

February 22, 2023

Shandong Intco Medical Products Co, Ltd. % Ivy Wang Consultant Shanghai Sungo Management Consulting Co. Ltd. 14th Floor, 1500# Century Avenue Shanghai, 200122 China

Re: K223298

Trade/Device Name: Sterile Latex Examination Gloves Powder Free (S, M, L, Extra L) Regulation Number: 21 CFR 880.6250 Regulation Name: Non-Powdered Patient Examination Glove Regulatory Class: Class I, reserved Product Code: LYY Dated: January 10, 2023 Received: January 12, 2023

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 <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,

Bifeng Qian -S

Bifeng Qian M.D., 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

Submission Number (if known)

K223298

Device Name

Sterile Latex Examination Gloves Powder Free (S, M, L, Extra L)

Indications for Use (Describe)

The Sterile Latex Examination Gloves Powder Free is a disposable device intended for medical purposes that is worn on the examiners' hand or finger 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.

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510(K) Summary - K223298

(As requirement by 21 CFR 807.92)

Date prepared: 2023-02-22

A. Applicant:
Name: Shandong Intco Medical Products Co., Ltd.
Address: 9888 Qiwang Road, Naoshan Industrial Park, Qingzhou, Shandong, China Contact: Mr. John Zhao
Title: Manager
Tel: +86-536-6136888
Email: johnzhao@basicmedical.com

Submission Correspondent: Primary contact: Ms. Ivy Wang <u>Shanghai SUNGO Management Consulting Co., Ltd.</u> Room 1401, Dongfang Building, 1500# Century Ave., Shanghai 200122, China Tel: +86-21-58817802 Email: <u>haiyu.wang@sungoglobal.com</u> Secondary contact: Mr. Raymond Luo Room 1401, Dongfang Building, 1500# Century Ave., Shanghai 200122, China Tel: +86-21-68828050 Email: <u>fda.sungo@gmail.com</u>

B. Device:

Trade Name: Sterile Latex Examination Gloves Powder Free (S, M, L, Extra L) Common Name: Latex Patient Examination Gloves (Powder Free)

<u>Regulatory Information</u> Classification Name: Latex Patient Examination Glove Classification: Class I Product code: LYY Regulation Number: 21 CFR 880.6250 Review Panel: General Hospital

C. Predicate device:

K171367 SANCARE STERILE LATEX EXAMINATION GLOVES Sanrea Healthcare Products Pvt Ltd

D. Indications for use of the device:

The Sterile Latex Examination Gloves Powder Free is a disposable device intended for medical purposes that is worn on the examiners' hand or finger to prevent contamination between patient and examiner.

E. Device Description:

The Sterile Latex Examination Gloves Powder Free are natural color, single use only, disposable examination gloves intended for medical purposes to be worn by examiners to prevent contamination between the patient and the examiner. The device is ambidextrous and can be worn on either the left or right hand. The gloves are offered in sizes small, medium, large and extra-large, and sterilized by Gamma radiation. The gloves are designed and manufactured in accordance with the ASTM D3578-19 standard.

F. Summary of Technological Characteristics

Table 1 General Comparison of Proposed and Predicate Devices					
Device	Proposed Device Predicate Device		Result		
510K #	K223298	K171367	-		
Product Name	Sterile Latex Examination Gloves Powder	SANCARE STERILE LATEX	-		
	Free	EXAMINATION GLOVES			
Product Code	LYY	LYY	Same		
Regulation	21 CFR 880.6250	21 CFR 880.6250	Same		
Number					
Indications for	The Sterile Latex Examination Gloves Powder	The Sterile Latex Examination Gloves,	Same		
use	Free is a disposable device intended for	Powder Free, is a disposable device			
medical purposes that is worn on the		intended for medical purposes that is			
examiners' hand or finger to prevent		worn on the examiners' hand or finger			
contamination between patient and		to prevent contamination between			
	examiner. patient and				
Powder free	Yes	Yes	Same		
Design feature Ambidextrous Ambidextrou		Ambidextrous	Same		
Material Natural Rubber Latex		Natural Rubber Latex	Same		
OTC use	Yes	Yes	Same		
Sterility	Gamma sterilized	Ethylene Oxide sterilized	Different		
Use	Singe use	Single use	Same		

Table 1 General Comparison of Proposed and Predicate Devices

Analysis: The proposed device uses a different sterilization method than the predicate device. But both sterilization methods are current commonly used sterilization methods and the sterilization process validation has been conducted to demonstrate its effectiveness. Therefore, this difference does not raise any new safety or performance questions.

