



**“We Point Toward Product Solutions”**

**Sequential Child Protocol Test ISO 8317**

**April 8, 2021 - September 9, 2021**

**Conducted for:**

**A&A Global Imports**

**Test No.:**

**ANA21-01SC**

**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: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

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

**Press to Close Pouch**

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### OBJECTIVE

A&A Global Imports submitted the following test for evaluation by Bird Dog Marketing Group, LLC to determine compliance with the the Child-Resistant Criteria for Protocol Testing, as per ISO 8317:2015

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

This test follows the guidelines set forth by the 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., per the Poison Prevention Packaging Act (PPPA) Enforcement Discretion Testing Advisory Letter 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 child resistant 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: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

### RESULTS AND DISCUSSION

#### RESULTS AND DISCUSSION:

The overall Result of test ANA21-01SC 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 ANA21-01SC consisted of ninety-seven (97) children (42-51 months) being tested in twenty-one (21) sites from April 8, 2021 through September 9, 2021. This test follows the guidelines set forth by the International Organization for Standardization (ISO) under 8317

The results of the study are as follows:

1) FIVE (5) of the children were able to open their package during the five (5) minute test period before demonstration. Before Demonstration is the number of children able to open the Child-Resistant Packaging before the proctor demonstrates opening and closing method.

- Refer to Child Resistant Packages Test Detail Report and Sequential Test Chart

2) EIGHT (8) of the children were able to open their package during the five (5) minute test period after demonstration. After Demonstration is the number of children able to open the Child-Resistant Packaging after the proctor demonstrates opening and closing method.

- Refer to Child Resistant Packages Test Detail Report and Sequential Test Chart

3) The children were given only one (1) type of child-resistant package during this protocol study

4) Only the site proctors noted in the report were present during this study.

5) The child resistant effectiveness for the first 5-minute period is 94.84%, and for the full ten minutes is 86.59%. Please refer to Chart of a sequential child test procedure (before and after demonstration) for child-resistant reclosable packages for results of testing.

6) Based on the results of this test, the submitted container complies with child test requirements of Standard ISO 8317 and meets the CPSC requirements per the 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.

#### TEST PACKAGE DESCRIPTION:

The container used for test ANA21-01SC 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.



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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 reseal 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 CHILDREN:

To begin the test, the tester handed the children identical packages and said, "PLEASE TRY TO OPEN THIS FOR ME."

If a child refused to participate after the test has started, the tester reassured the child and gently encourage the child to try. If the child continued to refuse, the tester asked the child to hold the package in his/her lap until the other child is finished.

Each child was be given up to 5 minutes to open his/her package. The tester watched the children at all times during the test. The tester minimized conversation with the children as long as they continued to attempt to open their packages. The tester did not discourage the children verbally or with facial expressions. If a child got frustrated or bored and stopped trying to open his/her package, the tester reassured the child and gently encouraged the child to keep trying (e.g., "please try to open the package").

If a child opened his/her package, the tester said, "THANK YOU," took the package from the child and put it out of the child's reach. This child was not asked to open the package a second time.

At the end of the 5-minute period, the tester demonstrated how to open the package if either child has not opened his or her package. A separate "demo" package was used for the demonstration.

Prior to beginning the demonstration, the tester asked the children to set their packages aside. The children were not allowed to continue to try to open their packages during the demonstration period.



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The tester said, "WATCH ME OPEN MY PACKAGE." The tester did not discuss or describe how to open the package.

To begin the second 5-minute period, the tester said, "NOW YOU TRY TO OPEN YOUR PACKAGES."

The test continued for an additional 5 minutes or until both children had opened their packages, whichever comes first.

At the end of the test period, the tester said "THANK YOU FOR HELPING." In addition, the tester said, "NEVER OPEN PACKAGES LIKE THIS WHEN YOU ARE BY YOURSELF. THIS KIND OF PACKAGE MIGHT HAVE SOMETHING IN IT THAT WOULD MAKE YOU SICK."

