

REPORT

Lab Number: (6222)217-0129





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TEST REPORT

TO: FOURSTAR GROUP

LAB NO.: (6222)217-0129
DATE IN: AUG. 05, 2022
DATE OUT: AUG. 16, 2022
MOD. DATE: -
PAGE: 1 OF 21
WORKING DAYS: 7

PURPOSE OF TEST: To evaluate the submitted sample in the test requested by the client only.

OVERALL RATING: PASS

SAMPLE DESCRIPTION:

Item Description:	CARDS WITH ERASERS
Style No.:	22473838
P.O. No.:	6443 US
Sources/Vendor:	-
Manufacturer:	-
Orig. Of Country:	-
Size:	EACH CARD: 5.5 X 8.25IN ERASER: 0.36 X 0.75 X 1.2IN
Color:	4

TEST RESULTS:

Evaluation	Citation/Method	Criteria	Results / Rating
Total heavy metal in surface coating	ASTM F963-17 Sec.4.3.5.1(2) & 8.3.1 / CPSC-CH-E1003-09.1 / CPSD-AN-00564- MTHD	All toys containing accessible surface coating, before and after use and abuse testing, shall not contain compounds of which the metal content of the total content exceeds the levels by weight (mg/kg) of the contained solid including pigments, film solids and driers [Antimony (Sb) 60, Arsenic (As) 25, Barium (Ba) 1000, Cadmium (Cd) 75, Chromium (Cr) 60, Lead (Pb) 90, Mercury (Hg) 60, Selenium (Se) 500] Report actual results or include data table within report. If all heavy metal limits except for lead are met then no soluble lead testing will be conducted when the CPSIA total lead requirement is not met. Component testing is allowed. Based on the standard, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit of any heavy metal except for lead based on the lowest weight component then soluble heavy metal content test with individual colors will be analyzed.	NA/ No Surface Coating

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Evaluation	Citation/Method	Criteria	Results / Rating
Soluble heavy metal in surface coating	ASTM F963-17 Sec.4.3.5.1(2) & 8.3.2 / CPSD-AN-00564- MTHD	<p>All toys containing accessible surface coating, before and after use and abuse testing, shall not contain compounds of which the metal content of the soluble material exceeds the levels by weight (mg/kg) of the contained solid including pigments, film solids and driers [Antimony (Sb) 60, Arsenic (As) 25, Barium (Ba) 1000, Cadmium (Cd) 75, Chromium (Cr) 60, Lead (Pb) 90, Mercury (Hg) 60, Selenium (Se) 500]</p> <p>Coating materials that contain less than the total limit of [Antimony (Sb) 60, Arsenic (As) 25, Barium (Ba) 1000, Cadmium (Cd) 75, Chromium (Cr) 60, Lead (Pb) 90, Mercury (Hg) 60, Selenium (Se) 500] do not need to be tested for the soluble content.</p> <p>Report actual results or include data table within report. Component testing is allowed. Compositing is not allowed.</p>	NA/-



Evaluation	Citation/Method	Criteria	Results / Rating
Total heavy metal in substrates	ASTM F963-17 Sec.4.3.5.2(2)(b) & 8.3.1 / 16 CFR 1251 / 16 CFR 1252 / 16 CFR 1253 / CPSC-CH- E1001-08.3 (Mod) / CPSC-CH-E1002-08.3 (Mod)	<p>All accessible substrates in toys, before and after use and abuse testing, shall have total heavy metals content comply with the limits specified in Table 1 of the standard. [Antimony (Sb) 60 mg/kg, Arsenic (As) 25 mg/kg, Barium (Ba) 1000 mg/kg, Cadmium (Cd) 75 mg/kg, Chromium (Cr) 60 mg/kg, Lead (Pb) 90 mg/kg, Mercury (Hg) 60 mg/kg, Selenium (Se) 500 mg/kg]</p> <p>Note:</p> <ul style="list-style-type: none"> - Report actual results or include data table within report. - If all heavy metal limits except for lead are met then no soluble lead testing will be conducted when the CPSIA total lead requirement is not met. - Conduct soluble heavy metal test directly if there is only one textile component in the product. - Component testing is allowed. - Based on the standard, will composite up to 3 like materials. If any material in the composite exceeds 80% of the limit of any heavy metal except for lead based on the lowest weight component then soluble heavy metal content test with individual material will be analyzed. - Unfinished and untreated wood as defined in 16 CFR 1251 will not be tested. - Untreated and unfinished engineered wood products (EWPs), specifically, particleboard, hardwood plywood, and medium-density fiberboard, made from virgin wood or pre-consumer wood waste as defined in 16 CFR 1252 will not be tested. Vendor shall claim this determination in TRF, otherwise testing will be conducted in all woods. - These unfinished manufactured fibers: nylon, polyurethane (spandex), viscose rayon, acrylic and modacrylic and natural rubber latex, as defined in 16 CFR 1253 will not be tested. Vendor shall claim this determination in TRF, otherwise testing will be conducted in all fibers. - Accessible glass, metal and ceramic toys or parts of toys are only tested if they are small parts. - Paper and paperboard are exempt for testing. - Substrates for children aged 6 or more are exempt for testing unless the parts can be mouthed, sucked or ingested. 	M/PASS See Page 12



