

Test Report

No.: QCT-D210510507

May. 19, 2021

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APPLICATION FOR CHILD RESISTANT PACKAGING TEST On Behalf of

MARIJUANA PACKAGING

Child Resistant Tube Model:CTCRSIL

Prepared For: MARIJUANA PACKAGING

3359 E 50th Street Vernon, CA 90058 US

Prepared By: Guangzhou QCT Technology Testing Co., Ltd

Chuangrong Cultural Center, No 36 Changsheng Street, Gangfeng Village, Yongning Sub-District,

Zengcheng District, Guangzhou, China

Date of Test : May.09-May.19,2021

Date of Report : May.19,2021

Report Number : QCT-D210510507



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TEST REPORT

US CPSC 16 CFR § 1700.20 Testing procedure for special packaging

Test by: Guangzhou QCT Technology Testing Co., Ltd Address: China: Chuangrong Cultural Center, No 36 Changsheng Street, Gangfeng Village, Yongning Sub-District, Zengcheng District, Guangzhou, China Report body....:: Guangzhou QCT Technology Testing Co., Ltd Address (China): China: Chuangrong Cultural Center, No 36 Changsheng Street, Gangfeng Village, Yongning Sub-District, Zengcheng District, Guangzhou, China MARIJUANA PACKAGING Applicant: Address: 3359 E 50th Street Vernon, CA 90058 US Standard: US CPSC 16 CFR § 1700.20 Test Result: Compliance with US CPSC 16 CFR § 1700.20 Procedure deviation: N.A. Non-standard test method N.A. Type of test object: Child Resistant Tube Trade Mark: N.A. Model/type reference: **CTCRSIL** MARIJUANA PACKAGING Manufacturer: 3359 E 50th Street Vernon, CA 90058 US Address:: Characterization & Condition of Sample: Normal Ambient Condition During Testing: (21~23)℃, (53~55) %RH, 86~106 kPa



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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.

Re Mark:

Sample photo:

(See appendix 1)



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Possible test case verdicts :	
test object does meet the requirement:	Р
test object does not meet the requirement:	F
test object does not involve the requirement:	N
<u>Str</u>	: Guangzhou QCT Technology Testing Co., Ltd Chuangrong Cultural Center, No 36 Changsheng eet, Gangfeng Village, Yongning Sub-District, ngcheng District, Guangzhou, China
Reported by : Stephen Fu, Test Eng	
Checked by : Kevin Tang, Project N	May.19,2021 Manager Date
Approved by : Xinla Lin, Jab. M.	



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	US CPSC 16 CFR § 1700.20			
Clause	Requirement Test	Result - Remark	Verdict	
Testing p	rocedure for special packaging.		-	
(a)Test p	rotocols -		-	
(1)Gener	al requirements -		-	
(i)Require	ements for packaging.		Р	
to meet th	ried in § 1700.15(b), special packaging is required the child test requirements and the applicable adult frements of this § 1700.20.		Р	
(ii)Condit	ion of packages to be tested -		Р	
(A)Tamp	er-resistant feature.		Р	
shall be r	per-resistant feature of the package to be tested removed prior to testing unless it is part of the schild-resistant design.		Р	
package	package is supplied to the consumer in an outer that is not part of the package's child-resistant ne of the following situations applies:		Р	
	child test, the package is removed from the outer and the outer package is not given to the child.		Р	
instructio package,	h the adult tests, if the outer package bears ns for how to open or properly resecure the the package shall be given to the test subject in package.		Р	
package	required to remove the package from the outer is not counted in the times allowed for attempting and, if appropriate, reclose the package.		Р	
bear any be remov	h the adult tests, if the outer package does not instructions relevant to the test, the package will red from the outer package, and the outer will not be given to the test subject.		Р	
tests, rec agency, s beginning	sable packages - adult tests. In both the adult losable packages, if assembled by the testing shall be properly secured at least 72 hours prior to g the test to allow the materials (e.g., the closure take a set."		Р	



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US CPSC 16 CFR § 1700.20					
Clause	Requirement	Test		Result - Remark	Verdict

Each adult shall read and sign a consent form prior to participating. Any appropriate language from the consent form Apr 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.	P
All packages shall be handled so that no damage or jarring will occur during storage or transportation.	Р
The packages shall not be exposed to extreme conditions of heat or cold.	Р
The packages shall be tested at room temperature.	Р
(2)Child test -	Р
(i)Test subjects -	-
(A)Selection criteria. Use from 1 to 4 groups of 50 children, as required under the sequential testing criteria in table 1.	Р
No more than 20% of the children in each group shall be tested at or obtained from any given site.	Р
Each group of children shall be randomly selected as to age, subject to the limitations set forth below.	Р
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.	Р
The children's ages in months shall be calculated as follows:	Р
(1) Arrange the birth date and test date by the numerical designations for month, day, and year (e.g., test date: 8/3/1990; birth date: 6/23/1986).	Р
(2) Subtract the month, day, and year numbers for the birth date from the respective numbers for the test date.	Р
This Apr result in negative numbers for the months or days. (e.g.,	Р