### PACKAGE PREPARATION:

- 1) Bird Dog Marketing Group, LLC received test sample packages on January 3, 2021.
- 2) The packages were assembled and set in the locked position on January 11, 2021 by Bird Dog Marketing Group, LLC
- 3) The testing agency checked each package by opening and closing them one time.
- 4) The testing agency numbered all the packages to track the testing results.

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Submitted by: Mark D. Perkins

Senior Member



# Child Resistant Packages Test Summary Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

Gender	Age Group/ Months	No. of Children Tested	Before Demonstration	After Demonstration	Total
Female	42-43	10	1.00	1.00	2.00
Male	42-43	11	0.00	1.00	1.00
		<b>21</b>	<b>1.00</b>	<b>2.00</b>	<b>3.00</b>
Female	44-45	10	0.00	2.00	2.00
Male	44-45	8	0.00	1.00	1.00
		<b>18</b>	<b>0.00</b>	<b>3.00</b>	<b>3.00</b>
Female	46-47	9	0.00	0.00	0.00
Male	46-47	10	1.00	0.00	1.00
		<b>19</b>	<b>1.00</b>	<b>0.00</b>	<b>1.00</b>
Female	48-49	10	0.00	0.00	0.00
Male	48-49	9	0.00	1.00	1.00
		<b>19</b>	<b>0.00</b>	<b>1.00</b>	<b>1.00</b>
Female	50-51	10	1.00	1.00	2.00
Male	50-51	10	2.00	1.00	3.00
		<b>20</b>	<b>3.00</b>	<b>2.00</b>	<b>5.00</b>
<b>Report Totals:</b>		<b>97</b>	<b>5.00</b>	<b>8.00</b>	<b>13.00</b>



# Proctor Participation Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

No. of Test Participants: 97.00  
Max. Participants per Proctor: 100.00 %

Proctor Id	Name	No. of Males	No. of Females	Total No.	Percent
CMT	Christine Trepanitis	4	2	6	6.19
CMW	Christine Woodworth	4	7	11	11.34
DJJ	Deb Jacobus	7	5	12	12.37
DOW	Denise White	2	1	3	3.09
FMS	Fran Sensenig	2	4	6	6.19
JB	Julie Burke	6	7	13	13.40
JSB	Julie Boyer	2	2	4	4.12
KBG	Kay Gemming	2	2	4	4.12
LBE	Laurie Esquillo	6	4	10	10.31
RAB	Rachel Barker	5	4	9	9.28
SCA	Sandra Avery	6	8	14	14.43
SEC	Sarah Cate	1	3	4	4.12
TBD	Teri Dunnigan	1	0	1	1.03
<b>Report Totals:</b>		<b>48</b>	<b>49</b>	<b>97</b>	





# Site Participation Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

No. of Test Participants: 97.00

Max. Participants per Site: 100.00 %

Site Id	Description	No. of Males	No. of Females	Total No.	Percent
BRMS	Blue Ridge Montessori School	2	2	4	4.12
CAB	Chesterbrook Academy - Bartlett	2	2	4	4.12
CAS	Chesterbrook Academy - Shorewood	2	3	5	5.15
CATLYH	Caterpillar Clubhouse - Lynchburg	1	0	1	1.03
CATRUST	Caterpillar Clubhouse - Rustburg	1	3	4	4.12
CFL	Center for Learning	1	0	1	1.03
DFB	Dutch Fork Baptist	0	1	1	1.03
KCF	Kinder Care - Fredrick	4	6	10	10.31
KCR	Kinder Care - Richert	3	1	4	4.12
LPLC	Little People Learning Center	4	6	10	10.31
MARSH	Marsh Memorial ELC	1	0	1	1.03
RHDC	Riverland Hills Day Care	2	2	4	4.12
SABC	St.Andrews Baptist Church	2	2	4	4.12
SOKA	Seven Oaks Kids Academy	1	2	3	3.09
SWP	Shandon Weekday Preschool	0	1	1	1.03
SWTR	Small Wonders Academy - TR	4	5	9	9.28
TCCC	Trinity child care center	5	1	6	6.19
VCCC	Valley Child Care & Learning Ctr. Carefree	4	3	7	7.22
VCCDM	Valley Child Care & Learning Center Daisy Mountain	3	0	3	3.09
VCCDY	Valley Child Care & Learning Center Dysart	5	9	14	14.43
VCCUH	Valley Child Care & Learning Center Union Hills	1	0	1	1.03
<b>Report Totals:</b>		<b>48</b>	<b>49</b>	<b>97</b>	



