



“We Point Toward Product Solutions”

**100 Unit Senior-Adult Protocol Test ISO 8317
January 9, 2021 - February 11, 2021**

Conducted for:

A&A Global Imports

Test No.:

ANA21-01A

Sample Type

Press to Close Pouch

Bird Dog Marketing Group, LLC

166 Farmington Lane

Lancaster, PA 17601

(717) 475-9751

(717) 615-9022



Test Objective & Procedures

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317
January 9, 2021 - February 11, 2021**

Report to: A&A Global Imports
3359 E. 50th St
Vernon, CA 90058

Press to Close Pouch

OBJECTIVE

A&A Global Imports submitted the following test for evaluation by Bird Dog Marketing Group, LLC to see if it meets the senior-adult (50-70 years of age) criteria set forth by the ISO 8317, Clause 4.5

ISO 8317 was used per the C.P.S.C. Poison Prevention Packaging Act (PPPA) Enforcement Discretion Testing Advisory Letter dated June 25, 2020, extended on November 12, 2020 and extended again on April 22, 2021 for poison prevention packaging under the alternative procedure for COVID-19 using ISO 8317 as the test method.

PROCEDURE

The test has been conducted as per ISO 8317 Child Resistant Packaging — Requirements and testing procedures for reclosable packages.

This test follows all the guidelines set forth by the C.P.S.C., Poison Prevention Packaging Act (PPPA) Enforcement Discretion Testing Advisory Letter dated on June 25, 2020 and extended on November 12, 2020 as a result of the COVID-19 pandemic by utilizing ISO 8317 as the acceptable alternative for the senior-adult resealing protocol.

DISCLAIMER

Bird Dog Marketing Group, LLC (Lancaster, PA. USA) is an independent marketing research firm specializing in field testing of child-resistant packages. It is to be noted that to the best of our knowledge, there are no commercial and or conflicts of interest between Bird Dog Marketing Group, LLC and A&A Global Imports at the time of this study. The results of this protocol are based only on the data collected from the package samples received at the time of testing. This study follows the guidelines set forth by the International Organization for Standardization under ISO 8317:2015. BDMG recommends the manufacturer establish a Standard Operating Procedure method such as an annual or bi-annual recertification process to ensure consistent compliance with the standard.

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Press to Close Pouch

Picture





Test Results and Discussion

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317
January 9, 2021 - February 11, 2021**

RESULTS AND DISCUSSION

RESULTS AND DISCUSSION:

The overall Result of test ANA21-01A was "PASS" The evaluation of the packages proves that all requirements of ISO 8317 and CPSC are fulfilled per the Poison Prevention Packaging Act (PPPA) Enforcement Discretion Testing Advisory Letter dated on June 25, 2020, extended on November 12, 2020 and extended again on April 22, 2021.

Test ANA21-01A consisted of one hundred (100) adults (50-70 years of age) being tested in twelve (12) sites from January 9, 2021 through February 11, 2021. This test is a one hundred (100) unit senior-adult (50-70 years of age) protocol as set forth by the International Organization for Standardization (ISO) under 8317 Clause 4.5 and the C.P.S.C. per the Poison Prevention Packaging Act (PPPA) Enforcement Discretion Testing Advisory Letter dated on June 25, 2020, extended on November 12, 2020 and extended again on April 22, 2021 as a result of the COVID-19 pandemic by utilizing ISO 8317 as the acceptable alternative for the senior-adult resealing protocol.

The results of this study are as follows.

1) NONE (0) of the senior-adults failed to open their first package (Package #1) during the 5-minute test period.

No demonstration of how to open the package was given by the supervisor. A period of 5-minutes was allowed for the test participants to familiarize themselves with the package to be tested by reading the opening instructions and then attempting to open and reclose it properly. The test participant was not allowed to consult with the test supervisor or other participants in the test.

- Refer to Adult Test Detail Report

2) THREE (3) of the eligible senior-adults failed to open their second package (Package #2) in the 1-minute test period.

Participants who successfully opened the first test package within the 5-minute period were given a new identical package and were requested to open and reclose this one as quickly as possible. A one (1) minute test period was allowed for the participant to open and properly reclose the new package.

- Refer to Adult Test Detail Report

3) FIVE (5) of the adults failed to re-secure their second package.

- Refer to Adult Test Detail Report

4) The ISO 8317 and the C.P.S.C. requires a SAUE of no less than 90.00% for a 100-unit Senior-Adult Protocol Test.

5) The SAUE for this package is 92.00% with 100 Senior-Adults Tested.

6) Based on the results of this test, the submitted package meets the senior adult criteria set forth by the C.P.S.C., dated June 25, 2020, extended on November 12, 2020 and extended again on April 22, 2021 for poison prevention packaging under the alternative procedure for COVID-19 using ISO 8317 as the test method.



Test Results and Discussion

Bird Dog Marketing Group, LLC

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TEST PACKAGE DESCRIPTION:

The container used for test ANA21-01A was a Press to Close Pouch.

