

TEST REPORT

LAB LOCATION:
REPORT NUMBER:

HONG KONG
65322-070259

ISSUE DATE:
PAGE:

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Applicant : Frenzy Toys Ltd
Rm. 1108, Goodluck Industrial Centre, 808 Lai Chi Kok Road, Kowloon, H.K.

Contact Person : Lawrence Lam

Sample Description : WIND UP SEA ANIMAL

Style Number : SP0137

Purchase Order Number : INFJ3H

Buyer : Dollar General

Country of Origin : CHINA

Country of Destination : USA

Date of Submission : JUL 14, 2022

Test Performance Dates : JUL 14, 2022 – JUL 27, 2022

Photo of Submitted Sample



For and on behalf of
Modern Testing Services (Global) Ltd.



Ng, Wai Hung
Senior Manager, Toys
Toys, Arts and Crafts Division



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TEST RESULT SUMMARY	
Test Requested	Results
ASTM F963-17 Standard Consumer Safety Specification for Toy Safety, Physical and Mechanical Tests	PASS
Federal Hazardous Substances Act Regulations 16 CFR 1500.3(c)(6)(vi) Flammable Solid	PASS
Screening of Soluble Heavy Metals Content (as Total Content) – Client’s Limit	PASS
Total Lead Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101	PASS
Total Lead Content – The Illinois Lead Poisoning Prevention Act	PASS
Total Lead Content in Toys and Child Care Articles – Client’s Requirement according to the Consent Decrees of California Proposition 65	PASS
Total Heavy Metal Screening in Similar Surface Coating Materials and Toys Substrate Materials – ASTM F963-17 Section 4.3.5.1(2) & 4.3.5.2(2)(b) / Section A12.7	PASS
Soluble Heavy Metals Content – Client’s Limit	PASS
Soluble Heavy Metals Content in Similar Surface Coating Materials and Toys Substrate Materials – ASTM F963-17 Section 4.3.5.1(2) & 4.3.5.2(2)(b)	PASS
Total Lead Content - Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates – Client’s Requirement with Reference to Subsection 2, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children`s Safe Product Act (CSPA)	PASS
Total Cadmium Content - Client’s Requirement with Reference to Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates, Subsection 2, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children`s Safe Product Act (CSPA)	PASS
Phthalates Content – Client’s Requirement with reference to U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 108	PASS
Phthalates Content – Client’s Requirement with reference to California Assembly Bill Law No. 1108	PASS
Phthalates Content – Client’s Requirement according to the Consent Decrees of California Proposition 65	PASS
Phthalate Content - Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates – Client’s Requirement with Reference to Subsection 1, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children`s Safe Product Act (CSPA)	PASS
Labeling and Construction Qualities requirement – Client’s protocol	PASS

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Unit 808, CEO Tower, 77 Wing Hong Street, Cheung Sha Wan, Kowloon, Hong Kong

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TEST DATA:

ASTM F963-17 Standard Consumer Safety Specification for Toy Safety, Physical and Mechanical Tests

AGE GRADE EVALUATION:

Client requested age grade: Not Requested
Labeled age grade: Not Declared
Appropriate age grade: All ages
Age grade for testing: All ages

RESULTS:

SUBCLAUSE	REQUIREMENT	RESULT
4.1	Material Quality	P
4.3.7	Stuffing materials – visual	NA
4.5	Sound Producing Toys	NA
4.6	Small Objects	P
4.7	Accessible Edges	P
4.8	Projections	NA
4.9	Accessible Points	P
4.10	Wires or Rods	NA
4.11	Nails and Fasteners	NA
4.12	Plastic Film	NA
4.13	Folding Mechanisms and Hinges	NA
4.14	Cords, Straps, and Elastics	NA
4.15	Stability and Over-Load Requirements	NA
4.16	Confined Spaces	NA
4.17	Wheels, Tires, and Axles	NA
4.18	Holes, Clearance, and Accessibility of Mechanisms	P
4.19	Simulated Protective Devices	NA
4.20	Pacifiers	NA
4.21	Projectile Toys	NA
4.22	Teethers and Teething Toys	NA
4.23	Rattles	NA
4.24	Squeeze Toys	NA
4.25	Battery-Operated Toys	NA
4.26	Toys Intended to be Attached to a Crib or Playpen	NA

