				Large	22.6	
				X-Large	24.2	
		After Ageing Tensile Strength	After Ageing Tensile Strength	Tensile	Ageing Strength MPa	Similar
		> 14 MPa	> 14 MPa	Size	Actual value	
				X-Small	24.1	
				Small	24.1	
				Medium	23.4	
				Large	24.3	
				X-Large	22.5	
Physical Properties- Ultimate Elongation	ASTM D3578-19	<u>Before</u> <u>Ageing</u> Ultimate	Before A geing Ultimate	<u>Before</u> Ultimate E > 65	Ageing longation 0%	Similar
		Elongation > 650%	Elongation > 650%	Size	Actual value	
				X-Small	830	
				Small	790	
				Medium	810	_
				Large	800	_
				X-Large	800	<u> </u>
		<u>After</u> <u>Ageing</u> Ultimate	A <u>fter</u> A geing Ultimate	<u>After</u> Ultimate E > 50	Ageing longation 0%	Similar
		Elongation >500%	Elongation >500%	Size	Actual value	
		20070	20070	X-Small	800	
				Small	760	
				Medium	830	
				Large	810	_
				X-Large	780	

CHARACTERSTICS	STANDARDS	DEVICE PERFORMANCE					Comparison
		PREDICATE	REFERENCE	SUBJECT		Т	
510(k) Number		K202377	K192329	ŀ	K21307	3	
Thickness	ASTM D3578-19	Palm > 0.08	Palm > 0.08	Palm > 0	0.08 mm	1	Similar
		mm	mm	Finger >	0.08 m	m	
		Finger > 0.08	Finger > 0.08		Palm	Finger	
		mm	mm	Size		(Actual	
				V C 11		value)	
				X-Small		0.125 0.128	
				Small Medium	0.115	0.128	
				Large	0.121	0.135	
				X-Large		0.122	
Powder Free Residue	ASTM D3578-19	$\leq 2 \text{ mg/glove}$	$\leq 2 \text{ mg/glove}$	≤ 2	2 mg/gl		Similar
				Size		Actual value	
				X-Sma	ıll	0.60	
				Smal	1	0.80	
				Mediu	m	1.46	
				Large		0.62	
				X-Larg		1.13	
	Primary Skin	Under the	Under the			dition of	Same
Biocompatibility	Irritation-ISO	condition of	condition of			irritant	Sume
	10993-10:2010(E)	study, not an	study, not an		, ,		
		irritant	irritant				
	Dermal	Under the	Under the			litions of	Same
	Sensitization-ISO	conditions of	conditions of		y, not a	sensitizer	
	10993-10:2010(E)		the study, not a				
	T	sensitizer Under the	sensitizer Under the	I Indan 4	1	litions of	Similar to
	In vitro cytotoxicity ISO10993-5	conditions	conditions of		ne conc udy, cy		reference
	:2009(E)	of the study,	the study,	the st	uuy, cy	IOIOAIC	device
		non-cytotoxic	cytotoxic				ueviee
		5	which is to be				
			expected as				
			latex is the				
			positive				
			control for this				
	A suite Courteurie	The day the	test.	TT. J.	41	nditions	<u> </u>
	Acute Systemic Toxicity Test ISO	Under the conditions of			the cor dy the		Similar
	10993-11:2017(E)	study the				ot reveal	
	10,5,5 11.201/(L)	device				toxicity	
		extracts do					
		not pose a					
		systemic					
		toxicity					
		concern					

510(K) SUMMARY As required by: 21cfr§807.92(C)