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	US CPSC 16 CFR § 1700.20				
Clause	Requirement	Test		Result - Remark	Verdict
number of value to the	months in the diff e number of mont was subtracted fro	years by 12 to obtain the erence in years, and add thing that was obtained when the test date (i.e., 4 × 12)	ne		Р
down by 1	month, depending	the same or be adjusted up g on the number of days of the birth date from the test			Р
in the birth	date from the day	tained by subtracting the day ys in the test date is + 16 or ne number of months obtaine			Р
If the numb	oer of days is −16	or less, subtract 1 month.			Р
Test by				angzhou QCT Technology sting Co., Ltd	P
		above, the number of days of this is therefore 50 - 1 = 49	is		Р
	distribution.				Р
number of		number of boys and the range shall not exceed 10% at range.	of		Р
	en selected should mental handicap	d have no obvious or overt .			Р
	r guardian of each rm prior to the chi	n child shall read and sign a ld's participation.			Р
performed		ot disregard the results of tes simply because informed otained.)	ts		Р
(ii)Test fail	ures.				Р
packaging unit packag who opens units which personal in gains acce	or gains access t ging, however, a t s or gains access n constitute the an njury or serious illr ess to more than 8	illd who opens the special o its contents. In the case of test failure shall be any child to the number of individual nount that Apr produce serioness, or a child who opens of individual units, whichever full 10 minutes of testing.	JS		Р



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US CPSC 16 CFR § 1700.20			
lause	Requirement Test	Result - Remark	Verdict
interprete	ber of units that a child opens or gains access to is ed as the individual units from which the product or can be removed in whole or in part.		P
produce	rmination of the amount of a substance that Apr serious personal injury or serious illness shall be a a 25-pound (11.4 kg) child.		Р
packagin requeste	turers or packagers intending to use unit g for a substance requiring special packaging are d to submit such toxicological data to the sion's Office of Compliance.		P
(iii)Seque	ential test.		Р
and, dependent of child- not child- Further to and invol	ential test is initially conducted using 50 children, ending on the results, the criteria in table 1 e whether the package is either child-resistant or resistant or whether further testing is required. esting is required if the results are inconclusive ves the use of one or more additional groups of 50 each, up to a maximum of 200 children.		P
	dual shall administer the test to more than 30% of ten tested in each group.		Р
rejection the full 10 continues	vives the acceptance (pass), continue testing, and (fail) criteria to be used for the first 5 minutes and 0 minutes of the children's test. If the test is past the initial 50-child panel, the package is shown in table 1 are cumulative.		Р
Table 1 -	Number of Openings:		Р
The child	ren shall be divided into groups of two.		Р
children,	ng shall be done in a location that is familiar to the for example, their custoApry nursery school or indergarten. No child shall test more than two ackages.		P
each pac	ore than one special package is being tested, chage shall be of a different ASTM type and they presented to the paired children in random order.		Р
This orde	er shall be recorded.		Р
	ren shall be tested by the procedure incorporated owing test instructions:		Р



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US CPSC 16 CFR § 1700.20					
Clause	Requirement	Test		Result - Remark	Verdict

Standardized Child Test Instructions	Р
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.	Р
All packages shall be handled so that no damage or jarring will occur during storage or transportation.	Р
The packages shall not be exposed to extreme conditions of heat or cold.	Р
The packages shall be tested at room temperature.	P
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.	Р
The opening and resecuring shall not be done in the presence of the children.	Р
(In the adult-resecuring test, the tester must not open and resecure the package prior to the test.)	Р
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.	Р
200 children age group at 42-51 months	Р
100old-man age group at 50-70 years old	Р
It is not necessary for the testers to protocol test the packages that they opened and resecured.	Р
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.	Р
5. The testing shall take place in a well-lighted location that is familiar to the children and that is isolated from all distractions.	Р
6. The tester, or another adult, shall escort a pair of children to the test area.	Р



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US CPSC 16 CFR § 1700.20			
Clause	Requirement Test	Result - Remark	Verdict
	er shall seat the two children so that there is no rrier between the children and the tester.		Р
7. The tes	ster shall talk to the children to make them feel at		Р
	nildren shall not be given the impression that they ace or contest.		Р
They are fun.	not to be told that the test is a game or that it is		Р
They are	not to be offered a reward.		Р
	ster shall record all data prior to, or after, the test all attention can be on the children during the test		Р
devices to	ester shall use a stopwatch(s) or other timing o time the number of seconds it takes the child to package and to time the 5-minute test periods.		P
	egin the test, the tester shall hand the children packages and say, "PLEASE TRY TO OPEN R ME."		Р
	nild refuses to participate after the test has started, r shall reassure the child and gently encourage to try.		Р
	d continues to refuse, the tester shall ask the child ne package in his/her lap until the other child is		Р
	of children shall not be eliminated from the results e refusing child disrupts the participation of the ld.		Р
13. Each his/her pa	child shall be given up to 5 minutes to open ackage.		Р
The teste test.	er shall watch the children at all times during the		Р
	er shall minimize conversation with the children as ney continue to attempt to open their packages.		Р
	er shall not discourage the children verbally or with pressions. "please try to open the package").		Р
his/her pa	gets frustrated or bored and stops trying to open ackage, the tester shall reassure the child and acourage the child to keep trying (e.g.,		Р