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<u>SUBCLAUSE</u>	<u>REQUIREMENT</u>	<u>RESULT</u>
4.27	Stuffed and Beanbag Type Toys	NA
4.28	Stroller and Carriage Toys	NA
4.30	Toy Gun Marking	NA
4.31	Balloons	NA
4.32	Certain Toys with Nearly Spherical Ends	NA
4.33	Marbles	NA
4.34	Balls	NA
4.35	Pompoms	NA
4.36	Hemispheric – Shaped Objects	NA
4.37	Yo Yo Elastic Tether Toys	NA
4.38	Magnets	NA
4.39	Jaw Entrapment in Handles and Steering Wheels	NA
4.40	Expanding Materials	NA
4.41	Toy Chests	NA
5.3	Safety labeling Requirements	NR
5.4	Aquatic Toys	NR
5.5	Crib and Playpen Toys	NR
5.6	Mobiles	NR
5.7	Stroller and Carriage Toys	NR
5.8	Toys Intended to be Assembled by an Adult	NR
5.9	Simulated Protective Devices	NR
5.10	Toys with Functional Sharp Edges or Points	NR
5.11	Small Objects, Small Balls, Marbles, and Balloons	NR
5.12	Toys Caps	NR
5.13	Art Materials	NR
5.15	Battery Operated Toys	NR
5.16	Promotional Materials	NR
5.17	Magnets	NR
6.1	Instructional Literature - Definition and Description	NR
6.2	Crib and Playpen Toys	NR
6.3	Mobiles	NR
6.4	Toy intended to be Assembled by an Adult	NR
6.5.1 to 6.5.2	Battery Operated Toys	NR

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SUBCLAUSE	REQUIREMENT	RESULT
6.6	Battery Powered Ride-on Toys	NR
6.7	Toys in Contact with Food	NR
6.8	Toy Chest	NR
7.1	Producer's Markings	NR
7.2	Battery-Powered Ride-On Toys	NR
7.3	Toy Chest	NR

Note: P = Pass F = Fail NA = Not applicable NR = Not Requested

Federal Hazardous Substances Act Regulations, 16 CFR 1500.3 (c)(6)(vi) Flammable Solid

RESULTS:

TEST METHOD	REQUIREMENT	RESULT
16 CFR 1500.44 Flammable solid ASTM F963-2017 Annex A5	Burnt rate shall be ≤ 0.1 inch / sec	P

Note: P = Pass F = Fail NA = Not applicable NR = Not Requested



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COMPONENT BREAKDOWN LIST:

Test Item	Component Description	Accessibility (Remark 1)	Classification
A	Clownfish	-	-
A1	Black coating (Eyes) - Style B, C, D, E	Accessible as received	Paint or similar surface coating
A2	White coating (Eyes) - Style D	Accessible as received	Paint or similar surface coating
A3	Yellow coating (Body)	Accessible as received	Paint or similar surface coating
A4	Orange plastic without coating (Body, switch, tail)	Accessible as received	Accessible substrate
B	Orca	-	-
B1	Black plastic (Body, tail, switch)	Accessible as received	Accessible substrate
B2	White plastic (Body) - Style C, E	Accessible as received	Accessible substrate
C	Manta ray	-	-
C1	Dark blue plastic (Body, switch, tail)	Accessible as received	Accessible substrate
C2	Silvery metal (Screw) - Style E	Accessible as received	Accessible substrate
D	Blue surgeon	-	-
D1	Hot blue plastic (Body)	Accessible as received	Accessible substrate
D2	Light blue plastic without coating (Body, switch, tail)	Accessible as received	Accessible substrate
E	Shark	-	-
E1	Sea blue plastic (Body, switch, tail)	Accessible as received	Accessible substrate

Remark:

1. The accessibility of the submitted sample is verified according to 16 CFR 1500.87 (e) before and after abuse.



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TEST RESULT:

TOTAL HEAVY METAL CONTENT – TOYS AND CHILDREN’S PRODUCTS

<u>Applicable Tests:</u>											
I. Screening of Soluble Heavy Metals Content (as Total Content) – Client’s Limit											
II. Total Lead Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101											
III. Total Lead Content – Illinois Lead Poisoning Prevention Act											
IV. Total Lead Content in Toys and Child Care Articles – Client’s Requirement according to the Consent Decrees of California Proposition 65											
TESTS	I								II	III	IV
HEAVY METALS	Sb	As	Ba	Cd	Cr	Pb	Hg	Se	Pb	Pb	Pb
Limits (ppm)	60	25	1000	75	60	40	60	500	Coating: 90 Substrate: 100		Coating: 90 Substrate: 100 PVC & non-PVC component of baby bibs: 200
									XRF	Wet Chem	
A1+A2+A3	NA	NA	NA	NA	NA	NA	NA	NA	NT	<10	<10
	NA								P	P	P
A4+B1+B2	<10	<10	<10	<10	<10	<10	<10	<10	NT	<10	<10
	P								P	NA	P
C1+D1	<10	<10	<10	<10	<10	<10	<10	<10	NA	<10	<10
	P								P	NA	P
C2	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10	<10
	NA								P	NA	P
D2+E1	<10	<10	<10	<10	<10	<10	<10	<10	NA	<10	<10
	P								P	NA	P

Sb = Antimony, As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium, Pb = Lead, Hg = Mercury, Se = Selenium

Note: ppm = part per million = mg/kg = milligram per kilogram
 “<” = less than
 P = PASS
 F = FAIL
 NA = Not Applicable
 NT = Not Tested
 RIT = Refer to Individual Test Results
 RSM = Refer to Soluble Heavy Metals Test Results

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REMARK:

I. Screening of Soluble Heavy Metals Content (as Total Content) – Client’s Limit

Method: Sample was digested with acid mixture and analyzed by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

II. Total Lead Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101

Method: XRF:
ASTM F2853-10 Standard test method for determination of Lead in paint and other similar surface coatings or in substrates and homogenous materials by energy dispersive X-ray Florescence Spectrometry using multiple monochromatic excitation beams.

Wet Chem:

- 1) Lead in paint and other similar surface coatings:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings, April 26, 2009 (CPSC-CH-E1003-09)
- 2) Lead in metals:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Children’s Metal Products (Including Children’s Metal Jewelry), December 4, 2008 (CPSC-CH-E1001-08)
- 3) Lead in other non-metal materials including plastics, glass and leather material:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Non-Metal Children’s Products, February 1, 2009 (CPSC-CH-E1002-08)

III. Total Lead Content – Illinois Lead Poisoning Prevention Act

Method:

- 1) Lead in paint and other similar surface coatings:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings, April 26, 2009 (CPSC-CH-E1003-09)
- 2) Lead in metals:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Children’s Metal Products (Including Children’s Metal Jewelry), December 4, 2008 (CPSC-CH-E1001-08)
- 3) Lead in other non-metal materials including plastics, glass and leather material:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Non-Metal Children’s Products, February 1, 2009 (CPSC-CH-E1002-08)

IV. Total Lead Content in Toys and Child Care Articles – Client’s Requirement according to the Consent Decrees of California Proposition 65

Method: Sample was digested with reference to EPA 3051. The lead content was analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: The maximum permissible limit(s) was / were quoted from the client’s protocol constructed according to various Consent Decrees. Compliance with the above stated limit(s) does not show compliance with Proposition 65 or a guarantee against possible legal action but provides a relative level of assurance against potential lawsuits.

