

May 19, 2022

Hunan Chopard Medical Devices Co., Ltd % Ivy Wang
Technical Manager
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14th Floor, 1500# Century Avenue
Shanghai, 200122
China

Re: K220824

Trade/Device Name: Medical Surgical Mask (Planar type)

Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical Apparel

Regulatory Class: Class II Product Code: FXX Dated: March 21, 2022 Received: March 21, 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 <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>.

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

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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 (<a href="DICE@fda.hhs.gov">DICE@fda.hhs.gov</a>) 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

## 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

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

K220824		
Device Name		
Medical Surgical Mask (Planar type)		
Indications for Use (Describe) The Medical Surgical Mask is intended to be worn to protect both microorganisms, body fluids and particulate material. The medical practices to reduce the potential exposure to blood and body fluids sterile.	surgical mask is intended for use in infection control	
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 IE 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.\*

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## 510(K) Summary

(As requirement by 21 CFR 807.92)

Date prepared: 19th, May, 2022

#### A. Applicant:

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#### **B.** Device:

Trade Name: Medical Surgical Mask (Planar type)

Common Name: Surgical Mask

Model: Planar type

#### **Regulatory Information**

Classification Name: Surgical Face Mask

Classification: Class II Product code: FXX

Regulation Number: 21 CFR 878.4040

Review Panel: Surgical Apparel

## C. Identification of Primary Predicate device:

K211827

Zhejiang Lanhine Medical Products LTD.

Trade Name: Level 3 Fluid Resistant Procedure/Surgical Mask

Common Name: Surgical Face Mask

Model(s): 15604F, 15704F

## **Regulatory Information**

Classification Name: Surgical Face Mask

Classification: Class II

Product code: FXX Regulation Regulation Number: 878.4040 Review Panel: Surgical Apparel

#### **D.** Indications for use of the device:

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

## **E.** Device Description:

The Medical Surgical Masks are blue color, three-layer, flat-pleaded masks with nose piece and ear loops, which are composed of inner layer, middle layer and outer layer. The colorant is blue polypropylene (PP) master batch.

The inner layer and outer layer of the mask are made of non-woven fabric (polypropylene), the middle layer is made of melt-blown fabric (polypropylene). The ear loop of the subject mask is held in place over the users' mouth and nose by two ear loops welded to the face mask. The ear loop is made with polyamide and spandex. The nose piece in the layers of face mask is to allow the user to fit the mask around their nose, which is made of polypropylene wrapped galvanized soft wire.

The Medical Surgical Mask is sold non-sterile and are intended to be single use, disposable devices.

The mask is designed and manufactured in accordance with ASTM F2100-19 Standard Specification for Performance of Materials Used in Medical Face Masks.

## F. Comparison of technological characteristics with the predicate device

The medical surgical masks are essentially the same as or similar to the predicate device in terms of the indications for use, design and construction, performance characteristics. Provided below table 1 is a comparison of the proposed device with the predicate device.

**Table 1 Comparison of Proposed and Predicate Devices** 

Device	Proposed Device	Predicate Device	Result
510K #	-	K211827	-
Manufacturer	Hunan Chopard Medical Devices Co., Ltd	Zhejiang Lanhine Medical Products	-
		LTD.	
<b>Product Name</b>	Medical Surgical Mask	Level 3 Fluid Resistant	Similar
		Procedure/Surgical Mask	