Evaluation	Citation/Method	Criteria	Results / Rating
Soluble heavy metal in substrates	ASTM F963-17 Sec.4.3.5.2(b) & 8.3.5 / 16 CFR 1251 / 16 CFR 1252 / 16 CFR 1253	<p>All accessible substrates in toys, before and after use and abuse testing, shall have soluble heavy metals content comply with the limits specified in Table 1 of the standard. [Antimony (Sb) 60 mg/kg, Arsenic (As) 25 mg/kg, Barium (Ba) 1000 mg/kg, Cadmium (Cd) 75 mg/kg, Chromium (Cr) 60 mg/kg, Lead (Pb) 90 mg/kg, Mercury (Hg) 60 mg/kg, Selenium (Se) 500 mg/kg]</p> <p>Substrates that contain less than the total limit of [Antimony (Sb) 60 mg/kg, Arsenic (As) 25 mg/kg, Barium (Ba) 1000 mg/kg, Cadmium (Cd) 75 mg/kg, Chromium (Cr) 60 mg/kg, Lead (Pb) 90 mg/kg, Mercury (Hg) 60 mg/kg, Selenium (Se) 500 mg/kg] do not need to be tested for the soluble content.</p> <p>Note:</p> <ul style="list-style-type: none"> - Report actual results or include data table within report. - Component testing is allowed. - Compositing is not allowed. - Unfinished and untreated wood as defined in 16 CFR 1251 will not be tested. - Untreated and unfinished engineered wood products (EWPs), specifically, particleboard, hardwood plywood, and medium-density fiberboard, made from virgin wood or pre-consumer wood waste as defined in 16 CFR 1252 will not be tested. Vendor shall claim this determination in TRF, otherwise testing will be conducted in all woods. - These unfinished manufactured fibers: nylon, polyurethane (spandex), viscose rayon, acrylic and modacrylic and natural rubber latex, as defined in 16 CFR 1253 will not be tested. Vendor shall claim this determination in TRF, otherwise testing will be conducted in all fibers. - Accessible glass, metal and ceramic toys or parts of toys are only tested if they are small parts. - Paper and paperboard are exempt for testing. - Substrates for children aged 6 or more are exempt for testing unless the parts can be mouthed, sucked or ingested. 	NA/-
Total lead in surface coating	16 CFR 1303/Consumer Product Safety Improvement Act of 2008 / CPSC-CH- E1003-09.1 / CPSD- AN-00001-MTHD	<p>All accessible surface coatings, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead or lead components in which the lead content is in excess of 0.009% (90ppm) of the weight of the total content.</p> <p>In case of insufficient coating for testing found on number of samples specified in the protocol, vendor needs to provide additional component parts (including raw materials) for testing.</p> <p>Report actual results or include data table within report.</p> <p>Issue a third party test report.</p> <p>Component testing is allowed.</p> <p>Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed.</p>	NA/- No Surface Coating



