

APPLICATION FOR CHILD RESISTANT PACKAGING TEST

On Behalf of



53mm Smooth Sided CR Closures

Model:53/400 Smooth Sided - US



Prepared for :



Prepared by : Beide (Shenzhen) Product Service Limited

**6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an
Dist, Shenzhen, China**

Date of Test : Nov.10-23,2020
Date of Report : Nov.24,2020
Report Number : B-S201133093



TEST REPORT US 16 CFR § 1700.20 Testing procedure for special packaging.	
Test by	Beide (Shenzhen) Product Service Limited
Address	6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an Dist, Shenzhen, China
Report body.....	Beide (Shenzhen) Product Service Limited
Address (China)	6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an Dist, Shenzhen, China
Applicant	
Address	
Client No	4286B687
Standard	US 16 CFR § 1700.20
Test Result	Compliance with US 16 CFR § 1700.20
Procedure deviation	N/A.
Non-standard test method	N/A.
Type of test object	53mm Smooth Sided CR Closures
Material	Outer closure: PP (polypropylene); Inner closure: PP (polypropylene); Seal liner: FS 3-19 Heat Seal Lined; Jar: PET
Trademark	N/A.
Model/type reference	53/400 Smooth Sided - US
Characterization & Condition of Sample :	Normal
Manufacturer	
Address	
Ambient Condition During Testing	NPT(normal pressure and temperature)



POINTS FOR ATTENTION

1. The test report is invalid without Special Seal for Testing or the official seal of test laboratory.
2. The duplicated report is invalid without Special Seal for Testing or the official seal of test laboratory again.
3. The test report is invalid without any signatures of the technical supervisor, the quality supervisor or the final approval.
4. The test report is invalid if being altered.
5. Any objections must be raised against to test laboratory within 15 days since the date the report is received. It will not be taken into consideration beyond this limit.
6. The test results apply only to the particular sample tested.
7. This report is based on the test of samples submitted by customers. The results are for reference only and cannot be used as proof.

Remark:

Sample photo:
(See appendix 1)

Product Structure:
(See appendix 2)

User manual:
(See appendix 3)

Conclusion Report
(See appendix 4)



Possible test case verdicts :	
test object does meet the requirement :	P(ass)
test object does not meet the requirement :	F(ail)
test object does not involve the requirement :	N/A
Test by : <u>Beide (Shenzhen) Product Service Limited</u> <u>6F, Bldg E, Hourui 3rd Ind Zone,</u> <u>Xixiang, Bao'an Dist, Shenzhen, China</u>	
Reported by : <u>Shen Xiao</u> Signature / Shen Xiao	<u>Nov. 24. 2020</u> Date
Checked by : <u>Austin Zhong</u> Signature / Austin Zhong	<u>Nov. 24. 2020</u> Date
Approved by : <u>Martin Wang</u> Signature / Martin Wang	<u>Nov. 24. 2020</u> Date



