

November 15, 1999

NOTE TO ANN SIBOLD

SUBJECT: EPA Reg. No. 65331-3, 65331-2, 65331-1 Response re 6(a)(2)

Overall, the Merial response to our six questions regarding the incidents involving children under 5 years old for April - June 1999 for EPA Reg. No. 65331-3, 65331-2, 65331-1 is reasonable. These 12 incidents involve less than one percent of the number of units sold. Furthermore, these injuries appear due to contact with the product out of the package in the majority of the cases based on the Merial response to questions 2 and 4. For 9 - 12% of the cases the package, the small dog pipette could have been involved. The CRP data for EPA Reg. No. 65331-3 and 65331-2 the small pipette 5 of the 50 children (10%) accessed a pipette during testing. The CRP regulations for sequential testing allow a maximum of 5 of the 50 children to access the package and pass rather than having to continue testing another 50 children. I would like to be kept apprized of the number incidents involving children to ascertain if more than about 10% of the cases involve children and the child-resistant pipette.



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