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US CPSC 16 CFR § 1700.20			
Clause	Requirement Test	Result - Remark	Verdict
work on the both child	hildren shall be allowed freedom of movement to heir packages as long as the tester can watch ren (e.g., they can stand up, get down on the ang or pry the package).		P
the test sh	nild is endangering himself or others at any time, nall be stopped and the pair of children eliminated inal results.		Р
about ope	hildren shall be allowed to talk to each other ening the packages and shall be allowed to watch er try to open the packages.		Р
17. A chile	d shall not be allowed to try to open the other ckage.		Р
"THANK 'out of the	wild opens his/her package, the tester shall say, YOU," take the package from the child and put it child's reach. The child shall not be asked to package a second time.		Р
demonstr not opene	end of the 5-minute period, the tester shall ate how to open the package if either child has ed his or her package. A separate "demo" shall be used for the demonstration.		Р
20. Prior to ask the clushall not be	to beginning the demonstration, the tester shall nildren to set their packages aside. The children of allowed to continue to try to open their during the demonstration period.		P
21. The to	ester shall say, "WATCH ME OPEN MY E."		Р
tester sha from the o	the tester gets the children's full attention, the all hold the demo package approximately two feet children and open the package at a normal speed ester were going to use the contents.		Р
There sha	all be no exaggerated opening movements.		Р
23. The te	ester shall not discuss or describe how to open ge.		Р
	gin the second 5-minute period, the tester shall W YOU TRY TO OPEN YOUR PACKAGES."		Р



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	US CPSC 16 CFR § 1700.20			
Clause	Requirement Test	Result - Remark	Verdict	
open their shall say i 5-minute p WANT TC	or both children have not used their teeth to try to packages during the first 5 minutes, the tester mmediately before beginning the second period, "YOU CAN USE YOUR TEETH IF YOU D." This is the only statement that the tester shall ut using teeth.		P	
	est shall continue for an additional 5 minutes or children have opened their packages, whichever st.		Р	
27. At the "THANK Y	end of the test period, the tester shall say, 'OU FOR HELPING."		Р	
tester sha COULD U NOT PUT In additior PACKAGE YOURSEI	were told that they could use their teeth, the II say, "I KNOW I TOLD YOU THAT YOU ISE YOUR TEETH TODAY, BUT YOU SHOULD THINGS LIKE THIS IN YOUR MOUTH AGAIN" IN the tester shall say, "NEVER OPEN ES LIKE THIS WHEN YOU ARE BY LF. THIS KIND OF PACKAGE MIGHT HAVE ING IN IT THAT WOULD MAKE YOU SICK."		P	
_	nildren shall be escorted back to their classroom upervised area by the tester or another adult.		Р	
tester sha before beg	children are to participate in a second test, the ll have them stand up and stretch for a short time ginning the second test. The tester shall take he children do not disrupt other tests in progress.		Р	
(3)Senior-	adult panel -		Р	
(i)Test sub	pjects.		Р	
Use a gro	up of 100 senior adults.		Р	
	than 19% of the senior adults tested shall be from or tested at any one site.		Р	
	p of senior adults shall be randomly selected as bject to the limitations set forth below.		Р	
years of a	ye percent of the participants shall be 50-54 ge, 25% of participants shall be 55-59 years of 50% of the participants shall be 60-70 years old.		Р	



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	US CPSC 16 CFR § 17	700.20	
Clause	Requirement Test	Result - Remark	Verdict
60-70 sh apportion tester sh	percent of the participants of ages 50-59 and ages all be female (17 or 18 females shall be ned to the 50-54 year age group). No individual all administer the test to more than 35% of the dults tested.		P
test reco	rd of children	See table 1	Р
test reco	rd of adults	See table 2	Р
package: "special"	rening tests for this purpose shall use two s with conventional (not child-resistant (CR) or) closures. One closure shall be a plastic snap and the other a CT plastic closure.		Р
the CT cl	sure shall have a diameter of 28 mm±18%, and losures shall have been resecured 72 hours esting at 10 inch-pounds of torque.		Р
shall be i ounce fo	rainers for both the snap- and CT-type closures round plastic containers, in sizes of 2 ounce± 1/2 r the CT-type closure and 8 drams±4 drams for -type closure.		Р
package	who cannot open and close both of the screening s in 1-minute screening tests shall not be counted ipants in the senior-adult panel.		Р
percenta first (5-m	or adult use effectiveness (SAUE) is the ge of adults who both opened the package in the inute) test period and opened and (if appropriate) resecured the package in the 1-minute test		Р
(iv)Test p	procedures.		Р
	or adults shall be tested individually, rather than in f two or more.		Р
instruction special p	or adults shall receive only such printed ons on how to open and properly secure the backaging as will appear on or accompany the as it is delivered to the consumer.		Р
incorpora instructio	or-adult panel is tested according to the procedure ated in the following senior-adult panel test ons:		Р



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US CPSC 16 CFR § 1700.20					
Clause	Requirement Tes	t	Result - Remark	Verdict	
The follo	owing test instructions ar	e used for all senio	or tosts		

