

September 23, 2023

Bemer INT. AG % Paul Dryden Consultant ProMedic Consulting LLC 131 Bay Point Dr. NE Saint Petersburg, Florida 33704

Re: K223919

Trade/Device Name: B.Light Clear Evo and B.Light Restore Evo
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
Dated: August 22, 2023
Received: August 22, 2023

Dear Paul Dryden:

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,

 Tanisha L.
 Tanisha L. Hithe -S 2023.09.23

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Tanisha Hithe, MS, MHS 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

Indications for Use

510(k) Number (if known)

K223919

Device Name

B.Light Clear Evo and B.Light Restore EVO

Indications for Use (Describe)

B.Light Clear Evo:

— The device is intended for over-the-counter (OTC) use to treat patients with mild to moderate acne vulgaris on the face.

B.Light Restore Evo:— Use of light-based treatment to reduce wrinkles on the face.

Type of Use (Select one or both, as applicable)

_ Prescription Use (Part 21 CFR 801 Subpart D) XX Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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FORM FDA 3881 (6/20)

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Date Prepared:

22-Sep-2023

Paul Dryden ProMedic, LLC

I Submitter

BEMER International, AG Austrasse 15 LIE-9495 Triesen, Liechtenstein Phone: +423-792-7386

Submitter Contact:

Sandra Schwarzenberger Quality Director

Submission Correspondent:

II Device Proprietary or Trade Name: Common/Usual Name:

Classification Name:

Regulation Product Code:

III Predicate Device:

Common/Usual Name: Classification Name:

Regulation Product Code:

Secondary Predicate Device:

Common/Usual Name: Classification Name:

Regulation Product Code:

Secondary Predicate Device: Common/Usual Name:

Classification Name:

Regulation Product Code:

Secondary Predicate Device: Common/Usual Name: Classification Name:

Regulation Product Code: BEMER Therapy Systems Evo Over-The-Counter Powered Light Based Laser For Acne Light Based Over The Counter Wrinkle Reduction Laser Surgical Instrument For Use In General And Plastic Surgery And In Dermatology (21 CFR 878.4810) OHS and OLP

Shenzhen Kaiyan Medical Co. Ltd. (K202390) Aduro Light Beauty Mask Laser Surgical Instrument For Use In General And Plastic Surgery And In Dermatology (21 CFR 878.4810) OHS and OLP

GlobalMed Technologies (K210948) Ominlux CLEAR Laser Surgical Instrument For Use In General And Plastic Surgery And In Dermatology (21 CFR 878.4810) OLP

Johnson and Johnson Consumer (K180847) Neutrogena Light Therapy Acne Mask+ Laser Surgical Instrument For Use In General And Plastic Surgery And In Dermatology (21 CFR 878.4810) OLP

Cellreturn Co. Ltd (K222377) LED Mask Platinum MD Laser Surgical Instrument For Use In General And Plastic Surgery And In Dermatology (21 CFR 878.4810) OHS

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IV Device Description:

The BEMER devices are noninvasive, fully reusable (no disposable components such as electrodes), and have configurations allowing both patient / home and professional / office use. The subject device is specific to the LED based applications.

Low Level Light Therapy (LLLT) delivered via Light Emitting Diodes (LED) is a nonthermal technology used to modulate cellular activity with specific wavelengths (nm) of light. Through photo biomodulation, photons are absorbed by chromophores within cells that are being treated. Various beneficial effects of LLLT delivered via light-emitting diodes at relatively low intensities have been reported, especially in indications where stimulation of healing, reduction of pain and inflammation, restoration of function, and skin rejuvenation are required. Light-emitting diode therapy (LED) is safe, nontoxic, and a noninvasive therapy for the treatment of Acne and the reduction of wrinkles and fine lines on the face.

V Indications for Use:

B.Light Clear Evo:

— The device is intended for over-the-counter (OTC) use to treat patients with mild to moderate acne vulgaris on the face.

B.Light Restore Evo:Use of light-based treatment to reduce wrinkles on the face.

Environments of use: OTC in the home.

VI Comparison of Technological Characteristics and Performance with the Predicate

Table 1 below provides the summarized equivalence comparison of general intended uses/actions, specific indications for use, equivalence of key clinical and technical features between subject and predicate devices, along with a full listing of technical and conformance specifications.