The composition of the package and its component information is as follows:

CLOSURE:

Description: Press to Close

Model: QDP-G-2

Manufacturer: Qindao Dejili Packaging Technology Co., Ltd.

Material: High Soft PE

Color: Green

Lot No.: QDP-20-2

POUCH:

Description: Pinch N Pull

Model: QA-G-2

Manufacturer: Qindao Dejili Packaging Technology Co., Ltd.

Material: PET/VMPET/PE 5MIL Matte

Color: Natural

Lot No.: QDP-T-2

The instructions on the pouch explaining how to open and resecure the package read:

1. Locate green tab
2. Pinch green tab (with thumb and index finger)
3. Pull to open

All with Picto.

A picture of the test package appears on Page 3.

DIRECTIONS GIVEN TO ADULTS:

Before beginning the test, the tester said, "PLEASE READ AND SIGN THIS CONSENT FORM." If an adult could not read the consent form for any reason (forgot glasses, illiterate, etc.), he/she did not participate in the test.

To begin the first 5-minute test period, the tester said, "I AM GOING TO ASK YOU TO OPEN AND PROPERLY CLOSE THESE TWO IDENTICAL PACKAGES ACCORDING TO THE INSTRUCTIONS FOUND ON THE POUCH."

The first package was handed to the participant by the tester, who said, "PLEASE OPEN THIS PACKAGE ACCORDING TO THE INSTRUCTIONS ON THE POUCH."



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The tester then said, "PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS ON THE POUCH."

If the participant did not open the package and stops trying to open it before the end of the 5-minute period, the tester said, "ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?"

To begin the second test period, the tester gave the participant another, but identical, package and said, "THIS IS AN IDENTICAL PACKAGE. PLEASE OPEN IT ACCORDING TO THE INSTRUCTIONS ON THE POUCH."

The tester then said, "PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS ON THE POUCH."

If the participant did not open the package and stops trying to open it before the end of the 1-minute period, the tester said, "ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?"

PACKAGE PREPARATION:

- 1) Bird Dog Marketing Group, LLC received test sample packages on on January 3, 2021.
- 2) The packages were assembled and set in the locked position on January 6, 2021 by Bird Dog Marketing Group, LLC
- 3) The testing agency checked each package by opening and closing them one time.

Submitted by: Mark D. Perkins

Senior Member



Adult-Child Resistant Packages Test Summary Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317**
January 9, 2021 - February 11, 2021

Gender	Age Group/ Years	No. of Adults Tested	No. Failed to Open		2nd Pkg Reapplication Failures	No. Passed	Adult Success Percentage
			Pkg 1	Pkg 2			
Female	50-54	18	0.00	0.00	1.00	17.00	94.44
Male	50-54	7	0.00	0.00	0.00	7.00	100.00
		25	0.00	0.00	1.00	24.00	96.00
Female	55-59	17	0.00	0.00	1.00	16.00	94.12
Male	55-59	8	0.00	0.00	0.00	8.00	100.00
		25	0.00	0.00	1.00	24.00	96.00
Female	60-70	35	0.00	3.00	2.00	30.00	85.71
Male	60-70	15	0.00	0.00	1.00	14.00	93.33
		50	0.00	3.00	3.00	44.00	88.00
Report Totals:		100	0.00	3.00	5.00	92.00	92.00



Proctor Participation Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317**
January 9, 2021 - February 11, 2021

No. of Test Participants: 100.00
Max. Participants per Proctor: 100.00 %

Proctor Id	Name	No. of Males	No. of Females	Total No.	Percent
ADL	Alice Lloyd	13	20	33	33.00
BFL	Bruce Lloyd	2	15	17	17.00
JMG	Jodi Gearhart	3	17	20	20.00
TMR	Tina Ries	12	18	30	30.00
Report Totals:		30	70	100	



Site Participation Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317
January 9, 2021 - February 11, 2021**

No. of Test Participants: 100.00

Max. Participants per Site: 100.00 %

Site Id	Description	No. of Males	No. of Females	Total No.	Percent
BF	Buckfield	1	0	1	1.00
CCI	Irmo Chamber	4	10	14	14.00
CYFB	Cystic Fibrosis	1	6	7	7.00
DG	Dutchway - Gap	0	4	4	4.00
GOBMN	Grocery Outlet Bargain Market New Holland	4	6	10	10.00
KJC	KJ's Market	0	9	9	9.00
LOWESC	Lowe's Foods	9	10	19	19.00
PNM	The Peanut Man	2	6	8	8.00
QH	Quentin Haus	6	6	12	12.00
WB	Wetherburn	1	0	1	1.00
WSLP	Weis Lititz Pike	1	2	3	3.00
WSSB	Weis Market Stony Battery	1	11	12	12.00
Report Totals:		30	70	100	



Age Distribution Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317**
January 9, 2021 - February 11, 2021

