

## Patricia D. Hastings

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**Sent:** Saturday, October 09, 2004 4:25 PM  
**Subject:** New EPA Web Site on Child-Resistant Packaging Established for Pesticide Manufacturers

**Action:** New Web Site on Child-Resistant Packaging Established for Pesticide Manufacturers  
 Posted to EPA Pesticide Program Update from EPA's Office of Pesticide Programs 10/08/04:

To protect children from poisonings around the home, the law requires that certain household pesticides be in child-resistant packaging. Pesticide manufacturers can now access on EPA's Web site (<http://www.epa.gov/opprd001/crp>) criteria for determining whether a pesticide product requires child-resistant packaging (CRP) and information on the types of child-resistant packaging available, along with photographs, and how to obtain them.

**Background:** To protect children from poisonings around the home, Federal law (see citation below) requires that certain household pesticides be in child-resistant packaging (CRP). The website cited above provides pesticide manufacturers with tools to determine if they should be using CRP for their product, what the ASTM (American Society for Testing and Materials) groupings are, and resources on how to obtain this packaging.

EPA provides that if a pesticide product triggers the **CRP toxicity criteria** and is used in a residential setting, then it is subject to CRP. Specifically, a pesticide product triggers the CRP toxicity criteria when, based upon testing with an appropriate test species, it meets any one of the following:

1. Acute oral LD50 of 1.5 g/kg or less;
2. Acute dermal LD50 of 2000 mg/kg or less;
3. Acute inhalation LC50 of 2 mg/ liter or less;
4. Is corrosive to the eye (causes irreversible destruction of ocular tissue) or causes corneal involvement or irritation persisting for 21 days or more;
5. Is corrosive to the skin (causes tissue destruction into the dermis and/or scarring) or causes severe skin irritation (severe erythema or edema) at 72 hours; or
6. The pesticide or device has such characteristics that, based upon human toxicological data, use history, accident data or such other evidence as is available, the Agency determines there is serious hazard of accidental injury or illness which child-resistant packaging could reduce. The law requires that pesticide manufacturers

**Resources:** EPA's pesticide regulations for Child-Resistant Packaging (CRP) are located at [40 CFR 157 subpart B](#); see [http://www.access.gpo.gov/nara/cfr/waisidx\\_03/40cfr157\\_03.html](http://www.access.gpo.gov/nara/cfr/waisidx_03/40cfr157_03.html).

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