

# Product Solution

## Engineering Services Group

**Product Description:**

**Pill Terminator**

**Report Number:**  
**(5114)189-0073**

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## **Executive Summary**

At the request of the client, the submitted product was subjected to an Actual Use Test to determine if the product functions as intended and meets and/or exceeds the U.S. Food and Drug Administration (FDA) and the U.S. Environmental Protection Agency (EPA) guidelines for disposal of unused medicines.

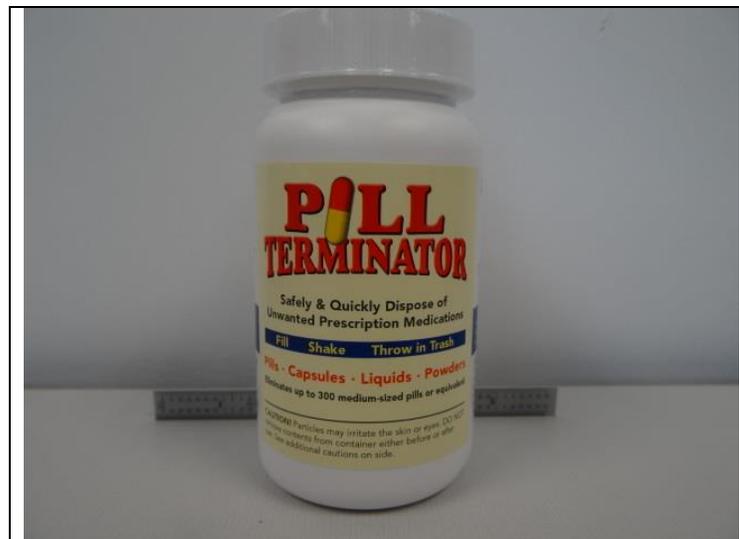
Based on the results of testing, it is the opinion of Bureau Veritas Consumer Products Services, Inc. (BVCPS) that the submitted product, Pill Terminator, exceeds the U.S. FDA and EPA guidelines for disposal of unused medicines.

Following the product's use instructions, the Pill Terminator rendered the medicine used in testing, coated aspirin tablets, unusable. The Pill Terminator dissolved the medicine used in this testing, exceeding the guidelines of the FDA and EPA for disposal of unused medicine.

Additional information is provided in this report. This report is for informational purposes only.

## **Samples/Products Tested**

Two (2) samples were submitted for testing as shown in Figure 1:



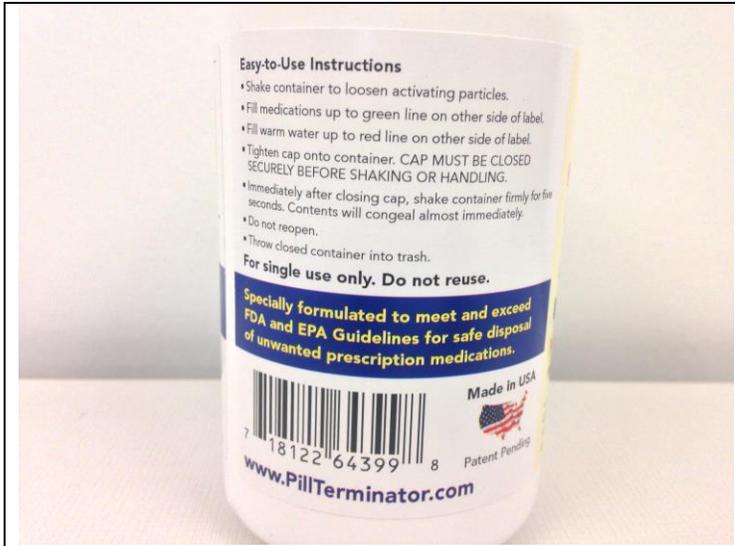
**Figure 1** – Typical sample as received.

The product is made in the U.S.A. by Combined Distributors, Inc. The product's UPC is 7 18122 64399 8.