Age (Years)	No. of Males	No. of Females	Total Participants
50	2	4	6
51	0	2	2
52	2	2	4
53	2	6	8
54	1	4	5
55	2	1	3
56	2	3	5
57	2	7	9
58	1	6	7
59	1	0	1
60	2	4	6
61	3	6	9
62	0	3	3
63	5	4	9
64	1	3	4
65	1	2	3
66	1	2	3
67	1	3	4
68	1	3	4
69	0	2	2
70	0	3	3
Report Totals:	30	70	100



Adult-Child Resistant Packages Test Detail Report

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Customer Test No:

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January 9, 2021 - February 11, 2021

Sample No.	M/F	Age Group/ Years	Test Date	Birth-Date	Age/ Year	Site Id	Proctor Id	Vial Package #1			Vial Package #2			Resc (Y/N)	Ease Code
								Removal (Sec)	Secure (Sec)	Total (Sec)	Removal (Sec)	Secure (Sec)	Total (Sec)		
002	F	50-54	1/9/2021	1/17/1967	53	LOWESC	ADL	8	4	12	5	2	7	Y	Easy
013	F	50-54	1/19/2021	5/5/1966	54	CCI	ADL	7	2	9	13	3	16	Y	Hard
021	F	50-54	1/20/2021	12/16/1969	51	PNM	BFL	11	1	12	5	1	6	Y	Hard
023	F	50-54	1/20/2021	9/15/1967	53	PNM	BFL	59	2	61	13	2	15	Y	Hard
026	F	50-54	1/20/2021	10/29/1967	53	PNM	BFL	13	2	15	9	2	11	Y	Average
028	F	50-54	1/21/2021	8/10/1968	52	KJC	BFL	12	2	14	5	1	6	Y	Average
029	F	50-54	1/21/2021	2/21/1969	51	KJC	BFL	8	3	11	10	4	14	Y	Easy
030	F	50-54	1/21/2021	9/8/1970	50	KJC	BFL	17	4	21	7	3	10	Y	Very Easy
032	F	50-54	1/21/2021	4/5/1970	50	KJC	BFL	15	3	18	6	4	10	Y	Easy
057	F	50-54	2/4/2021	9/11/1966	54	GOBMN	TMR	9	2	11	14	2	16	Y	Easy
058	F	50-54	2/4/2021	3/28/1970	50	GOBMN	TMR	7	2	9	10	2	12	Y	Hard
061	F	50-54	2/10/2021	9/19/1966	54	CYFB	TMR	9	2	11	2	2	4	N	Average
062	F	50-54	2/10/2021	2/2/1969	52	CYFB	TMR	11	2	13	8	2	10	Y	Average
063	F	50-54	2/10/2021	3/3/1966	54	CYFB	TMR	6	2	8	10	2	12	Y	Easy
064	F	50-54	2/10/2021	5/21/1967	53	CYFB	TMR	23	2	25	8	2	10	Y	Average
065	F	50-54	2/10/2021	3/30/1970	50	CYFB	TMR	23	2	25	6	2	8	Y	Hard
068	F	50-54	2/11/2021	12/2/1967	53	DG	JMG	6	2	8	30	2	32	Y	Hard
069	F	50-54	2/11/2021	11/6/1967	53	DG	JMG	18	2	20	12	2	14	Y	Hard
081	M	50-54	1/13/2021	9/29/1967	53	CCI	ADL	10	3	13	6	2	8	Y	Hard
084	M	50-54	1/20/2021	8/14/1966	54	PNM	BFL	11	2	13	5	3	8	Y	Average
085	M	50-54	1/20/2021	9/25/1968	52	PNM	BFL	7	2	9	9	2	11	Y	Easy
093	M	50-54	2/4/2021	4/21/1967	53	GOBMN	TMR	12	2	14	10	2	12	Y	Average
096	M	50-54	2/4/2021	8/5/1970	50	GOBMN	TMR	5	2	7	4	2	6	Y	Average
099	M	50-54	2/10/2021	10/1/1968	52	WB	JMG	18	3	21	26	3	29	Y	Very Hard
100	M	50-54	2/10/2021	5/3/1970	50	BF	TMR	9	2	11	5	2	7	Y	Average
003	F	55-59	1/9/2021	1/7/1964	57	LOWESC	ADL	11	5	16	9	4	13	Y	Average
005	F	55-59	1/9/2021	10/14/1962	58	LOWESC	ADL	14	4	18	6	3	9	Y	Average
008	F	55-59	1/9/2021	9/5/1962	58	LOWESC	ADL	15	5	20	7	3	10	N	Average
010	F	55-59	1/9/2021	4/25/1963	57	LOWESC	ADL	12	2	14	9	2	11	Y	Average
011	F	55-59	1/13/2021	11/14/1964	56	CCI	ADL	9	7	16	5	2	7	Y	Average
012	F	55-59	1/13/2021	4/11/1962	58	CCI	ADL	28	2	30	6	2	8	Y	Hard
016	F	55-59	1/13/2021	2/23/1965	55	CCI	ADL	12	3	15	11	5	16	Y	Average
018	F	55-59	1/13/2021	12/27/1963	57	CCI	ADL	52	4	56	33	4	37	Y	Hard
019	F	55-59	1/13/2021	12/10/1963	57	CCI	ADL	27	5	32	28	3	31	Y	Very Hard
053	F	55-59	2/4/2021	10/9/1962	58	GOBMN	TMR	9	3	12	15	3	18	Y	Easy
055	F	55-59	2/4/2021	12/31/1964	56	GOBMN	TMR	19	2	21	7	2	9	Y	Hard
056	F	55-59	2/4/2021	11/25/1963	57	GOBMN	TMR	7	2	9	15	2	17	Y	Easy