# Age Distribution Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

Age (Months)	No. of Males	No. of Females	Total Participants
42	5	7	12
43	6	3	9
44	3	6	9
45	5	4	9
46	6	5	11
47	4	4	8
48	5	3	8
49	4	7	11
50	4	6	10
51	6	4	10
<b>Report Totals:</b>	<b>48</b>	<b>49</b>	<b>97</b>



# Child Resistant Packages Test Detail Report

Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

Sample No.	Male/ Female	Age Group/ Months	Test Date	Birth- Date	Age/ Months	Site Id	Proctor Id	Method	Opening Seconds
003	F	42-43	4/29/2021	9/19/2017	43	SWP	CMW		601
004	F	42-43	5/4/2021	9/24/2017	43	DFB	LBE		601
024	F	42-43	4/8/2021	10/13/2017	42	TCCC	LBE		601
031	F	42-43	5/17/2021	11/7/2017	42	CATRUST	SEC		601
037	F	42-43	6/1/2021	12/2/2017	42	SWTR	FMS		601
053	F	42-43	9/9/2021	3/20/2018	42	KCR	RAB		601
056	F	42-43	9/7/2021	3/18/2018	42	CAB	SCA		601
075	F	42-43	9/2/2021	2/20/2018	42	VCCDY	DJJ	Pull Apart	085
076	F	42-43	9/2/2021	2/15/2018	43	VCCDY	DJJ	Pull Apart	515
090	F	42-43	9/2/2021	2/27/2018	42	VCCDY	JB		601
001	M	42-43	4/21/2021	9/25/2017	43	RHDC	KBG		601
002	M	42-43	4/22/2021	10/10/2017	42	CFL	TBD		601
016	M	42-43	4/20/2021	10/19/2017	42	SABC	JSB		601
034	M	42-43	6/1/2021	10/27/2017	43	SWTR	FMS		601
038	M	42-43	5/19/2021	10/29/2017	43	CATLYH	CMT		601
054	M	42-43	9/9/2021	3/15/2018	42	KCR	RAB		601
059	M	42-43	9/3/2021	3/13/2018	42	KCF	SCA		601
085	M	42-43	9/2/2021	1/25/2018	43	VCCDY	JB		601
089	M	42-43	9/2/2021	3/2/2018	42	VCCDY	DJJ		601
092	M	42-43	9/1/2021	2/3/2018	43	VCCC	JB	Pull Apart	474
094	M	42-43	9/1/2021	2/13/2018	43	VCCC	JB		601
005	F	44-45	4/15/2021	8/7/2017	44	LPLC	CMW		601
013	F	44-45	4/15/2021	7/5/2017	45	LPLC	CMW	Pull Apart	592
014	F	44-45	4/15/2021	7/8/2017	45	LPLC	CMW		601
041	F	44-45	5/18/2021	10/11/2017	44	BRMS	CMT		601
049	F	44-45	6/1/2021	8/24/2017	45	SWTR	FMS		601
062	F	44-45	8/26/2021	1/4/2018	44	CAS	RAB		601
074	F	44-45	9/2/2021	1/2/2018	44	VCCDY	DJJ		601
077	F	44-45	8/26/2021	11/11/2017	45	CAS	RAB		601
086	F	44-45	9/2/2021	1/12/2018	44	VCCDY	JB	Pull Apart	418
091	F	44-45	9/1/2021	1/16/2018	44	VCCC	JB		601
011	M	44-45	4/15/2021	7/31/2017	44	LPLC	CMW		601
025	M	44-45	4/8/2021	7/19/2017	45	TCCC	LBE		601
027	M	44-45	4/8/2021	7/10/2017	45	TCCC	LBE		601
035	M	44-45	5/17/2021	8/7/2017	45	CATRUST	SEC		601
051	M	44-45	9/9/2021	12/4/2017	45	KCR	RAB		601
057	M	44-45	9/7/2021	12/21/2017	45	CAB	SCA		601