The following test instructions are used for all senior tests.	Р
If non-reclosable packages are being tested, the commands to close the package are eliminated.	Р
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.	Р
2. Each adult shall read and sign a consent form prior to participating.	Р
Any appropriate language from the consent form Apr be used to recruit potential participants. The form shall include the basic elements of informed consent as defined in 16 CFR 1028.116.	Р
Examples of the forms used by the Commission staff for testing are shown at § 1700.20(d).	Р
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.	Р
3. Each adult shall participate individually and not in the presence of other participants or onlookers.	Р
The tests shall be conducted in well-lighted and distraction-free areas.	Р
5. 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.	Р
Recording the test times to open and resecure the package are the only exceptions.	Р
6. 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 FOUND ON THE CAP."	Р
(Specify other instruction locations if appropriate.)	Р
7. The first package is handed to the participant by the tester, who says, "PLEASE OPEN THIS PACKAGE ACCORDING TO THE INSTRUCTIONS ON THE CAP." (Specify other instruction locations if appropriate.)	Р



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	US CPSC 16 CFR § 170	0.20	
Clause	Requirement Test	Result - Remark	Verdict
"PLEASE etc.) INTC the package PACKAGE INSTRUC	cage contains product, the tester shall say, EMPTY THE (PILLS, TABLETS, CONTENTS, O THIS CONTAINER." After the participant opens ge, the tester says, "PLEASE CLOSE THE E PROPERLY, ACCORDING TO THE TIONS ON THE CAP." (Specify other instruction f appropriate)		P
	ants are allowed up to 5 minutes to read the as and open and close the package.		Р
The tester	r uses a stopwatch(s) or other timing device to pening and resecuring times.		Р
	ed times in seconds to open the package and to package are recorded on the data sheet as two imes.		Р
closed the	minutes, or when the participant has opened and package, whichever comes first, the tester shall st materials from the participant.		Р
	ipant Apr remove and replace the closure more if the participant initiates these actions.		Р
trying to o tester sha	cipant does not open the package and stops pen it before the end of the 5-minute period, the II say, "ARE YOU FINISHED WITH THAT E, OR WOULD YOU LIKE TO TRY AGAIN?"		Р
open the p	cipant indicates that he/she is finished or cannot backage and does not wish to continue trying, struction 13.		Р
the partici "THIS IS A ACCORD (Specify o package o EMPTY T THIS CON package, PACKAGE INSTRUC	gin the second test period, the tester shall give pant another, but identical, package and say, AN IDENTICAL PACKAGE. PLEASE OPEN IT ING TO THE INSTRUCTIONS ON THE CAP." ther instruction locations if appropriate.) If the contains product, the tester shall say, "PLEASE HE (PILLS, TABLETS, CONTENTS, etc.) INTO NTAINER." After the participant opens the tester says, "PLEASE CLOSE THE PROPERLY, ACCORDING TO THE TIONS ON THE CAP." (Specify other instruction f appropriate.)		Р



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	US CPSC 16 CFR § 1700.20					
Clause	Requirement Test		Result - Remark	Verdict		
seconds) t	rticipants are allowed up to 1 minus of open and close the package. The conds to open and to close the part of the data sheet as two separate	e elapsed ackage are		Р		
and the en	nat elapses between the opening of d of the instruction to close the pass part of the 1-minute test time.			Р		
opened an	ne 1-minute test, or when the parti d finished closing the package, what, the tester shall take all the test no pant.	nichever		Р		
again. If the stops trying period, the	pant shall not be allowed to handle e participant does not open the pa g to open it before the end of the tester shall say, "ARE YOU FINIS CKAGE, OR WOULD YOU LIKE T	ackage and I-minute SHED WITH		P		
open the p this shall b 13. Particip 5-minute to	cipant indicates that he/she is finis ackage and does not wish to cont e counted as a failure of the 1-mir pants who do not open the packagest period are asked to open and desistant screening packages.	inue trying, nute test. le in the first		P		
The partici package.	pants are given a 1-minute test pe	eriod for each		Р		
	shall give the participant a packag OPEN AND PROPERLY CLOSE :."			Р		
	records the time for opening and whichever is less, on the data sheet			Р		
	then gives the participant the sectification of the section of the			Р		
	o open and resecure, or 61 second all be recorded on the data sheet.	ds, whichever		Р		
non-child-r	pants who cannot open and resect esistant screening packages are r 100-seniors panel. Additional part and tested.	ot counted as		Р		



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		US CPSC 16 CFR § 1700	0.20	
Clause	Requirement	Test	Result - Remark	Verdict
15. No ad sitting.	ult Apr participate	in more than two tests per		Р
		wo tests, the packages tested M type of package.		Р
necessary		r age group are tested than are UE, the last person(s) tested at group.		Р
(4)Younge	er-adult panel.			Р
overt phys	sical or mental ha	e 18 to 45 inclusive, with no ndicaps, and 70% of whom are test panel for younger adults.		Р
any one s to more th	ite. No individual nan 35% of the ad	ts shall be obtained or tested at tester shall administer the test ults tested. The adults shall be nan in groups of two or more.		Р
how to op	en and properly ropear on the packa	y such printed instructions on esecure the special packaging ge as it is delivered to the		Р
	tes shall be allow propriate, the rese	ed to complete the opening ecuring process.		Р
open and		the number of adults unable to the other adults tested who fail ecial packaging.		Р
packaging packaging	g and then proper g (if resecuring is	successfully open the special ly resecure the special appropriate) is the percent of he special packaging.		P
		ng, the percent of adult-use		Р

effectiveness shall be the number of adults who successfully open a single (unit) package.