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Table 1: Comparison of Subject vs. Predicates

	Subject Device		Predicate Device 1	Predicate Device 2	Predicate Device 3	Predicate Device 4
Device	BEMER Int. AG	BEMER Int. AG	Shenzhen	GlobalMed	Johnson & Johnson	Cellreturn Co.,Ltd
Manufacturer			Kaiyan Medical Co. Ltd.	Technologies		
	BEMER Light	BEMER Light	Aduro Light Beauty Mask	Omnilux CLEAR	Neutrogena Light	LED Mask Platinum
	Therapy System	Therapy System	Model: MK-66O, MK-		Therapy Acne Mask+	MD
			66USBO, MK-66USBA,			
	Applicator:	Applicator:	MK-66USBB, MK-02O,			
	B. Light Clear Evo	B.Light Restore Evo	MK-02A, MK-02B			
510(K) Number	-	-	K202390	K210948	K180847	K222377
Device	Over the counter	Light based over the	Over the counter powered	Over the counter	Over the counter	Light based over the
Classification	powered light based	counter wrinkle	light based laser for acne	powered light based laser	powered light based	counter wrinkle
Name	laser for acne	reduction	(OLP)	for acne vulgaris	laser for acne vulgaris	reduction
			Light based over the counter wrinkle			
			Reduction (OHS)			
Device Product	OLP	OHS	OHS, OLP, ILY	OLP	OLP	OHS
Code						
Regulation number	21 CFR 878.4810	21 CFR 878.4810	21 CFR 878.4810	21 CFR 878.4810	21 CFR 878.4810	21 CFR 878.4810

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	Subject Device		Predicate Device 1	Predicate Device 2		Predicate Device 4
Indications for Use	The device is intended	Use of light based	For MK-66O, MK-	Tue Omnilux CLEAR	The Neutrogena Light	LED Mask Platinum
	for over-the-counter	treatment to reduce	66USBO, MK-02O:	acne facemask is an	Therapy Acne Mask+	MD is an over the
	(OTC) use to treat	wrinkles on the face.	The Aduro Light Beauty	over-the-counter device	is intended to emit	counter device that is
	patients with mild to		Mask (Model: MK-66O,	intended to emit energy	energy in the red and	indicated for the
	moderate acne vulgaris		MK-66USBO, MK-02O)	in the red and blue region	blue region of the	treatment on the full
	on the face.		emits energy in the red and	of the light spectrum,	spectrum,	face wrinkles.
			blue region of the spectrum,	specifically indicated to	specifically indicated	
			specifically indicated to treat	treat mild to moderate	to treat mild to	
			full face wrinkles and/or	acne vulgaris on the face.	moderate acne on the	
			mild to moderate acne.	_	face.	
			For MK-66USBA, MK-			
			02A:			
			The Aduro Light Beauty			
			Mask (Model: MK-			
			66USBA, MK-02A) is			
			intended to emit light in the			
			blue region of the spectrum,			
			specifically indicated to treat			
			mild to moderate acne on the			
			face.			
			For MK-66USBB, MK-02B:			
			The Aduro Light Beauty			
			Mask (Model: MK-			
			66USBB, MK-02B) is an			
			over the counter device that			
			is intended for the use in the			
			treatment of full-face			
			wrinkles.			
Area of application		Face	Face	Face	Face	Face
Wavelengths	Red: 645 nm \pm 20 nm	IR: 860 nm \pm 20 nm	Red: 640 nm \pm 10 nm	Red: $630 \text{ nm} \pm 5 \text{ nm}$	Red: 620-640 nm	IR: 820 - 880 nm
U U	Blue: $465 \text{ nm} \pm 20 \text{ nm}$	Red: 645 nm \pm 20 nm	Blue: $465 \text{ nm} \pm 10 \text{ nm}$	Blue: $412.5 \text{ nm} \pm 7.5 \text{ nm}$	Blue: 425-450 nm	Red: 630 - 690 nm
	LEDs	LEDs	LEDs	LEDs	LEDs	LEDs
Power intensity	Red: 0.76 mW/cm ²	Red: 0.56 mW/cm ²	Red+Blue: 30 mW/cm ²	Red: 16 mW/cm ²	Not publicly available	IR+Red: 2 mW/cm ²
	Blue: 1.20 mW/cm ²	IR: 1.40 mW/cm ²		Blue: 28 mW/cm ²		
Treatment dose	1 J/cm ² per treatment	1 J/cm ² per treatment	Not publicly available	Red: 9.5 J/cm ²	1.28 J/cm ² per	0.96 J/cm ²
	-	-		Blue: 16.8 J/cm ²	treatment	
					38.38 J/cm ²	
					Total 30 day dose	
Treatment time	8 minutes per day	8 minutes per day	10 minutes per day,	10 Minutes	10 Minutes per day	8 min each time
	30 days	30 days	3 times per week	4 times per week	30 days	
	-	-		6 weeks	-	

