

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

IN 10/05/98 & 01/11/99 (amended) OUT 01/27/99Reviewed by Rosalind L. Gross*RJ Gross*
01/27/99EPA Reg. No. or File Symbol 64240-33DP Barcode D250068 D252382

EPA Petition or EUP No. _____

Date Division Received _____

Type Product(s) InsecticideData Accession No(s) 446590-01, (GLM 16368A, 98-071) amended report MRID 447332-01Product Mgr./Chemical Review Mgr./Contact Person PM 03 Division RD

Product Name(s) _____

Company Name(s) _____

Submission Purpose Examine to ascertain if packaging is CRPActive Ingredient(s), PC code, & % Fipronil**Summary of Findings****EPA REG NO 64240-33 Based on Amended Report**

In Conclusion, three children (12, 34, 21) each accessed one bait station and 28 children tore one or more stations either during separation from each other or during testing, which were not considered access. Additionally, 98-071 reports several instances of tears in the base of the station including the fin. There is some concern that some of these tears could widen the bait station openings such that a child could potentially touch the bait. **Since no child accessed 9 stations which is the amount needed for a child failure, the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The certification for 1/14/99 18 pack is**

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acceptable for 98-071. However, it should be noted there is a significant increase in the number of children and number of instances of station crack tears per child, in studies 97-46 (9 children), 97-091A (41 children), 98-068 (24 children), 98-070 (19 children), 98-071 (31 children with numerous instances of 3-5 stations/child). There is a concern that while technically these studies pass the child test according to the sequential test chart in 16 CFR 1700.20 they are becoming more of a marginal pass and that the public has a false sense of security regarding access to these bait stations by children.

The station is 25ml black HIPS base, 25ml black HIPS lid, index weld. Ramp height is ≤ 1 cm. Station containing lipstick placebo mixture tested with children getting 18 stations attached to one another at the beginning of the test. Failure was defined as evidence of the lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. The results indicate two children (12 and 34) each accessed one bait station. The raw data on page 25 as amended on pages 46 and 48 indicate child 21 tore up the base of the station and 0.75 cm up the ramp. Based on the dimensions of the station, child 21 should also be counted as accessing one bait station. **Therefore, three children (12, 34, 21) each accessed one bait station.** It should be noted that while no access was achieved there were several instances (28) where the child tore one or more stations either during separation from each other or during testing. Additionally, 98-071 reports several instances of tears in the base of the station including the fin. There is some concern that some of these tears could widen the bait station openings such that a child could potentially touch the bait.

In Conclusion, three children (12, 34, 21) each accessed one bait station and 28 children tore one or more stations either during separation from each other or during testing, which were not considered access. Since no child accessed 9 stations which is the amount needed for a child failure, the study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. The certification for 1/14/99 18 pack is acceptable for 98-071. However, it should be noted there is a significant increase in the number of children and number of instances of some station crack tears per child, from studies 97-46 (9 children), 97-091A (41 children), 98-068 (24 children), 98-070 (19 children), 98-071 (31 children with numerous instances of 3-5 stations/child). There is a concern that while technically these studies pass the child test according to the sequential test chart in 16 CFR 1700.20 they are becoming more of a marginal pass and that the public has a false sense of security regarding access to these bait stations by children.

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