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US CPSC 16 CFR § 1700.20					
Clause	Requirement Test	Result - Remark	Verdict		
purpose of subject to the act wi effectivent each and	tandards published as regulations issued for the of designating particular substances as being the requirements for special packaging under all stipulate the percent of child-resistant these and adult-use effectiveness required for where appropriate, will include any other as deemed necessary and provided for in the act.		P		
packaging regulation Commiss	commended that manufacturers of special g, or producers of substances subject to ns issued pursuant to the act, submit to the ion sumApries of data resulting from tests d in accordance with this protocol.		Р		
(d)Recom	nmendations		Р		
required,	ving instructions and procedures, while not are used by the Commission's staff and are nded for use where appropriate		Р		
(1)Report	format for child test.		Р		
A. Identifi	cation		Р		
	up color photographs(s) clearly identifying the and showing the opening instructions on the		Р		
2. Producthe packa	et name and the number of tablets or capsules in age.		Р		
3. Produc	et manufacturer.		Р		
4. Closure	e model (trade name - e.g., "KLIK & SNAP").		Р		
5. Closure	e size (e.g., 28 mm).		Р		
6. Closure	e manufacturer.		Р		
7. Closure	e material and color(s) (e.g., white //ene).		Р		
8. Closure	e liner material.		Р		
9. TAC se	eal material.		Р		
PUSHING	ing instructions (quote exactly, e.g., "WHILE G, DOWN, TURN RIGHT"). Commas are used to words that are on different lines.		Р		
11. Symb	ols, numbers, and letters found inside the		Р		
12. Packa	age model.		Р		



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US CPSC 16 CFR § 1700.20 Result - Remark Verdict Clause Requirement Test 13. Package material and color. Ρ 14. Net contents. 15. Symbols, numbers, and letters on the bottom of the Р package. 16. Other product identification, e.g., EPA Registration Ρ Number. B. Procedures 1. Describe all procedures for preparing the test packages. Р Р 2. Describe the testing procedures. P 3. Describe all instructions given to the children. Ρ 4. Define an individual package failure. C. Results Р Р 1. Openings in each 5-minute period and total openings for males and for females in each age group. 2. Opening methods (e.g., normal opening, teeth, etc.). Ρ P 3. Mean opening times and standard deviation for each 5-minute test period. 4. The percentage of packages tested at each site as a Ρ percentage of total packages. 5. The percentage of packages tested by each tester as a Р percentage of total packages. 6. Child-resistant effectiveness for the first 5-minute period Р and for the total test period. (2)Standardized adult-resecuring test instructions. CPSC Р will use the adult-resecuring test where an objective determination (e.g., visual or mechanical) that a package is properly resecured cannot be made. The adult-resecuring test is performed as follows: Adult-Resecuring Procedure Ρ 1. After the adult participant in either the senior-adult test of Р 16 CFR 1700.20(a)(3) or the younger-adult test of 16 CFR

Ρ

1700.20(a)(4) has resecured the package, or at the end of the test period (whichever comes first), the tester shall take

The adult participant shall not be allowed to handle the

the package and place it out of reach.

package again.



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	US CPSC 16 CFR § 1700	0.20	
lause	Requirement Test	Result - Remark	Verdict
resecure to the ch	ackages that have been opened and appear to be ed by adults shall be tested by children according hild-test procedures to determine if the packages en properly resecured.		P
	kages are given to the children without being or resecured again for any purpose.		P
3. Using apparent	the results of the adult tests and the tests of tly-resecured packaging by children, the adult use ness is calculated as follows:		Р
a. Adult	use effectiveness.		Р
plus the children the appa	umber of adult opening and resecuring failures, number of packages that were opened by the during the full 10-minute test that exceeds 20% of arently-resecured packages, equals the total of failures.		P
100) min	otal number of packages tested by adults (which is not the total number of failures equals the percent e effectiveness.		Р
(3)Repor	rt format for adult-resecuring test.		Р
A. Identi	fication		Р
	-up color photograph(s) clearly identifying the and showing the top of the closure.		Р
2. Produ the pack	ct name and the number of tablets or capsules in age.		Р
3. Produ	ct manufacturer.		Р
4. Closui	re model (trade name).		Р
5. Closui	re size (e.g., 28 mm).		Р
6. Closui	re manufacturer.		Р
7. Closui	re material and color(s) (e.g., white polypropylene)		Р
8. Closui	re liner material.		Р
9. Symbo	ols, numbers, and letters found inside the closure.		Р
10. TAC	seal material.		Р
PUSHIN	ning instructions (Quote exactly, e.g., "WHILE G, DOWN, TURN RIGHT"). Commas are used to e words that are on different lines.		P
12. Pack	kage model.		P