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Evaluation	Citation/Method	Criteria	Results / Rating
Total lead in substrate	Consumer Product Safety Improvement Act of 2008 / 16 CFR 1252 / CPSC-CH-E1001-08.3 / CPSC-CH-E1002-08.3 / CPSD-AN-00185-MTHD / CPSD-AN-00196-MTHD	All accessible substrates, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead in excess of 0.01% (100ppm) of the weight of the total content. Note: - In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing. - Report actual results or include data table within report. - Issue a third party test report. - Component testing is allowed. - Compositing up to 3 like materials is allowed except metal. - Exempt materials as defined by the Consumer Products Safety Commission in 16 CFR 1500.88, 16 CFR 1500.91 (d) and (e) and 16 CFR 1252 will not be tested. - Untreated and unfinished engineered wood products (EWPs), specifically, particleboard, hardwood plywood, and medium-density fiberboard, made from virgin wood or pre-consumer wood waste as defined in 16 CFR 1252 will not be tested. Vendor shall claim this determination in TRF, otherwise testing will be conducted in all woods.	M/PASS See Page 13



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Evaluation	Citation/Method	Criteria	Results / Rating
Phthalates content	16 CFR 1307 / 16 CFR 1252 / CPSC-CH-C1001-09.4	<p>Children's toys and childcare articles, before and after use and abuse testing, shall not contain concentrations of more than 0.1% BBP, DBP, DEHP, DINP, DIBP, DPENP(=DnPP), DHEXP(=DnHP) or DCHP individually.</p> <p>Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber) (excluding materials listed below), plasticizer print, scrapable surface coatings, decals, polymeric coated materials (unscrapable), adhesives and sealants (exclude adhesive for stickers), polyvinyl acetate (PVAc) adhesive formulations used in hardwood plywood, toy nail polish, reusable packaging, electrical plug and cables.</p> <p>Polypropylene (PP), polyethylene (PE), acrylonitrile butadiene styrene (ABS), general purpose polystyrene (GPPS), medium-impact polystyrene (MIPS), high-impact polystyrene (HIPS), and super high-impact polystyrene (SHIPS), and their additives as listed in 16 CFR 1308 are exempt from testing, however, they are not exempt from compliance or certification.</p> <p>If material identification is not provided, phthalate testing will be conducted on all plastic materials. If adhesive formulation of hardwood plywood is not provided, phthalate testing will be conducted on all hardwood plywood.</p> <p>Vendor shall be responsible for the compliance of all other accessible materials, including additives in the exempt plastic materials.</p> <p>In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing.</p> <p>Report actual results or include data table within report.</p> <p>Component testing is allowed.</p> <p>Compositing up to 3 like materials is allowed.</p> <p>Product manufactured and imported as of April 25, 2018 must comply.</p>	M/PASS See Page 14



Evaluation	Citation/Method	Criteria	Results / Rating
Phthalates in toy, child care article and watch	Sacramento Superior Court 07AS04683 / Solvent extraction with GC-MS/HPLC-MS analysis / Alameda Superior Court BG07350969 / RG08367601 / RG07351032 / RG08378050	<p>[Toys, child care articles and children watches] Product shall not contain more than 0.1% (1000 ppm) of each of DEHP, BBP, DBP, DIDP and DnHP.</p> <p>Labeling is not allowed by the Consent Judgment.</p> <p>Reformulation of product is required.</p> <p>Note:</p> <ul style="list-style-type: none"> - Toys are defined as products designed to be used by children under 6 years of age when they play (e.g., toy balls, bats, and gloves, bath toys). - Child care articles are defined as products designed to facilitate sleep, relaxation, grooming, hygiene, or feeding of children under 3 years of age, or to help children under 3 years of age with sucking or teething (e.g., sipper bottles, baby bibs, art smocks). - Children watches are defined as watches marketed to or designed to be used by children ages 12 and under. <p>For toys and child care articles:</p> <ul style="list-style-type: none"> - Actual testing will be conducted on all accessible plastics materials (including natural and synthetic rubber), plasticizer print, scrapable surface, coatings, decals, polymeric coated material (unscrapable), adhesives and sealants (exclude adhesive for stickers), toy nail polish, reusable packaging, electrical plug and cables as conducted for CPSIA (refer to CPSD-GB-PTCL-08444-US-CPSIA REQUIREMENTS SUPPLEMENT for additional information). - Composite up to 3 colors / like materials is allowed. - For component test together with CPSIA, transfer the CPSIA result here for compliance. - Vendor is responsible for compliance of all other materials. The CPSC Draft Guidance document will be used to determine applicable products. <p>For children watches:</p> <ul style="list-style-type: none"> - Actual testing will be conducted on all accessible plastic substrates only. 	M / PASS See Page 15