Level	Level 3	Level 3	Same
<b>Product Code</b>	FXX	FXX	Same
Regulation	21 CFR 878.4040	21 CFR 878.4040	
Number			
Indications for use	The Medical Surgical Mask is intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. The medical surgical mask is intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This a single use, disposable device(s), provided non-sterile.	The Level 3 Fluid Resistant Procedure/Surgical Masks (model: 15604F, 15704F) 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 a single use, disposable device(s), provided non-sterile.	Same
Design Feature	Ear loops, flat pleated, 3 layers	Ear loops, tie-on, flat pleated, 3 layers	Similar
Color	Blue	Blue	Same
Dimension	Length: 17.5cm±5%	17.5cm±0.5cm	Similar
	Width: 9.5cm ± 5%	$9.5$ cm $\pm 0.5$ cm	
Sterility	Non-sterile	Non-sterile	Same
Use	Single Use, Disposable	Single Use, Disposable	Same
Material			
Outer layer	Non-woven fabric (Polypropylene)	Non-woven fabric (Polypropylene)	Same
Middle layer	Melt blown fabric (Polypropylene)	Melton blown fabric (Polypropylene)	Same
Inner layer	Non-woven fabric (Polypropylene)	Non-woven fabric (Polypropylene)	Same
Nose clip	Polypropylene wrapped galvanized soft wire	Polypropylene coating iron	Different
Ear loops	polyamide and spandex	Polyurethane	Different
Biocompatibility	ISO 10993	ISO 10993	Same

## **Difference Analysis:**

The proposed device has different material of nose clip and ear loops to the predicate device. However, biocompatibility test has been performed on the proposed device according to ISO 10993-5 and ISO 10993-10 and the results do not show any adverse effect. Thus, this difference will not affect the safety and effectiveness between the proposed device and the predicate device.

## G. Summary of Non-Clinical Testing

Non-clinical tests were conducted to verify that the proposed device met all design specification. 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 Mask - Premarket Notification [510(K)] Submission issued on March 5, 2004:

- ➤ ISO 10993-05:2009 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

Performance testing and biocompatibility testing are summarized in below table 2.

Table 2: Summary of Performance Testing & Biocompatibility testing

Test Methodology	Purpose	Acceptance Criteria	Result
		for Level 3 Barrier	
Bacterial Filtration	Measure bacterial	≥98%	Passed
Efficiency	filtration efficiency		3 non-consecutive lots tested, using a
ASTM F2101			sample size of 32/lot
			Lot 1: ≥98%
			Lot 2:≥98%
			Lot 3:≥98%
Differential	Determine	<6.0 mmH <sub>2</sub> O/cm <sup>2</sup>	Passed
Pressure	breathability of the		3 non-consecutive lots tested, using a
$(mmH_2O/cm^2)$	mask		sample size of 32/lot
EN 14683:2019			Lot 1: <6.0
Annex C			Lot 2: <6.0
			Lot 3: <6.0
Sub-micron	Measure initial	≥98%	Passed
Particulate	particle filtration		3 non-consecutive lots tested, using a
Filtration	efficiency		sample size of 32/lot
Efficiency ASTM			Lot 1: ≥98%
F2299-17			Lot 2: ≥98%
			Lot 3: ≥98%
Resistance to	Evaluate the	29 out of 32 pass at 160	Passed
Penetration by	resistance to	mmHg	3 non-consecutive lots tested, using a
Synthetic Blood	penetration by		sample size of 32/lot
ASTM F1862-17	impact of small		Lot 1: 32 out of 32 pass at 160 mmHg
	volume of synthetic		Lot 2:32 out of 32 pass at 160 mmHg
	blood		Lot 3:32 out of 32 pass at 160 mmHg

Flammability	Response of	Class I	Passed
16 CFR Part	materials to heat		3 non-consecutive lots tested, using a
1610-2008	and flame		sample size of 32/lot
			Lot 1: Class 1
			Lot 2: Class 1
			Lot 3: Class 1
Cytotoxicity	Assess the potential	Non-cytotoxic	Pass
	risk of cytotoxicity		Under the condition of this study, the
	of mask material		device has no potential toxicity.
Irritation	Assess the potential	Negligibly irritating	Under the condition of this study, the
	risk of irritation of		device is negligibly irritating.
	mask material		
Sensitization	Assess the potential	Non-sensitizing	Under the conditions of the study, the
	risk of sensitization		device is non-sensitizing
	of mask material		

## **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 Medical Surgical Mask is as safe, as effective, and performs as well as or better than the legally marketed predicate device cleared under K211827.