	Designation		Size				Toloranco
Designation		XS	S	М	L	XL	Tolerance
Predicate	Length, mm	230	230 230 230 230				
device	Width, mm	70	0 80 85 111 120				
(K171367)			Thickness, mm				
	Finger		0.08 min				min
	Palm	0.08 min				min	

Table 2 Device dimension comparison

	Designation		Siz	ze		Tolerance	
	Designation	S	М	L	XL	TOTETATICE	
Proposed	Length, mm	220	230 230 230				
device	Width, mm	80	95 111 120				
(K223298)		Thickness, mm					
	Finger		0.08 min				
	Palm	0.08 min					
Result		Similar					

Analysis: The physical dimensions are slightly different from that of the predicate, but they all meet the requirements of ASTM D3578-19, so the differences do not raise any new safety or performance questions.

Table 3 Performance comparison

Item			Proposed device	Predicate device	Result
			(K223298)	(K171367)	
Color			Nature	Nature	Same
Physical	Before Tensile strength		18MPa, min	18MPa, min	Same
properties	aging	Ultimate elongation	650%, min	650%, min	Same
		Stress at 500%	5.5 MPa, Max	5.5 MPa, Max	Same
		Elongation			
	After	Tensile strength	14MPa, min	14MPa, min	Same
	aging	Ultimate elongation	500%, min	500%, min	Same
Comply with ASTM D3578				Comply with ASTM	Same
				D3578	
Freedom from holes			Be free from holes when	Be free from holes when	Different
			tested in accordance with	tested in accordance	
			ASTM D3578 & ASTM	with ASTM D3578 &	
			D5151	ASTM D5151	
			G-1, AQL 1.5	G-1, AQL 2.5	
Residual Powder			Meet the requirements	Meet the requirements	Same
			of ASTM D3578 & ASTM	of ASTM D3578 & ASTM	
			D6124	D6124	
			Less than 2 mg per glove	Less than 2 mg per glove	
Residual Protein			Meet the requirements	Meet the requirements	Same
			of ASTM D3578 & ASTM	of ASTM D3578 & ASTM	
			D5712	D5712	
			Less than 200µg/dm²	Less than 200µg/dm²	

Analysis: The subject device tested the leakage performance with a different AQL as compared to the predicate device. A more stringent acceptance criterion does not affect the safety and performance of the proposed device.

Table 4 safety comparison

	Item	Proposed device	Predicate	device	Result
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		(K223298)	(K171367)	
Material		Natural rubber latex	Natural rubber latex	Same
Biocompatibility	Irritation	Under the	Comply with ISO	Same
	ISO 10993-10	conditions of the	10993-10	
		study, not an		
		irritant. Comply		
		with ISO 10993-10.		
	Sensitization	Under the		
	ISO 10993-10	conditions of the		
		study, not a		
		sensitizer. Comply		
		with ISO 10993-10.		
	Acute systemic	Under the	/	Different
	toxicity	conditions of the		
	ISO 10993-11	study, the device		
		does not induce		
		acute systemic		
		toxicity response.		

Analysis: Toxicity information for the predicate device is not publicly available. This does not raise different safety or performance questions since the subject device has acceptable biocompatibility per the biocompatibility endpoint assessment.

