

APPLICATION FOR CHILD RESISTANT PACKAGING TEST

On Behalf of

**Stephen Gould Corporation
30 Commerce Way
Tewksbury, MA 01876
978.851.2500**

Tin

**Prepared for : Stephen Gould Corporation
30 Commerce Way
Tewksbury, MA 01876
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**Prepared by : Beide (Shenzhen) Product Service Limited
6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an
Dist, Shenzhen, China**

**Date of Test : : Jan.02-06,2020
Date of Report : : Jan.07,2020
Report Number : : B-S191227503**



TEST REPORT US 16 CFR § 1700.20 Testing procedure for special packaging.	
Test by	Beide (Shenzhen) Product Service Limited
Address	6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an Dist, Shenzhen, China
Report body.....	Beide (Shenzhen) Product Service Limited
Address (China)	6F, Bldg E, Hourui 3rd Ind Zone, Xixiang, Bao'an Dist, Shenzhen, China
Applicant	Stephen Gould Corporation
Address	30 Commerce Way Tewksbury, MA 01876 978.851.2500
Client No.....	00219826
Standard	US 16 CFR § 1700.20
Test Result	Compliance with US 16 CFR § 1700.20
Procedure deviation	N/A.
Non-standard test method	N/A.
Type of test object	Tin
Material	Box: 0.23mm Tinplate; Gasket: 2mm Silicon rubber; Pin: Stainless wire; Clip: Manganese steel nickel plated; Spring: Steel wire nickel plated
Trademark	N/A.
Model/type reference	N/A.
Characterization & Condition of Sample :	Normal
Manufacturer	Dongguan United Tin Box Co.Ltd
Address	No. 5 Niutouling Road, Jiuwei Village, Qishi Town, Dongguan
Ambient Condition During Testing	(21~23)°C, (53~55) %RH, 86~106 kPa



POINTS FOR ATTENTION

1. The test report is invalid without Special Seal for Testing or the official seal of test laboratory.
2. The duplicated report is invalid without Special Seal for Testing or the official seal of test laboratory again.
3. The test report is invalid without any signatures of the technical supervisor, the quality supervisor or the final approval.
4. The test report is invalid if being altered.
5. Any objections must be raised against to test laboratory within 15 days since the date the report is received. It will not be taken into consideration beyond this limit.
6. The test results apply only to the particular sample tested.

Remark:

Sample photo:

(See appendix 1)

Product Structure

(See appendix 2)

User manual

(See appendix 3)



Possible test case verdicts :	
test object does meet the requirement	: P(ass)
test object does not meet the requirement	: F(ail)
test object does not involve the requirement	: N/A
Test by : <u>Beide (Shenzhen) Product Service Limited</u> <u>6F, Bldg E, Hourui 3rd Ind Zone,</u> <u>Xixiang, Bao'an Dist, Shenzhen, China</u>	
Reported by : <u>Shen Xiao</u> Signature / Shen Xiao	<u>Jan. 08. 2020</u> Date
Checked by : <u>Austin Zhong</u> Signature / Austin Zhong	<u>Jan. 08. 2020</u> Date
Approved by : <u>Martin Wang</u> Signature / Martin Wang	<u>Jan. 08. 2020</u> Date