# Child Resistant Packages Test Detail Report

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Sample No.	Male/ Female	Age Group/ Months	Test Date	Birth- Date	Age/ Months	Site Id	Proctor Id	Method	Opening Seconds
093	M	44-45	9/1/2021	12/30/2017	44	VCCC	JB	Pull Apart	330
099	M	44-45	9/7/2021	12/23/2017	44	VCCUH	DJJ		601
019	F	46-47	4/15/2021	6/13/2017	46	LPLC	CMW		601
020	F	46-47	4/15/2021	6/13/2017	46	LPLC	CMW		601
029	F	46-47	4/14/2021	6/16/2017	46	SOKA	LBE		601
032	F	46-47	5/17/2021	6/25/2017	47	CATRUST	SEC		601
043	F	46-47	6/1/2021	7/11/2017	47	SWTR	FMS		601
061	F	46-47	9/3/2021	9/20/2017	47	KCF	SCA		601
066	F	46-47	9/3/2021	10/23/2017	46	KCF	SCA		601
073	F	46-47	9/2/2021	9/22/2017	47	VCCDY	DJJ		601
088	F	46-47	9/2/2021	11/15/2017	46	VCCDY	JB		601
007	M	46-47	4/20/2021	6/14/2017	46	SABC	JSB		601
009	M	46-47	4/21/2021	6/26/2017	46	RHDC	KBG		601
030	M	46-47	4/14/2021	6/3/2017	46	SOKA	LBE		601
033	M	46-47	5/5/2021	6/17/2017	47	MARSH	CMT	Pull Apart	159
050	M	46-47	6/1/2021	8/9/2017	46	SWTR	DOW		601
055	M	46-47	9/3/2021	9/25/2017	47	KCF	SCA		601
070	M	46-47	9/3/2021	10/19/2017	46	KCF	SCA		601
082	M	46-47	9/7/2021	11/14/2017	46	VCCDM	DJJ		601
095	M	46-47	9/7/2021	10/8/2017	47	VCCDM	DJJ		601
100	M	46-47	9/7/2021	10/20/2017	47	VCCDM	DJJ		601
008	F	48-49	4/21/2021	3/22/2017	49	RHDC	KBG		601
010	F	48-49	4/21/2021	3/22/2017	49	RHDC	KBG		601
015	F	48-49	4/20/2021	4/10/2017	48	SABC	JSB		601
039	F	48-49	6/1/2021	5/7/2017	49	SWTR	DOW		601
048	F	48-49	5/18/2021	4/5/2017	49	BRMS	CMT		601
067	F	48-49	9/3/2021	8/18/2017	49	KCF	SCA		601
068	F	48-49	9/3/2021	7/20/2017	49	KCF	SCA		601
071	F	48-49	9/2/2021	8/31/2017	48	VCCDY	DJJ		601
078	F	48-49	8/26/2021	8/1/2017	49	CAS	RAB		601
096	F	48-49	9/2/2021	9/1/2017	48	VCCDY	JB		601
012	M	48-49	4/15/2021	3/2/2017	49	LPLC	CMW		601
017	M	48-49	4/15/2021	4/14/2017	48	LPLC	CMW		601
018	M	48-49	4/15/2021	4/4/2017	48	LPLC	CMW		601
045	M	48-49	5/18/2021	4/12/2017	49	BRMS	CMT		601
047	M	48-49	6/1/2021	5/24/2017	48	SWTR	FMS	Pull Apart	317
058	M	48-49	9/7/2021	7/28/2017	49	CAB	SCA		601



