

## CR PACKAGING TESTING OVERVIEW

### **TESTING**

*Testing is conducted on packaging in finished format as the consumer will use the package. Closures alone are not CR certified - they are part of the finished packaging that can be certified.*

- **Testing Protocols**

- *In US - Consumer Product Safety Commission (16 CFR, part 1700)*
- *In EU - ISO 8317 : 2015*
- *The testing procedures are similar between US and EU.*
- *Testing is conducted by a special lab / firm.*

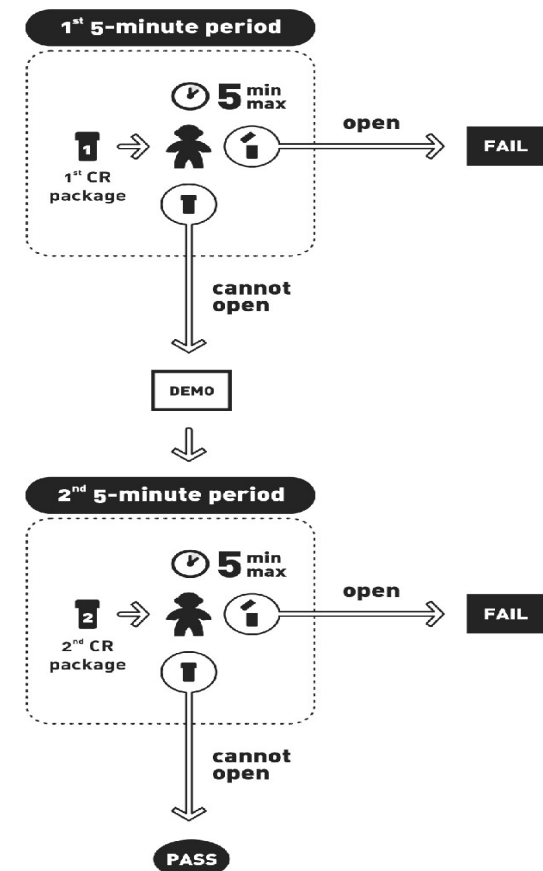
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#### • Basic Testing Steps - Children

- Four-year old children 42 to 51 months, 50% female / male.
- Two children at a time with a moderator at a location the children are comfortable.
- Children are given the package and asked to try to open.
- If a child gets into the package by any means it is a fail.
- After 5 mins the moderator demonstrates opening the package, mentions children can use their teeth.
- The children are given another 5 mins to try to open the package, 10 mins total.

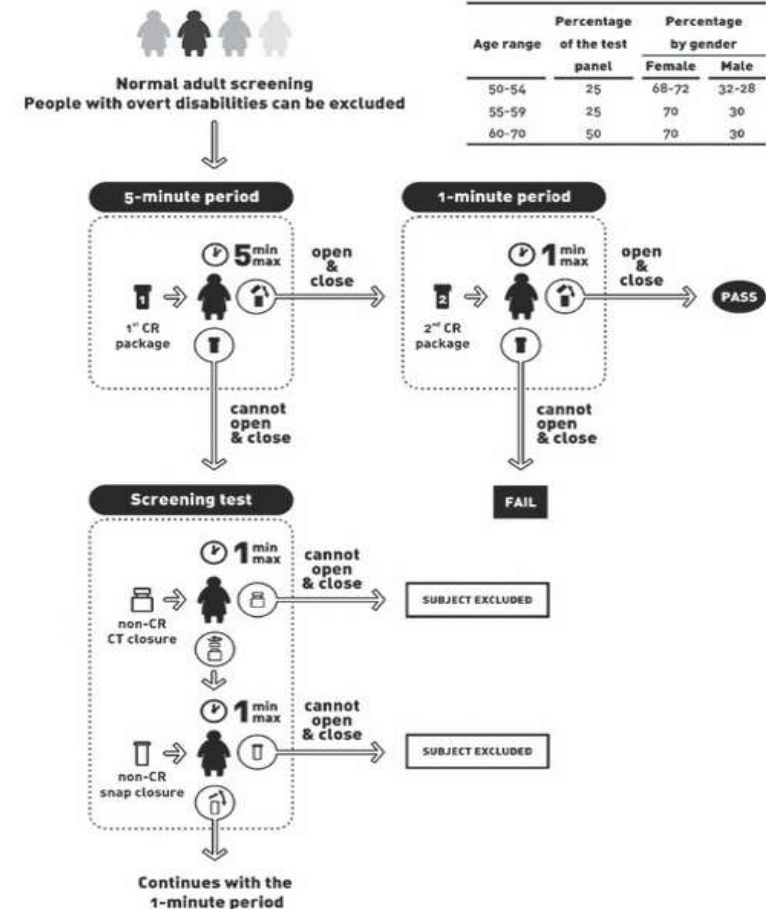
Test Panel	Cumulative number of children	Package Openings					
		First 5 minutes			Full 10 minutes		
		Pass	Continue	Fail	Pass	Continue	Fail
1....	50	0 – 3	4 – 10	11+	0 – 5	6 – 14	15+
2....	100	4 – 10	11 – 18	19+	6 – 15	16 – 24	25+
3....	150	11 – 18	19 – 25	26+	16 – 25	26 – 34	35+
4....	200	19 – 30	.....	31+	26 – 40	.....	41+



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- **Basic Testing Steps – Senior Adults**
  - One-hundred senior adults participants age 50 to 70.
  - Participants are tested individually.
  - Instructions provided are those printed on package.
  - 1<sup>st</sup> test - allowed up to 5 minutes to read the instructions and open and close the package.
  - 2<sup>nd</sup> test - allowed up to 1 minute to open and close a second identical package.
  - Adult-use effectiveness of not less than 90 percent.



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- **Discussion about CR Closures and Testing**

- *There is no such thing as CR certified zipper / closure.*
- *Only a complete package can be tested, a zipper / closure is part of a certified package.*
- *In principle each specific package, size, material, closure has to be tested. In practice it is acceptable to test the smallest and largest package and include the range between.*
- *Packages are only CR certified if they pass both the children and senior adult testing. In the cannabis market likely only the child portion of the CR certification is completed in some instances.*
- *Rules / regulations on what products require CR certified packaging can be vague.*