Test instructions for children	
1.	Reclosable packages, if assembled by the testing agency, shall be properly secured at least 72 hours prior to the opening described in instruction number 3 to allow the materials (e.g., the closure liner) to "take a set." Application torques must be recorded in the test report.
2.	All packages shall be handled so that no damage or jarring will occur during storage or transportation. The packages shall not be exposed to extreme conditions of heat or cold. The packages shall be tested at room temperature.
3.	Reclosable packages shall be opened and properly resecured one time (or more if appropriate), by the testing agency or other adult prior to testing. The opening and resealing shall not be done in the presence of the children. (In the adult-resealing test, the tester must not open and resecure the package prior to the test.) If multiple openings/resealings are to be used, each of four (4) testers shall open and properly resecure one fourth of the packages once and then shall open and properly resecure each package a second, third, fourth, through tenth (or other specified number) time, in the same sequence as the first opening and resealing. The packages shall not be opened and resecured again prior to testing. The name of each tester and the package numbers that he/she opens and reseals shall be recorded and reported. It is not necessary for the testers to protocol test the packages that they opened and resecured.
4.	The children shall have no overt physical or mental handicaps. No child with a permanent or temporary illness, injury, or handicap that would interfere with his/her effective participation shall be included in the test.
5.	The testing shall take place in a well lighted location that is familiar to the children and that is isolated from all distractions.
6.	The tester, or another adult, shall escort a pair of children to the test area. The tester shall seat the two children so that there is no visual barrier between the children and the tester.
7.	The tester shall talk to the children to make them feel at ease.
8.	The children shall not be given the impression that they are in a race or contest. They are not to be told that the test is a game or that it is fun. They are not to be offered a reward.
9.	The tester shall record all data prior to, or after, the test so that full attention can be on the children during the test period.
10.	The tester shall use a stopwatch(s) or other timing devices to time the number of seconds it takes the child to open the package and to time the 5-minute test periods.
11.	To begin the test, the tester shall hand the children identical packages and say, "PLEASE TRY TO OPEN THIS FOR ME."
12.	If a child refuses to participate after the test has started, the tester shall reassure the child and gently encourage the child to try. If the child continues to refuse, the tester shall ask the child to hold the package in his/her lap until the other child is finished. This pair of children shall not be eliminated from the results unless the refusing child disrupts the participation of the other child.
13.	Each child shall be given up to 5 minutes to open his/her package. The tester shall watch the children at all times during the test. The tester shall minimize conversation with the children as long as they continue to attempt to open their packages. The tester shall not discourage the children verbally or with facial expressions. If a child gets frustrated or bored and stops trying to open his/her package, the tester shall reassure the child and gently encourage the child to keep trying (e.g., "please try to open the package").
14.	The children shall be allowed freedom of movement to work on their packages as long as the tester can watch both children (e.g., they can stand up, get down on the floor, or bang or pry the package).
15.	If a child is endangering himself or others at any time, the test shall be stopped and the pair of children eliminated from the final results.
16.	The children shall be allowed to talk to each other about opening the packages and shall be allowed to watch each other try to open the packages.
17.	A child shall not be allowed to try to open the other child's package.
18.	If a child opens his/her package, the tester shall say, "THANK YOU," take the package from the child and put it out of the child's reach. The child shall not be asked to open the package a second time.
19.	At the end of the 5-minute period, the tester shall demonstrate how to open the package if either



	child has not opened his or her package. A separate "demo" package shall be used for the demonstration.
20.	Prior to beginning the demonstration, the tester shall ask the children to set their packages aside. The children shall not be allowed to continue to try to open their packages during the demonstration period.
21.	The tester shall say, "WATCH ME OPEN MY PACKAGE".
22.	Once the tester gets the children's full attention, the tester shall hold the demo package approximately two feet from the children and open the package at a normal speed as if the tester were going to use the contents. There shall be no exaggerated opening movements.
23.	The tester shall not discuss or describe how to open the package.
24.	To begin the second 5-minute period, the tester shall say, "NOW YOU TRY TO OPEN YOUR PACKAGES.".
25.	If one or both children have not used their teeth to try to open their packages during the first 5 minutes, the tester shall say immediately before beginning the second 5-minute period, "YOU CAN USE YOUR TEETH IF YOU WANT TO." This is the only statement that the tester shall make about using teeth.
26.	The test shall continue for an additional 5 minutes or until both children have opened their packages, whichever comes first.
27.	At the end of the test period, the tester shall say, "THANK YOU FOR HELPING." If children were told that they could use their teeth, the tester shall say, "I KNOW I TOLD YOU THAT YOU COULD USE YOUR TEETH TODAY, BUT YOU SHOULD NOT PUT THINGS LIKE THIS IN YOUR MOUTH AGAIN" In addition, the tester shall say, "NEVER OPEN PACKAGES LIKE THIS WHEN YOU ARE BY YOURSELF. THIS KIND OF PACKAGE MIGHT HAVE SOMETHING IN IT THAT WOULD MAKE YOU SICK."
28.	The children shall be escorted back to their classroom or other supervised area by the tester or another adult.
29.	If the children are to participate in a second test, the tester shall have them stand up and stretch for a short time before beginning the second test. The tester shall take care that the children do not disrupt other tests in progress.
Test instructions for adult	
1.	No adult with a permanent or temporary illness, injury, or disability that would interfere with his/her effective participation shall be included in the test.
2.	Each adult shall read and sign a consent form prior to participating. Any appropriate language from the consent form may be used to recruit potential participants. The form shall include the basic elements of informed consent as defined in 16 CFR 1028.116. Examples of the forms used by the Commission staff for testing are shown at § 1700.20(d). Before beginning the test, the tester shall say, "PLEASE READ AND SIGN THIS CONSENT FORM." If an adult cannot read the consent form for any reason (forgot glasses, illiterate, etc.), he/she shall not participate in the test.
3.	Each adult shall participate individually and not in the presence of other participants or onlookers.
4.	The tests shall be conducted in well lighted and distraction-free areas.
5.	Records shall be filled in before or after the test, so that the tester's full attention is on the participant during the test period. Recording the test times to open and reseal the package are the only exceptions.
6.	To begin the first 5-minute test period, the tester says, "I AM GOING TO ASK YOU TO OPEN AND PROPERLY CLOSE THESE TWO IDENTICAL PACKAGES ACCORDING TO THE INSTRUCTIONS FOUND ON THE CAP." (Specify other instruction locations if appropriate).
7.	The first package is handed to the participant by the tester, who says, "PLEASE OPEN THIS PACKAGE ACCORDING TO THE INSTRUCTIONS ON THE CAP." (Specify other instruction locations if appropriate.) If the package contains product, the tester shall say, "PLEASE EMPTY THE (PILLS, TABLETS, CONTENTS, etc.) INTO THIS CONTAINER." After the participant opens the package, the tester says, "PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS



