



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

**Poison Prevention Packaging Act (PPPA) Enforcement Discretion  
Second Extension Letter**

April 22, 2021

Dear Sir or Madam:

This letter updates my June 25, 2020 [letter](#) and November 15, 2020 [letter](#), in which I communicated an allowance for temporary use of alternative testing to demonstrate regulatory compliance of packages subject to the testing requirements of the Poison Prevention Packaging Act (PPPA) and its implementing regulations under 16 CFR part 1700. I am writing now to extend this allowance through December 31, 2021, due to continued challenges of performing testing due to the COVID-19 pandemic.

The specifics of this temporary allowance are contained in my earlier letters. There is also a helpful question and answer document attached to the November 15, 2020, letter that you may want to revisit. For regulated products in special packaging that are certified using any of the alternatives outlined in our enforcement discretion, the importer or domestic manufacturer of the products must submit the General Certificate of Conformity (GCC) and testing protocol data to the Office of Compliance before distribution into commerce. Please submit this information via e-mail to [RegulatedCMT@cpsc.gov](mailto:RegulatedCMT@cpsc.gov). All other requirements under 16 CFR § 1700.20 remain in full force and effect.

Testing to an acceptable alternative method must be initiated by December 31, 2021, in order to use this temporary enforcement discretion. We are declining to specify a date or time frame by which such alternative testing must be completed due to the fluidity of the pandemic and the constraints it presents. Nevertheless, we remind you that prompt completion of testing is encouraged and expected.

Thank you for your attention and continued cooperation during this challenging time. Please direct any questions to: [RegulatedCMT@cpsc.gov](mailto:RegulatedCMT@cpsc.gov).

Sincerely,

Robert S. Kaye  
Director  
Office of Compliance and Field Operations