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## 1 Introductory Note

This test report confirms the conformity of packaging with **US 16 CFR § 1700.20**. The test report in regard to child resistance and suitability for adults has been furnished by ivm Institut Verpackungsmarktforschung GmbH, Friedrich-Seele-Straße 20, 38122 Braunschweig, Germany.

ivm is accredited in accordance with **ISO/IEC 17065** as a certification body and **ISO/IEC 17025** as a testing laboratory by the German Accreditation Body (**DAkkS**) and registered under registration no. **D-ZE-14061-01-00** and **D-PL-14061-01-00**. Therefore ivm is not only accredited as testing laboratory but can also grant certificates.

The section 3 of this test report describes the test procedure and the test results in accordance with the requirements of the above mentioned standard.

Details and/or findings that emerged during the test, but are outside the scope of the test report, are commented on separately.

A summary of the findings is given in the additional "Brief Test Report".

The certification is granted based on an assessment according to **US 16 CFR § 1700.20** and the contract signed with ivm, as certification body, about the testing and certification of child-resistant and senior-friendly packaging.

All submitted documents, i.e. product descriptions, drawings, enclosures etc. are part of the certification. Amendments are valid only if made in writing.

The certification is granted on the understanding that it can be revoked at any time, if the preconditions as set out in the contract cease to exist and/or modifications are made to the certified package in size, material, weight or shape. The agreements signed between the customer and ivm are binding.

The certification documents and enclosures may be published only in unchanged form. Excerpts may not be published without the approval of the certification body.

The customer must avoid creating the impression that the certification relates to products, components or properties of the tested package that have not been certified as child-resistant in the certification process. If such an impression is created in violation of this provision, the certification body has the right to demand a change of conduct.

All documents relating to the test and certification process are documented at ivm and may be inspected by authorized persons upon request.

## **2 Test Report – General**

### **2.1 Test Period**

Test Object: CR Closure 14 mm was tested in November and December 2015.

### **2.2 Manufacturers/Suppliers**

The tested packages were made available by:

**Ebottles.com**

This company is identical with the party that has filled the request for certification.

### **2.3 Test and Supervisory Personnel**

The kindergarten tests were conducted in the period named above by trained ivm tester Petra Becker, Bettina Heming, Susanne Porzelt and Stefanie Pflugmacher in Braunschweig and its environs.

The adult tests were conducted in November and December 2015 by trained ivm testers Jasmine Baumgart, Jan Lewerenz and Noah Jeremias in Braunschweig. The tests conducted in kindergartens were audited by Stephanie Georg, Chief Test Director of the institute.

### **2.4 Description of the Tested Packaging**

Comments on points not covered by the certification report are given in chapter 5 of this test report.

Copies of the technical descriptions and drawings are shown on chapter 2.3.1 of this test report.

During production, the packages and their components are regularly inspected for compliance with the specified. Examples of inspection reports were made available to ivm.

All information relating to the certification process are documented at ivm and may be inspected by authorized persons upon request.

## 2.5 Test Procedure

### 2.5.1 Type of Test

Test Object: CR Closure 14 mm.

The test was carried out in accordance with **US 16 CFR § 1700.20** and comprised of: Two tests with children (one before and one after demonstration) and a test with adults.

### 2.5.2 Test Instruction as defined in US 16 CFR § 1700.20

#### a) Test with 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 resecuring shall not be done in the presence of the children. (In the adult-resecuring test, the tester must not open and resecure the package prior to the test.) If multiple openings/resecurings 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 resecuring. 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 resecurers 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.

**b) Test with Adults**

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 resecure 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.

## **2.6 Preparation of samples**

### **2.6.1 Torque dependant closure**

For torque dependant closure systems an application torque based on a force of 70 N has been used for the preparation of the samples if no other value has been provided by the customer.

### **2.6.2 Substitute Product Used**

According to the provisions for the testing of child-resistant packaging, the original product is to be replaced with a non-hazardous substitute (e.g. tap water, granules or placebo tablets) for the purpose of the test.