	ON THE CAP.” (Specify other instruction locations if appropriate).
8.	Participants are allowed up to 5 minutes to read the instructions and open and close the package. The tester uses a stopwatch(s) or other timing device to time the opening and resealing times. The elapsed times in seconds to open the package and to close the package are recorded on the data sheet as two separate times.
9.	After 5 minutes, or when the participant has opened and closed the package, whichever comes first, the tester shall take all test materials from the participant. The participant may remove and replace the closure more than once if the participant initiates these actions. If the participant does not open the package and stops trying to open it before the end of the 5-minute period, the tester shall say, “ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?” If the participant indicates that he/she is finished or cannot open the package and does not wish to continue trying, skip to Instruction 13.
10.	To begin the second test period, the tester shall give the participant another, but identical, package and say, “THIS IS AN IDENTICAL PACKAGE. PLEASE OPEN IT ACCORDING TO THE INSTRUCTIONS ON THE CAP.” (Specify other instruction locations if appropriate.) If the package contains product, the tester shall say, “PLEASE EMPTY THE (PILLS, TABLETS, CONTENTS, etc.) INTO THIS CONTAINER.” After the participant opens the package, the tester says, “PLEASE CLOSE THE PACKAGE PROPERLY, ACCORDING TO THE INSTRUCTIONS ON THE CAP.” (Specify other instruction locations if appropriate).
11.	The participants are allowed up to 1 minute (60 full seconds) to open and close the package. The elapsed times in seconds to open and to close the package are recorded on the data sheet as two separate times. The time that elapses between the opening of the package and the end of the instruction to close the package is not counted as part of the 1-minute test time.
12.	After the 1-minute test, or when the participant has opened and finished closing the package, whichever comes first, the tester shall take all the test materials from the participant. The participant shall not be allowed to handle the package again. If the participant does not open the package and stops trying to open it before the end of the 1-minute period, the tester shall say, “ARE YOU FINISHED WITH THAT PACKAGE, OR WOULD YOU LIKE TO TRY AGAIN?” If the participant indicates that he/she is finished or cannot open the package and does not wish to continue trying, this shall be counted as a failure of the 1-minute test.
13.	Participants who do not open the package in the first 5-minute test period are asked to open and close two non-child-resistant screening packages. The participants are given a 1-minute test period for each package. The tester shall give the participant a package and say, “PLEASE OPEN AND PROPERLY CLOSE THIS PACKAGE.” The tester records the time for opening and closing, or 61 seconds, whichever is less, on the data sheet. The tester then gives the participant the second package and says, “PLEASE OPEN AND PROPERLY CLOSE THIS PACKAGE.” The time to open and resecure, or 61 seconds, whichever is less, shall be recorded on the data sheet.
14.	Participants who cannot open and resecure both of the non-child-resistant screening packages are not counted as part of the 100-seniors panel. Additional participants are selected and tested.
15.	No adult may participate in more than two tests per sitting. If a person participates in two tests, the packages tested shall not be the same ASTM type of package.
16.	If more adults in a sex or age group are tested than are necessary to determine SAUE, the last person(s) tested shall be eliminated from that group.