Test instructions for children	
1.	Reclosable packages, if assembled by the testing agency, shall be properly secured at least 72 hours prior to the opening described in instruction number 3 to allow the materials (e.g., the closure liner) to "take a set." Application torques must be recorded in the test report.
2.	All packages shall be handled so that no damage or jarring will occur during storage or transportation. The packages shall not be exposed to extreme conditions of heat or cold. The packages shall be tested at room temperature.
3.	Reclosable packages shall be opened and properly resecured one time (or more if appropriate), by the testing agency or other adult prior to testing. The opening and resecuring shall not be done in the presence of the children. (In the adult-resecuring test, the tester must not open and resecure the package prior to the test.) If multiple openings/resecurings are to be used, each of four (4) testers shall open and properly resecure one fourth of the packages once and then shall open and properly resecure each package a second, third, fourth, through tenth (or other specified number) time, in the same sequence as the first opening and resecuring. The packages shall not be opened and resecured again prior to testing. The name of each tester and the package numbers that he/she opens and resecures shall be recorded and reported. It is not necessary for the testers to protocol test the packages that they opened and resecured.
4.	The children shall have no overt physical or mental handicaps. No child with a permanent or temporary illness, injury, or handicap that would interfere with his/her effective participation shall be included in the test.
5.	The testing shall take place in a well lighted location that is familiar to the children and that is isolated from all distractions.
6.	Use from 1 to 4 groups of 50 children, No more than 20% of the children in each group shall be tested at or obtained from any given site. Each group of children shall be randomly selected as to age, subject to the limitations set forth below. Thirty percent of the children in each group shall be of age 42-44 months, 40% of the children in each group shall be of age 45-48 months, and 30% of the children in each group shall be of age 49-51 months.
7.	The difference between the number of boys and the number of girls in each age range shall not exceed 10% of the number of children in that range. The children selected should have no obvious or overt physical or mental handicap. A parent or guardian of each child shall read and sign a consent form prior to the child's participation. (The Commission staff will not disregard the results of tests performed by other parties simply because informed consent for children is not obtained.)
8.	The tester, or another adult, shall escort a pair of children to the test area. The tester shall seat the two children so that there is no visual barrier between the children and the tester.
9.	The tester shall talk to the children to make them feel at ease.
10.	The children shall not be given the impression that they are in a race or contest. They are not to be told that the test is a game or that it is fun. They are not to be offered a reward.
11.	The tester shall record all data prior to, or after, the test so that full attention can be on the children during the test period.
12.	The tester shall use a stopwatch(s) or other timing devices to time the number of seconds it takes the child to open the package and to time the 5-minute test periods.
13.	To begin the test, the tester shall hand the children identical packages and say, "PLEASE TRY TO OPEN THIS FOR ME."
14.	If a child refuses to participate after the test has started, the tester shall reassure the child and gently encourage the child to try. If the child continues to refuse, the tester shall ask the child to hold the package in his/her lap until the other child is finished. This pair of children shall not be eliminated from the results unless the refusing child disrupts the participation of the other child.
15.	Each child shall be given up to 5 minutes to open his/her package. The tester shall watch the children at all times during the test. The tester shall minimize conversation with the children as long as they continue to attempt to open their packages. The tester shall not discourage the children verbally or with facial expressions. If a child gets frustrated or bored and stops trying to open his/her package, the tester shall reassure the child and gently encourage the child to keep trying (e.g., "please try to open the package").

Test instructions for children	
16.	The children shall be allowed freedom of movement to work on their packages as long as the tester can watch both children (e.g., they can stand up, get down on the floor, or bang or pry the package).
17.	If a child is endangering himself or others at any time, the test shall be stopped and the pair of children eliminated from the final results.
18.	The children shall be allowed to talk to each other about opening the packages and shall be allowed to watch each other try to open the packages.
19.	A child shall not be allowed to try to open the other child's package.
20.	If a child opens his/her package, the tester shall say, "THANK YOU," take the package from the child and put it out of the child's reach. The child shall not be asked to open the package a second time.
21.	At the end of the 5-minute period, the tester shall demonstrate how to open the package if either child has not opened his or her package. A separate "demo" package shall be used for the demonstration.
22.	Prior to beginning the demonstration, the tester shall ask the children to set their packages aside. The children shall not be allowed to continue to try to open their packages during the demonstration period.
23.	The tester shall say, "WATCH ME OPEN MY PACKAGE".
24.	Once the tester gets the children's full attention, the tester shall hold the demo package approximately two feet from the children and open the package at a normal speed as if the tester were going to use the contents. There shall be no exaggerated opening movements.
25.	The tester shall not discuss or describe how to open the package.
26.	To begin the second 5-minute period, the tester shall say, "NOW YOU TRY TO OPEN YOUR PACKAGES."
27.	If one or both children have not used their teeth to try to open their packages during the first 5 minutes, the tester shall say immediately before beginning the second 5-minute period, "YOU CAN USE YOUR TEETH IF YOU WANT TO." This is the only statement that the tester shall make about using teeth.
28.	The test shall continue for an additional 5 minutes or until both children have opened their packages, whichever comes first.
29.	At the end of the test period, the tester shall say, "THANK YOU FOR HELPING." If children were told that they could use their teeth, the tester shall say, "I KNOW I TOLD YOU THAT YOU COULD USE YOUR TEETH TODAY, BUT YOU SHOULD NOT PUT THINGS LIKE THIS IN YOUR MOUTH AGAIN" In addition, the tester shall say, "NEVER OPEN PACKAGES LIKE THIS WHEN YOU ARE BY YOURSELF. THIS KIND OF PACKAGE MIGHT HAVE SOMETHING IN IT THAT WOULD MAKE YOU SICK."
30.	The children shall be escorted back to their classroom or other supervised area by the tester or another adult.
31.	If the children are to participate in a second test, the tester shall have them stand up and stretch for a short time before beginning the second test. The tester shall take care that the children do not disrupt other tests in progress.