## **3 Test Report**

### **3.1 Test with Children**

#### **3.1.1 Test Requirements as defined in US 16 CFR § 1700.20**

The tests were carried out with 50 children aged 42 up to and including 51 months; the assessment method was permitted by sequential test. The plain packages were filled with a neutral substitute product. The testers checked each package for proper functioning.

The following was documented in the test records:

- Number, names (first name only for data protection reason), age in months, and gender of the children
- Number, names and gender of the children who succeeded in opening the package before and after demonstration
- The means by which the children opened the package.
- Evaluation of test results in per cent (successful / unsuccessful opening attempts)

The sequential evaluation was made.

#### **3.1.2 Test Preparations and Test Procedure**

The tests were conducted in kindergartens located in Braunschweig. The kindergartens chosen for the tests had been suitably prepared in advance and provided with detailed information. The tests were carried out by the trained testers Petra Becker, Bettina Heming, Susanne Porzelt and Stefanie Pflugmacher under supervision of Stephanie Georg, Chief Test Director of the institute.

The head of the kindergarten certified the test procedure, the number of children that took part in the tests as well as the total testing time. This certification serves as proof of the correctness of the test. In addition, each tester was audited and the results recorded by the testers were checked for plausibility.

The original records are kept at ivm and may be inspected by authorized persons upon request.

The children were chosen with regard to having a test group that is as representative as possible. To meet this requirement, the tests were made in various kindergartens located in the city of Braunschweig and its vicinity. The kindergartens that took part in the tests were run either by the church or independent institutions.

It was checked prior to the tests that the children were healthy, judging by appearances, and that their manual skills were not impaired. When selecting the children and kindergartens, the testers made sure also that no participant had taken part in more than one test in the course of the last 12 months. Where a test child had in fact taken part in such a test, the testers checked that the system tested was of a different design and that the test took place more than two weeks before the new test.

The tests were made in surroundings that were familiar to the children. The children were tested in pairs, and care was taken to ensure that the children would not disturb each other. They were repeatedly requested to keep trying hard to open the package. Tips on how to open the package were not given. Where adults were in the room together with the children, the testers made sure that they did not influence the children in any manner. Their presence was documented in the records.

The children were given five minutes to try to open the package. They were allowed to use any opening method they could think of. Tools or other opening aids were not made available. If a child succeeded in opening the package, he or she remained in the room until the end of test.

After five minutes, the children that were unsuccessful in opening the package were given a practical demonstration of the opening procedure, but received no verbal explanation. Again, the children had five minutes to try to open the package.

### **3.1.3 Results of Tests with Children**

Test Object: CR Closure 14 mm.

3 (three) openings were registered in the first 5-minutes test (before demonstration). In the full 10-minutes test, 5 (five) openings were registered. This corresponds to a percentage of 6.00 % before demonstration and a total percentage of 10.00 %. This is within the tolerance range of US 16 CFR § 1700.20.

These results base on the assumption that an opening of the package is defined as the situation when a child gets access to 1 (or more) unit packed in the package. This corresponds to a failure rate of  $F=1$ .