Result		
According to table 1 at most 30 children can open the package before demonstration	0	P
According to table 1 at most 40 children can open the package after demonstration	2	P
According to table 2 at least 90 % or more of the eligible adults are able to open the package in the first 5 min test period and open and properly reclose it in the 1 min test period	100%	P
Every one of the testing should be marked pass or fail	--	P
Test by	Beide(Shenzhen)Product Service Limited	--
Date of Test	Jan.02-06,2020	--
Manufacturer	--	--
Specification is provided	--	--
Test place	Kindergarten & Senior Living Center & Park	--
Test Children distribution	--	--
Statistical result record	--	--
Test record of children	See table 1	P
Test Seniors distribution	--	--
Statistical result record	--	--
Test record of adults	See table 2	P
Test conclusion	--	P



Test place: Kindergarten

Test Children distribution

Age(months)	Boys	Girls	Total
42-44	28	32	60
45-48	40	40	80
49-51	30	30	60
Total	98	102	200

TABLE 1-Statistical result

Item	Age	42-44 (months)	45-48 (months)	49-51 (months)	Total
Before Demonstration	Males	0	0	0	0
	Females	0	0	0	
After Demonstration	Males	0	0	1	2
	Females	0	0	1	

Note: 1. The data in the table is the statistical result of a child's successful opening at each age.



Test place: Senior Living Center & Park

Test Seniors distribution

Age(years old)	Male	Female	Total
50-54	8	17	25
55-59	7	18	25
60-70	15	35	50
Total	30	70	100