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Total Heavy Metal Screening in Similar Surface Coating Materials and Toys Substrate Materials – ASTM F963-17 Section 4.3.5.1(2) & 4.3.5.2(2)(b) / Section A12.7

Test Item	Mass of Trace Amount (mg)	Result – Total Heavy Metals (mg/kg)								Conclusion
		Sb	As	Ba	Cd	Cr	Pb	Hg	Se	
A4+B1+B2	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
C1+D1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
D2+E1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
Limit for Surface Coatings and Substrates Other Than Modeling Clay		60	25	1000	75	60	90	60	500	-
Limit for Modeling Clays		60	25	250	50	25	90	25	500	-

Sb = Antimony, As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium, Pb = Lead, Hg = Mercury, Se = Selenium

Method: ASTM F963-17 Section 8.3.1, sample was digested with acid mixture and analyzed by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer / ASTM F963-17 Section A12.7, sample was analyzed by X-ray Fluorescence Spectrometry.

Note: mg/kg = milligram per kilogram
 mg = milligram
 "<" = less than
 NA = Not applicable



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Soluble Heavy Metals Content – Client’s Limit

Test Item	Mass of Trace Amount (mg)	Result – Soluble Heavy Metals (mg/kg)								Conclusion
		Sb	As	Ba	Cd	Cr	Pb	Hg	Se	
A1	<10 (Remark 2)	NA	NA	NA	NA	NA	NA	NA	NA	NA
A2	<10 (Remark 2)	NA	NA	NA	NA	NA	NA	NA	NA	NA
A3	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
Client’s Limit		60	25	1000	75	60	40	60	500	-

Sb = Antimony, As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium, Pb = Lead, Hg = Mercury, Se = Selenium

Method: 1) For surface coating:
With reference to ASTM F963-08 Section 8.3 / ASTM F963-11 Clause 8.3.2. The heavy metals content was determined by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

2) For accessible substrate:
With reference to ASTM F963-11 Clause 8.3.5. The heavy metals content was determined by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: 1. All the reported results are adjusted analytical results with the analytical correction shown in the following table.

Element	Sb	As	Ba	Cd	Cr	Pb	Hg	Se
Analytical correction (%)	60	60	30	30	30	30	50	60

2. The received sample(s) contained component(s) of less than 10mg on one single sample, therefore such component(s) was not tested for soluble heavy metals content as specified in clause 8.3.3.1 of ASTM F963-08 / clause 8.3.3.6 (2) & 8.3.5.3 (2) of ASTM F963-11

Note: mg/kg = milligram per kilogram
mg = milligram
“<” = less than
NA = Not applicable



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Soluble Heavy Metals Content in Similar Surface Coating Materials and Toys Substrate Materials – ASTM F963-17 Section 4.3.5.1(2) & 4.3.5.2(2)(b)

Test Item	Mass of Trace Amount (mg)	Result – Soluble Heavy Metals (mg/kg)								Conclusion
		Sb	As	Ba	Cd	Cr	Pb	Hg	Se	
A1	<10 (Remark 4)	NA	NA	NA	NA	NA	NA	NA	NA	NA
A2	<10 (Remark 4)	NA	NA	NA	NA	NA	NA	NA	NA	NA
A3	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
Limit for Surface Coatings and Substrates Other Than Modeling Clay		60	25	1000	75	60	90	60	500	-
Limit for Modeling Clays		60	25	250	50	25	90	25	500	-

Sb = Antimony, As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium, Pb = Lead, Hg = Mercury, Se = Selenium

Method: ASTM F963-17 Section 8.3.2 (surface coatings) / ASTM F963-17 Section 8.3.5 (substrate material). The heavy metals content was determined by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: 1. All the reported results are adjusted analytical results with the analytical correction shown in the following table.

Element	Sb	As	Ba	Cd	Cr	Pb	Hg	Se
Analytical correction (%)	60	60	30	30	30	30	50	60

- The accessibility of the submitted sample is verified according to ASTM F963-17 before and after abuse.
- The material type of tested component(s) is / are classified as below per clause 8.3 of this standard.

Material Type Classification	Test Item
Paint and other similar surface-coating materials	A1-A3

- The received sample(s) contained component(s) of less than 10mg on one single sample, therefore such component(s) was not tested for soluble heavy metals content as specified in clause 8.3.3.6 (2) / 8.3.5.3 (2) of this standard.