Adult-Child Resistant Packages Test Detail Report

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January 9, 2021 - February 11, 2021

Sample No.	M/F	Age Group/ Years	Test Date	Birth-Date	Age/ Year	Site Id	Proctor Id	Vial Package #1			Vial Package #2			Resc (Y/N)	Ease Code
								Removal (Sec)	Secure (Sec)	Total (Sec)	Removal (Sec)	Secure (Sec)	Total (Sec)		
059	F	55-59	2/9/2021	12/17/1962	58	WSLP	JMG	4	2	6	4	2	6	Y	Average
060	F	55-59	2/9/2021	12/16/1964	56	WSLP	JMG	14	2	16	6	2	8	Y	Average
066	F	55-59	2/10/2021	8/23/1962	58	CYFB	TMR	7	2	9	4	2	6	Y	Easy
067	F	55-59	2/11/2021	6/6/1963	57	DG	JMG	5	2	7	5	2	7	Y	Easy
070	F	55-59	2/11/2021	3/13/1963	57	DG	JMG	10	2	12	13	2	15	Y	Average
072	M	55-59	1/9/2021	1/2/1962	59	LOWESC	ADL	9	3	12	12	2	14	Y	Average
073	M	55-59	1/9/2021	5/8/1964	56	LOWESC	ADL	22	2	24	13	3	16	Y	Very Hard
077	M	55-59	1/9/2021	2/11/1962	58	LOWESC	ADL	18	5	23	12	4	16	Y	Average
080	M	55-59	1/13/2021	2/17/1963	57	CCI	ADL	15	3	18	11	3	14	Y	Hard
094	M	55-59	2/4/2021	8/30/1963	57	GOBMN	TMR	9	2	11	9	2	11	Y	Hard
095	M	55-59	2/4/2021	6/9/1965	55	GOBMN	TMR	10	2	12	12	2	14	Y	Easy
097	M	55-59	2/9/2021	4/1/1965	55	WSLP	JMG	13	2	15	5	2	7	Y	Average
098	M	55-59	2/10/2021	2/19/1964	56	CYFB	TMR	7	2	9	5	2	7	Y	Hard
001	F	60-70	1/9/2021	11/17/1955	65	LOWESC	ADL	7	4	11	11	4	15	Y	Easy
004	F	60-70	1/9/2021	1/22/1958	62	LOWESC	ADL	9	2	11	10	3	13	Y	Easy
006	F	60-70	1/9/2021	3/23/1951	69	LOWESC	ADL	17	4	21	7	2	9	Y	Average
007	F	60-70	1/9/2021	11/6/1954	66	LOWESC	ADL	11	3	14	7	2	9	Y	Easy
009	F	60-70	1/9/2021	12/20/1950	70	LOWESC	ADL	35	3	38	61		61	Y	Very Hard
014	F	60-70	1/13/2021	1/21/1960	60	CCI	ADL	7	2	9	10	3	13	Y	Hard
015	F	60-70	1/13/2021	5/19/1959	61	CCI	ADL	19	3	22	8	4	12	Y	Average
017	F	60-70	1/13/2021	4/15/1960	60	CCI	ADL	98	0	98	61		61	Y	Very Hard
020	F	60-70	1/13/2021	8/20/1951	69	CCI	ADL	16	2	18	8	2	10	Y	Average
022	F	60-70	1/20/2021	8/18/1959	61	PNM	BFL	8	3	11	7	2	9	Y	Easy
024	F	60-70	1/20/2021	10/11/1957	63	PNM	BFL	10	3	13	20	3	23	Y	Average
025	F	60-70	1/20/2021	1/14/1959	62	PNM	BFL	11	3	14	6	2	8	Y	Easy
027	F	60-70	1/21/2021	12/29/1958	62	KJC	BFL	9	3	12	10	2	12	Y	Average
031	F	60-70	1/21/2021	10/20/1950	70	KJC	BFL	23	5	28	18	8	26	Y	Easy
033	F	60-70	1/21/2021	5/29/1960	60	KJC	BFL	94	0	94	61		61	Y	Very Hard
034	F	60-70	1/21/2021	12/30/1952	68	KJC	BFL	7	5	12	6	4	10	Y	Easy
035	F	60-70	1/21/2021	5/20/1954	66	KJC	BFL	10	3	13	9	3	12	Y	Easy
036	F	60-70	1/28/2021	10/30/1960	60	QH	TMR	2	2	4	2	2	4	Y	Easy
037	F	60-70	1/28/2021	4/20/1953	67	QH	TMR	14	2	16	7	2	9	Y	Easy
038	F	60-70	1/28/2021	7/28/1950	70	QH	TMR	50	6	56	17	4	21	Y	Hard
039	F	60-70	1/28/2021	3/27/1957	63	QH	TMR	40	4	44	2	4	6	N	Easy
040	F	60-70	1/28/2021	6/2/1956	64	QH	TMR	35	3	38	5	3	8	Y	Easy
041	F	60-70	1/28/2021	12/17/1956	64	QH	TMR	8	2	10	5	3	8	Y	Easy
042	F	60-70	2/3/2021	9/20/1955	65	WSSB	JMG	8	3	11	5	2	7	Y	Average



