LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Task group meeting – "ASTM F15.77 Task Group on Test Methods RE: Storage Containers"
DATE OF MEETING: March 19, 2020 2:00pm, ET
LOG ENTRY SOURCE: Stephen Harsanyi (ESHF)
DATE OF LOG ENTRY: March 25, 2020
LOCATION: Teleconference
CPSC ATTENDEE(S): Patricia Edwards (EXHR), Stephen Harsanyi (ESHF), and Timothy Smith (ESHF).
NON-CPSC ATTENDEE(S): Contact ASTM for the attendee list.

Summary of meeting:
The task group discussed sections 9.2.2 and 9.2.3 of the "Draft Standard for Marketing & Labeling Magnet Sets Containing Small Loose, Powerful Magnets with a Flux Index ≥ 50," concerning packaging options and requirements for the permanent storage container that must be included with magnet sets.

During the discussion of the packaging options, CPSC staff raised concern that, based on current incident data, the majority of victims have been 5 years of age or older. For this reason, CPSC staff recommended changing or removing certain options, especially those limiting access only to children under 3 years. Regarding this concern, the task group decided to do the following:

(1) Adjust the second bulleted item of 9.2.2, which refers to the force required to open the permanent storage container. The task group increased the requisite force from "at least 10 lbf or 3 inches lbf" to "at least 15 lbf or 4 inches lbf." A task group member explained that the increased force requirement accounts for children up to 96 months of age.
(2) Remove the third bulleted item of 9.2.2, which refers to the cognitive understanding of children under 3 years of age.

At least one task group member stated that users may not reliably use the packaging because of the intended uses of the product. Another task group member raised concern that the requirements of the PPPA, cited in the fourth bullet of 9.2.2, may be overly restrictive for packaging design. Other task group members, including CPSC staff, stated that the PPPA requires performance-based testing, and would likely not be unreasonably restrictive for packaging design.

The task group discussed section 9.2.3, which refers to the longevity of the permanent storage container's closing mechanism (per section 9.2.2). The task group agreed that this section should specify a minimum count of open and close cycles before the closure is rendered ineffective. CPSC staff voiced concern regarding how to quantify the "expected life of the product," which several task group members indicated was only 1 year; they explained that the product loses utility over time, both because of the temporary coating and because they feel the user will lose interest over time. CPSC staff stated that secondary users are also a concern, and both CPSC staff and another task group member questioned whether the product actually loses utility after 1 year of use. In response to CPSC staff's concern, several manufacturers on the call stated that they would attempt to acquire end user input regarding the longevity of the product.

Additionally, CPSC staff indicated that they would upload (to the subcommittee's online collaboration area) the results from recent pictogram research performed by a contractor for the CPSC, which includes

a magnet ingestion hazard pictogram.[1] CPSC staff explained that the pictogram did not pass ANSI's comprehension requirements, but that it would be good to discuss.

Next Steps:
The task group will review the pictogram and compare it to the pictogram licensed by NASPGHAN. The task group will report their thoughts on the matter to the subcommittee; note, staff stated that this would be an opinion-based activity, and not scientific.

The next subcommittee meeting is scheduled for April 7, 2020 at 1:00 PM ET, during which the subcommittee plans to focus the discussion predominantly on the consideration of performance requirements for the draft standard.

[1] https://cpsc.gov/s3fs-public/CPSC%20Gather%20Consumer%20Feedback%20-%20Final%20Report%20with%20CPSC%20Staff%20Statement%20-%20REDACTED%20and%20CLEARED.pdf