Test instructions for adult	
1.	No adult with a permanent or temporary illness, injury, or disability that would interfere with his/her effective participation shall be included in the test.
2.	Each adult shall read and sign a consent form prior to participating. Any appropriate language from the consent form may be used to recruit potential participants. The form shall include the basic elements of informed consent as defined in 16 CFR 1028.116. Examples of the forms used by the Commission staff for testing are shown at § 1700.20(d). Before beginning the test, the tester shall say, "PLEASE READ AND SIGN THIS CONSENT FORM." If an adult cannot read the consent form for any reason (forgot glasses, illiterate, etc.), he/she shall not participate in the test.
3.	Each adult shall participate individually and not in the presence of other participants or onlookers.
4.	The tests shall be conducted in well lighted and distraction-free areas.
5.	Use a group of 100 senior adults. Not more than 24% of the senior adults tested shall be obtained from or tested at any one site. Each group of senior adults shall be randomly selected as to age, subject to the limitations set forth below. Twenty-five percent of the participants shall be 50-54 years of age, 25% of participants shall be 55-59 years of age, and 50% of the participants shall be 60-70 years old. Seventy percent of the participants of ages 50-59 and ages 60-70 shall be female (17 or 18 females shall be apportioned to the 50-54 year age group). No individual tester shall administer the test to more than 35% of the senior adults tested. The adults selected should have no obvious or overt physical or mental disability.
6.	Records shall be filled in before or after the test, so that the tester's full attention is on the participant during the test period. Recording the test times to open and resecure the package are the only exceptions.
7.	To begin the first 5-minute test period, the tester says, "I AM GOING TO ASK YOU TO OPEN AND PROPERLY CLOSE THESE TWO IDENTICAL PACKAGES ACCORDING TO THE INSTRUCTIONS."
8.	The first package is handed to the participant by the tester, who says, "PLEASE OPEN THIS PACKAGE ACCORDING TO THE INSTRUCTIONS" If the package contains product, the tester shall say, "PLEASE EMPTY THE (PILLS, TABLETS, CONTENTS, etc.) INTO THIS CONTAINER." After the participant opens the package, the tester says, "PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS."
9.	Participants are allowed up to 5 minutes to read the instructions and open and close the package. The tester uses a stopwatch(s) or other timing device to time the opening and resealing times. The elapsed times in seconds to open the package and to close the package are recorded on the data sheet as two separate times.
10.	After 5 minutes, or when the participant has opened and closed the package, whichever comes first, the tester shall take all test materials from the participant. The participant may remove and replace the closure more than once if the participant initiates these actions. If the participant does not open the package and stops trying to open it before the end of the 5-minute period, the tester shall say, "ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?" If the participant indicates that he/she is finished or cannot open the package and does not wish to continue trying, skip to Instruction 13.
11.	To begin the second test period, the tester shall give the participant another, but identical, package and say, "THIS IS AN IDENTICAL PACKAGE. PLEASE OPEN IT ACCORDING TO THE INSTRUCTIONS." If the package contains product, the tester shall say, "PLEASE EMPTY THE (PILLS, TABLETS, CONTENTS, etc.) INTO THIS CONTAINER." After the participant opens the package, the tester says, "PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS."
12.	The participants are allowed up to 1 minute (60 full seconds) to open and close the package. The elapsed times in seconds to open and to close the package are recorded on the data sheet as two separate times. The time that elapses between the opening of the package and the end of the instruction to close the package is not counted as part of the 1-minute test time.

