

February 23, 2023

Guangdong Newdermo Biotech Co.,Ltd Annie Cai Certificate Engineer Building C28. Huachuang Industrial Park, Jinshan Avenue Shiji Town, Panyu Guangzhou, 511450 China

Re: K223544

Trade/Device Name: LED light therapy mask (FM-01, FM-02, FM-03)

Regulation Number: 21 CFR 878.4810

Regulation Name: Laser Surgical Instrument For Use In General And Plastic Surgery And In

Dermatology

Regulatory Class: Class II Product Code: OHS, OLP, ILY Dated: November 24, 2022 Received: November 25, 2022

#### Dear Annie Cai:

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.

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>.

2K223544 - Annie Cai Page

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 <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); 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 <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

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

Sincerely,

## Jianting Wang -S

Jianting Wang
Acting Assistant Director
DHT4A: Division of General 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.

K225344
Device Name LED light therapy mask (FM-01, FM-02, FM-03)
Indications for Use (Describe) Red light: Treatment of full-face wrinkles. Blue light: Treatment of mild to moderate inflammatory acne. Infrared light: Provide topical heating for the purpose of elevating tissue temperature; arthritis and muscle spasm; relieving stiffness; promoting the relaxation of muscle tissue; and to temporarily increase local blood circulation. Mixed light: Treatment of mild to moderate inflammatory acne.
Type of Use (Select one or both, as applicable)
Prescription Use (Part 21 CFR 801 Subpart D)
CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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# 510(K) Summary **K223544**

#### 510(K) Summary

### Prepared in accordance with the content and format regulatory requirements of 21 CFR Part 807.92

#### 1. Submitter:

510(k) owner's name: Guangdong Newdermo Biotech Co.,Ltd

Building C28. Huachuang Industrial Park,

Jinshan Avenue, Shiji Town,

Address: Panyu, Guangzhou,

511450 P.R. China

Tel: +86(020) 31105688

Contact person: Annie Cai

Email: caidejiao@qq.com
Preparing date: February 22, 2023

#### 2. Device name and classification:

Device Name: LED light therapy mask

Model: FM-01, FM-02, FM-03

Classification Name/ 21 CFR 878.4810 OHS 21 CFR 878.4810 OLP

Product code: 21 CFR 890.5500 ILY

Regulatory Class: Class II

#### 3.Premarket Notification Class III Certification and Summary

Not applicable, the subject device is Class II.

#### 4. Predicate Device(s):

#### 1) Predicate device1

Sponsor: NINGBO HESI ELECTRIC CO., LTD

LED FACIAL LIGHT THERAPY MASK, FLEXIBLE LED LIGHT

Device name: THERAPY

510(k) Number: K200983

Product Code: OHS, OLP, ILY

#### 2) Predicate device2

Sponsor: Hunan Guangye Biotechnology Co., Ltd.

Device name: Beauty LED Mask

510(k) Number: K221151

Product Code: OHS, OLP

#### 3) Predicate device3

Sponsor: Zhongshan Bisen Plastic Electronic Products Co.,Ltd.

Device name: RED Light Device

510(k) Number: K162489 Product Code: OHS

#### 4) Predicate device4

Sponsor: Theragun, Inc.

Device name: TheraFace LED

510(k) Number: K212155 Product Code: OHS, OLP

#### 5) Reference device

Sponsor: Xuzhou Kernel Medical Equipment Co., Ltd.

Device name: LED Light Therapy Device, KN-7000L

510(k) Number: K222751 Product Code: GEX

#### 5. Reason for Submission

New device, there were no prior submissions for the device.

#### 6. Pre-Submission, IDE

Not applicable, there is no prior submission.

#### 7. Device Description:

LED light therapy mask is a home use wearable LED phototherapy device which can help solve various skin problems. LED light therapy mask is consisting of mask, controller, adapter, USB cable and straps.

There are 4 kinds of light which include Red light (wavelength 620nm), Blue light (wavelength 460nm), Infrared light (wavelength 850nm), Mixed light (wavelength 620nm and 850nm and 460nm).

#### 8. Intended Use:

Red light: Treatment of full-face wrinkles.

Blue light: Treatment of mild to moderate inflammatory acne.

Infrared light: Provide topical heating for the purpose of elevating tissue temperature; for the temporary relief of minor muscle and joint pain, arthritis and muscle spasm; relieving stiffness; promoting the relaxation of muscle tissue; and to temporarily increase local blood circulation.

Mixed light: Treatment of mild to moderate inflammatory acne.