Evaluation	Citation/Method	Criteria	Results / Rating
Total lead in children products	Alameda Superior Court RG07356892 / EPA 3050B (Mod) / EPA 3051A (Mod) / CPSD-AN-00108-MTHD	<p>[Children products]</p> <p>All accessible components, before and after use and abuse testing, on items intended for children ages 12 and under shall comply with the following limits:</p> <p>a. Paints and surface coatings shall not exceed 90 ppm (0.009%) total lead content.</p> <p>b. Substrates shall not exceed 100 ppm (0.010%) total lead content.</p> <p>Labelling is not allowed by the Consent Judgment. Reformulation of product is required.</p> <p>Note:</p> <ul style="list-style-type: none"> - Children products including but not limited to toys, child care articles, baby bibs, etc. - For component test together with CPSIA, composite up to 3 colors / like materials (except metals) is allowed, transfer the CPSIA result here for compliance - Non-suspect materials, as defined by the Consumer Products Safety Commission in 16 CFR 1500.88, 1500.91 (d) and (e) will not be tested. Vendor is responsible for compliance of these materials. 	M / PASS See Page 16
Lead in office and school supply	Brimer out of court settlement 2012-12-14 / EPA 3051A (Mod) / EPA 3050B (Mod) / NIOSH method 9100 (Mod)	<p>[Office and school supplies]</p> <p>Product shall comply with the following requirements:</p> <p>a. Products shall not exceed 100 ppm (0.01%) total lead content.</p> <p>AND</p> <p>b. Products shall produce a result of 1.0 micrograms or less lead in Ghost Wipe™ test</p> <p>Labeling is not allowed by the Consent Judgment. Reformulation of product is required.</p> <p>Note:</p> <ul style="list-style-type: none"> - Office and school supplies include erasers, vinyl pencil cases, calculators, vinyl pens and toppers for pens, vinyl clip boards, vinyl flexible rulers, vinyl LED book light and vinyl pencil sharpeners. For erasers and calculators, <ul style="list-style-type: none"> - Actual testing would be conducted on all accessible substrates. - Non-suspect materials, except leather, as defined by the Consumer Products Safety Commission in 16 CFR 1500.91 (d) and (e) will not be tested. Vendor is responsible for compliance of these materials. For vinyl pencil cases, vinyl pens and toppers for pens, vinyl clip boards, vinyl flexible rulers, vinyl LED book light and vinyl pencil sharpeners, <ul style="list-style-type: none"> - The main plastic material of products that are marketed as vinyl or PVC will be tested. - BVCPS recommend all products shall provide documentation or material bill for material identification. If documentation is not provided the Beilstein test will be conducted on all plastic substrates to confirm the presence of PVC. - Vendor is responsible for compliance of all other vinyl materials. 	M / PASS See Page 17, 18



Evaluation	Citation/Method	Criteria	Results / Rating
DEHP in office and school supply	Brimer out of court settlement 2012-12-14 / Solvent extraction with GC-MS/LC-MS analysis / CPSD-AN-00108-MTHD	<p>[Office and school supplies] Products shall not contain more than 0.1% (1000 ppm) of DEHP.</p> <p>Labeling is not allowed by the Consent Judgment. Reformulation of product is required.</p> <p>Note: - Office and school supplies include erasers, vinyl pencil cases, vinyl pens and toppers for pens, vinyl clip boards, vinyl flexible rulers, vinyl LED book light and vinyl pencil sharpeners. For erasers, - Actual testing would be conducted on all accessible plastic substrates. - Vendor is responsible for compliance of all other materials. For vinyl pencil cases, vinyl pens and toppers for pens, vinyl clip boards, vinyl flexible rulers, vinyl LED book light and vinyl pencil sharpeners, - The main plastic material of products that are marketed as vinyl or PVC will be tested. - BVCPS recommend all products shall provide documentation or material bill for material identification. If documentation is not provided the Beilstein test will be conducted on all plastic substrates to confirm the presence of PVC. - Vendor is responsible for compliance of all other vinyl materials.</p>	M / PASS See Page 19
Phthalates in writing instruments and pencil cups	San Francisco Superior Court CGC-09-485784 / Solvent extraction with GC-MS/LC-MS analysis / CPSD-AN-00108-MTHD	<p>[Writing instruments and pencil cups] Product shall not contain more than 0.1% (1000 ppm) of each of DEHP, BBP, and DBP.</p> <p>Labeling is not allowed by the Consent Judgment. Reformulation of product is required.</p> <p>Note: - Applicable to erasers, pens, pencils, markers, highlighters, sharpeners and pencil cups. - Applicable to set/kit in self-contained pouches and bags. - Actual testing would be conducted on all accessible plastic substrates (including natural and synthetic rubber) and surface coatings. - Vendor is responsible for compliance of all other materials.</p>	M / PASS See Page 20



