

LOG OF MEETING

SUBJECT: Child Resistant Packaging for household chemical products meeting.

DATE OF MEETING: 12-13-94

PLACE: CPSC Headquarters, Room 605

LOG ENTRY SOURCE: Michael T. Bogumill, CERM

COMMISSION REPRESENTATIVES: Michael T. Bogumill, CERM; Charles J. Wilbur, HSPS; and Suzanne Barone, HSPS

NON-COMMISSION REPRESENTATIVES: David Crow, DC Legislative & Regulatory Services; Dan Paradiso, The Andersons; and Nick Wakeman, Product Safety Letter.

SUMMARY OF MEETING

This meeting was held at the request of David Crow, consultant to The Andersons, a large agricultural products company in the midwest. Mr. Paradiso presented a unique packaging concept at the meeting for a pesticide (fungicide) product wherein the toxic chemical in concentrated form is all contained inside a child-resistant capsule inside a plastic bottle cap. When the cap is screwed onto the plastic container, a ridge inside the bottle causes the capsule to release the chemical into the water-filled spray bottle where the chemical is diluted for use. The products this container is designed for fall under EPA jurisdiction, but the firm is concerned that the packaging system meet the protocol test procedures for child-resistance in the PPPA. The package, which is manufactured in Germany, consists of a quart size plastic bottle with a long neck topped by a pump spray assembly and a second opening with a non-CR screw cap. The product is located inside a capsule inside 4 plastic child-resistant screw caps that fit into a groove on the outside of the bottle for storage before use. The plastic product caps may also be sold separately in units of 4 caps.

Mr. Paradiso and Mr. Crow were provided with copies of the PPPA regulations booklet and the briefing package for the final rule proposal for protocol revisions meant to make CR packaging more "Senior Friendly."

CPSA 6 (b)(1) Cleared

✓ No N/ps/Prvtlbrs or ²⁻⁹⁻⁹⁵ ~~110~~
Products Identified
Exempted by _____