Adult-Child Resistant Packages Test Detail Report

Bird Dog Marketing Group, LLC

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January 9, 2021 - February 11, 2021

Sample No.	M/F	Age Group/ Years	Test Date	Birth-Date	Age/ Year	Site Id	Proctor Id	Vial Package #1			Vial Package #2			Resc (Y/N)	Ease Code
								Removal (Sec)	Secure (Sec)	Total (Sec)	Removal (Sec)	Secure (Sec)	Total (Sec)		
043	F	60-70	2/3/2021	12/31/1959	61	WSSB	JMG	5	4	9	4	2	6	Y	Hard
044	F	60-70	2/3/2021	11/1/1959	61	WSSB	JMG	16	3	19	7	4	11	Y	Easy
045	F	60-70	2/3/2021	8/25/1953	67	WSSB	JMG	10	2	12	10	2	12	Y	Easy
046	F	60-70	2/3/2021	6/13/1957	63	WSSB	JMG	2	3	5	2	2	4	Y	Easy
047	F	60-70	2/3/2021	8/15/1952	68	WSSB	JMG	5	2	7	4	2	6	Y	Easy
048	F	60-70	2/3/2021	7/10/1956	64	WSSB	JMG	5	3	8	13	2	15	Y	Easy
049	F	60-70	2/3/2021	10/17/1959	61	WSSB	JMG	14	3	17	4	3	7	Y	Easy
050	F	60-70	2/3/2021	7/21/1957	63	WSSB	JMG	2	2	4	15	2	17	Y	Average
051	F	60-70	2/3/2021	9/4/1953	67	WSSB	JMG	40	3	43	4	3	7	Y	Easy
052	F	60-70	2/3/2021	5/9/1952	68	WSSB	JMG	85	6	91	9	3	12	N	Hard
054	F	60-70	2/4/2021	11/25/1959	61	GOBMN	TMR	11	2	13	4	2	6	Y	Average
071	M	60-70	1/9/2021	11/20/1957	63	LOWESC	ADL	8	3	11	7	3	10	Y	Hard
074	M	60-70	1/9/2021	9/22/1953	67	LOWESC	ADL	19	3	22	18	2	20	Y	Hard
075	M	60-70	1/9/2021	8/2/1952	68	LOWESC	ADL	10	3	13	36	4	40	Y	Hard
076	M	60-70	1/9/2021	10/13/1960	60	LOWESC	ADL	22	3	25	8	3	11	Y	Easy
078	M	60-70	1/9/2021	7/9/1959	61	LOWESC	ADL	14	4	18	11	2	13	Y	Hard
079	M	60-70	1/9/2021	8/6/1955	65	LOWESC	ADL	5	12	17	6	3	9	N	Very Hard
082	M	60-70	1/13/2021	1/5/1960	61	CCI	ADL	40	3	43	13	3	16	Y	Hard
083	M	60-70	1/13/2021	2/2/1954	66	CCI	ADL	11	2	13	16	3	19	Y	Average
086	M	60-70	1/28/2021	5/7/1957	63	QH	TMR	13	3	16	5	3	8	Y	Easy
087	M	60-70	1/28/2021	5/16/1957	63	QH	TMR	10	4	14	3	4	7	Y	Easy
088	M	60-70	1/28/2021	2/12/1956	64	QH	TMR	30	4	34	6	2	8	Y	Hard
089	M	60-70	1/28/2021	3/4/1957	63	QH	TMR	14	5	19	5	4	9	Y	Average
090	M	60-70	1/28/2021	5/5/1957	63	QH	TMR	16	3	19	5	3	8	Y	Easy
091	M	60-70	1/28/2021	12/10/1960	60	QH	TMR	18	3	21	17	3	20	Y	Average
092	M	60-70	2/3/2021	10/25/1959	61	WSSB	JMG	18	2	20	12	2	14	Y	Easy



Package Identification/Opening Method Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317**
January 9, 2021 - February 11, 2021