CHARACTERSTICS	STANDARDS	D	EVICE PERFO	RMANCE	Comparison
		PREDICATE	REFERENCE	SUBJECT	
510(k) Number		K202377	K192329	K213073	
Water Tight (1000 ml)	ASTM D5151-19 AQL-2.5	Passes	Passes	Passes	Similar
Indication for Use		intended for medical purpose that	Blue Latex Examination Powder Free Gloves are disposable devices intended for medical purpose that are worn on the examiner's hand to prevent contamination between patient and examiner.	on the examiner's hand to prevent contamination	Similar
Material		Natural Latex	Natural Latex	Natural Latex	Identical
Color		Natural (No color is added)	Blue	Natural color (No color is added)	Similar to predicate device
Size	ASTM D3578-19	X Small, Small, Medium, Large	Small, Medium, Large, X Large & XX Large	X-Small, Small, Medium, Large, X- Large	Similar (compared to predicate and reference devices)
Single Use	Medical Glove Guidance Manual- Labeling	Single Use	Single Use	Single Use	Same
Sterile/nonsterile		Nonsterile	Non sterile	Nonsterile	Similar
Powder/Powder free		Powder free	Powder free	Powder free	Same
Label and Labeling	FDA Label requirements	Meets FDA's label and labeling requirements	Meets FDA's label and labeling requirements	Meets FDA's label and labeling requirements	Same
Manufacturer(s)		Hi-Care Thai Gloves Co. Ltd.	JR Engineering & Medical Technologies (M) SDN.BHD.	THAI RUBBER GLOVES CO., LTD.	

There are no significant differences between the products and are identical in terms of intended use, materials, design and manufacturing methods. Devices meet the ASTM standard D3578-19.

510(K) SUMMARY As required by: 21cfr§807.92(C)

G.COMPARISON BASED ON AN ASSESSMENT OF NON-CLINICAL PERFORMANCE DATA

BENCH TEST DATA

TEST METHOD	PURPOSE	ACCEPTANCE	RESULT
		CRITERIA	
ASTM D3578-19	To determine the	Min 230 mm for all sizes	X-Small : 245 mm
Standard Specification for Rubber	length of the gloves		Small : 244 mm
Examination Gloves			Medium : 247 mm
			Large : 240 mm
			X-Large : 247 mm
ASTM D3578-19	To determine the	X-Small : 70+/-10 mm	X-Small : 77 mm
Standard Specification for Rubber	width of the gloves	Small : 80+/-10 mm	Small : 80 mm
Examination Gloves		Medium : 95+/-10 mm	Medium : 92 mm
		Large : 111+/-10 mm	Large : 101 mm
		X Large : 120+/-10 mm	X-Large : 110 mm

TEST	PURPOSE	ACCEPTANCE		RESULT	
METHOD		CRITERIA			
ASTM D3578-19	To determine the	Palm	Size	P <u>alm</u>	F <u>inger</u>
Standard	thickness of the	0.08 mm min	X-Small	0.115 mm	0.125 mm
Specification for	gloves	for all sizes	Small	0.115 mm	0.128 mm
Rubber	-	Finger	Medium	0.115 mm	0.132 mm
Examination Gloves		0.08 mm min	Large	0.121 mm	0.135 mm
		for all sizes	X Large	0.109 mm	0.122 mm
ASTM D3578-19	To determine the	B <u>efore Ageing</u>	Size	Before ageing	After ageing
Standard	physical properties-	Tensile Strength			
Specification for	Tensile strength	18MPa Min for all	X-Small	26.2 MPa	24.1 MPa
Rubber		sizes	Small	25.0 MPa	24.1 MPa
Examination Gloves		After Ageing	Medium	24.0 MPa	23.4 MPa
		Tensile Strength	Large	22.6 MPa	24.3 MPa
		14MPa Min for all	X Large	24.2 MPa	22.5 MPa
		sizes			
	To determine the	Before Ageing	S <u>ize</u>	Before ageing	After ageing
	physical properties-	Ultimate			
	Ultimate Elongation	Elongation 650%	X-Small	830%	800%
		Min for all sizes	Small	790%	760%
		After Ageing	Medium	810%	830%
		Ultimate	Large	800%	810%
		Elongation 500%	X Large	800%	780%
		Min for all sizes			

