CPSA 6 (b)(1) Cleared
4/9/97
X No Mfrs/PrvtLblrs or
Products Identified
___Excepted by_____
___Firms Notified,
Comments Processed.

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE

Division of
Regulatory Management

MAR 19 1997

Mary F. Toro
Compliance Officer
Tel: 301-504-0400 ext.1378
Fax: 301-504-0359

Ethylene Glycol Antifreeze Producers

To Whom It May Concern:

This letter is written in response to recent requests for an extension of time regarding the implementation date for suggested first aid labeling for ethylene glycol based antifreeze. The October 21, 1996 *Federal Register* notice announced a revocation of the statement of policy at 16 CFR 1500.132, which sets forth examples of a hazard warning label for ethylene glycol-based radiator antifreeze that would meet the FHSA requirements.

At the time the FDA published the example of hazard labeling for this product, the most common technique to reduce gastrointestinal absorption of most ingested poisons was to induce emesis (vomiting) with syrup of ipecac. Current medical information indicates that this practice is often ineffective in reducing absorption of a toxin when administered more than one hour after ingestion. In addition, syrup of ipecac may not be appropriate in certain circumstances. Thus, the use of syrup of ipecac has declined and the American Associate of Poison Control Centers, PoisIndex, and the American Association of Pediatrics now recommend consulting a medical professional before inducing vomiting for ingestion of any toxic substances.

Based on this information, the Commission revoked the suggested labeling for ethylene glycol-based antifreeze because the first aid instruction is no longer medically appropriate. Although the revocation was effective immediately, the Commission delayed enforcement to coincide with the products annual production and packaging period. According to information provided by the industry to staff, annual production of the antifreeze begins in May and labels are generally ordered prior to production. Therefore, ethylene glycol-based antifreeze introduced into

commerce after April 1, 1997 was expected to bear an appropriate first aid instruction to satisfy the FHSA requirements.

It was expected that the six month delay in enforcement would allow manufacturers sufficient time to make appropriate labeling changes. However, several manufacturers have written to the Commission to request an extension of time to comply with appropriate first aid labeling. The basis of those requests were inventory costs and time to re-tool/label. Based on the information submitted by the manufacturers, the allowance of an extension in time seems reasonable.

The staff will allow any manufacturer having difficulty complying by the April 1, 1997 date, or requiring additional time to exhaust label or package inventories, a six month extension, until September 30, 1997, to meet the deadline. In addition, the staff will consider the compliance date to be the "date filled" instead of "the date introduced into commerce." Therefore, ethylene glycol antifreeze with a fill date of October 1, 1997 and after will be expected to bear appropriate first aid instructions that satisfy the FHSA requirements.

Any questions concerning the allowance of this time extension should be addressed to the undersigned at the above telephone number.

Sincerely,

Mary F. Toro

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