ivm		Institut VerpackungsMarktforschung							
Childtest		Friedrich Seele Str. 20, 38122 Braunschweig, Tel.: +49 (0) 531 - 28509-245, Fax.: +49 (0) 531 - 28509-246							
Cert.No.:		08412101115			Object:		CR Closure 14 mm		
Kindergarten				Date	No.	Tester		Remarks	
Kiga Kleiner Muck, Salzgitter				18.11.2015	1-4	Petra Becker			
St. Martin, Emmerke				18.11.2015	5-11	Bettina Heming			
Kita Maria Königin, Ahrbergen				19.11.2015	12-19	Bettina Heming			
Kiga Flachstöckheim, Salzgitter				23.11.2015	20-20	Petra Becker			
Arche Noah, Braunschweig				25.11.2015	21-28	Susanne Porzelt			
Schunterarche, Braunschweig				30.11.2015	29-35	Susanne Porzelt			
DRK Kita Meinersen, Meinersen				01.12.2015	36-45	Stefanie Pflugmacher			
DRK Kita GF-Nord, Gifhorn				03.12.2015	46-50	Stefanie Pflugmacher			
A					Test before Demonstration		Test after Demonstration		Remarks
No.	Name	Age/Months	female	male	not opened	opened	not opened	opened	Remarks
1	Jonna	45	1	0	1	0	1	0	
2	Najib	46	0	1	1	0	1	0	
3	Leni	51	1	0	1	0	1	0	
4	Henri	50	0	1	1	0	1	0	
5	Emily	43	1	0	1	0	1	0	
6	Henry	48	0	1	1	0	1	0	
7	Max	48	0	1	1	0	1	0	
8	Jonas	47	0	1	1	0	1	0	
9	Helene	50	1	0	1	0	1	0	
10	Elia	50	0	1	1	0	1	0	
11	Benno	50	0	1	1	0	1	0	
12	Elena	44	1	0	1	0	1	0	
13	Fahri	44	0	1	1	0	1	0	
14	Lukas	44	0	1	1	0	1	0	
15	Sophie	48	1	0	1	0	1	0	
16	Matilda	46	1	0	1	0	1	0	
17	Kira	48	1	0	1	0	1	0	
18	Fiona	47	1	0	1	0	1	0	
19	Anna	49	1	0	1	0	1	0	
20	Lucia	43	1	0	0	1	-	-	
21	Karolina	47	1	0	0	1	-	-	
22	Kasper	47	0	1	1	0	1	0	
23	Justin	48	0	1	1	0	1	0	
24	Christian	47	0	1	1	0	1	0	
25	John	45	0	1	1	0	1	0	
26	Celine	47	1	0	1	0	1	0	
27	Sofia	44	1	0	1	0	1	0	
28	Ewa	44	1	0	1	0	1	0	
29	Elian	50	0	1	1	0	1	0	
30	Levin	50	0	1	1	0	0	1	
31	Elisa	50	1	0	1	0	1	0	
32	Finja	46	1	0	1	0	1	0	
33	Paul	42	0	1	1	0	1	0	
34	Leon	44	0	1	1	0	1	0	
35	Mira	51	1	0	1	0	1	0	
36	Clara Matilda	44	1	0	0	1	-	-	
37	Fiona	48	1	0	1	0	1	0	
38	Louisa	50	1	0	1	0	1	0	
39	Luise	51	1	0	1	0	1	0	
40	Malik	44	0	1	1	0	0	1	
41	Tarek	43	0	1	1	0	1	0	
42	Vincent	45	0	1	1	0	1	0	
43	Benjamin	51	0	1	1	0	1	0	
44	Bjarne	51	0	1	1	0	1	0	
45	Benjamin	50	0	1	1	0	1	0	
46	Maire	42	1	0	1	0	1	0	
47	Pia	43	1	0	1	0	1	0	
48	Hanna	46	1	0	1	0	1	0	
49	Konrad	45	0	1	1	0	1	0	
50	Luan	43	0	1	1	0	1	0	
Σ	-	46.78	25	25	47	3	45	2	

