

July 23, 2021

Dear Valued Customer,

Subject: Child-Resistant Closure Protocol Test Results for:

VCCR16

- Full Adult (Age 50-70),
- Senior Adult (Age 60-70)
- Children

Enclosed with this letter is a copy of the results of the protocol test conducted with adults and children on child-resistant closures.

It is important to note that on the protocol test results we are sending to you we have recorded the container type and size, the closure components including the liner, the package preparation conditions, as well as the test conditions. The closures, lining materials, and containers selected by [REDACTED] for protocol testing are not intended to duplicate any specific customer packages or specifications.

It is particularly important that you, as the packager using child-resistant packaging, carefully monitor the performance of your production line and the performance of your package in the marketplace since both the Poison Prevention Packaging Act as administered by the Consumer Product Safety Commission and the Federal Insecticide, Fungicide, and Rodenticide Act as administered by the Environmental Protection Agency place the responsibility for proper performance of special packaging on the packager.

Further significance of these protocol test results lies in the fact that they in no way imply CR closures will perform under all conditions of application, package storage and package handling or will perform satisfactorily on containers of a different size and shape. These studies do document that the [REDACTED] closure has the capability to fulfill the requirements as per the current Code of Federal Regulations (CFR) Title 16, Part 1700.

Lastly, whether you accept the [REDACTED] protocol data or elect to generate protocol data on your own specific packages can only be determined after you have considered all the requirements for child-resistant packaging, as detailed in the regulation applicable to your particular product and have discussed this entire matter with your legal counsel.

We certainly hope the enclosed information will be helpful to you. If you have any questions concerning it, we would be pleased to discuss them with you.

***** SENIOR ADULT PROTOCOL TEST *****
AGE GROUP: 50-70 YEARS

Test Number: n/a

Test Date: December 1997

CLOSURE INFORMATION

Closure Type: Purse-Pak Closure

Size: 16mm

Inner Material: NA

Outer material: Phillips 66 CH200L PP (One Piece Closure)

Liner: None

CONTAINER INFORMATION

Container Type: VCCR16

Size: 5mL

Finish: 16mm/400

Shape: Round

Container Material: PP

PACKAGE PREPARATION

Initial Application Torque: Presented to adult in locked position

1 Week Removal Torque (avg.): n/a

End of Test Removal Torque (avg.): n/a



TEST RESULTS

SEX	NO. TESTED	NO. SUCCESSFULLY OPENED AND RECLOSED
FEMALE	70	65
MALE	30	29

TOTAL PACKAGES	100	94
TOTAL PERCENT	100%	94%

PROTOCOL SUMMARY:

<u>Initial SAUE %</u>	<u>Child Portion Opened %</u>	<u>Final SAUE %</u>
94%	0.18%	94%

Based on test results, the submitted package meets the senior-adult criteria set forth by 16 CFR Part 1700.15 and 1700.20.

*** * * SENIOR- ADULT PROTOCOL TEST * * ***

AGE GROUP: 60-70 YEARS

Test Number: 18-012

Test Date: June 8 – 19, 2018

CLOSURE INFORMATION

Closure Type: Purse Pak

Size: 16mm

Inner Material: n/a

Outer material: Polypropylene / white color

Liner: fitment

CONTAINER INFORMATION

Container Type: VCCR16

Size: n/a

Finish: 16-400

Shape: Cylinder

Container Material: PP



PACKAGE PREPARATION

Initial Application Torque: Applied to click

TEST RESULTS

SEX	NO. TESTED	NO. SUCCESSFULLY OPENED AND RECLOSED
FEMALE	35	35
MALE	15	15
TOTAL	50	50
	PERCENT	100

Initial SAUE

Child Portion Opened

Final SAUE

100%

n/a

100%

Test conducted complies with 16 CFR Part 1700.15 and 1700.20

* * * **CHILDREN'S PROTOCOL TEST** * * *

Test Number: 18-013

Test Date: May 15 – June 1, 2018

CAP INFORMATION

Closure type: Purse Pak

Size: 16mm

Inner Material: n/a

Outer Material: Polypropylene / white color

Liner: fitment

CONTAINER INFORMATION

Container Type: VCCR16

Size: n/a

Finish: 16/400

Shape: Cylinder

Container Material: PP

PREPARATION OF THE TEST PACKAGES

Initial application: Applied to click

Re-application: n/a (lug type packages)

Comments: 2 child openings before demo



TEST RESULTS

NUMBER OPENED

AGE (MO.)	NO. CHILDREN TESTED	GIRLS	BOYS	5 MIN. BEFORE DEMONSTRATION	5 MIN. AFTER DEMONSTRATION
42	8	5	3	0	0
43	5	1	4	0	0
44	2	1	1	0	0
45	1	0	1	0	0
46	7	4	3	0	0
47	3	2	1	0	0
48	9	4	5	1	0
49	4	1	3	0	0
50	6	3	3	0	0
51	5	4	1	1	0
TOTALS:	50	25	25	2	0

Summary – 96% Effectiveness before demonstration; 96% Effectiveness after demonstration

Test conducted complies with 16 CFR Part 1700.15 and 1700.20