Sample No.	Customer Package Id No.	Opening Method	Sample No.	Customer Package Id No.	Opening Method
001	001	Normal	042	042	Normal
002	002	Normal	043	043	Normal
003	003	Normal	044	044	Normal
004	004	Normal	045	045	Normal
005	005	Normal	046	046	Normal
006	006	Normal	047	047	Normal
007	007	Normal	048	048	Normal
008	008	Normal	049	049	Normal
009	009	Did Not Open 2nd Pkg.	050	050	Normal
010	010	Normal	051	051	Normal
011	011	Normal	052	052	Normal
012	012	Normal	053	053	Normal
013	013	Normal	054	054	Normal
014	014	Normal	055	055	Normal
015	015	Normal	056	056	Normal
016	016	Normal	057	057	Normal
017	017	Did Not Open 2nd Pkg.	058	058	Normal
018	018	Normal	059	059	Normal
019	019	Normal	060	060	Normal
020	020	Normal	061	061	Normal
021	021	Normal	062	062	Normal
022	022	Normal	063	063	Normal
023	023	Normal	064	064	Normal
024	024	Normal	065	065	Normal
025	025	Normal	066	066	Normal
026	026	Normal	067	067	Normal
027	027	Normal	068	068	Normal
028	028	Normal	069	069	Normal
029	029	Normal	070	070	Normal
030	030	Normal	071	071	Normal
031	031	Normal	072	072	Normal
032	032	Normal	073	073	Normal
033	033	Did Not Open 2nd Pkg.	074	074	Normal
034	034	Normal	075	075	Normal
035	035	Normal	076	076	Normal
036	036	Normal	077	077	Normal
037	037	Normal	078	078	Normal
038	038	Normal	079	079	Normal
039	039	Normal	080	080	Normal
040	040	Normal	081	081	Normal
041	041	Normal	082	082	Normal



Package Identification/Opening Method Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01A

Customer Test No:

Test Description: **100 Unit Senior-Adult Protocol Test ISO 8317**
January 9, 2021 - February 11, 2021

Sample No.	Customer Package Id No.	Opening Method	Sample No.	Customer Package Id No.	Opening Method
083	083	Normal			
084	084	Normal			
085	085	Normal			
086	086	Normal			
087	087	Normal			
088	088	Normal			
089	089	Normal			
090	090	Normal			
091	091	Normal			
092	092	Normal			
093	093	Normal			
094	094	Normal			
095	095	Normal			
096	096	Normal			
097	097	Normal			
098	098	Normal			
099	099	Normal			
100	100	Normal			

CPSC Advisement Letter



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

**Poison Prevention Packaging Act (PPPA) Enforcement Discretion
Testing Advisory Letter**

June 25, 2020

Dear Sir or Madam:

I am writing to announce certain enforcement discretion for packages subject to the testing requirements of the Poison Prevention Packaging Act (PPPA) and its implementing regulations, stemming from testing challenges posed by COVID-19. The Office of Compliance will adhere to this enforcement discretion for 6 months until December 25, 2020.

The PPPA requires products containing a regulated substance (listed at 16 CFR § 1700.14) to be packaged in special packaging (referred to as child-resistant and senior-friendly packaging). The packaging required by the PPPA must be designed or constructed to be significantly difficult for children under 5 years of age to open within a reasonable time, and not be difficult for normal adults to use properly.

Under the Consumer Product Safety Improvement Act of 2008 (CPSIA), the importer or the domestic party that packages a PPPA-regulated substance in special packaging must issue the general certificate of conformity (GCC) to validate that the product meets the applicable requirements of 16 CFR § 1700.15. This certification is supported by the child-resistance and senior-friendly testing data (also known as protocol data), obtained in accordance with the procedures described under 16 CFR §1700.20.

During an open public meeting held on May 14, 2020, PPPA testing firms informed us that testing for certification to the PPPA has been halted as a result of the COVID-19 pandemic. The firms further informed us that due to public health guidance for social distancing, testing to all of the procedures described under 16 CFR § 1700.20 may not be feasible.

In consideration of this information, the Office of Compliance will accept the following alternatives for 6 months, to ease the current interruption of testing and certification under the PPPA:

- Testing protocol data to the methods described under the international standards ISO 8317, ISO 14375, EN 862, CSA Z76.1 and CSA Z76.2, in lieu of the method described under 16 CFR § 1700.20;
 - Transparent barriers between the tester and test subjects (children or adults), and in the cases of the child test, between children¹; and
1. The transparent barriers must not hinder the ability for the demo to be seen by the children, as well as, allow the children to see each other manipulate the packaging and talk to each other during the testing period. The transparent barriers also must not limit the child's ability to get up and move. In addition, the transparent barriers must not limit the tester's ability to monitor the children to ensure there are no safety concerns during testing. If a transparent barrier is used during testing, it must be noted on the testing protocol data.

- Single-site child and adult testing under 16 CFR § 1700.20.²

For any regulated products in special packaging certified using any of these alternatives, the GCC and testing protocol data must be submitted by the importer or domestic manufacturer to the Office of Compliance, by emailing: RegulatedCMT@cpsc.gov, before distribution into commerce. All other requirements under 16 CFR § 1700.20 remain in full force and effect.

This enforcement discretion will remain in effect until December 25, 2020. Please direct any questions to: RegulatedCMT@cpsc.gov.

Thank you for your cooperation.

