

**LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES**

SUBJECT: Meeting with ASTM F02 Mechanical Dispensers and Subcommittee

DATE OF MEETING: March 28, 2019

PLACE OF MEETING: Virtual (teleconference)

LOG ENTRY SOURCE: Mark Eilbert (LSM)

COMMISSION ATTENDEES: Mark Eilbert (LSM) & Jill Hurley (ESHF)

NON-COMMISSION ATTENDEES: Mark Plezia (Merck), John Punzi (Consumer Healthcare Products Association), Dan Budnitz (CDC), James Farrell (ASTM)

SUMMARY OF MEETING:

This meeting with members of the ASTM F02.30 subcommittee for Mechanical Dispensers was intended to discuss the CPSC staff comments on the ballot item: Test Method for Assessing Non-Metered Restricted Delivery Systems for Liquid Consumer Products WK41534, a new standard. The meeting was led by Mark Plezia.

The meeting began with a discussion of CPSC staff technical comments on the ballot item which closed March 15, receiving no negative votes. Technical comments addressed the dimensions used for the test fixtures in the ballot item. CPSC staff explained that their recommended dimensions for the thumb and palm, and the grip force for the squeeze test and the forearm length in the deceleration test are from published anthropometric data. The sources of the ASTM dimensions were not clear, as there is no rationale in the balloted standard. In addition, staff explained that the CPSC squeeze test fixture and its dimensions are related to but are not intended as a recommended replacement for the subject test fixture or dimensions in the ballot item, as is explained in a published Guidance document¹. The CPSC test fixture assesses the flow from the container when squeezed vertically, while the ASTM fixture squeezes horizontally. CPSC staff also reiterated their desire to see rationales included for the test methods in the ballot item. ASTM attendees expressed their opinion that rationales could be included as a separate section or in footnotes.

The discussion concluded with an understanding that CPSC comments were advisory and that they could be incorporated in future updates to the standard.

¹ March 8, 2019 – Nicotine Packaging Test Parameters Letter to Stakeholders. <https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Liquid-Nicotine-Packaging-Business-Guidance>