TEST METHOD	PURPOSE	ACCEPTANCE CRITERIA	RESULT
ASTM D5151-19 Standard Test Method for Detection of Holes in Medical Gloves	To determine the holes in the gloves	AQL 2.5	Gloves Passes AQL 2.5
ASTM D6124-06 (Reapproved 2017) Standard Test Method for Residual Powder on Medical Gloves	To determine the residual powder in the gloves	\leq 2 mg/glove	X-Small : 0.60 mg/glove Small : 0.80 mg/glove Medium : 1.46 mg/glove Large : 0.62 mg/glove X- Large : 1.13 mg/glove
ASTM D5712-15 (Reapproved 2020) Standard Test Method for Analysis of Aqueous Extractable Protein in Latex, Natural Rubber, and Elastomeric Products Using the Modified Lowry Method	To determine the extractable protein in the gloves.	200 µg/ dm² Max	Medium : 191.9 µg/ dm ²

BIOCOMPATIBILITY DATA

TEST METHOD	PURPOSE	ACCEPTANCE CRITERIA	RESULT
ISO 10993-10:2010(E) Biological Evaluation Of Medical Devices - Part 10, Tests for Irritation and Skin Sensitization. Test done for irritation.	To evaluate the test item, for skin irritation test in New Zealand White rabbits.	Under the condition of study, not an irritant	Under the condition of study, not an irritant
ISO 10993 10:2010(E) Biological Evaluation of Medical Devices - Part 10, Tests for Irritation and Skin Sensitization. Test done for skin sensitization	To evaluate the test item, for the skin sensitization in Guinea pigs by maximization test.	Under the conditions of the study, not a sensitizer	Under the conditions of the study, not a sensitizer
ISO10993-5:2009(E) Biological Evaluation of Medical Devices - Part 5, Tests for In Vitro Cytotoxicity.	To evaluate the test item, for its ability to induce cytotoxicity using L-929 mouse fibroblast cells by Elution Method.	Under the conditions of the study, non- cytotoxic	Under the conditions of the study the device is "cytotoxic"
ISO 10993-11:2017(E) Biological Evaluation of Medical Devices - Part 11, Tests for Systemic Toxicity.	To evaluate the test item, for acute systemic toxicity in Swiss Albino Mice.	Under the conditions of study, the device extracts do not pose a systemic toxicity concern	Under the conditions of study, the device extracts did not reveal any systemic toxicity

The performance test data of the non-clinical tests that support a determination of safety and equivalence is the same as mentioned above (ASTM Requirements).

The performance test data of the non-clinical tests meet following standards:

ASTM D3578-19 Standard Specification for Rubber Examination Gloves

ASTM D5151-19 Standard Test Method for Detection of Holes in Medical Gloves

ASTM D6124-06 (Reapproved 2017) Standard Test Method for Residual Powder on Medical Gloves

ASTM D5712-15 (Reapproved 2020) Standard Test Method for Analysis of Aqueous Extractable Protein in Latex, Natural Rubber, and Elastomeric Products Using the Modified Lowry Method

ISO 10993-10:2010 (E) Biological Evaluation of Medical Devices - Part 10, Tests for Irritation and Skin Sensitization.

ISO 10993-5:2009 (E) Biological Evaluation of Medical Devices - Part 5, Tests for In Vitro Cytotoxicity.

ISO 10993-11:2017 (E) Biological Evaluation of Medical Devices - Part 11, Tests for Systemic Toxicity.

H. COMPARISON BASED ON ASSESSMENT OF CLINICAL PERFORMANCE

DATA

Not applicable - Clinical data is not needed for gloves or for most devices cleared by the 510(k) process.

I. CONCLUSION

The conclusion drawn from the nonclinical tests demonstrates that the subject devices in 510(K) submission, Latex Examination Powder Free Gloves, are as safe, as effective, and performs as well as or better than the legally marketed predicate device K202377.