Note: mg/kg = milligram per kilogram
mg = milligram
“<” = less than
NA = Not applicable



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Total Lead Content - Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates – Client's Requirement with Reference to Subsection 2, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children's Safe Product Act (CSPA)

Test Item	Total Lead (Pb) (mg/kg)		Conclusion
	Result	Maximum Permissible Limit	
A1+A2+A3	<10	90	PASS
A4+B1+B2	<10	90	PASS
C1+D1	<10	90	PASS
C2	<10	90	PASS
D2+E1	<10	90	PASS

Method: Sample was digested with acid mixture and analyzed by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Note: mg/kg = milligram per kilogram
“<” = less than



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Total Cadmium Content - Client's Requirement with Reference to Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates, Subsection 2, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children's Safe Product Act (CSPA)

Test Item	Total Cadmium (Cd) (mg/kg)		Conclusion
	Result	Maximum Permissible Limit	
A1+A2+A3	<10	40	PASS
A4+B1+B2	<10	40	PASS
C1+D1	<10	40	PASS
C2	<10	40	PASS
D2+E1	<10	40	PASS

ND = Not detected (Laboratory Reporting Limit = 10mg/kg)

Method: Sample was digested with acid mixture and analyzed by Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Note: mg/kg = milligram per kilogram
" < " = less than



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Phthalates Content – 16CFR part 1307, amended U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 108

Test Item	Result – Phthalates Content (%)								Conclusion
	DBP	BBP	DEHP	DIBP	DCHP	DINP	DnHP/DHEXP	DPP/DPEN	
A1+A2+A3	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	PASS
Limit	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	-

List of Phthalates:

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Dicyclohexyl phthalate (DCHP)	84-61-7
Butyl benzyl phthalate (BBP)	85-68-7	Di-iso-nonyl phthalate (DINP)	28553-12-0/ 68515-48-0
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	Di-n-hexyl phthalate (DnHP/DHEXP)	84-75-3
Di-iso-butyl phthalate (DIBP)	84-69-5	Dipentyl phthalate (DPP/DPENP)	131-18-0

Method: The test is conducted according to the US CPSC Standard Operation Procedure for Determination of Phthalates, January 17, 2018 (CPSC-CH-C1001-09.4)

Note: % = percentage
“<” = less than
“>” = more than



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Phthalates Content – California Assembly Bill Law No. 1108

Test Item	Result (%) (Remark)						Conclusion
	Part A			Part B			
	DBP	BBP	DEHP	DNOP	DIDP	DINP	
A1+A2+A3	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	PASS
Limit	0.1	0.1	0.1	0.1	0.1	0.1	-

List of Phthalates:

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Di-n-octyl phthalate (DNOP)	117-84-0
Butyl benzyl phthalate (BBP)	85-68-7	Di-iso-decyl phthalate (DIDP)	26761-40-0/ 68515-49-1
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	Di-iso-nonyl phthalate (DINP)	28553-12-0/ 68515-48-0

Method: The test is conducted according to the US CPSC Standard Operation Procedure for Determination of Phthalates, January 17, 2018 (CPSC-CH-C1001-09.4)

Remark: Toys and childcare articles shall meet the requirement of Part A. Toys or childcare articles intended for use by a child under three years of age if that product can be placed in the child's mouth shall meet the requirements of both Part A and B.

Note: % = percentage
“<” = less than

NA = Not applicable



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Phthalates Content in Toys and Childcare Articles – Client’s Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: Sacramento Superior Court 07AS04683 / Alameda Superior Court BG07350969 / RG08367601 / RG07351032 / RG08378050)

Test Item	Result (%)					Conclusion
	DBP	BBP	DEHP	DIDP	DnHP	
A1+A2+A3	<0.005	<0.005	<0.005	<0.005	<0.005	PASS (See Remark)

List of Phthalates:

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Di-iso-decyl phthalate (DIDP)	26761-40-0/ 68515-49-1
Butyl benzyl phthalate (BBP)	85-68-7	Di-n-hexyl phthalate (DnHP)	84-75-3
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	-	-

Method: The test is conducted according to the US CPSC Standard Operation Procedure for Determination of Phthalates, April 1, 2010 (CPSC-CH-C1001-09.3)

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

The reformulation level set forth in the Consent Decrees of similar products to the Sample is **0.1% (each)**. The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

Note: % = percentage
“<” = less than
“>” = more than
NA = Not applicable

Modern Testing Services (Global) Ltd.