Sincerely,

Robert S. Kaye
Director
Office of Compliance and Field Operations

2. The alternative site location for testing can be in lieu of a site familiar to the children. The site restrictions prohibiting 20% of children and 24% of adults being obtained from or tested at any one site will be waived; however, no more than 20% of children and 24% of adults may be from the same zip code. Testers should record the permanent zip code of the test subjects and also note whether an alternative test site was used in the testing protocol data.



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

**Poison Prevention Packaging Act (PPPA) Enforcement Discretion
Extension Letter**

November 12, 2020

Dear Sir or Madam:

Given continued testing challenges related to Covid-19, the Office of Compliance and Field Operations is extending, through June 25, 2021, the enforcement discretion for packages subject to the testing requirements of the Poison Prevention Packaging Act (PPPA), described in my June 25, 2020 [letter](#).

In addition, we are expanding the enforcement discretion to accept the use of the adult-resecuring data (16 CFR § 1700.20(d)(2)) as the basis for determining whether a package meets the child-resistant requirements to reduce the total number of children needed for testing. Answers to potential questions regarding application of the adult-resecuring test for determining child-resistance acceptance, as well as other aspects of the enforcement discretion, are attached.

For regulated products in special packaging and certified using any of the alternatives outlined in our enforcement discretion, the General Certificate of Conformity (GCC) and testing protocol data must be submitted by the importer or domestic manufacturer to the Office of Compliance, by emailing: RegulatedCMT@cpsc.gov, before distribution into commerce. All other requirements under 16 CFR § 1700.20 remain in full force and effect.

Again, this enforcement discretion will remain in effect until June 25, 2021. Please direct any questions to: RegulatedCMT@cpsc.gov. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Robert Kaye".

Robert S. Kaye

Director

Office of Compliance and Field Operations

Adult-Resecuring Test

Question: When should the adult-resecuring test be recommended?

Answer: When an objective determination (*e.g.* visual or mechanical) cannot be made establishing that a reclosable package is properly resecured after the senior-adult test (16 CFR § 1700.20(a)(3)), or the younger-adult test (16 CFR § 1700.20(a)(4)), then we recommend that the package be retested with children, following the adult-resecuring procedure set forth in 16 CFR § 1700.20(d)(2).

Question: During the enforcement discretion period, can the criteria from the adult-resecuring test be used to determine whether the package meets the child-resistant requirements instead of conducting a separate child-test procedure (16 CFR § 1700.20(a)(2))?

Answer: Yes. To reduce the total number of children required to test the package, the Office of Compliance will accept an adult-resecuring test as the basis for determining whether the packaging meets the child-resistant packaging requirements during the enforcement discretion period. The procedures of the adult-resecuring test state that children are to be tested according to the child-test procedures.

Suggested guidance for determining whether the package meets the child-resistant requirements from the adult-resecuring data is set forth below:

- Table 1 in the child-test procedure (16 CFR § 1700.20(a)(2)(iii)) gives the acceptance (pass), continue testing, and rejection (fail) criteria to be used for the first 5 minutes and the full 10 minutes of the children's test. This table is to be used for the 100 cumulative number of children tested during the adult-resecuring test to determine whether the package has passed, must undergo additional testing, or has failed the child-resistant requirements.
- If there are fewer than 100 packages available for the adult-resecuring test because not all adults passed the adult tests, additional packages are to be added so that 100 cumulative children can be tested. These additional packages should be conditioned as indicated in the Standardized Child Test Instructions (16 CFR § 1700.20(a)(2)(iv)) and shall not be based on the adult-resecuring procedure.
- The packages added to meet the 100 total are not to be included in the Adult-Use Effectiveness calculation. Calculation of the Adult-Use Effectiveness must still follow the criteria described in 16 CFR § 1700.20(d)(2).
- If after testing the 100 children, and the criteria from Table 1 indicate continuing testing for the child-resistant determination, follow the child-test procedure for additional testing.

Testing to 16 CFR § 1700.20

Question: Does the test to 16 CFR § 1700.20 expire?

Answer: There is no expiration date when testing to 16 CFR § 1700.20, and there is no requirement to retest, as long as the tests adequately reflect the current package and substance contained in the package. If there is a material change in the packaging or substance within the

package, or there is a change in the manufacturing process, then we recommend retesting to ensure that the package continues to meet the PPPA requirements.

Testing During the Enforcement Discretion Period

Question: If testing for certification to the PPPA was conducted to the accepted alternative method(s) of § 1700.20, or to an international standard **during** the enforcement discretion period, does the package need to be retested after the enforcement discretion period ends?

