



**CORMACK
PACKAGING**
A TRICORBRAUN® COMPANY

TECHNICAL TIPS

“ARE CORMACK’S CHILD-RESISTANT CAPS CR-CERTIFIED?”

WE OFTEN GET ASKED THE ABOVE QUESTION. IT’S A VALID QUESTION - BUT IS IT THE RIGHT ONE TO ASK THOUGH? (HOT TIP: IT’S NOT!)

The Therapeutic Goods Administration (TGA), in their latest Therapeutic Goods Order (TGO) 95 specifies that it is the sponsor’s (i.e. brand owner’s) responsibility to ensure that the whole PACK (cap AND bottle) passes Child-Resistant testing. This means that testing should be done on the full pack the sponsor plans to use. Both the cap and the exact bottle. It requires a separate testing for each bottle material used (generally Glass, HDPE and PET). TGO 95 goes on to specify the guidelines around how to conduct the tests and which bottle to use if there are, for example, three different bottle sizes that use the same CR cap. This is very different to the old TGO 65 that focused only on the cap. This was phased out in 2008.

Most importantly, it is up to the brand owner to ensure that the whole pack is CR-tested and certified. Factors like specific application torques and the removal torque the consumer will experience must also be considered before getting these tests done.



CHILD-RESISTANT VS CHILD-PROOF?

TGO 95 further stipulates that the term ‘child-resistant’ is not synonymous with ‘child-proof’. “Child-resistant packaging is only the last in a series of protective measures, and does not release parents or guardians from their duty to keep hazardous products out of the reach of children.

“Child-resistant packages provide only the safeguard of delay in access, in the protection of children against accidental poisoning. Other precautions need to be taken by parents, legislators, educators and marketers to ensure the safety of children where these products are kept.”

CHILD-RESISTANT AND ELDERLY-FRIENDLY PACKAGING

Wrap-rage is real. It is the common term for the extreme levels of frustration one can experience while trying open or unseal hard to open packaging. This is why industry bodies like Arthritis Australia have an Accessibility Design Division. Among other things, they help identify and even score packaging based on criteria such as Ease of Use and Easy to Open.

TGO 95 not only ensures CR caps are child-resistant. It also factors in the 50 to 70 year age group during testing, “to better reflect the age group that may experience difficulties in opening child-resistant packages.”

“While this group is not intended to represent the population as a whole, it covers adults who can read the instructions and would be expected to implement them with a high likelihood of success. Older people may be perceived to be more likely to need help in opening such packages.

GETTING YOUR PACK CERTIFIED

We can provide two levels of testing for packs our caps will be used for:

- AS 1928-2007 This is for end packs that will only be sold in Australia and New Zealand. For this test we would require 100 of the exact bottle that needs to be certified. This testing is approximately \$9,000 subject to quote once we have reviewed your intended pack.
- ISO 8317:2015 This is the global standard and is required if you intend to export your filled packs to Europe, USA, Canada and China. For this we need 300 sample bottles and the approximate cost is \$11,500 subject to our review of your exact packs.

With both these tests your goods will be independently submitted to both a child’s panel and a senior adult’s panel as per the requirements of TGO90 and a certificate provided to you stipulating your exact pack has been confirmed to pass the guideline.

*These are generally accepted application torques. Specific closures may require specific application torques which differ from those listed above. Check with your closure manufacturer for specific information.

Note: Immediate removal torque values are approximately 40-80% of application torque values. Production capping equipment should be adjusted to produce similar immediate removal torque values. It is important you test packs 30 days after application as this will be more indicative of the of the removal force the consumer will experience opening your finished pack. This is very critical for any torque dependent Child resistant package.