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**April 8, 2021 - September 9, 2021**

Sample No.	Male/ Female	Age Group/ Months	Test Date	Birth- Date	Age/ Months	Site Id	Proctor Id	Method	Opening Seconds
063	M	48-49	9/3/2021	7/24/2017	49	KCF	SCA		601
081	M	48-49	9/8/2021	8/25/2017	48	VCCC	JB		601
087	M	48-49	9/2/2021	9/15/2017	48	VCCDY	JB		601
006	F	50-51	4/20/2021	2/5/2017	50	SABC	JSB		601
021	F	50-51	4/15/2021	2/27/2017	50	LPLC	CMW		601
023	F	50-51	4/14/2021	2/21/2017	50	SOKA	LBE	Pull Apart	490
042	F	50-51	6/1/2021	2/23/2017	51	SWTR	FMS	Pull Apart	056
044	F	50-51	5/17/2021	2/11/2017	51	CATRUST	SEC		601
060	F	50-51	9/7/2021	7/13/2017	50	CAB	SCA		601
064	F	50-51	9/3/2021	6/7/2017	51	KCF	SCA		601
065	F	50-51	9/3/2021	6/27/2017	50	KCF	SCA		601
083	F	50-51	9/1/2021	6/21/2017	50	VCCC	JB		601
084	F	50-51	9/1/2021	6/10/2017	51	VCCC	JB		601
022	M	50-51	4/8/2021	1/1/2017	51	TCCC	LBE		601
026	M	50-51	4/8/2021	2/16/2017	50	TCCC	LBE		601
028	M	50-51	4/8/2021	1/5/2017	51	TCCC	LBE		601
036	M	50-51	6/1/2021	2/25/2017	51	SWTR	DOW	Pull Apart	188
046	M	50-51	5/18/2021	3/13/2017	50	BRMS	CMT	Pull Apart	045
069	M	50-51	9/9/2021	7/22/2017	50	KCR	RAB		601
079	M	50-51	8/26/2021	6/6/2017	51	CAS	RAB		601
080	M	50-51	8/26/2021	5/18/2017	51	CAS	RAB		601
097	M	50-51	9/2/2021	6/25/2017	50	VCCDY	DJJ	Pull Apart	360
098	M	50-51	9/2/2021	6/15/2017	51	VCCDY	DJJ		601



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Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

Test Description: **Sequential Child Protocol Test ISO 8317**  
**April 8, 2021 - September 9, 2021**

Sample No.	Customer Package Id No.	Sample No.	Customer Package Id No.	Sample No.	Customer Package Id No.
001	001	038	038		
002	002	039	039		
003	003	041	041		
004	004	042	042		
005	005	043	043		
006	006	044	044		
007	007	045	045		
008	008	046	046		
009	009	047	047		
010	010	048	048		
011	011	049	049		
012	012	050	050		
013	013	051	051		
014	014	053	053		
015	015	054	054		
016	016	055	055		
017	017	056	056		
018	018	057	057		
019	019	058	058		
020	020	059	059		
021	021	060	060		
022	022	061	061		
023	023	062	062		
024	024	063	063		
025	025	064	064		
026	026	065	065		
027	027	066	066		
028	028	067	067		
029	029	068	068		
030	030	069	069		
031	031	070	070		
032	032	071	071		
033	033	073	073		
034	034	074	074		
035	035	075	075		
036	036	076	076		
037	037	077	077		



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Bird Dog Marketing Group, LLC

Test Id: ANA21-01SC

Customer Test No:

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**April 8, 2021 - September 9, 2021**