#### 9. Predicate Device Comparison

Item	Subject Device	Predicate	Predicate	Comparison
		device1(K200983)	Device2(K221151)	Result
Trade name	LED light therapy	LED FACIAL	Beauty LED Mask	/
	mask	LIGHT		
		THERAPY		
		MASK,		
		FLEXIBLE LED		
		LIGHT		
		THERAPY		
510 (k) number	K223544	K200983	K221151	/
Manufacturer	Guangdong	NINGBO HESI	Hunan Guangye	/
	Newdermo Biotech	ELECTRIC CO.,	Biotechnology Co.,	
	Co.,Ltd	LTD	Ltd.	
Regulation	21 CFR 878.4810	21 CFR 878.4810,	21 CFR 878.4810	Same
number	21 CFR 890.5500	21 CFR 890.5500		
Regulation	Light Based Over	Light Based Over	Light Based Over	Same
Name	The Counter	The Counter	The Counter	
	Wrinkle	Wrinkle	Wrinkle	
	Reduction(OHS),	Reduction(OHS),	Reduction(OHS),	
	Over-The-Counter	Over-The-Counter	Over-The-Counter	
	Powered Light	Powered Light	Powered Light	
	Based Laser For	Based Laser For	Based Laser For	
	Acne(OLP),	Acne(OLP),	Acne(OLP)	
	Infrared,	Lamp, Infrared,		
	Therapeutic	Therapeutic		
	Heating(ILY)	Heating(ILY)		
Product code	OHS, OLP, ILY	OHS, OLP, ILY	OHS, OLP	Same
Classification	п	п	п	Same
Classification Indications for	II Dad light	The LED FACIAL	II The device is	
use/ Intended	Red light:	The LED FACIAL	The device is intended to use	Similar Note2
	Treatment of full-face wrinkles.	LIGHT		Note2
use		THERAPY MASK (Model)	LED light for the treatment of	
	Blue light:	MASK (Model:	wrinkles and mild	
	Treatment of mild	HK207) is intended to:		
	to moderate		to moderate acne.	
	inflammatory acne.	- The device		

Infrared light: emitting energy in Provide topical the blue is heating for the intended to reduce purpose of the mild to elevating tissue moderate temperature; inflammatory acne arthritis and muscle vulgaris. spasm; relieving - The device stiffness; promoting emitting energy in the relaxation of the red and muscle tissue; and infrared spectrum is intended for the to temporarily increase local blood treatment of full-face wrinkles. circulation. The FLEXIBLE Mixed light: Treatment of mild LED LIGHT to moderate **THERAPY** inflammatory acne. (Model: HK209) is intended to: - The device emitting energy in the blue is intended to reduce the mild to moderate inflammatory acne vulgaris. - The device emitting energy in the red and infrared spectrum is intended for the treatment of full-face wrinkles. - The device is intended to deliver heat in the IR spectrum to provide topical heating for the purpose of elevating tissue temperature; for

		the temporary		
		relief of minor		
		muscle and joint		
		pain, arthritis and		
		muscle spasm;		
		relieving stiffness;		
		promoting the		
		relaxation of		
		muscle tissue; and		
		to temporarily		
		increase local		
		blood circulation.		
Location for use	Face and body	Entire Face and	Face	Same
		body		
OTC or	OTC	OTC	OTC	Same
prescription				Suille
Power supply	Input:	Input: 100 –	Input: 100 -240 V	Similar
1 ower suppry	100-240 V~, 50/60	240Vac,	~ 50 /60 Hz	Note4
	Hz, 0,25 A	2.0 A, 50/60Hz	Output: 5V 1A	Notes
	Output: DC 5 V,	2.0 A, 50/00112	Output. 5 v 1A	
	500 mA			
Light gayage		LED	LED	
Light source	LED		+	same
Wavelength	Red: 620nm	465nm,	Red (637nm±5nm)	Compare
	Blue: 460nm	640nm,	and	with
	Infrared: 850nm	880nm	IR (854nm±5nm);	predicate
	Mixed: 620nm and		Blue (465±5nm)	device 4
	850nm and 460nm			Similar
				Note 5
LED Intensity	Red light: 2.0~3.0	6.5 mW/cm <sup>2</sup>	Red+IR:	Similar
	mW/cm <sup>2</sup>		25.5mW/cm <sup>2</sup>	Note6
	Blue light:2.0~4.0		Blue: 1.36mW/cm <sup>2</sup>	
	mW/cm <sup>2</sup>			
	Infrared light:			
	2.0~4.0 mW/cm <sup>2</sup>			
	Mixed light:			
	9.0~12.0 mW/cm <sup>2</sup>			
Treatment time	Manual Mode:	3 times a week for	10min each time	Compare
	15minutes each	30		with
	time,	min. 4 weeks		predicate
	Automatic Mode:			device 3
	10minutes each			Similar
	time.			Note7
	time. 3-4 treatment a			Note7

	treatment a week once the results			
	shown.			
Dimensions	FM-01:	Not public	LED Mask:	/
(mm)	207X277X43mm,		Approximately 183	
	FM-02:		mm	
	198X383X33.5mm,		x 238 mm x 98	
	FM-03:		mm	
	237.5X108X8.1mm		Controller: 100mm	
			x 50	
			mm x 21.5 mm	
Electrical safety	IEC 60601-1;	IEC 60601-1;	IEC 60601-1;	Same
	IEC 60601-1-2	IEC 60601-1-2	IEC 60601-1-2	
Biocompatibility	All body-contacting	All	All	Same
feature	materials are	body-contacting	body-contacting	
	complied with	materials are	materials are	
	ISO10993-5 and	complied with	complied with	
	ISO 10993-10	ISO10993-5 and	ISO10993-5 and	
		ISO 10993-10	ISO 10993-10	