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13. Package material and color. 14. Net contents. P 15. Symbols, numbers, and letters on the bottom of the package. 16. Other product identification, e.g., EPA Registration Number. B. Procedures P 1. Describe all procedures for preparing the test packages. P 2. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results Adult Test P 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 3. Mean resecuring times and standard deviation for total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. P Child Test P	lause	Requirement Test	Result - Remark	Verdict
15. Symbols, numbers, and letters on the bottom of the package. 16. Other product identification, e.g., EPA Registration Number. B. Procedures P. 1. Describe all procedures for preparing the test packages. P. 2. Describe the testing procedures in detail. 3. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results P. 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females, and total openings by males. 2. Mean opening times and standard deviation for total openings, total openings by females and total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. P. Peoff, etc.)	13. Pack	age material and color.		Р
package. 16. Other product identification, e.g., EPA Registration Number. B. Procedures P 1. Describe all procedures for preparing the test packages. P 2. Describe the testing procedures in detail. P 3. Describe all instructions given to participants. P 4. Define an individual package failure and the procedures for determining a failure. C. Results P Adult Test P 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females; and packages resecured by males and by females, and total openings by males. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. P P P D D D D D D D D D D	14. Net c	contents.		Р
Number. B. Procedures 1. Describe all procedures for preparing the test packages. 2. Describe the testing procedures in detail. 3. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results Adult Test 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. Percentage of total packages. B. Percentage of packages tested by each tester as a percentage of total packages. B. Percentage of total packages. C. Results Percentage of total packages. Percentage of total packages. Percentage of total packages. C. Results Percentage of total packages. Percentage of total packages. Percentage of total packages.				Р
1. Describe all procedures for preparing the test packages. 2. Describe the testing procedures in detail. 3. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results P. Adult Test 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings to that resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)				Р
2. Describe the testing procedures in detail. 3. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results Padult Test P. 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	B. Proce	dures		Р
3. Describe all instructions given to participants. 4. Define an individual package failure and the procedures for determining a failure. C. Results P Adult Test P 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females; and packages resecured by males and by females, and total openings by males. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	1. Descri	be all procedures for preparing the test packages.		Р
4. Define an individual package failure and the procedures for determining a failure. C. Results Adult Test 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females, and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	2. Descri	be the testing procedures in detail.		Р
for determining a failure. C. Results PAdult Test P. Adult Test P. 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	3. Descri	be all instructions given to participants.		Р
Adult Test 1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)				Р
1. Total packages opened and total packages resecured; packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	C. Resul	ts		Р
packages opened by males and by females; and packages resecured by males and by females. 2. Mean opening times and standard deviation for total openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	Adult Te	st		Р
openings, total openings by females, and total openings by males. 3. Mean resecuring times and standard deviation for total resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	package	s opened by males and by females; and packages		Р
resecurings, total resecurings by females and total resecurings by males. 4. The percentage of packages tested at each site as a percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)				Р
percentage of total packages. 5. The percentage of packages tested by each tester as a percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)	resecurir	ngs, total resecurings by females and total		Р
percentage of total packages. 6. Methods of opening (e.g., normal opening, pried closure off, etc.)				Р
off, etc.)				Р
Child Test P		ds of opening (e.g., normal opening, pried closure		Р
	Child Tes	st		Р

P P

Р

for males and females in each age group.

3. Mean opening times and standard deviation for each

4. The percentage of packages tested at each site as a

2. Opening methods.

5-minute test period.

percentage of total packages.



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	US CPSC 16 CFR § 1700.20					
Clause	Requirement Test	Result - Remark	Verdict			
	rcentage of packages tested by each tester as a ge of total packages.		Р			
	mission uses the following consent forms for ult testing reclosable and unit-dose packaging, ely.		Р			
1. Reclos	able packages.		Р			
[Testing C	Organization's Letterhead]		Р			
Child-Res	sistant Package Testing		Р			
responsib packaging	Consumer Product Safety Commission is le for testing Testing procedure for special g to make sure they protect young children from and dangerous household products.		Р			
improve tl	nelp of people like you, manufacturers are able to he packages we use, keeping the contents safe lren but easier for the rest of us to open.		Р			
prevented	Testing procedure for special packaging have I thousands of poisonings since the Poison Act was passed in 1970.		Р			
prescription	of Testing procedure for special packaging on on medicines alone Apr have saved the lives of children since 1974.		P			
package t	this program, we are testing a child-resistant to determine if it can be opened and properly an adult who is between 50 and 70 years of age.		Р			
You Apr of testing.	or Apr not be familiar with the packages we are		Р			
	r time, and please do not feel that you are being re are testing the package, not you.		Р			
Description	on of the Test		Р			
	ve you a package and ask you to read the as and open and properly close the package.		Р			
	ighty-five percent children can't open the before demonstration	100%				
	ighty percent children can't open the package onstration	100%				
At least 9 within five	0% adults can open and close the package minutes	100%				



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US CPSC 16 CFR § 1700.20					
Clause Requirement Test	Result - Remark	Verdict			
Date of Test	May.19,2021				
Testing time:	11:30-12:00 am				
Manufacturer:	Prime Care Inc				
Specification is provided model:	CTCRSIL				
Test place	Kindergarten and old people's home				
Effective Testing procedure for special packaging have prevented thousands of poisonings since the Poison Prevention Act was passed in 1970.		Р			