Test instructions for adult	
13.	After the 1-minute test, or when the participant has opened and finished closing the package, whichever comes first, the tester shall take all the test materials from the participant. The participant shall not be allowed to handle the package again. If the participant does not open the package and stops trying to open it before the end of the 1-minute period, the tester shall say, "ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?" If the participant indicates that he/she is finished or cannot open the package and does not wish to continue trying, this shall be counted as a failure of the 1-minute test.
14.	Participants who do not open the package in the first 5-minute test period are asked to open and close two non-child-resistant screening packages. The participants are given a 1-minute test period for each package. The tester shall give the participant a package and say, "PLEASE OPEN AND PROPERLY CLOSE THIS PACKAGE." The tester records the time for opening and closing, or 61 seconds, whichever is less, on the data sheet. The tester then gives the participant the second package and says, "PLEASE OPEN AND PROPERLY CLOSE THIS PACKAGE." The time to open and resecure, or 61 seconds, whichever is less, shall be recorded on the data sheet.
15.	Participants who cannot open and resecure both of the non-child-resistant screening packages are not counted as part of the 100-seniors panel. Additional participants are selected and tested.
16.	No adult may participate in more than two tests per sitting. If a person participates in two tests, the packages tested shall not be the same ASTM type of package.
17.	If more adults in a sex or age group are tested than are necessary to determine SAUE, the last person(s) tested shall be eliminated from that group.

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.



| Test instructions for adult | | |
|---|---|----|
| According to table 1 at most 3 children can open the package in First 5 minutes. | 0 | P |
| According to table 1 at most 5 children can open the package in Full 10 minutes | 0 | P |
| According to table 2 at least 90 % or more of the eligible adults are able to open the package in the first 5 min test period and open and properly reclose it in the 1 min test period | 100% | P |
| Every one of the testing should be marked pass or fail | -- | P |
| Test by | Beide(Shenzhen)Product Service Limited | -- |
| Date of Test | Nov.10-23,2020 | -- |
| Manufacturer | -- | -- |
| Specification is provided | -- | -- |
| Test place | Community & Senior Living Center & Park | -- |
| Test Children distribution | -- | -- |
| Statistical result record | -- | -- |
| Test record of children | See table 1 | P |
| Test Seniors distribution | -- | -- |
| Statistical result record | -- | -- |
| Test record of adults | See table 2 | P |
| Test conclusion | -- | P |



Test place: Community

Test Children distribution

| Age(months) | Boys | Girls | Total |
|-------------|------|-------|-------|
| 42-44 | 7 | 8 | 15 |
| 45-48 | 10 | 10 | 20 |
| 49-51 | 8 | 7 | 15 |
| Total | 25 | 25 | 50 |

TABLE 1-Statistical result

| Test panel
(number of
people) | Item | Age | 42-44
(months) | 45-48
(months) | 49-51
(months) | Total |
|-------------------------------------|--|---------|-------------------|-------------------|-------------------|-------|
| 50 | First 5 minutes
(Before Demonstration) | Males | 0 | 0 | 0 | 0 |
| | | Females | 0 | 0 | 0 | |
| | The second 5 minutes
(After Demonstration) | Males | 0 | 0 | 0 | 0 |
| | | Females | 0 | 0 | 0 | |
| Total | Full 10 minutes | Males | 0 | 0 | 0 | 0 |
| | | Females | 0 | 0 | 0 | |

Note:

1. The data in the table is the statistical result of a child's successful opening at each age.
2. First 5 minutes : Each child shall be given a package with the request that it be opened by whatever means the child wishes to use. in order to achieve this, 5 min shall be allowed.
3. Full 10 minutes: At the end of the 5-minute period, the tester shall demonstrate how to open the package if either child has not opened his or her package. The child shall then have a further 5 min to open the package, The two tests lasted ten minutes.