Item	Subject Device	Predicate	Predicate	Comparison
		device3(K162489)	Device4(K212155)	Result
Trade name	LED light therapy mask	RED Light Device	TheraFace LED	/
510 (k) number	K223544	K162489	K212155	/
Manufacturer	Guangdong	Zhongshan Bisen	Theragun, Inc.	/
	Newdermo Biotech	Plastic Electronic		
	Co.,Ltd	Products Co.,Ltd.		
Regulation	21 CFR 878.4810,	21 CFR 878.4810	21 CFR 878.4810	Similar
number	21 CFR 890.5500			Note1
Regulation	Light Based Over	Light Based Over	Light Based Over	Similar
Name	The Counter	The Counter	The Counter	Note1
	Wrinkle	Wrinkle	Wrinkle	
	Reduction(OHS),	Reduction(OHS),	Reduction(OHS),	
	Over-The-Counter			
	Powered Light			
	Based Laser For			
	Acne(OLP),			
	Infrared,			
	Therapeutic			
	Heating(ILY)			
Product code	OHS, OLP, ILY	OHS	OHS, OLP	Similar
				Note1
Classification	II	II	II	Same

Indications for	Red light:	The RED Light	1) The red light is	Similar
use/ Intended	Treatment of	Device is an OTC	intended to treat	Note2
use	full-face wrinkles	device indicated to	periorbital	
	Blue light:	emit energy in the	wrinkles.	
	Treatment of mild	red and IR region	2) The blue light is	
	to moderate	of the	intended to treat	
	inflammatory acne.	spectrum for use in	mild to moderate	
	Infrared light:	dermatology for	inflammatory acne.	
	Provide topical	the treatment of	3) The Red + IR	
	heating for the	periorbital	is intended to treat	
	purpose of	wrinkles.	periorbital	
	elevating tissue		wrinkles.	
	temperature;			
	arthritis and muscle			
	spasm; relieving			
	stiffness; promoting			
	the relaxation of			
	muscle tissue; and			
	to temporarily			
	increase local blood			
	circulation.			
	Mixed light:			
	Treatment of mild			
	to moderate			
	inflammatory acne.			
Location for use	Face and body	/	Face	Similar
				Note3
OTC or	OTC	OTC	OTC	Same
prescription				
Power supply	Input:	Adaptor:100~240V	Lithium	Similar
	100-240 V~, 50/60	AC 50/60Hz	battery:2x3.7V	Note4
	Hz, 0,25 A	Lithium battery:		
	Output: DC 5 V,	2x3.7V		
	500 mA			
Light source	LED	LED	LED	Same
Wavelength	Red: 620nm	Red: 633 ±5nm	Red light:	Compare
	Blue: 460nm	Infrared: 830 ±5nm	633nm±10nm	with
	Infrared: 850nm		Blue light:	predicate
	Mixed: 620nm and		415nm±10nm	device 4
	850nm and 460nm		Red+IR:	Similar
			633±10nm /	Note 5
			830nm±10nm	
LED Intensity	Red light: 2.0~3.0	125 mW/cm <sup>2</sup>	Red light 73±5	Compare
	mW/cm <sup>2</sup>	70 mW/cm <sup>2</sup> (633	mW/cm <sup>2</sup>	with