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	US CPSC 16 CFR § 1700.20				
Clause	Requirement	Test		Result - Remark	Verdict

Test place: kindergarten Test time: May 19 2021

Can't turn it on.: N

It's on.: Y

Test person distribution

	_		
Age(months)	Boys	Girls	Total
42-45	28	23	51
45-48	31	33	64
48-51	45	40	85
Total	104	96	200

statistical result

No demonstration

1st group

No.	Re	sult	No.	Resu	ılt	No.	Res	sult	No.	Res	sult
1		N	14		Ν	27		N	40		Ν
2		N	15		Ν	28		N	41		Ν
3		N	16		Ν	29		N	42		Ν
4		N	17		N	30		N	43		N
5		N	18		N	31		N	44		N
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		Ν
9		N	22		N	35		N	48		N



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US CPSC 16 CFR § 1700.20													
Clause	Requiren	ent Te	st		Re	esult - R	emark	Verdict					
10	N	23	N	36		N	49	N					
11	N	19	N	37		N	50	N					
12	N	25	N	38		N							
13	N	26	N	39		N	1						

2nd group

No.	Re	sult	No.	Re	sult	No.	Res	sult	No.	Re	sult
1		N	14		N	27		N	40		N
2		N	15		N	28		N	41		N
3		N	16		N	29		N	42		N
4		N	17		N	30		N	43		N
5		N	18		N	31		Ν	44		N
6		N	19		N	32		Ν	45		Ν
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		N	36		Ν	49		N
11		N	19		N	37		N	50		N
12		N	25		N	38		N			
13		N	26		N	39		N			

3rd group

					•	9. 0	~P				
No.	Res	sult	No.	Res	sult	No.	Res	sult	No.	Res	sult
1		N	14		N	27		N	40		N
2		N	15		N	28		N	41		N
3		N	16		N	29		N	42		N
4		N	17		Ν	30		N	43		Ν
5		N	18		N	31		N	44		Ν
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		Ν	36		Ν	49		Ν
11		N	19		Ν	37		N	50		Ν
12		N	25		N	38		N			
13		N	26		N	39		N			



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			US CPSC 16 CFR § 1700.2	0	
Clause	Requirement	Test		Result - Remark	Verdict

4th group

No.	Re	sult									
1		N	14		N	27		N	40		N
2		N	15		N	28		N	41		N
3		N	16		N	29		N	42		N
4		N	17		N	30		N	43		N
5		N	18		N	31		N	44		N
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		N	36		N	49		N
11		N	19		N	37		N	50		N
12		Ν	25		N	38		Ν			·
13		N	26		N	39		N			

After demonstration table 1

1st group

No.	Res	sult	No.	Result	No.	Res	ult	No.	Res	sult
1		N	14	N	27		Ν	40		N
2		N	15	N	28		Ν	41		N
3		N	16	N	29		Ν	42		N
4		N	17	N	30		Ν	43		N
5		N	18	N	31		Ν	44		N
6		N	19	N	32		N	45		N
7		N	20	N	33		N	46		N
8		N	21	N	34		N	47		N
9		N	22	N	35		N	48		N
10		N	23	N	36		N	49		N



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US CPSC 16 CFR § 1700.20													
Clause	Re	quireme	nt Test				R	esult - Re	emark	Verdict			
11		N	19		N	37		N	50	N			
12		N	25		N	38		N					
13		N	26		N	39		N	1				

2nd group

No.	Re	sult	No.	Re	sult	No.	Res	sult	No.	Re	sult
1		N	14		N	27		Ν	40		Ν
2		N	15		N	28		N	41		N
3		N	16		N	29		N	42		N
4		N	17		N	30		N	43		N
5		N	18		N	31		N	44		N
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		N	36		N	49		N
11		N	19		N	37		Ν	50		N
12		N	25		N	38		N			
13		N	26		N	39		Ν			

3rd group

					-	9					
No.	Res	sult	No.	Res	sult	No.	Res	sult	No.	Re	sult
1		N	14		N	27		N	40		N
2		N	15		N	28		N	41		N
3		N	16		N	29		N	42		N
4		N	17		N	30		N	43		N
5		N	18		N	31		N	44		N
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		N	36		Ν	49		N
11		N	19		N	37		N	50		N
12		N	25		N	38		N			
13		N	26		N	39		Ν			



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			US CPSC 16 CFR § 1700.2	0	
Clause	Requirement	Test		Result - Remark	Verdict

4th group

						tui gi o	aρ				
No.	Re	sult	No.	Re	sult	No.	Re	sult	No.	Re	sult
1		N	14		N	27		N	40		N
2		N	15		N	28		Ν	41		Ν
3		N	16		N	29		N	42		N
4		N	17		N	30		N	43		N
5		N	18		N	31		N	44		N
6		N	19		N	32		N	45		N
7		N	20		N	33		N	46		N
8		N	21		N	34		N	47		N
9		N	22		N	35		N	48		N
10		N	23		N	36		N	49		N
11		N	19		N	37		N	50		N
12		N	25		N	38		N			
13		N	26		N	39		Ν			

