

Log of Meeting

2/3/19/95

Subject: Proposed PPPA protocol revisions.

Date of Meeting: March 22, 1995.

Location of Meeting: Williams and Jensen, 1155 21st Street, NW, Suite 300, Washington, DC.

Date of Log Entry: May 2, 1995.

CPSC Attendees: Eric Rubel, General Counsel and Robert Wager, Director, Office of Congressional Relations.

Non-CPSC Attendees: William Bradley, Nonprescription Drug Manufacturers Association; Darla Williamson, Closure Manufacturers Association; Kathleen Sanzo, Morgan, Lewis & Backius; Jack McMackin, Williams & Jensen; Steve Hart, Williams & Jensen; Sally Pfund, Williams & Jensen; and Peter Mayberry, Health Care Compliance Packaging Council.

Summary of Meeting: The purpose of the meeting was to discuss the proposed protocol revisions to test child-resistant packages under the Poison Prevention Packing Act of 1970. The following issues were discussed:

1. Industry representatives proposed changing the adult test panel from 60-75 year olds to 18-60 year olds.
2. Industry representatives did not object to the 5 minute/1 minute test in the adult protocol.
3. Industry representatives proposed that the adult test panel include only 100 participants, with a passing score of 90%.
4. Industry representatives proposed eliminating the resecure verification test.
5. Industry representatives proposed eliminating references to child consent forms or that they only be recommended.
6. Industry representatives proposed deleting the statement that children be told they may use their teeth to open packaging during the child test.
7. Industry representatives proposed delaying the publication date for the rule, adopting a more lenient approach to extensions of the effective date, and announcing an enforcement policy.
8. Industry representatives said that some companies would like to increase the child test score, but that other companies disagreed.

2/2

In addition, Bob Wager asked Bill Bradley whether NDMA would provide the information requested by CPSC concerning charts that NDMA submitted along with its supplemental comments.