Test place: Senior Living Center & Park



Test Seniors distribution

| Age(years old) | Male | Female | Total |
|----------------|------|--------|-------|
| 50-54 | 8 | 17 | 25 |
| 55-59 | 7 | 18 | 25 |
| 60-70 | 15 | 35 | 50 |
| Total | 30 | 70 | 100 |

TABLE 2-Statistical result

| Item | Age | 50-54
(years old) | 55-59
(years old) | 60-70
(years old) | Total |
|-------------|---------|------------------------|------------------------|------------------------|-------|
| First test | Males | 0 | 0 | 0 | 0 |
| | Females | 0 | 0 | 0 | |
| Second test | Males | 0 | 0 | 0 | 0 |
| | Females | 0 | 0 | 0 | |

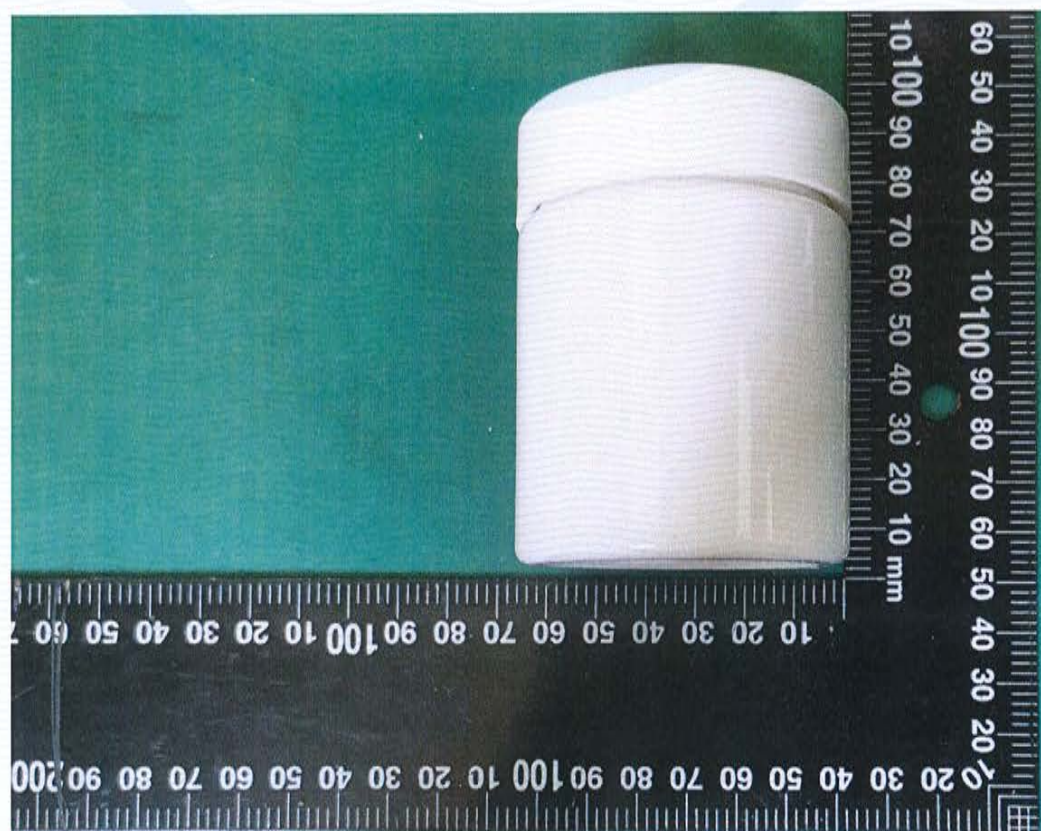
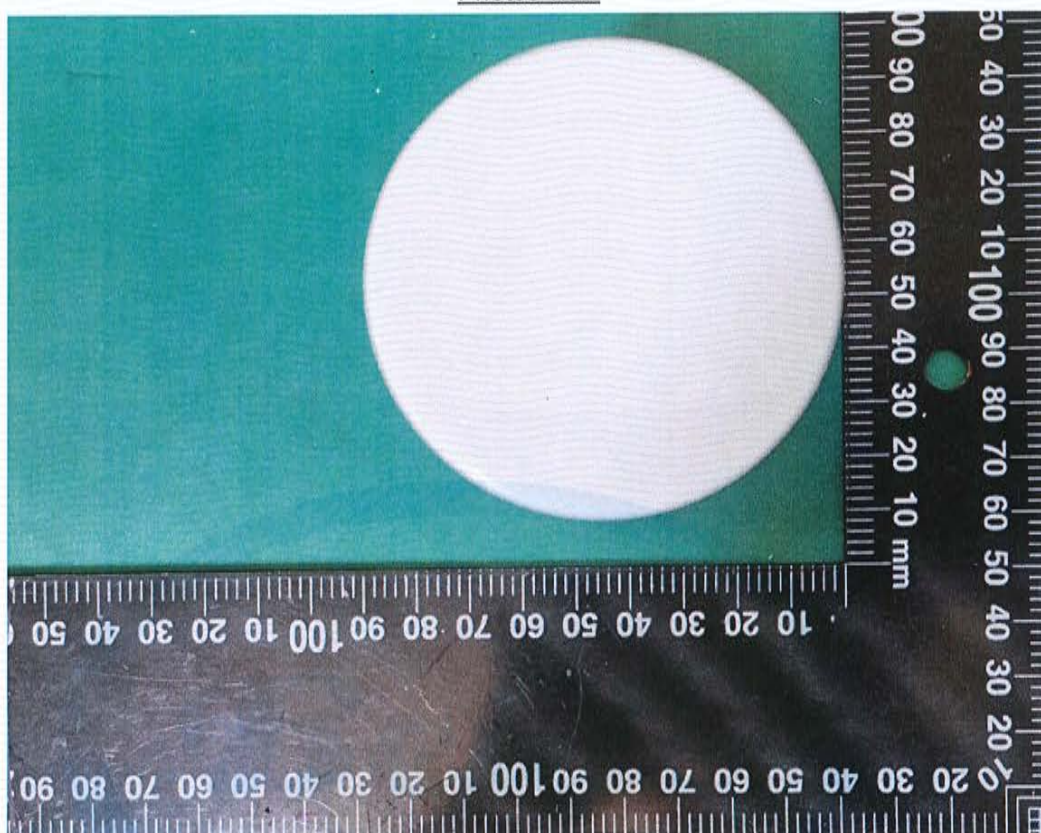
Note:

1. The data in the table is the statistics result that Seniors unsuccessful first test and unsuccessful second test at each age.
2. First test : The Seniors did not successfully open the package within 5 minutes.
3. Second test: The Seniors successfully open the package in the first 5 minutes test period and unsuccessfully open and properly reclose it in the next 1 minute test period.



Appendix 1

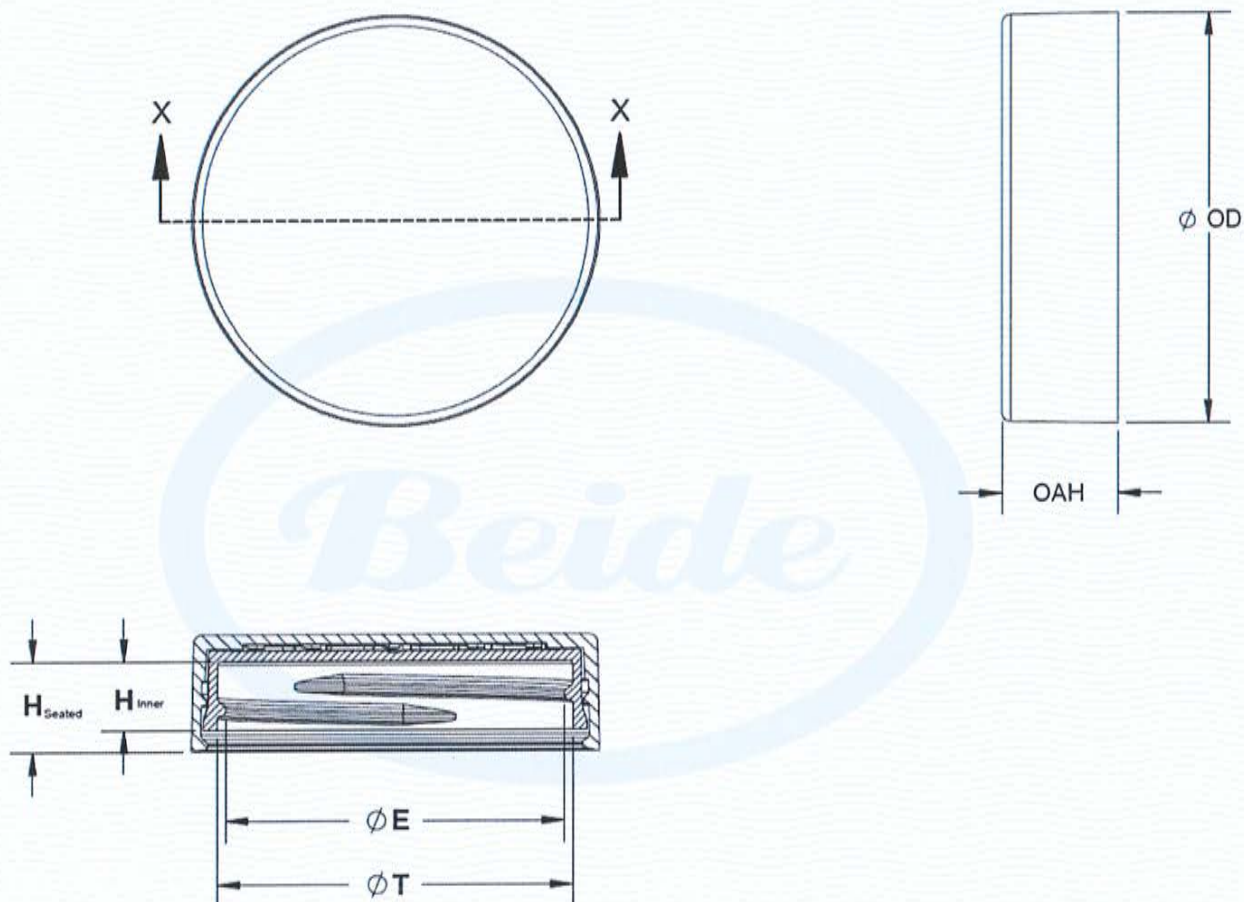
Photos view

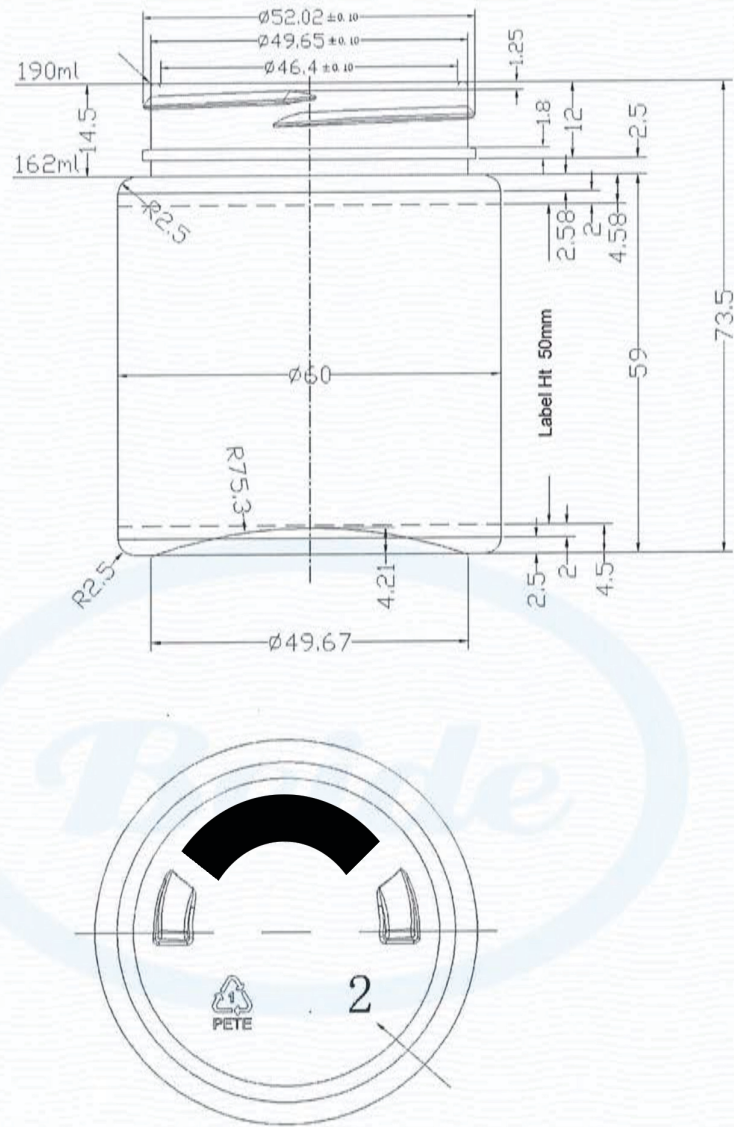




Appendix 2

Product Structure





Cavity No.

Remarks: Length unit-mm



Appendix 3

User manual

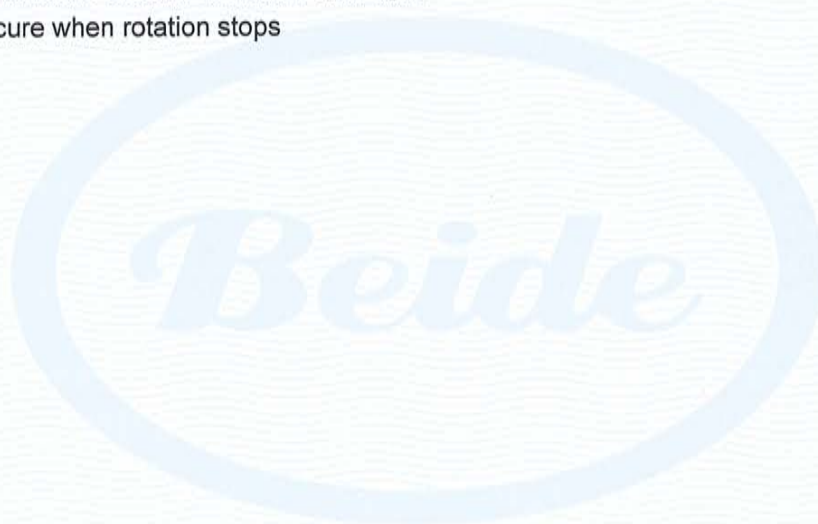
Opening Instructions:

TO OPEN:

- 1). Push down on closure
- 2). While pushing down, rotate closure counter-clockwise to unscrew
- 3). Remove closure

TO CLOSE:

- 1). Place closure on top of jar
- 2). Push down and rotate closure clockwise until tight
- 3). Closure is secure when rotation stops



Appendix 4

Conclusion Report