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	Subject Device		Predicate Device 1	Predicate Device 2	Predicate Device 3	Predicate Device 4
Total treatment time over recommended treatment period	240 minutes	240 minutes	300 minutes	240 minutes	300 minutes	Not publicly available
Power supply	Control unit : Input voltage 100 -240 V AC / 50 - 60 Hz, 15 VDC / 2A Applicator: 15 V AC	Control unit : Input voltage 100 -240 V AC / 50 - 60 Hz, 15 VDC / 2A Applicator: 15 V AC	For model MK-66O, MK- 66USBO: 3.7 VDC 2600 mAh Lithium battery Adapter for charging only: Input: 100-240 VAC; Output: 5 VDC, 2A For model MK-02O: 3.7 VDC, 2600 mAh Lithium battery	Not publicly available	Batteries	Main body input power: DC 5V, 2A Built-in battery: 3.7 V, 2000 mAh
Safety and EMC	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57	IEC 60601-1, IEC 60601-1-2, IEC 60601-1-6, IEC 60601-1-11, IEC 60601-2-57
Biocompatibility	ISO 10993-1	ISO 10993-1	ISO 10993-1, ISO 10993-5, ISO 10993-10	ISO 10993-1, ISO 10993-5, ISO 10993-10	ISO 10993-1	Not publicly available
Weight	System (B.Box Evo): 926 g Applicator: 0.12 kg	System (B.Box Evo): 926 g Applicator: 0.12 kg	0.8 kg	Not publicly available	Not publicly available	690 g Mask: 685 g
Dimensions, Applicator (W x H x D)	12 cm x 12 cm x 2.5 cm	12 cm x 12 cm x 2.5 cm	Not publicly available	Not publicly available	Not publicly available	224 mm x 313 mm x 172 mm
Dimensions, System (W x H x D)	210 mm x 150 mm x 43 mm	210 mm x 150 mm x 43 mm	Not publicly available	Not publicly available	Not publicly available	268 mm x 183 mm x 240 mm
Power Consumption (System)	30 Watt max.	30 Watt max.	Not publicly available	Not publicly available	Not publicly available	Not publicly available

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	Subject Device		Predicate Device 1	Predicate Device 2	Predicate Device 3	Predicate Device 4
Input (System)	Hz,	100 - 240 VAC 50 - 60 Hz, 0.6 A	AC 100 - 240 V	Not publicly available	Not publicly available	AC 100 – 240 V, 50 – 60 Hz
Output (System)	15V DC 15 V DC / 2 A	15 V DC / 2 A	DC5V - 2.1 A			DC 5V, 2A
			Nickel metal hydride (NiMH) battery, 3.7 V, 2000 mAh.			
Number of output modes (System)	1	1	1	1	1	1
Number of output channels and ports (System)	2 for each	2 for each	1	1	1	1
Software / Firmware / Microprocessor controlled	Yes	Yes	Yes	Yes	Yes	No
Sterilization	Not provided sterile	Not provided sterile	Not provided sterile	Not provided sterile	Not provided sterile	Not provided sterile

VII Substantial Equivalence

The B.LIGHT Clear and B.LIGHT Restore applicators have the same indications for use as the predicates, K202390, K210948, K180847 and K222377.

Intended Use/ Indications for Use

The BEMER Light System can only be used with the B.BOX Evo. The BEMER devices have similar indications for use, population and use environments as the predicates K202390, K210948 and K222377 but, similar to K180847.

Technological Characteristics

The technology of the LED's is identical to that of the predicate devices. The Power intensity (mW/cm^2) is lower than that of the predicates, K202390, K210948 and K222377.

Principles of Operation

The principle of operation is similar to the predicates, K202390, K210948, K18947 and K222377.

Non-clinical Testing

Performance testing involved multiple measurements of:

- o Software
- o Electrical / EMC
- Home healthcare
- Non laser-light source equipment
- Biocompatibility

Discussion of Differences

The general clinical and functional equivalence between anatomic sites and applicator use between Bemer (B. LIGHT Restore, B.LIGHT Clear) and predicate - Aduro Light Beauty Mask, Omnilux Clear and LED Mask Platinum MD.

Unlike the other devices, the BEMER Light System is controlled by an external control unit while the Predicate Devices have an integrated the controller.

This difference does not raise different risks or concerns of safety and effectiveness compared to the predicate.

VIII Conclusion

Based non-clinical performance testing and comparison to the predicates, the B.LIGHT Clear and B.LIGHT Restore have demonstrated they are substantially equivalent for safety and effectiveness to the predicate devices.