Test Old-man distribution table 2

Age(years old)	Male	Female	Total
50-54	11	18	29
55-59	7	14	21
60-70	12	38	50
Total	30	70	100

statistical result

1st group

No.	Re	sult									
1	Υ		14	Υ		27	Υ		40	Υ	
2	Υ		15	Υ		28	Υ		41	Υ	
3	Υ		16	Υ		29	Υ		42	Υ	



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US CPSC 16 CFR § 1700.20											
Clause	Require	ment Tes				Verdict					
4	Y		17	Υ		30	Υ		43	Υ	
5	Υ		18	Υ		31	Υ		44	Y	
6	Υ		19	Υ		32	Υ		45	Υ	
7	Υ		20	Υ		33	Υ		46	Υ	
8	Υ		21	Υ		34	Υ		47	Υ	
9	Υ		22	Υ		35	Υ		48	Υ	
10	Υ		23	Υ		36	Υ		49	Y	
11	Υ		19	Υ		37	Υ		50	Υ	
12	Υ		25	Υ		38	Υ				•
13	Υ		26	Υ		39	Υ				

2nd group

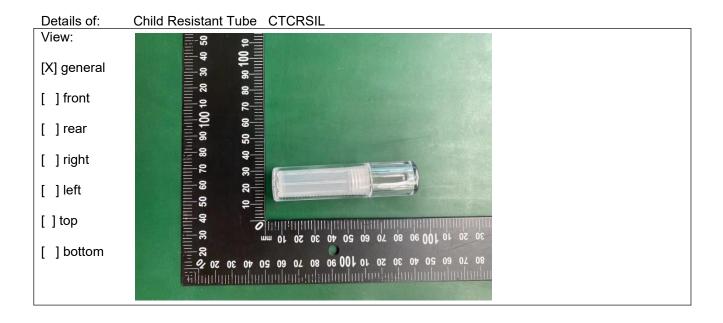
	=a g a.p										
No.	Re	sult	No.	Re	sult	No.	Re	sult	No.	Re	sult
1	Υ		14	Υ		27	Υ		40	Υ	
2	Υ		15	Υ		28	Υ		41	Υ	
3	Υ		16	Υ		29	Υ		42	Υ	
4	Υ		17	Υ		30	Υ		43	Υ	
5	Υ		18	Υ		31	Υ		44	Υ	
6	Υ		19	Υ		32	Υ		45	Υ	
7	Υ		20	Υ		33	Υ		46	Υ	
8	Υ		21	Υ		34	Υ		47	Υ	
9	Υ		22	Υ		35	Υ		48	Υ	
10	Υ		23	Υ		36	Υ		49	Υ	
11	Υ		19	Υ		37	Υ		50	Υ	
12	Υ		25	Υ		38	Υ				
13	Υ		26	Υ		39	Υ				



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US CPSC 16 CFR § 1700.20							
Clause	Requirement	Test		Result - Remark	Verdict		

Child Resistant Tube CTCRSIL Details of: View: 8 [X] general 20 [] front 90 [] rear 8 2 30 [] right 09 20 [] left mm 01 02 02 04 03 03 08 08 001 01 8 30 [] top [] bottom





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US CPSC 16 CFR § 1700.20							
Clause	Requirement	Test		Result - Remark	Verdict		

Child Resistant Tube CTCRSIL Details of: View: 99 20 20 [X] general [] front 80 90 100 10 [] rear [] right 20 [] left 9 20 OS 02 05 04 05 05 05 08 06 001 or os os [] top [] bottom OZ OZ OZ OT OS O9 OZ O8 O6 OOL OL OZ OZ OF OS O9 OZ O8 O6 OOZ OL OZ OZ

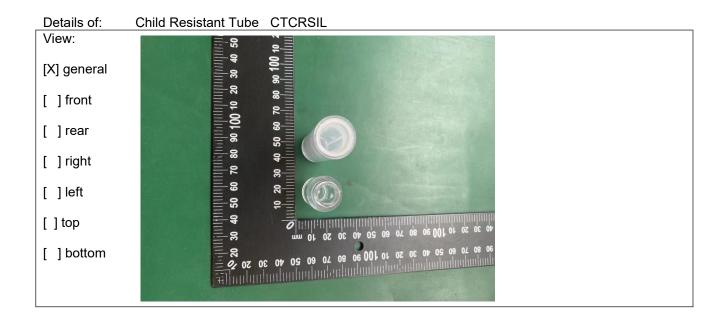




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US CPSC 16 CFR § 1700.20							
Clause	Requirement	Test		Result - Remark	Verdict		

Child Resistant Tube CTCRSIL Details of: View: [X] general 20 [] front [] rear 20 \$ [] right 2 20 [] left mm 0f 0S 0E 04 0E 09 07 08 0E 001 of [] top 三夕 oz oz ot os o9 oz o8 o6 001 oz oz ot os o9 oz o8 o6 000 [] bottom





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US CPSC 16 CFR § 1700.20								
Clause	Requirement	Test		Result - Remark	Verdict			

- End of Test Report -