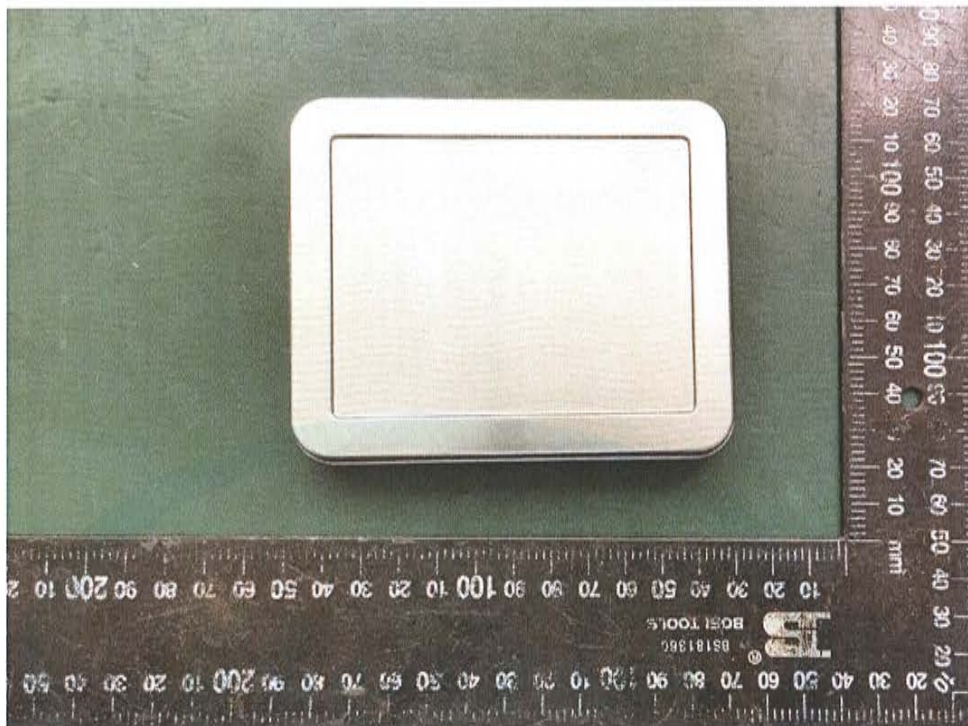
TABLE 2- Statistical result

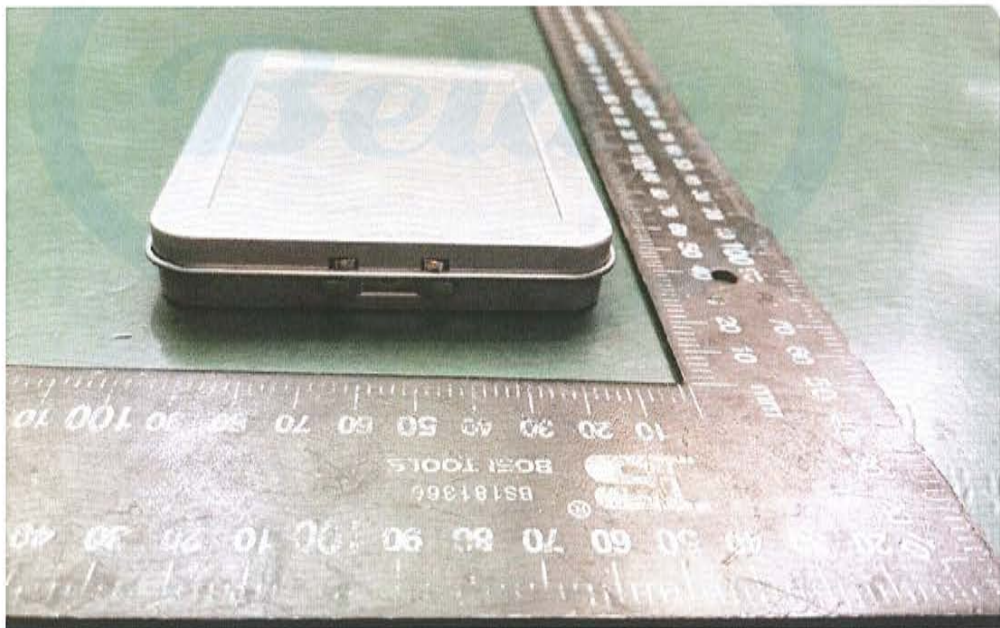
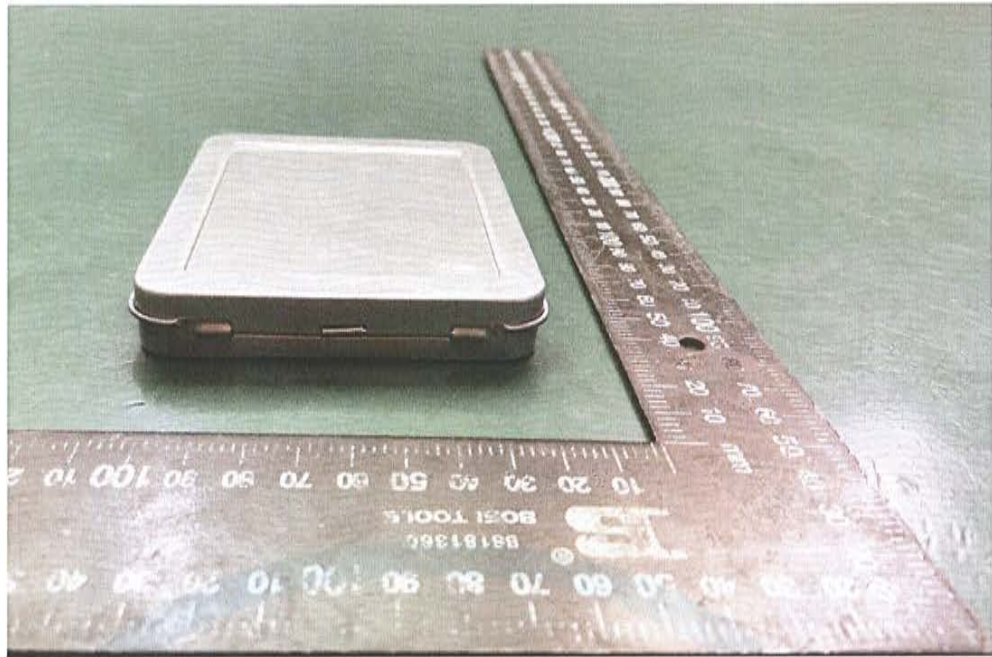
Item	Age	50-54 (years)	55-59 (years)	60-70 (years)	Total
First test	Males	0	0	0	0
	Females	0	0	0	
Second test	Males	0	0	0	0
	Females	0	0	0	

- Note: 1. The data in the table is the statistics result that Seniors unsuccessful first test and unsuccessful second test at each age.
2. First test : The Seniors did not successfully open the package within 5 minutes.
3. Second test: The Seniors successfully open the package in the first 5 minutes test period and unsuccessfully open and properly reclose it in the next 1 minute test period.

