



Terminology Guide

Poison Prevention Packaging Act

Official Terminology

- **Special packaging**
- **Child-resistant**
- **Senior-friendly**
- **Tamper-resistant**

The US Poison Prevention Packaging Act (PPPA) was passed in 1970 with the intention of reducing the number of accidental poisonings that occurred each year. The legislative language provides a specific definition for **special packaging**, which informs other standards.

***Special Packaging.** Packaging that is designed or constructed to be significantly difficult for children under five years of age to open or obtain a toxic or harmful amount of the substance contained therein within a reasonable time and not difficult for normal adults to use properly, but does not mean packaging which all such children cannot open or obtain a toxic or harmful amount within a reasonable time.*

This terminology created the foundation for child-resistant packaging, which quantifies the original statute and amendments of the PPPA. Today, those standards are set and enforced by two federal agencies. The Consumer Product Safety Commission (CPSC) is responsible for administering the PPPA for potentially harmful household substances. The Environmental Protection Agency (EPA) is responsible for administering the PPPA as it pertains to pesticides and related devices.

The definition of special packaging is the foundation for the official terminology of **child-resistant** and **senior-friendly** which are used by the CPSC. These designations have stringent requirements specified in 16 CFR § 1700.15 and 1700.20 (standards and test procedures) for poison prevention packaging.

The panel used to evaluate the **child-resistant effectiveness of a package** is comprised of children ages 42 to 51 months, with specific distributions for age and gender. Sequential panels of fifty children are tested until the package passes or fails the criteria or until 200 children are tested. Pass/fail rates are based on the cumulative number of children that are unable to open the package within the first 5-minute period of testing and the full 10-minute test period. If a product does not reach the required 80% effectiveness threshold, the package is not child-resistant.

Test participants for **senior-friendly packaging** are aged 50 to 70 years, with specific distributions for age and gender. One-hundred adults are tested for the senior panel. At least 90% of participants must be able to properly open and close the package to be defined as senior-friendly.

Tamper-resistant, defined by the Food and Drug Administration (FDA), is not considered to be a child-resistant feature.

***Tamper-Resistant**. A tamper-resistant package is one having an indicator or barrier to entry which, if breached or missing, can reasonably be expected to provide visible evidence to consumers that tampering has occurred.*

The purpose of a tamper-resistant feature is to prevent “malicious adulteration” of a product, which could cause harm to consumers unaware of the defects. This requirement provides a level of consumer confidence in the security of products being purchased.

The FDA provides specific details about the technologies that can be used to meet its standards. Although tamper-resistant requirements are only specified for over-the-counter human drug products, the standards and technologies have been adopted by many industries and organizations.

Incorrect Terminology

- **Childproof**

Childproof is a term incorrectly used to describe packaging. Some media outlets and firms mistakenly use the term interchangeably with child-resistant. The CPSC has publicly stated that **"There is no such thing as childproof packaging."**

The standards for child-resistant packaging allow for up to 20% of the child test participants to access the contents of the package and still be considered child-resistant. Child-resistant packaging is one barrier to safeguard children, but it is not failsafe.

Childproof is not a federally defined term and it is an incorrect descriptor to describe packaging with safety features.

Unofficial Terminology

- **Child-deterrent**
- **Arthritis-friendly**
- **Tamper-evident**

Child-deterrent is a term used to describe packaging by some companies and industries. It's most commonly referenced in the cannabis industry and the only government body that appears to use the term child-deterrent is the Vermont Cannabis Control Board (VCCB).

The VCCB mandates child-resistant packaging for “cannabis products,” which can include edibles and concentrates. For items like flower and pre-rolls without additives, the board requires child-deterrent packaging--a lower threshold that must be met.

***Child-Deterrent Packaging.** Tear-resistant packaging that can be sealed in a manner that would deter children under five years of age from easily accessing the contents of the package within a reasonable time and not difficult for adults to use properly. (VCCB)*

Child-deterrent is not a federally defined term for packaging. Test protocols to determine if a package is child-deterrent do not appear to exist.

Arthritis-friendly is a term primarily used by advocates and special interest groups. These organizations may provide their own definitions and guidelines, in addition to designations like the “Ease of Use Certification” from the Arthritis Foundation. These organizations write and administer their own standards, which vary by organization.

Arthritis-friendly adherence is not a substitute for passing the protocol test for senior-friendly testing as defined in the Code of Federal Regulations.

Tamper-evident is a term often used in place of tamper-resistant, likely due to the regulatory language that describes features that cannot be altered “without leaving visible evidence of entry.”

Tamper-evident features are not considered to be part of a child-resistant packaging system and must be removed before testing samples with children for child-resistant package protocol testing.

Enforceable Standards


- **Consumer Product Safety Commission (CPSC)**
- **Environmental Protection Agency (EPA)**
- **Food and Drug Administration (FDA)**


In the United States, federal agencies are responsible for creating and enforcing safety standards for packaging. Federal agencies often choose to collaborate with applicable trade groups to make decisions, but **trade group standards are not the legal standard in the United States.**


Quick Guide

US Packaging Safety Standards

What kind of product do you have?	➔	Which term(s) apply to the packaging?	➔	Agency
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A potentially harmful household substance.	➔	Special packaging Child-resistant Senior-friendly	➔	
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A pesticide or related device.	➔	Special packaging Child-resistant Senior-friendly	➔	
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An over-the-counter human drug product.	➔	Tamper-resistant	➔	
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Terms to avoid for regulated substances	➔	Childproof (incorrect) Child-deterrent (unofficial) Arthritis-friendly (unofficial) Tamper-evident (unofficial)
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