<b>Object: CR Closure 14 mm</b>						
<b>1. Openings</b>						
<b>A</b>	<b>female</b>			<b>male</b>		
age in months	number of children	openings 5-minutes-test	openings 10-minutes-test	number of children	openings 5-minutes-test	openings 10-minutes-test
42 - 44	8   16.0%	2   4.0%	2   4.0%	7   14.0%	0   0.0%	1   2.0%
45 - 48	10   20.0%	1   2.0%	1   2.0%	10   20.0%	0   0.0%	0   0.0%
49 - 51	7   14.0%	0   0.0%	0   0.0%	8   16.0%	0   0.0%	1   2.0%
$\Sigma$	25   50.0%	3   6.0%	3   6.0%	25   50.0%	0   0.0%	2   4.0%
<b>2. Opening Methods</b>						
Regular opening method.						
<b>3. Mean opening times and standard deviation</b>						
5-minutes-test - Average: 73s; Standard deviation: 75s						
10-minutes-test - Average: 213s; Standard deviation: 199s						
<b>4. Percentage of packages tested at each site (kindergarten)</b>						
Kiga Kleiner Muck, Salzgitter: 8.0%						
St. Martin, Emmerke: 14.0%						
Kita Maria Königin, Ahrbergen: 16.0%						
Kiga Flachstockheim, Salzgitter: 2.0%						
Arche Noah, Braunschweig: 16.0%						
Schunterarche, Braunschweig: 14.0%						
DRK Kita Meinersen, Meinersen: 20.0%						
DRK Kita GF-Nord, Gifhorn: 10.0%						
<b>5. Percentage of packages tested by each tester</b>						
Petra Becker: 10.0%						
Bettina Heming: 30.0%						
Susanne Porzelt: 30.0%						
Stefanie Pflugmacher: 30.0%						
<b>6. Child-Resistant Effectiveness</b>						
5-minutes-test: 94.0%						
10-minutes-test: 90.0%						

*Results of tests with children*

## **3.2 Test with Adults**

### **3.2.1 Test Procedure**

The adult tests were conducted in Braunschweig and Hutfiltern with 100 test persons. According to US 16 CFR § 1700.20 70 % of the test persons were female; 30 % were male. 25 % were aged 50–54, 25 % were aged 55–59 and 50 % 60–70.

The participants were given the necessary instructions in writing.

The participants were chosen at random and had no visible impairment. If any impairment (e.g. impaired hand movement due to particular problems) became evident during the test, the results were not counted and the impairment was documented in the test records.

### **3.2.2 Results of Adult Tests**

Test Object: CR Closure 14 mm.

The results were entered in the test sheets.

The results, 0 (zero) unsuccessful first attempts and 0 (zero) unsuccessful second attempts and 0 (zero) unsuccessful re-closings are within the tolerance range allowed by § 1700.20 (US 16 CFR § 1700.20 allows a rate of 10 % (ten percent) of unsuccessful openings).