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Evaluation	Citation/Method	Criteria	Results / Rating
Total lead in writing instruments and pencil cups	San Francisco Superior Court CGC-09-485784 / EPA 3050B (Mod) / EPA 3051A (Mod) / CPSD-AN-00108-MTHD	<p>[Writing instruments and pencil cups] Products shall not exceed 100 ppm (0.01 %) total lead content.</p> <p>Products, which are NOT primarily intended for use by individuals twelve years of age or younger, exceed the limits shall utilize a warning statement.</p> <p>Note: - Applicable to erasers, pens, pencils, markers, highlighters, sharpeners and pencil cups. - Applicable to set/kit in self-contained pouches and bags. - Actual testing would be conducted on all accessible substrates and surface coatings that can be touched by a person during reasonable and foreseeable use. - Non-suspect materials, except leather, as defined by the Consumer Products Safety Commission in 16 CFR 1500.91 (d) and (e) will not be tested. Vendor is responsible for compliance of these materials.</p>	M / PASS See Page 21

****Results Key:**

M	Meets	NM	Does Not Meet
PASS	Pass	FAIL	Fail



Remark: BVCPS Contact information for this report.

Technical questions:

Primary Contact: Chad Hsieh, Tel: 886-2-2895-3666#302, email: chad.hsieh@tw.bureauveritas.com

Concerns regarding billing:

Primary Contact: Pearl Lin. Tel: 886-2-2895-3666#309, email: pearl.lin@tw.bureauveritas.com

**BUREAU VERITAS CONSUMER PRODUCTS SERVICES (H.K.) LIMITED,
TAIWAN BRANCH**

**CHAD HSIEH
HARDLINE OPERATION MANAGER**

REMARKS:

1. This report is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our written permission.
2. Our report is limited to the test samples identified herein. The results set forth in this report are not necessarily indicative or representative of the statistical quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted.
3. Our report includes all the tests requested by you and the results thereof. You shall have thirty days from receipt of this report to request additional testing of the samples or to notify us of any errors or omissions relating to our report; provided, however, such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.



TEST RESULTS:

TOTAL HEAVY METALS CONTENT - INITIAL SCREENING OF ASTM INTERNATIONAL STANDARD ASTM F963-17, SECTION 4.3.5.2(2)(B) FOR SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE

Test Method : ASTM International Standard ASTM F963-17, Section 8.3.1 and Annex 7.

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Total Element(s)	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Maximum Allowable Limit (mg/kg)	25	1 000	75	60	60	90	60	500

-	Unit	Result
Test Item(s)	-	1+2
Parameter	-	-
Total Arsenic (As)	mg/kg	< 10
Total Barium (Ba)	mg/kg	< 50
Total Cadmium (Cd)	mg/kg	< 10
Total Chromium (Cr)	mg/kg	< 10
Total Mercury (Hg)	mg/kg	< 10
Total Lead (Pb)	mg/kg	< 10
Total Antimony (Sb)	mg/kg	< 10
Total Selenium (Se)	mg/kg	< 10
Conclusion	-	PASS

Note / Key :

ND = Not detected “>” = Greater than NR = Not requested
 % = percent g = gram(s)
 mg/kg = milligram(s) per kilogram = ppm = part(s) per million
 Detection Limit (mg/kg) :
 For Nonmetallic material(s) - As : 16; Each (Ba, Cd, Cr, Hg & Pb) : 10; Sb : 30; Se : 50
 For Metallic material(s) - Each (As, Ba & Hg) : 5; Each (Cd, Cr & Pb) : 2; Sb : 10; Se : 15

