

EPA FOR YOUR INFORMATION

PESTICIDES, POISON PREVENTION, AND CHILD-RESISTANT PACKAGING

History

- In 1972, regulations requiring child-resistant packaging (CRP) for pesticides were first proposed by the Federal Drug Administration (FDA).
- In 1976, EPA was given the sole jurisdiction for CRP for pesticides.
- In 1979, EPA published regulations requiring child-resistant packaging (CRP) for residential use pesticides.

Standards

- All residential use pesticides meeting certain toxicity criteria must be in CRP. The pesticide manufacturer must certify to the EPA that their product, as packaged, will meet certain standards of effectiveness, compatibility, and durability. Furthermore, the registrant must have data on file to substantiate their certification.
- EPA has over 4,000 pesticides products with CRP certifications on file.

Summary of Regulations

- EPA requires registrants to comply with its CRP regulations before they can register residential use pesticides for sale and distribution in the United States.
- All residential use pesticides meeting one or more of six toxicity criteria must be in CRP. The pesticide manufacturer must certify to the EPA that the product, as packaged, will meet certain standards of effectiveness, compatibility, and durability. Furthermore, the registrant must have data on file to substantiate the certification.
- The six toxicity criteria are acute oral toxicity, acute dermal toxicity, dermal irritation, acute inhalation toxicity, eye irritation, and human experience data (toxicological data, use history, or injury data).



- For pesticides that meet the CRP toxicity criteria, all sizes of products must be packaged in CRP with the exception of certain large sizes. EPA does not have a noncomplying size provision for the elderly and handicapped.
- In addition to the large size exemptions, exemptions are provided for pesticides classified for restricted use, or based on a lack of toxicity or technical factors. Restricted use pesticides are exempted because they must be used by or in the presence of a certified applicator.

Pesticides Requiring CRP, Types of CRP, and Use Patterns

- Some of the types of pesticides that require CRP are toilet bowl cleaners, mildewicides, rodenticides, insecticides, flea and tick products for cats, dogs, ant and roach products, lawn and garden products, weed killers, fungicides, marine paints, herbicides, pool chemicals, disinfectants, and laundry bleaches.
- Some of the types of CRP used for pesticides can involve a 3 1/2 gallon pail of swimming pool chemical, a 12 ounce bottle of toilet bowl cleaner, a 35 pound bag of weed killer, a gallon paint can, a 2 ounce stick of insect repellent, a flea and tick collar, an insect repellent strip, a gallon plastic bottle, or a small bait station for a mouse or ants.
- Some of the pesticides requiring CRP are designed for use by removing the product and reclosing the package. There are others that involve using the package as the applicator (toilet bowl squirt type packages), and still others involve having the pesticide in use and around children (although reportedly out of sight and reach) for prolonged periods of time. For example, flea and tick collars may be on the pet for 30 days.

Deaths and Injuries

- In 1968-70, the three years preceding the enactment of the Poison Prevention Packaging Act, there were 23 deaths per year to children under 5 years of age due to pesticides. In 1989 (the last year for which data are available), there was one death to a child under 5 years of age from pesticides.

Future Actions

- EPA has a requirement under the Federal Insecticides, Fungicides, and Rodenticides Act (FIFRA) that pesticide manufacturers must report to EPA any adverse effects from pesticides (FIFRA 6(a)(2)). A data base of incidents from pesticide exposures has recently been developed, and may enable EPA to ascertain patterns of problems with certain pesticides.

- EPA is monitoring compliance with the CRP regulations by reviewing consumer complaints as well as injury incidents. Consumer complaints, which do not involve injuries may be referred to the pesticide manufacturer for investigation and follow-up with the Agency.
- EPA agrees with the Consumer Product Safety Commission (CPSC) in encouraging "elderly friendly" packages, especially since our regulations do not allow the elderly to get a nonchild-resistant size of a pesticide.
- EPA will have CRP protocol testing changes consistent with those of the CPSC, as FIFRA mandates.

Related Measures

- EPA is concerned that use patterns which leave the pesticide in areas where children play may present exposure hazards that CRP alone cannot address. Consequently, the Agency has adopted numerous auxiliary safety measures to reduce exposure to these pesticides.
- EPA has begun to require more explicit information regarding bait protection to be printed on labels for rodenticide baits that are not sold in ready-to-use, tamper-resistant bait stations.

Testing Strategies

- Ready-to-use bait stations or other devices that have the pesticide in a contained "package" which children could come in contact with must demonstrate that the pesticide will not come out of the package if the child handles the package, abuses, bites, or sucks it, etc.
- EPA has developed testing standards to protect children from access to ready-to-use bait stations.
- If the package is considered small enough that a child might swallow it, certain tests are requested to demonstrate that the child cannot swallow, choke, or bite off a piece of the package.