	Blue light:2.0~4.0	nm); 55 mW/cm <sup>2</sup>	Blue light 64±5	predicate
	mW/cm <sup>2</sup>	(830nm)	mW/cm <sup>2</sup>	device 3
	Infrared light:		Red+IR:	Similar
	2.0~4.0 mW/cm <sup>2</sup>		73±5/55±5	Note6
	Mixed light:		mW/cm <sup>2</sup>	
	9.0~12.0 mW/cm <sup>2</sup>			
Treatment time	Manual Mode:	For the first month	Red light: 5 - 7	Compare
	15minutes each	(4 weeks),	minutes per	with
	time,	treatment	treatment zone	predicate
	Automatic Mode:	should be	Blue: 5 - 7 minutes	device 3
	10minutes each	performed 3 times	per treatment zone	Similar
	time.	a week for	Red+IR: 5 - 7	Note7
	3-4 treatment a	15-20 minutes each	minutes per	
	week, reduce to 1-2	time.(5-7 minutes	treatment zone	
	treatment a week	on		
	once the results	each treatment		
	shown.	zone).		
Dimensions	FM-01:	/	/	/
(mm)	207X277X43mm,			
	FM-02:			
	198X383X33.5mm,			
	FM-03:			
	237.5X108X8.1mm			
Electrical safety	IEC 60601-1;	IEC 60601-1;	IEC 60601-1;	Same
	IEC 60601-1-2	IEC 60601-1-2	IEC 60601-1-2	
Biocompatibility	All body-contacting	All	All	Same
feature	materials are	body-contacting	body-contacting	
	complied with	materials are	materials are	
	ISO10993-5 and	complied with	complied with	
	ISO 10993-10	ISO10993-5 and	ISO10993-5 and	
		ISO 10993-10	ISO 10993-10	

#### Comparison in Detail(s):

#### Note1

The Regulation number, Regulation Name, Product code of predicate1 are not identical to the subject device, all these device are process similar intended use and use very similar light wavelengths to get the intended purpose. This slight deference will not raise safety and effective issue.

#### Note2

The Indications for use/ Intended use of Red light, Blue light, Infrared light of the subject device is the same as that of primary device K200983. The Indications for use/ Intended use of mixed light of the subject device is the same as that of secondary device K221151.

#### Note3

The treatment location of the subject device is the same as the predicate device K200983 but identical the other predicate device. The difference in applicable location will not raise safety and effective issue.

#### Note4

The power supply of devices are very similar but not identical, the IEC60601-1test demonstrated the safety of the power adapter. The slight difference will not raise safety and effective issue.

#### Note5

The light wavelength is very similar but not identical. The subject device emits blue light, red light and IR light. In the mixed light mode, the subject device emits blue light, red light, IR light simultaneously, while the reference device K222751 can emit red, blue, IR light simultaneously and it has been demonstrated that emit three lights simultaneously is safe and effect. Besides, the subject device has passed IEC60601-2-57 test, the slight difference will not raise safety and effective issue.

#### Note6

The LED Intensity of these devices are different, and the LED intensity of the subject device is low and subject device has passed IEC60601-2-57 test, the slight difference will not raise safety and effective issue.

#### Note7

The treatment time of these devices are very similar but not identical, treatment is one of the factors to get the intended purpose. What's more, the subject device has IEC60601-1, IEC60601-2-57 test, the slight difference will not raise safety and effective issue.

All the differences don't affect the safety and effectiveness which is concluded after all the required testing, so no safety and effectiveness issues relating to the product come into conclusion.

#### 10. Performance Data:

#### **Non-clinical data:**

Non-clinical tests have been conducted to verify that the Beauty LED Mask meets all design specifications which supports the conclusion that it's Substantially Equivalent (SE) to the predicate device. The testing results demonstrate that the subject device complies with the following standards:

- ANSI AAMI ES 60601-1, Medical electrical equipment Part 1: General requirements for basic safety and essential performance
- ➤ IEC 60601-1-2, Medical electrical equipment Part 1-2: General requirements for basic safety and essential performance Collateral standard: Electromagnetic disturbances Requirements and tests
- ➤ IEC 60601-1-11, Medical electrical equipment Part 1-11: General requirements for basic safety and essential performance Collateral standard: Requirements for medical electrical equipment and medical electrical systems used in the home healthcare environment

➤ IEC 60601-2-57, Medical Electrical Equipment - Part 2-57: Particular requirements for the basic safety and essential performance of non-laser light source equipment intended for therapeutic, diagnostic, monitoring and cosmetic/aesthetic use

#### **Biocompatibility Test**

The device has been tested for biocompatibility; it complies with the following standards.

- ➤ ISO 10993-5, Biological Evaluation of Medical Devices Part 5: Tests for In Vitro Cytotoxicity
- ➤ ISO 10993-10, Biological Evaluation of Medical Devices Part 10: Tests for Irritation and Skin Sensitization.

#### **Software Verification and Validation Testing**

Software verification and validation testing were conducted and documentation was provided as recommended by FDA's Guidance for Industry and FDA Staff, "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices."

Clinical data: Not applicable.

#### **Summary**

Based on the non-clinical and clinical performance as documented in the system development, the subject devices were found to have a safety and effectiveness profile that is similar to the predicate device.

#### 11. Conclusion

The non-clinical data support the safety of the device and the hardware and software verification and validation demonstrate that LED light therapy mask should perform as intended in the specified use conditions, and all the data demonstrate that the subject devices perform comparably to the predicate device that is currently marketed for the same intended use. In other words, the subject device (LED light therapy mask) is Substantial Equivalent to the predicate devices K200983, K221151, K162489 and K212155.