Senior Adult Use Effectiveness (SAUE): 100 %

ivm Institut VerpackungsMarktforschung													
Friedrich Seele Str. 20 38122 Braunschweig							Tel.: +49 (0) 531 - 28509-245 Fax.: +49 (0) 531 - 28509-246						
Adulttest			US 16 CFR § 1700.20				Certification No.: 08412101115						
Tester: Jasmine Baumgart			Date: 02.12.2015				Location: Braunschweig, Damm (1-13)						
Tester: Jasmine Baumgart			Date: 02.12.2015				Location: Braunschweig, Hutfiltern (14-22)						
Tester: Jan Lewerenz			Date: 04.12.2015				Location: Braunschweig, Burgplatz (23-42)						
Tester: Jan Lewerenz			Date: 04.12.2015				Location: Braunschweig, Sack (43-57)						
Tester: Jasmine Baumgart			Date: 04.12.2015				Location: Braunschweig, Schuhstraße (58-70)						
Tester: Noah Jeremias			Date: 05.12.2015				Location: Braunschweig, Kohlmarkt (71-90)						
Tester: Noah Jeremias			Date: 05.12.2015				Location: Braunschweig, Altstadtmarkt (91-100)						
Object: CR Closure 14 mm													
No.	Age	Gender		1. Opening			2. Opening			Reclosure o.k.			Remarks
		F	M	Yes	in Sec.	No	Yes	in Sec.	No	Yes	No	damaged	
1	59	1	0	1	4	0	1	3	0	1	0	0	
2	62	1	0	1	4	0	1	2	0	1	0	0	
3	65	1	0	1	8	0	1	3	0	1	0	0	
4	65	1	0	1	5	0	1	3	0	1	0	0	
5	57	0	1	1	3	0	1	2	0	1	0	0	
6	51	0	1	1	4	0	1	3	0	1	0	0	
7	54	1	0	1	3	0	1	3	0	1	0	0	
8	60	0	1	1	3	0	1	4	0	1	0	0	
9	58	1	0	1	6	0	1	3	0	1	0	0	
10	70	1	0	1	12	0	1	4	0	1	0	0	
11	66	1	0	1	5	0	1	4	0	1	0	0	
12	68	0	1	1	6	0	1	4	0	1	0	0	
13	53	1	0	1	4	0	1	3	0	1	0	0	
14	55	0	1	1	4	0	1	4	0	1	0	0	
15	51	1	0	1	5	0	1	4	0	1	0	0	
16	66	1	0	1	3	0	1	2	0	1	0	0	
17	65	0	1	1	4	0	1	3	0	1	0	0	
18	69	1	0	1	5	0	1	4	0	1	0	0	
19	56	0	1	1	3	0	1	4	0	1	0	0	
20	53	1	0	1	9	0	1	3	0	1	0	0	
21	53	0	1	1	4	0	1	3	0	1	0	0	
22	57	1	0	1	4	0	1	3	0	1	0	0	
23	67	1	0	1	2	0	1	2	0	1	0	0	
24	53	1	0	1	2	0	1	2	0	1	0	0	
25	61	1	0	1	2	0	1	2	0	1	0	0	
26	58	1	0	1	3	0	1	2	0	1	0	0	
27	60	1	0	1	2	0	1	2	0	1	0	0	
28	63	1	0	1	2	0	1	2	0	1	0	0	
29	69	1	0	1	4	0	1	2	0	1	0	0	
30	56	1	0	1	2	0	1	2	0	1	0	0	
31	55	1	0	1	2	0	1	2	0	1	0	0	
32	50	1	0	1	2	0	1	2	0	1	0	0	
33	59	1	0	1	2	0	1	2	0	1	0	0	
34	58	1	0	1	2	0	1	2	0	1	0	0	
35	56	1	0	1	3	0	1	2	0	1	0	0	
36	51	1	0	1	2	0	1	2	0	1	0	0	
37	68	1	0	1	3	0	1	2	0	1	0	0	
38	70	1	0	1	2	0	1	2	0	1	0	0	
39	50	1	0	1	2	0	1	2	0	1	0	0	
40	69	1	0	1	2	0	1	2	0	1	0	0	
41	61	1	0	1	3	0	1	2	0	1	0	0	
42	52	1	0	1	2	0	1	2	0	1	0	0	
43	64	1	0	1	3	0	1	3	0	1	0	0	
44	69	1	0	1	2	0	1	2	0	1	0	0	
45	64	1	0	1	2	0	1	2	0	1	0	0	
46	52	1	0	1	2	0	1	2	0	1	0	0	
47	58	0	1	1	3	0	1	2	0	1	0	0	
48	69	0	1	1	2	0	1	2	0	1	0	0	
49	70	0	1	1	3	0	1	2	0	1	0	0	
50	68	0	1	1	2	0	1	2	0	1	0	0	