Answer: No, but the GCC and testing protocol data must be submitted by email. (RegulatedCMT@cpsc.gov) before distribution into commerce. (*See Figure 1*)

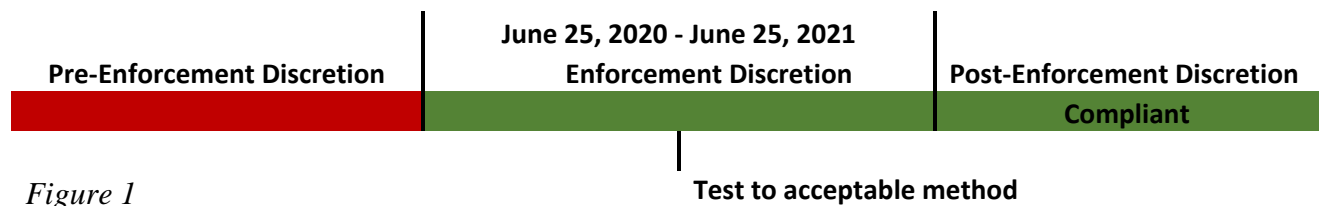


Figure 1

Testing Prior to the Enforcement Discretion Period

Question: If testing was conducted to an international standard **prior to** the enforcement discretion period, does the package need to be retested before the enforcement discretion period ends?

Answer: Yes. Testing to a standard other than 16 CFR § 1700.20 was not accepted for certification to the PPPA prior to the enforcement discretion period. Although it will be accepted as a basis for certification during the enforcement discretion period, it will not be accepted after June 25, 2021 (*See Figure 2*). The package shall be retested to § 1700.20, the accepted alternative method(s) of § 1700.20, or to an international standard during the enforcement discretion period to be accepted after June 25, 2021 (*See Figure 3*).

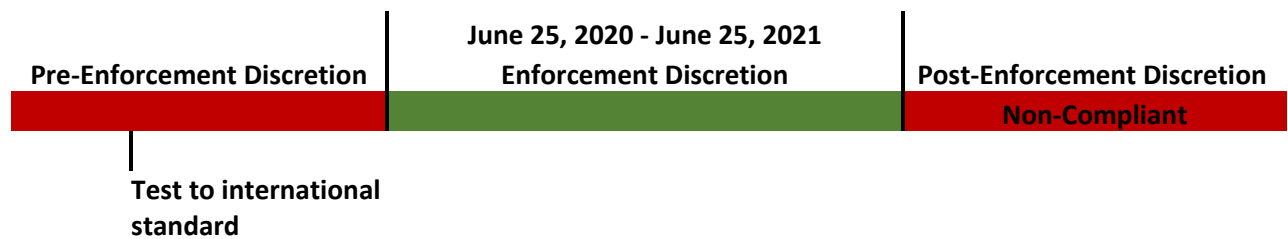


Figure 2

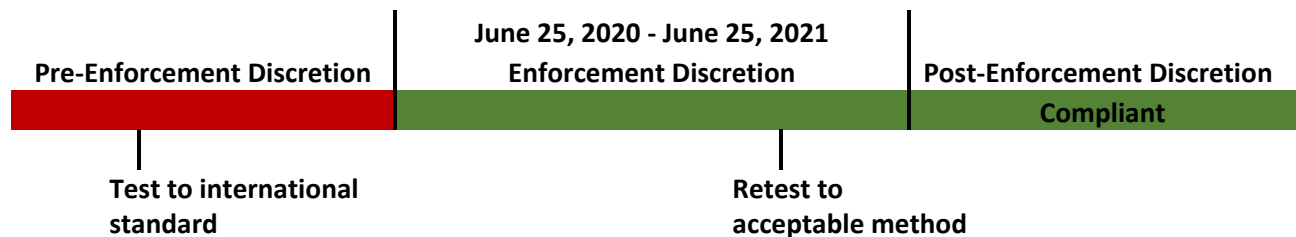


Figure 3



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

**Poison Prevention Packaging Act (PPPA) Enforcement Discretion
Second Extension Letter**

April 22, 2021

Dear Sir or Madam:

This letter updates my June 25, 2020 [letter](#) and November 15, 2020 [letter](#), in which I communicated an allowance for temporary use of alternative testing to demonstrate regulatory compliance of packages subject to the testing requirements of the Poison Prevention Packaging Act (PPPA) and its implementing regulations under 16 CFR part 1700. I am writing now to extend this allowance through December 31, 2021, due to continued challenges of performing testing due to the COVID-19 pandemic.

The specifics of this temporary allowance are contained in my earlier letters. There is also a helpful question and answer document attached to the November 15, 2020, letter that you may want to revisit. For regulated products in special packaging that are certified using any of the alternatives outlined in our enforcement discretion, the importer or domestic manufacturer of the products must submit the General Certificate of Conformity (GCC) and testing protocol data to the Office of Compliance before distribution into commerce. Please submit this information via e-mail to RegulatedCMT@cpsc.gov. All other requirements under 16 CFR § 1700.20 remain in full force and effect.

Testing to an acceptable alternative method must be initiated by December 31, 2021, in order to use this temporary enforcement discretion. We are declining to specify a date or time frame by which such alternative testing must be completed due to the fluidity of the pandemic and the constraints it presents. Nevertheless, we remind you that prompt completion of testing is encouraged and expected.

Thank you for your attention and continued cooperation during this challenging time. Please direct any questions to: RegulatedCMT@cpsc.gov.

Sincerely,

Robert S. Kaye

Robert S. Kaye
Director
Office of Compliance and Field Operations