



September 11, 2021

Sunsmmed Protective Products Ltd.  
% Boyle Wang  
General Manager  
Shanghai Truthful Information Technology Co., Ltd.  
Room 608, No.738, Shangcheng Rd., Pudong  
Shanghai, Shanghai 200120  
China

Re: K211296  
Trade/Device Name: Surgical face mask  
Regulation Number: 21 CFR 878.4040  
Regulation Name: Surgical Apparel  
Regulatory Class: Class II  
Product Code: FXX  
Dated: August 5, 2021  
Received: August 10, 2021

Dear Boyle 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 <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-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>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Clarence W. Murray III -S

Clarence W. Murray, III, PhD  
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**

510(k) Number (if known)

K211296

Device Name

Surgical face mask

Indications for Use (Describe)

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

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 – K211296**

This 510(k) summary is being submitted in accordance with 21 CFR 807.92.

### **1.0 Submitter's information**

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Contact: Ms. Joyce Lee

Date of Preparation: 16/03/2021

### **Designated Submission Correspondent**

Mr. Boyle Wang

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### **2.0 Device information**

Trade name: Surgical face mask

Common name: Surgical face mask

Classification name: Mask, Surgical

Model(s): ear strap, 175×95mm

### **3.0 Classification**

Production code: FXX

Regulation number: 21CFR 878.4040

Classification: Class II

Panel: Surgical apparel

### **4.0 Predicate device information**

Manufacturer: Wuhan Dymex Healthcare Co., Ltd

Device: Surgical Face Mask

510(k) number: K182515

### **5.0 Indication for Use Statement**

Surgical face mask is intended to be worn to protect both the patient and healthcare

personnel from transfer of microorganisms, body fluids and particulate material. It is intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non sterile.

## 6.0 Device description

The Surgical face mask is single use, three-layer, flat-pleated style with ear straps and nose piece. The mask is manufactured with three layers, the inner and outer layers are made of nonwoven fabrics, and the middle layer is made of melt blown fabrics. The ear straps are held in place over the users' mouth and nose by two elastic ear straps welded to the facemask. The elastic ear straps are not made with natural rubber latex. The nose piece on the layers of facemask is to allow the user to fit the facemask around their nose, which is made of HDPE (high density polyethylene). The Surgical face mask will be provided in blue. The masks are sold non-sterile and are intended to be single use, disposable devices.

## 7.0 Technological Characteristic Comparison Table

**Table 1 - General Comparison**

| Item           |                | Proposed device                                                                                                                                                                                                                                                                                                                                              | Predicated device                                                                                                                                                                                                                                                                                                                                                             | Comparison |
|----------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| Product Code   |                | FXX                                                                                                                                                                                                                                                                                                                                                          | FXX                                                                                                                                                                                                                                                                                                                                                                           | Same       |
| Regulation No. |                | 21 CFR 878.4040                                                                                                                                                                                                                                                                                                                                              | 21 CFR 878.4040                                                                                                                                                                                                                                                                                                                                                               | Same       |
| Class          |                | II                                                                                                                                                                                                                                                                                                                                                           | II                                                                                                                                                                                                                                                                                                                                                                            | Same       |
| Product name   |                | Surgical face mask                                                                                                                                                                                                                                                                                                                                           | Surgical Face Mask                                                                                                                                                                                                                                                                                                                                                            | -          |
| 510(k) No.     |                | K211296                                                                                                                                                                                                                                                                                                                                                      | K182515                                                                                                                                                                                                                                                                                                                                                                       | -          |
| Models         |                | ear strap, 175×95mm                                                                                                                                                                                                                                                                                                                                          | ear strap                                                                                                                                                                                                                                                                                                                                                                     | -          |
| Intended Use   |                | The Surgical face mask is intended to be worn to protect both the patient and healthcare personnel from transfer of microorganisms, body fluids and particulate material. It is intended for use in infection control practices to reduce the potential exposure to blood and body fluids. This is a single use, disposable device(s), provided non sterile. | The Surgical Face Masks 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 is a single use, disposable device(s), provided non-sterile. | Same       |
| OTC use        |                | Yes                                                                                                                                                                                                                                                                                                                                                          | Yes                                                                                                                                                                                                                                                                                                                                                                           | Same       |
| Composite      |                | Flat Pleated, 3 layers                                                                                                                                                                                                                                                                                                                                       | Flat Pleated, 3 layers                                                                                                                                                                                                                                                                                                                                                        | Similar    |
| Material       | Internal layer | Spun-bond polypropylene                                                                                                                                                                                                                                                                                                                                      | Spun-bond polypropylene                                                                                                                                                                                                                                                                                                                                                       | Similar    |
|                | Middle layer   | Melt blown polypropylene                                                                                                                                                                                                                                                                                                                                     | Melt blown polypropylene                                                                                                                                                                                                                                                                                                                                                      | Similar    |
|                | External       | Spun-bond                                                                                                                                                                                                                                                                                                                                                    | Spun-bond polypropylene                                                                                                                                                                                                                                                                                                                                                       | Similar    |

