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LOG OF MEETING

U.S. CONSUMER PRODUCT SAFETY COMMISSION  
OFFICE OF COMMISSIONER MARY SHEILA GALL

SUBJECT: THE PPPA PROTOCOL REVISION

DATE OF MEETING: MARCH 2, 1995

PLACE: CPSC Headquarters/Room 722

LOG ENTRY SOURCE: PATRICIA M. SEMPLE

DATE OF ENTRY: MARCH 2, 1995

COMMISSION ATTENDEES:

Commissioner Mary Sheila Gall  
Bruce Navarro  
Patricia Semple

NON-COMMISSION ATTENDEES:

William W. Bradley, Nonprescription Drug Manufacturers Association  
Donald A. Cadge, McNeil Consumer Products Company  
Nick Wakeman, Product Safety Letter

SUMMARY OF MEETING:

SEE ATTACHMENT

ATTACHMENT: THE PPPA PROTOCOL REVISION MEETING LOG OF MARCH 2, 1995

Visit was requested by Bill Bradley in order to present new data re. PPPA protocol revisions.

NDMA has data which indicates child resistance is compromised with the senior protocols. Even though their testing is well within approval ranges, member companies are not satisfied with lowering their currently established passing rates in the high 90%. They feel it is an ethical issue to allow any decrease whatsoever in child resistance since there is no absolute proof that senior friendly packaging will cause people to replace tops after opening.

Moreover, member companies are uncomfortable having packaging which will pass the cr protocols (in the 80%) range, which they feel can be opened by some children even when properly secured.

The issue of the regulations requiring these protocols with perhaps resulting lower child resistance (but still well above passing) does not assuage their ethical issue of allowing any decrease whatsoever in their cr packaging.

Their research (per ASTM) indicates that adults over the age of 70 have far too many variables which may in fact be the problem with the lower cr test results. Because their data indicates that the variables are non-existent at age 70 and below, they feel the upper age panels compromise their results.

They plan to submit written comments during the open period and request an opportunity to testify at the March 16th hearing.