



May 9, 2018

Honorable Anne Marie Buerkle
Acting Chairman
U.S. Consumer Product Safety Commission
4330 East West Highway, Room 724
Bethesda, MD 20814-4408

Honorable Robert Adler
Commissioner
U.S. Consumer Product Safety Commission
4330 East West Highway, Room 724
Bethesda, MD 20814-4408

Honorable Elliot Kaye
Commissioner
U.S. Consumer Product Safety Commission
4330 East West Highway, Room 724
Bethesda, MD 20814-4408

Honorable Marietta Robinson
Commissioner
U.S. Consumer Product Safety Commission
4330 East West Highway, Room 724
Bethesda, MD 20814-4408

Dear Acting Chairman Buerkle and Members of the Commission:

In March 2018, Safe Kids released its sixth annual report on medication safety, [“Safe Medicine Storage: Recent Trends and Insights for Families and Health Educators.”](#) The report is important because, despite some progress, too many children are still getting into medicine and are poisoned. Every twelve days, a child under age 6 dies from accidental overdose of prescription drugs, pain relievers, vitamins and other medicines they find within reach. Accidental medicine poisoning sends a young child to the emergency room every nine minutes. Safe Kids Worldwide and 70 of its coalitions around the nation are joining together to urge Consumer Product Safety Commission (“CPSC” or “Commission”) to engage in awareness efforts relating to medication packaging.

The *Poison Prevention Packaging Act* says that medications and other products such as certain cleaning supplies, cosmetic products and chemicals must be “child-resistant.” This means they are designed to be “significantly difficult” for children under 5 years old to open within a reasonable period of time. We appreciate the work the Commission does in enforcing the 48-year-old *Poison Prevention Packaging Act*.¹ The law is time-tested and it works.

Research suggests that 44-55 percent of accidental medicine poisonings involve products with child resistant packaging.² The challenge is that a large number of parents believe “child-resistant” means “childproof.” But as you know, this is neither the reality nor what the law requires. Almost half of parents surveyed incorrectly believe that child-resistant packaging means a child won’t be able to open it at all, and 1 in 3 agreed that medicine in child-resistant packages can be safely stored somewhere visible and handy. Thus, medications in “child-resistant” packaging that are not kept up, away, and out of reach and sight pose a danger to children.

Based on the foregoing, we believe it would be important and helpful for the Commission to conduct a public awareness campaign on the meaning of “child-resistant,” and on the vital importance of the “up, away and out of reach and sight” message. As in the past with campaigns—“Pool Safely,” “Anchor It,” and others—Safe Kids stands ready to work with you and help the Commission get the message out. Safe Kids’ work on medication safety is made possible by Johnson & Johnson Consumer Inc.

Sincerely,

	Alaska		Indiana
Safe Kids Alaska		Safe Kids Bartholomew	
	Arizona		Iowa
Safe Kids Pima County		Safe Kids Woodbury County	
	California		Kansas
Safe Kids Central California		Safe Kids Kansas	
Safe Kids King County		Safe Kids Johnson County	
Safe Kids Greater Sacramento		Safe Kids Shawnee County	
Safe Kids Stanislaus County			Maryland
	Colorado	Safe Kids Baltimore	
Safe Kids Colorado		Safe Kids Prince George's County	
Safe Kids Larimer County			Michigan
Safe Kids Colorado Springs		Safe Kids Greater Flint	
Safe Kids Denver Metro		Safe Kids Capital Area	
	Florida	Safe Kids Oakland County	
Safe Kids Volusia/Flagler Counties		Safe Kids Kalamazoo	
Safe Kids Seminole County			Minnesota
Safe Kids Northeast Florida		Safe Kids Minneapolis	
Safe Kids Greater Tampa			Mississippi
Safe Kids Miami Dade		Safe Kids Mississippi	
Safe Kids Southwest Florida			Missouri
	Georgia	Safe Kids Newton/Jasper	
Safe Kids Savannah		Safe Kids West Central	
Safe Kids Gainesville/Hall Counties		Safe Kids Springfield	
Safe Kids Columbus			Montana
Safe Kids Cherokee County		Safe Kids Missoula	
Safe Kids DeKalb County			Nevada
	Hawaii	Safe Kids Washoe County	
Safe Kids Hawaii			

New Jersey

Safe Kids New Jersey
Safe Kids Passaic County
Safe Kids Middlesex County

North Carolina

Safe Kids Guilford County
Safe Kids Watauga County
Safe Kids Northwest Piedmont
Safe Kids Pitt County
Safe Kids Wayne County
Safe Kids Wilkes County
Safe Kids Randolph County

North Dakota

Safe Kids Grand Forks

Ohio

Safe Kids Carroll County
Safe Kids Central Ohio
Safe Kids Cincinnati

Oklahoma

Safe Kids Tulsa

Pennsylvania

Safe Kids SE Pennsylvania
Safe Kids Erie
Safe Kids Bucks County

South Carolina

Safe Kids Upstate
Safe Kids Cleveland County

Tennessee

Safe Kids Tennessee

Texas

Safe Kids Greater Dallas
Safe Kids Tarrant County
Safe Kids Greater Houston
Safe Kids San Antonio

Utah

Safe Kids Utah County

Virginia

Safe Kids Virginia

Washington State

Safe Kids Thurston County
Safe Kids Benton-Franklin

Wyoming

Safe Kids Park County

¹ *Poison Prevention Packaging Act*, 15 U.S.C. Sections 1471-1477, available at https://www.cpsc.gov/s3fs-public/pdfs/blk_media_pppa.pdf. The law calls for the Consumer Product Safety Commission to have primary jurisdiction.
² MacKay JM, Samuel E. Safe Medicine Storage: Recent Trends and Insights for Health Educators. Washington D.C.: Safe Kids Worldwide, March 2018. *This letter was researched and written by Alisha Yan, a Safe Kids Public Policy intern, and a rising senior at Dartmouth College