Sample No.	Customer Package Id No.	Sample No.	Customer Package Id No.	Sample No.	Customer Package Id No.
078	078				
079	079				
080	080				
081	081				
082	082				
083	083				
084	084				
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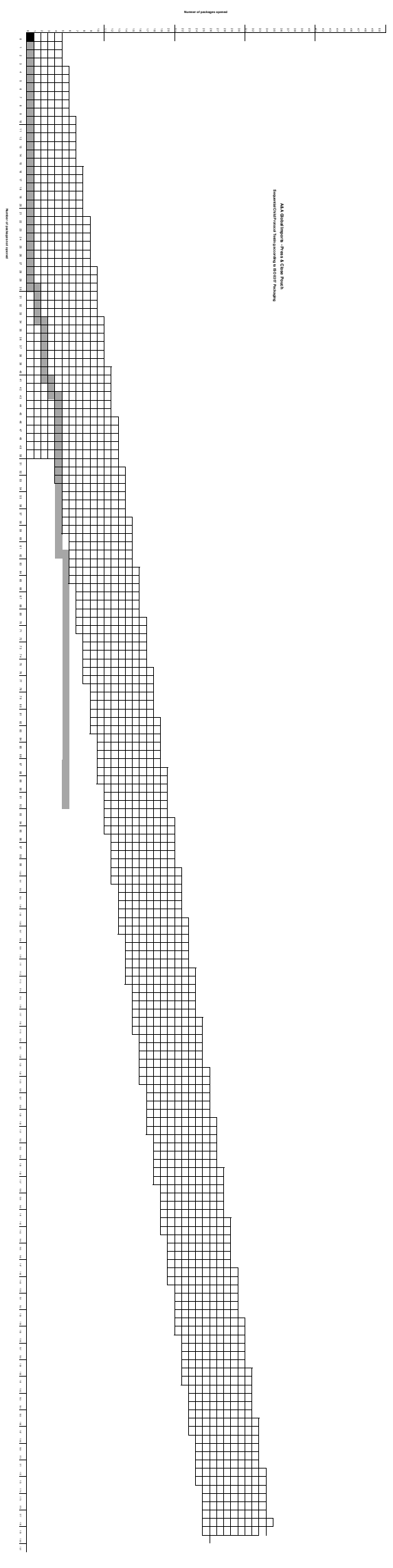
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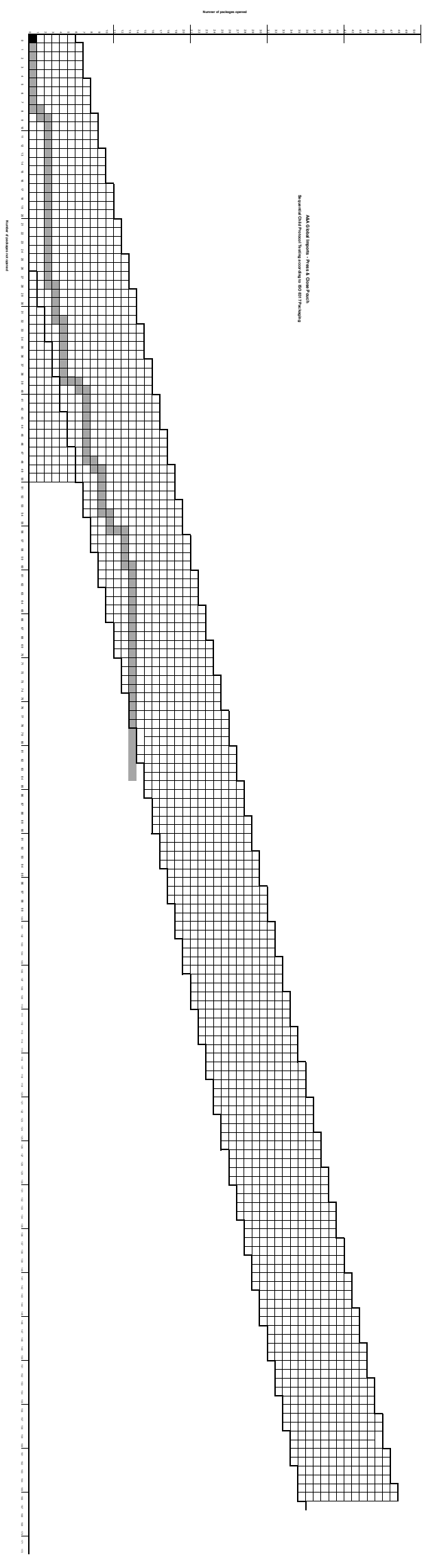
# **ISO 8317 Sequential Child Test Chart(s)**

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ADM Global Logistics - Project & Global Growth  
 Department of Global Production Services (DPS) / Project Support

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# **CPSC Advisement Letter**

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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 children<sup>1</sup>; 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.<sup>2</sup>

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](mailto: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](mailto: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.