ivm Institut VerpackungsMarktforschung													
Friedrich Seele Str. 20 38122 Braunschweig							Tel.: +49 (0) 531 - 28509-245 Fax.: +49 (0) 531 - 28509-246						
Adulttest			US 16 CFR § 1700.20				Certification No.: 08412101115						
Tester: Jasmine Baumgart			Date: 02.12.2015				Location: Braunschweig, Damm (1-13)						
Tester: Jasmine Baumgart			Date: 02.12.2015				Location: Braunschweig, Hutfiltern (14-22)						
Tester: Jan Lewerenz			Date: 04.12.2015				Location: Braunschweig, Burgplatz (23-42)						
Tester: Jan Lewerenz			Date: 04.12.2015				Location: Braunschweig, Sack (43-57)						
Tester: Jasmine Baumgart			Date: 04.12.2015				Location: Braunschweig, Schuhstraße (58-70)						
Tester: Noah Jeremias			Date: 05.12.2015				Location: Braunschweig, Kohlmarkt (71-90)						
Tester: Noah Jeremias			Date: 05.12.2015				Location: Braunschweig, Altstadtmarkt (91-100)						
Object: CR Closure 14 mm													
No.	Age	Gender		1. Opening			2. Opening			Reclosure o.k.			Remarks
		F	M	Yes	in Sec.	No	Yes	in Sec.	No	Yes	No	damaged	
51	59	0	1	1	3	0	1	3	0	1	0	0	
52	51	0	1	1	2	0	1	2	0	1	0	0	
53	54	0	1	1	2	0	1	3	0	1	0	0	
54	70	0	1	1	3	0	1	3	0	1	0	0	
55	53	0	1	1	4	0	1	2	0	1	0	0	
56	56	0	1	1	3	0	1	2	0	1	0	0	
57	67	0	1	1	3	0	1	2	0	1	0	0	
58	57	1	0	1	3	0	1	4	0	1	0	0	
59	64	1	0	1	3	0	1	4	0	1	0	0	
60	66	0	1	1	3	0	1	3	0	1	0	0	
61	60	1	0	1	8	0	1	4	0	1	0	0	
62	55	1	0	1	3	0	1	2	0	1	0	0	
63	61	1	0	1	4	0	1	3	0	1	0	0	
64	54	1	0	1	4	0	1	3	0	1	0	0	
65	54	0	1	1	4	0	1	2	0	1	0	0	
66	63	1	0	1	5	0	1	3	0	1	0	0	
67	66	1	0	1	4	0	1	3	0	1	0	0	
68	50	1	0	1	5	0	1	3	0	1	0	0	
69	64	0	1	1	3	0	1	3	0	1	0	0	
70	57	1	0	1	3	0	1	2	0	1	0	0	
71	59	1	0	1	6	0	1	2	0	1	0	0	
72	58	1	0	1	6	0	1	3	0	1	0	0	
73	62	1	0	1	5	0	1	3	0	1	0	0	
74	54	1	0	1	8	0	1	2	0	1	0	0	
75	56	1	0	1	4	0	1	3	0	1	0	0	
76	68	1	0	1	5	0	1	2	0	1	0	0	
77	56	1	0	1	6	0	1	3	0	1	0	0	
78	69	1	0	1	5	0	1	2	0	1	0	0	
79	62	1	0	1	2	0	1	2	0	1	0	0	
80	66	1	0	1	3	0	1	3	0	1	0	0	
81	52	1	0	1	6	0	1	3	0	1	0	0	
82	59	1	0	1	2	0	1	2	0	1	0	0	
83	51	1	0	1	3	0	1	2	0	1	0	0	
84	54	1	0	1	5	0	1	2	0	1	0	0	
85	68	1	0	1	4	0	1	2	0	1	0	0	
86	63	1	0	1	5	0	1	3	0	1	0	0	
87	68	1	0	1	6	0	1	2	0	1	0	0	
88	62	1	0	1	5	0	1	3	0	1	0	0	
89	50	1	0	1	4	0	1	2	0	1	0	0	
90	67	1	0	1	5	0	1	2	0	1	0	0	
91	69	1	0	1	6	0	1	2	0	1	0	0	
92	54	1	0	1	5	0	1	3	0	1	0	0	
93	68	0	1	1	5	0	1	2	0	1	0	0	
94	62	0	1	1	6	0	1	3	0	1	0	0	
95	66	0	1	1	2	0	1	2	0	1	0	0	
96	52	0	1	1	3	0	1	2	0	1	0	0	
97	58	0	1	1	6	0	1	2	0	1	0	0	
98	62	0	1	1	5	0	1	2	0	1	0	0	
99	65	0	1	1	2	0	1	2	0	1	0	0	
100	57	0	1	1	3	0	1	2	0	1	0	0	
<b>Σ</b>	<b>60.11</b>	<b>70</b>	<b>30</b>	<b>100</b>	<b>3.83</b>	<b>0</b>	<b>100</b>	<b>2.54</b>	<b>0</b>	<b>100</b>	<b>0</b>	<b>0</b>	