G. Summary of Non-Clinical Testing

> Biocompatibility

The following tests for the subject device were conducted to evaluated the biocompatibility of Sterile Latex Examination Gloves Powder Free:

- ISO 10993-10: Primary Skin Irritation
- ISO 10993-10: Dermal Sensitization
- ISO 10993-11: Acute Systemic Toxicity

Performance Testing

Physical performance testing of the proposed device was conducted as per ASTM D3578-19 *Standard Specification for Rubber Examination Gloves.*

To summarize, the performance testing of the subject device was conducted to adequately demonstrate the effectiveness of the device in accordance with the relevant test methods cited below:

- ASTM D3578-19 Standard Specification for Rubber Examination Gloves
- ASTM D6124-06 (Reapproved 2017) Standard Test Method for Residual Powder on Medical Gloves
- ASTM D5151-19 Standard Test Method for Detection of Holes in Medical Gloves
- ASTM D5712-15 Standard Test Method for Analysis of Aqueous Extractable Protein in Natural Rubber in Latex Natural Rubber and Elastomeric Products Using the Modified Lowry Method

Test Method	Purpose	Acceptance Criteria	Results
Dimensions (width)	The purpose of the	Width 80 \pm 10mm for Small size	Pass

(thickness)	test is to evaluate	95 \pm 10mm for Medium size	81mm min for S
	the physical	105 \pm 10mm for Large size	95mm min for M
	dimension of the	115 \pm 10mm for Extra large	106mm min for L
	glove	size	115mm min for Extra L
		Length 230mm min	238mm min length
		Palm – 0.08mm min.	Pass
		Finger–0.08mm min.	Palm – 0.11mm min.
			Finger–0.11mm min
Physical properties	The purpose of the	Before Aging:	Pass
	test is to evaluate	Tensile Strength: 18 MPa, min.	Before Aging:
	the tensile strength	Elongation: 650%, min.	Tensile Strength: 23.4MPa, min.
	and ultimate	Stress at 500% Elongation:	Elongation: 650%, min.
	elongation before	5.5MPa, max.	Stress at 500% Elongation:
	and after aging	After Aging:	5.3MPa, max.
		Tensile Strength: 14 MPa, min.	After Aging:
		Elongation: 500%, min.	Tensile Strength: 22MPa, min.
			Elongation: 704%, min.
Freedom from holes	The purpose of the	No leakage at sampling level of	Pass
	test is to detect	G-1, AQL 1.5	No leakage, 314 of 315 passed
	holes in the gloves		
Residual Powder	The purpose of the	<2mg per glove	Pass
	test is to detect the		average 0.09 mg per glove
	powder residue in		
	the glove		
Residual Protein	The purpose of the	<200µg/dm²	Pass
	test is to detect the		Average 70.880ug/dm ²
	protein residue in		
	the glove		
Sterility	The purpose of the	Sterile	Pass
	test is to detect the		Sterile
	sterility of the glove		
Irritation	The purpose of the	Under the conditions of the	Under the conditions of the
ISO 10993-10	testing is to	study, not an irritant. Comply	study, not an irritant. Comply
	demonstrate the	with ISO 10993-10.	with ISO 10993-10.
Sensitization	safety of the subject	Under the conditions of the	Under the conditions of the
ISO 10993-10	device.	study, not a sensitizer. Comply	study, not a sensitizer. Comply
		with ISO 10993-10.	with ISO 10993-10.
Acute systemic		Under the conditions of the	Under the conditions of the
toxicity		study, the device does not	study, the device does not
, ISO 10993-11		induce acute systemic toxicity	induce acute systemic toxicity
		madee deate systemic toxicity	madee deate systemic toxicity

> Sterilization

The proposed device is provided Gamma sterilized to achieve the sterility Assurance Level (SAL) of 10⁻⁶. The sterilization process validation was conducted in accordance with ISO 11137-1 Sterilization of health care products Radiation Part 1: Requirements for development, validation and routine control of a sterilization process for medical devices, and ISO11137-2 Sterilization of health care products - Radiation - Part 2: Establishing the sterilization dose.

H. Clinical Test Conclusion

No clinical study is included in this submission.

I. Conclusion

The conclusion drawn from the nonclinical tests demonstrates that the subject device in 510(K) submission, the Sterile Latex Examination Gloves Powder Free are as safe, as effective, and performs as well as or better than the legally marketed predicate device cleared under K171367.