Below is Beide (Shenzhen) Product Service Limited Final Report 53mm Smooth Sided CR Closures as a Poison Protection Package. The test units were evaluated using the Consumer Product Safety Commission Protocol and Standards. Study indicates 53mm Smooth Sided CR Closures fulfills requirements for a Poison Prevention Package as per current Code of Federal Regulations (C.F.R.) Title 16, Part 1700.20.

SUMMARY

Report to: [REDACTED]

Samples of: 53mm Smooth Sided CR Closures

Contract No.: B-S201133093

Samples Received: Nov.10,2020

Objective

[REDACTED] Incorporated submitted 53mm Smooth Sided CR Closures to determine if the bottle/closure would be compliant with the Consumer Product Safety Commission's current protocol and standards for poison prevention packaging Code of Federal Regulations (C.F.R.) Title 16, Part 1700.20.

Procedures

The protocol for evaluation of packaging for poison prevention (current C.F.R. Title 16, Part 1700.20) was strictly adhered to for this study.

Panelists

During this study 50 children (42 to 51 months of age) and 100 seniors (50 to 70 years-old, 70% female) were employed.

Results

Results of the study indicate that the 53mm Smooth Sided CR Closures meets the standards for poison prevention packaging per current C.F.R. Title 16, Part 1700.20.