<b>Object: CR Closure 14 mm</b>			
<b>composition of random sample</b>			
	female	70	
	male	30	
	1. opening successful	100	
	1. opening not successful	0	
	2. opening successful	100	
	2. opening not successful	0	
	re-closure o.k.	100	
	re-closure not o.k.	0	
	closure damaged	0	
	average time in sec	3.83	
	average age in years	60.11	
<b>allowed failings by standard US 16 CFR § 1700.20</b>			
	failed openings/re-closures	0	
	allowed failings by standard	10	
<b>Package can be denoted as suitable for adults.</b>			

*Composition of random sample*

### 3.3 Overall Test Result

As the results of both tests (children and adults) show, the number of negative test results is within the acceptable range of the US 16 CFR § 1700.20 for both children and adults. CR Closure 14 mm can be declared as child-resistant as well as suitable for adults.

The evaluation of the packages proves that all requirements of the standard for child-resistant packaging are fulfilled.

## 4 Confirmation of Conformity

Test Object: CR Closure 14 mm

The test results of the test carried out were evaluated by Stephanie Georg, Chief Test Director of ivm.

The results of the tests relating to child resistance are within the tolerance range of US 16 CFR § 1700.20.

The package can be designated as **child-resistant** and **suitable for adults**.

The relevant certificate has the reference number ivm - **ZE - 08412101115 – 1700.20**

Braunschweig, 09.12.2015

A handwritten signature in black ink, appearing to read 'S. Georg', with a stylized flourish at the end.

Signed: Stephanie Georg, Chief Test Director

## 5 Observations outside the Scope of Certification

Test Object: CR Closure 14 mm

Nothing unusual was noticed during the tests with children.

The required marking designating the package as childproof can be shown the label. Recommended wording: "Child-resistant according to US 16 CFR § 1700.20".

Any modifications in the technical specifications, dimensions and materials have to be reported to ivm to maintain the certificate's validity. Failure to report modifications leads to the invalidity of the certificate.

## 6 Brief Test Report

### 1. Test Institute

ivm Institut VerpackungsMarktforschung GmbH, Friedrich-Seele-Straße 20, 38122 Braunschweig, Germany, accredited in accordance with ISO/IEC 17065 and ISO/IEC 17025 by the German Accreditation Body (DAkkS), registered under D-ZE-14061-01-00 and D-PL-14061-01-00.

Confirmation: Stephanie Georg; Certification: Dr. Rolf Abelmann

### 2. Manufacturers/Suppliers of the Tested Package

eBottles.com

### 3. Tested Package

Test Object: CR Closure 14 mm

### 4. Test Period

The tests were performed in November and December 2015.

### 5. Test Standard

Test to US 16 CFR § 1700.20 for child resistance and suitability for adults

### 6. Test Persons

50 children aged 42–51 months, adult test with 100 test persons

### 7. Results of Test with Children

5-minutes test: 3 openings, 10-minutes test: 5 openings

### 8. Results of Tests with Adults

0 failed attempts; SAUE: 100 %

### 9. Confirmation of Conformity

Based on the evaluation of the test results, Stephanie Georg, Chief Test Director of the test institute confirms conformity with the requirements. All results are within the tolerance range of US 16 CFR § 1700.20. The sequential evaluation proves the results.

The package can be designated as **child-resistant** and **suitable for adults**.

### 10. Certificate

The certificate is issued by the General Manager of the test institute.

**Certification No.: ivm - ZE 08412101115 – 1700.20**

It is valid for a maximum of ten years as long as no modifications are made to the package, the material, the dimensions and the closure system.

Braunschweig, 10.12.2015

ivm Institut VerpackungsMarktforschung GmbH



Dr. Rolf Abelmann  
General Manager

Attachments forming part of this report: 2 Certificates  
End of test report no. 08412101115.



**ZE-08412101115-1700.20**