Appendix 1

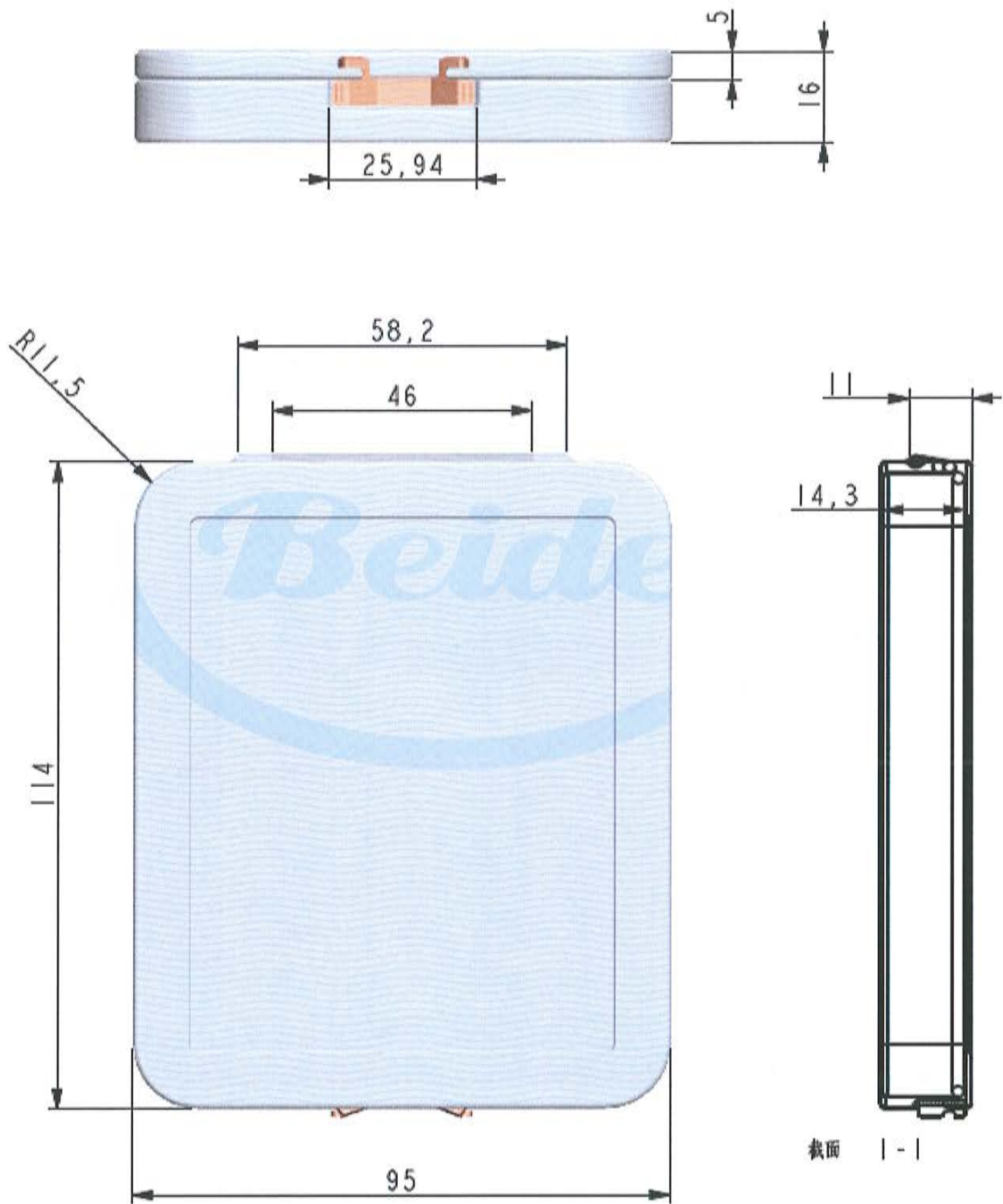
Photos view





Appendix 2

Product Structure



Remarks: Length unit-mm



Appendix 3

User manual

Opening Instructions:

1. Press the 2 ends of the clip with 2 fingers at same time
2. Press out the 2 locks of the clip from the lid open windows
3. Tin lid will be flicked
4. Open the lid with 2 hands