Unit 808, CEO Tower, 77 Wing Hong Street, Cheung Sha Wan, Kowloon, Hong Kong
Tel: (852) 3604 1328 Fax: (852) 2810 7188 E-mail: info@mts-global.com Website: www.mts-global.com



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Phthalate Content - Prohibition on the manufacturing and sale of children's products containing lead, cadmium, or phthalates – Client's Requirement with Reference to Subsection 1, 70.240.20, Revised Code of Washington (RCW), Title 70, Chapter 70.240, Children's Safe Product Act (CSPA)

Test Item	Result (%)							Conclusion
	DBP	BBP	DEHP	DNOP	DIDP	DINP	Total	
A1+A2+A3	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.03	PASS
Limit	0.1	0.1	0.1	0.1	0.1	0.1	0.1	-

List of Phthalates:

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Di-n-octyl phthalate (DNOP)	117-84-0
Butyl benzyl phthalate (BBP)	85-68-7	Di-iso-decyl phthalate (DIDP)	26761-40-0/ 68515-49-1
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	Di-iso-nonyl phthalate (DINP)	28553-12-0/ 68515-48-0
Di-n-hexyl phthalate (DNHP)	84-75-3	-	-

Method: Sample was extracted with organic solvent and analyzed by Gas Chromatograph Mass Spectrometer / Liquid Chromatograph Mass Spectrometer.

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Labeling and Construction Qualities requirement – Client’s protocol

TY-001-US

Evaluation	Citation/Method	Criteria	Result
Defects	MTS in house method	Shall have no discernible surface degradation, including crazing, shivering, denting, bubbles, cracks, stains, deformations, chips, fractures, heavy lines, waves, shear marks, scratches, scuff marks, indentations, or blisters.	P
Workmanship	MTS in house method	Shall have no components missing, malformed, and/or fractured. Shall present proper, even and uniform adhesion. Components shall be even in color.	P
Functionality	MTS in house method	Shall function as intended. The evaluation does not include the functions that are covered by other tests.	P

Note: P = Pass F = Fail NA = Not applicable NR = Not Requested



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NOTE:

The statement of conformity is based on a 95% coverage probability for the expanded uncertainty of the measured result (guard band):

Rule 1:

For any requirement state to be "Maximum"

PASS - The measured result is below a specification limit minus guard band.

INCONCLUSIVE - The measured result is inside the guard band and below the specification limit and the measured result is above the specification limit but below the specification limit added to the guard band.

FAIL - The measured result is above a specification limit added to the guard band.

DATA - There is no specification limit required which is not possible to state the conformity.

Rule 2:

For any requirement state to be "Minimum"

PASS - The measured result is above a specification limit plus guard band.

INCONCLUSIVE - The measured result is inside the guard band and above the specification limit and the measured result is below the specification limit but above the specification limit added to the guard band.

FAIL - The measured result is below a specification limit minus guard band.

DATA - There is no specification limit required which is not possible to state the conformity.

Rule 3:

For any requirement state to be "a range (Between Upper to Lower specification limit)"

PASS - The measured result is within a range of upper and lower acceptance limit.

INCONCLUSIVE - The measured result is inside the guard band at either side of specification limits

FAIL - The measured result is outside a specification limit minus/added to the guard band.

DATA - There is no specification limit required which is not possible to state the conformity.

Rule 4:

For any test based on subjective grading of results by using 9-point scale

PASS - The measured result is above specification limit.

FAIL - The measured result is below a specification limit.

DATA - There is no specification limit required which is not possible to state the conformity.

If there is question or concern regarding the above results, please contact the appropriate lab person below:

Technical question & concern:

Ng, Wai Hung
Senior Manager, Toys
Toys, Arts and Crafts Division
Tel: (852) 3604 1388
Fax: (852) 2323 4180
Email: marcong@mts-global.com

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