## Performance Tests & Methods

Following the product's usage instructions, one sample was subjected to an Actual Use Test using 302 coated aspirin tablets. See Figures 2 through 5:



**Figure 2** – Product's usage instructions on labeling.



**Figure 3** – Product's usage instructions on labeling.



**Figure 4** – Container of coated aspirin used in Actual Use Test. 302 tablets were present in the container.



**Figure 5** – View of typical tablet of coated aspirin used in Actual Use Test.



The product's usage instructions, as shown in Figure 2, are as follows:

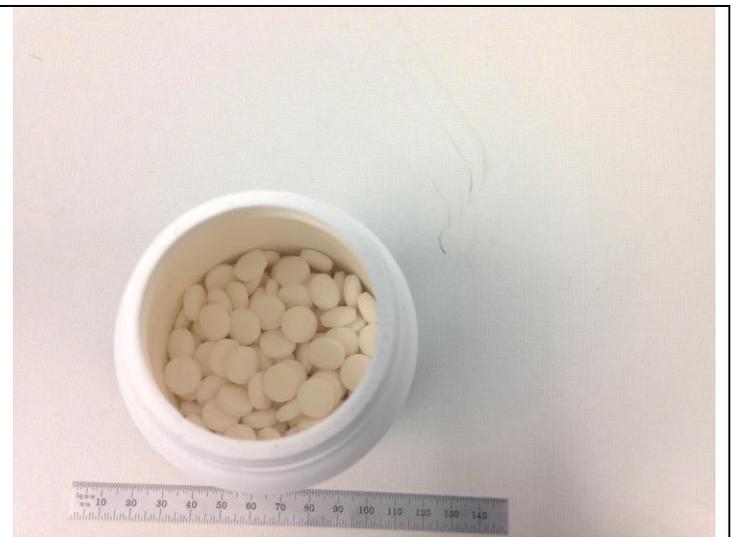
1. Shake container to loosen activating particles.
2. Fill medications up to the green line on the other side of label. (*see Figure 3*)
3. Fill warm water up to the red line on the other side of label. (*see Figure 3*)
4. Tighten cap onto container. CAP MUST BE CLOSED SECURELY BEFORE SHAKING OR HANDLING.
5. Immediately after closing cap, shake container firmly for five seconds. Contents will congeal almost immediately.
6. Do not reopen.
7. Throw closed container in trash.

## Results

Following the product's usage instructions, the product was filled with all 302 aspirin tablets. The results are shown in figures 6 through 11:



**Figure 6** – View of activating particles present inside sample after opening of container.



**Figure 7** – View of 302 tablets after being placed inside of sample.



**Figure 8** – Interior view of sample 2 minutes after completion of step 5 of product’s usage instructions.



**Figure 9** – Interior view of sample 60 minutes after completion of step 5 of product’s usage instructions.



**Figure 10** – Interior view of sample 2 hours after completion of step 5 of product’s usage instructions.



**Figure 11** – View of contents removed from sample after following the product’s usage instructions.

As shown in Figure 11, the coated aspirin tablets have been destroyed by the product.



## Observations

The guidelines for proper disposal of unused medicines from both the FDA and EPA found on the following links:

<http://water.epa.gov/scitech/swguidance/ppcp/upload/ppcpflyer.pdf>

<http://www.fda.gov/forconsumers/consumerupdates/ucm101653.htm>

To summarize the guidelines, the following criteria need to be met for proper disposal of unused medicine:

1. The medicine must be removed from its original container and mixed with an undesirable substance.
2. The mixture must be placed in a sealable container that does not leak so that it can be placed in the trash.

Based on our testing and analysis, it is the opinion of BVCPS that the Pill Terminator exceeds the FDA and EPA guidelines for proper disposal of unused medicines due to the following observations:

- The medicine was placed in the container with particles that emits an undesirable odor.
- The container is made of high density polyethylene which has a child resistant cap.
- The medicine dissolved and became part of a gel / mud like substance with a foul smell.

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