

September 20, 2022

Xiantao Junhui Plastic Products Co., Ltd. % Ms. Ivy Wang Technical Manager Shanghai Sungo Management Consulting Co., Ltd. 14th Floor, 1500# Century Avenue Shanghai, 200122 China

Re: K221976

Trade/Device Name: Surgical Face Mask (Non-sterile)

Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical Apparel

Regulatory Class: Class II Product Code: FXX Dated: July 5, 2022 Received: July 5, 2022

Dear Ms. 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,

for
Brent L. 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

Form Approved: OMB No. 0910-0120

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

| Submission Number (if known) | |
|---|--|
| K221976 | |
| Device Name | |
| Surgical Face Mask (Non-sterile) | |
| Indications for Use (Describe) | |
| The Surgical Face Mask (Non-sterile) is intended to healthcare personnel from transfer of microorganism Surgical Face Mask is intended for use in infection to blood and body fluids. This a single use, disposal | ns, body fluids and particulate material. The control practices to reduce the potential exposure |
| 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

(As requirement by 21 CFR 807.92)

Date prepared: 15th, June, 2022

A. Applicant:

Name: XIANTAO JUNHUI PLASTIC PRODUCTS CO., LTD.

Address: No. 3, Babu Industrial Park, Pengchang Town, Xiantao City, HUBEI, CHINA

Contact: Fiona Tian
Title: Sales Manager
Tel: +86-15027285720
Email: fiona@xtjhslzp.com

Submission Correspondent:

Primary contact: Ms. Ivy Wang

Shanghai SUNGO Management Consulting Co., Ltd.

Room 1401, Dongfang Building, 1500# Century Ave., Shanghai 200122, China

Tel: +86-21-58817802

Email: haiyu.wang@sungoglobal.com Secondary contact: Mr. Raymond Luo

Room 1401, Dongfang Building, 1500# Century Ave., Shanghai 200122, China

Tel: +86-21-68828050

Email: fda.sungo@gmail.com

B. Device:

Trade Name: Surgical Face Mask (Non-sterile)

Model: Flat type/over-the-ear

Regulatory Information

Common Name: Surgical Face Mask

Classification: Class II Product code: FXX

Regulation: 21 CFR 878.4040 - 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:

Common Name: Surgical Face Mask

Classification: Class II Product code: FXX

Regulation: 21 CFR 878.4040 - Surgical apparel

D. Indications for use of the device:

The Surgical Face Mask (Non-sterile) is intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. The Surgical Face 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 Surgical Face Masks (Non-sterile) 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 spun-bonded non-woven fabric (polypropylene), the middle layer is made of polypropylene melt-blown non-woven fabric. 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 nylon 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 galvanized iron wire coated by PE.

The Surgical Face Mask (Non-sterile) 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 Surgical Face 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 | XIANTAO JUNHUI PLASTIC | Zhejiang Lanhine Medical Products | - |
| | PRODUCTS CO., LTD. | LTD. | |
| Product Name | Surgical Face Mask (Non-sterile) | Level 3 Fluid Resistant | Similar |
| | | Procedure/Surgical Mask | |
| Level | Level 3 | Level 3 | Same |

| Product Code | FXX | FXX | Same |
|-----------------------|---|---|-----------|
| Regulation | 21 CFR 878.4040 | 21 CFR 878.4040 | Same |
| Number | | | |
| Indications for use | The Surgical Face Mask (Non-sterile) is intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. The Surgical Face 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 | 175±5mm 95±5mm | 17.5cm±0.5cm 9.5cm±0.5cm | Same |
| Sterility | Non-sterile | Non-sterile | Same |
| Use | Single Use, Disposable | Single Use, Disposable | Same |
| Material | | , , | 1 |
| Outer layer | Spun-bonded non-woven fabric (polypropylene) | Non-woven fabric (Polypropylene) | Same |
| Middle layer | Polypropylene melt-blown non-woven fabric | Melton blown fabric (Polypropylene) | Same |
| Inner layer | Spun-bonded non-woven fabric (polypropylene) | Non-woven fabric (Polypropylene) | Same |
| Nose clip | Galvanized iron wire coated by PE | Polypropylene coating iron | Different |
| Ear loops | Nylon and spandex | Polyurethane | Different |
| Biocompatibility | ISO 10993 | ISO 10993 | Same |

Difference Analysis:

The proposed device has same intended use, structure, parameter and performance with the predicate device. The materials of inner layer, middle layer and outer layer of the proposed device are also the same as those of the predicate device.

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 does 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 |
|------------------------|--------------------------|-----------------------------------|--|
| Test Methodology | 1 ui posc | for Level 3 Barrier | Kesuit |
| | | | |
| 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 | $<6.0 \text{ mmH}_2\text{O/cm}^2$ | 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 particle | ≥98% | Passed |
| Particulate Filtration | filtration efficiency | | 3 non-consecutive lots tested, using a |
| Efficiency ASTM | | | sample size of 32/lot |
| F2299-17 | | | Lot 1: ≥98% |
| | | | Lot 2: ≥98% |
| | | | Lot 3: ≥98% |
| Resistance to | Evaluate the resistance | 29 out of 32 pass at | Passed |
| Penetration by | to penetration by | 160 mmHg | 3 non-consecutive lots tested, using a |

| | T | | T |
|-----------------|--------------------------|-----------------------|--|
| Synthetic Blood | impact of small | | sample size of 32/lot |
| ASTM F1862-17 | volume of synthetic | | Lot 1: 32 out of 32 pass at 160 mmHg |
| | blood | | Lot 2: 32 out of 32 pass at 160 mmHg |
| | | | Lot 3: 32 out of 32 pass at 160 mmHg |
| Flammability | Response of materials | Class I | Passed |
| 16 CFR Part | to heat and flame | | 3 non-consecutive lots tested, using a |
| 1610-2008 | | | 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 of | | Under the condition of this study, the |
| | 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 of | | device is non-sensitizing |
| | 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 Surgical Face Mask (Non-sterile) is substantially equivalent to the legally marketed predicate device cleared under K211827.