|                    |            |                           |                             |         |
|--------------------|------------|---------------------------|-----------------------------|---------|
|                    | layer      | polypropylene             |                             |         |
|                    | Nose piece | High Density Polyethylene | Malleable polyethylene wire | * Gap 1 |
|                    | ear strap  | Polyester, spandex        | spandex                     | * Gap 2 |
| Color              |            | Blue                      | Yellow                      | * Gap 3 |
| Dimension (Length) |            | 17.5cm±0.5cm              | 17.5cm±0.2cm                | * Gap 4 |
| Dimension (Width)  |            | 9.5cm±0.5cm               | 9.5cm±0.2cm                 | * Gap 5 |
| Sterility          |            | Non-Sterile               | Non-Sterile                 | Same    |
| Single Use         |            | Yes                       | Yes                         | Same    |
| Sterile            |            | No                        | No                          | Same    |
| ASTM F2100 Level   |            | Level 2                   | Level 2                     | Same    |

\* Gap analysis:

Gap 1-3: the two devices have some difference in materials and product color.

Gap 4-5: the two devices share same dimensions otherwise the tolerance is different, the little deviation in tolerance..

## **8.0 Clinical Test Conclusion**

No clinical study implemented for the Surgical face mask.

## **9.0 Non-Clinical Test Conclusion**

The proposed device was tested and conformed to the related recognized standards and the requirements stated in the Guidance for Industry and FDA Staff: Surgical face masks – Premarket Notification [510(k)] Submission issued on March 5, 2004.

**Table 2 - Performance Testing**

| Items                                                    | Purpose                                                                                             | Acceptance Criteria<br>(Level 2, ASTM F2100-19) | Result                                             |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------|
| Bacterial filtration efficiency (BFE) (%)                | The purpose of the test is to evaluate the Bacterial filtration efficiency (BFE) (%)                | ≥98                                             | 98.9~99.7%<br>Pass                                 |
| Different pressure (mmH <sub>2</sub> O/cm <sup>2</sup> ) | The purpose of the test is to evaluate the Different pressure (mmH <sub>2</sub> O/cm <sup>2</sup> ) | <6.0 mmH <sub>2</sub> O/cm <sup>2</sup>         | 4.1~5.0 mmH <sub>2</sub> O/cm <sup>2</sup><br>Pass |

|                                                                                        |                                                                                                                                   |                                          |                                                                                                                                                                 |
|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sub-micron particulate filtration efficiency at 0.1 micron, % (PFE)                    | The purpose of the test is to evaluate the Sub-micron particulate filtration efficiency at 0.1 micron, % (PFE)                    | ≥98                                      | 98.03~98.86% Pass                                                                                                                                               |
| Resistance to penetration by synthetic blood, Minimum pressure in mmHg for pass result | The purpose of the test is to evaluate the Resistance to penetration by synthetic blood, Minimum pressure in mmHg for pass result | 29 of 32 test articles passed at 120mmHg | Test 1: 30 of 32 test articles passed at 120mmHg;<br>Test 2: 31 of 32 test articles passed at 120mmHg;<br>Test 3: 31 of 32 test articles passed at 120mmHg Pass |
| Flammability                                                                           | The purpose of the test is to evaluate the Flammability                                                                           | Class 1                                  | Class 1, Non Flammable Pass                                                                                                                                     |

**Table 3 - Biocompatibility Testing**

| Item          | Proposed Device                                                 | Result |
|---------------|-----------------------------------------------------------------|--------|
| Cytotoxicity  | Under the conditions of the study, the device is noncytotoxic.  | Pass   |
| Irritation    | Under the conditions of the study, the device is nonirritating. | Pass   |
| Sensitization | Under the conditions of the study, the device is nonsensitizing | Pass   |

## 10.0 **Conclusion**

The conclusions drawn from the nonclinical test demonstrate that the proposed device is as safe, as effective, and performs as well as the legally marketed predicated device.