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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](mailto: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](mailto: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](mailto:RegulatedCMT@cpsc.gov)) before distribution into commerce. (*See Figure 1*)

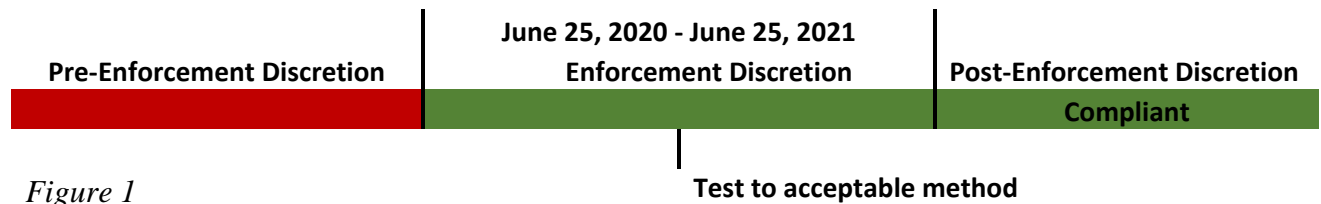


Figure 1

**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*).

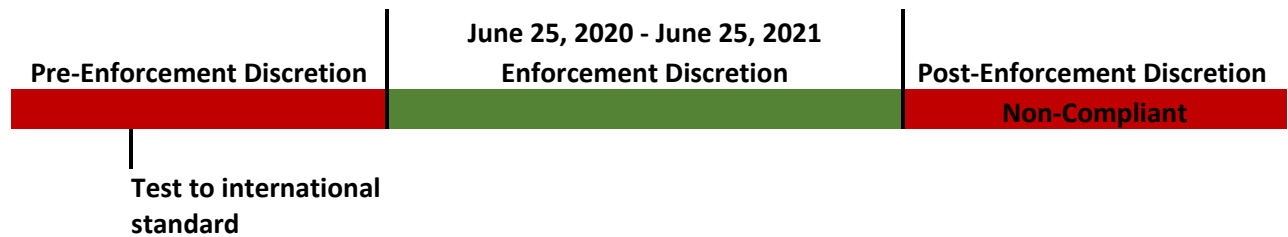


Figure 2

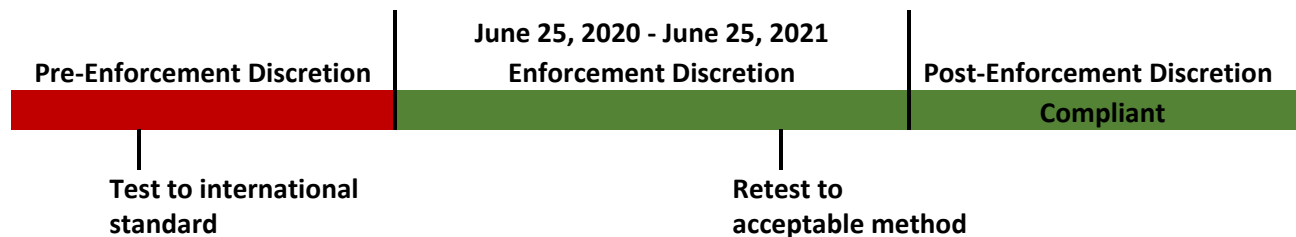


Figure 3





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](mailto: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](mailto:RegulatedCMT@cpsc.gov).

Sincerely,

*Robert S. Kaye*

Robert S. Kaye  
Director  
Office of Compliance and Field Operations