Remark :

- Test Item(s) with total heavy metals content in substrate exceeding 80 % of this maximum allowable limit based on the lowest weight component or this maximum allowable limit should be considered as data and further tested by soluble heavy metals analysis of ASTM International Standard ASTM F963-17, Section 8.3.5 (Excluding 8.3.5.5(3)) as specified in Section 8.3.1.3.
- When Test Item(s) with only total lead content in substrate exceeding the total lead content requirement (With maximum allowable limit of 100 mg/kg) of United States Consumer Product Safety Improvement Act (CPSIA) of 2008, Section 101(a)(2), no further soluble heavy metals analysis will be performed.
- According to Toy Industry Association, Inc., textile substrate(s) of the product(s) is (are) exempted from total and soluble lead content requirements of ASTM International Standard ASTM F963-17, Section 4.3.5.2(2)(b). Therefore, Test Item(s) < For E.g. 1028 > containing the found total lead level should be exempted and concluded as pass.
- Although the Test Item(s) < For E.g. 1013 + 1014 + 1015 > complies (comply) with the above requirement, it is possible that, if tested separately, one or more of the constituents of this (these) Test Item(s) may not comply with this requirement. Separate testing on this (these) Test Item(s) is recommended to discern the failed constituent(s).



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**TOTAL LEAD CONTENT IN SUBSTRATE - UNITED STATES CONSUMER PRODUCT SAFETY
IMPROVEMENT ACT (CPSIA) SECTION 101(A)(2)**

Parameter	Unit	Result	Maximum allowable limit
Total Lead (Pb)	mg/kg	< 10	100 mg/kg
Conclusion	-	PASS	-

Test Item 1: Multi-color plastic (eraser set/pin,A)

Test Item 2: Multi-color plastic (eraser set,B)

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

Method: U.S. CPSC-CH-E1001-8.1 (Issued on June 21, 2010)-Metal or U.S. CPSC-CH-E1002-08.1 (Issued on June 21, 2010)-Non-Metal
The lead content was analyzed by Atomic Absorption Spectrophotometer or Inductively Coupled Argon Plasma Spectrometer.



PHthalates Content

Test Method: With reference to U. S. CPSC-CH-C1001-09.3 (April 1, 2010).

Sample Identity	Color / Component	Location	Style
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Analyte:	BBP	DBP	DEHP	DINP	DIBP	DPENP	DHEXP	DCHP	
Limit (%) :	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	

Analyte	BBP	DBP	DEHP	DINP	DIBP	DPENP	DHEXP	DCHP	Conclusion
Sample	Result (%)								
1+2	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	PASS

Detection Limit :

- | | | |
|-------|---------------------------------------|--------------------------------|
| BBP | = Butyl benzyl phthalate (0.005%) | Results reported in percentage |
| DBP | = Dibutyl phthalate (0.005%) | LT = Less than |
| DEHP | = Di(2-ethylhexyl) phthalate (0.005%) | ND = None detected |
| DINP | = Di-iso-nonyl phthalate (0.005%) | |
| DIBP | = diisobutyl phthalate (0.005%) | |
| DHEXP | = di-n-hexyl phthalate (0.005%) | |
| DPENP | = di-n-pentyl phthalate(0.005%) | |
| DCHP | = dicyclohexyl phthalate(0.005%) | |



BBP/DBP/DEHP/DNHP/DIDP PHTHALATES CONTENT REQUIREMENTS IN TOYS, CHILD CARE ARTICLES AND WATCHES (CALIFORNIA PROPOSITION 65 SETTLEMENTS OF COUNTY OF SACRAMENTO CASE NUMBER 07AS04683, AND THE ALAMEDA SUPERIOR COURT CASE NUMBERS BG07350969, RG08367601, RG07351032 AND RG08378050)

Color / Component		Location	Style
	Composite of		
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Test Parameter	BBP	DBP	DEHP	DnHP	DIDP	
Limit (%)	0.1	0.1	0.1	0.1	0.1	
Sample	Result (%)					Conclusion
1+2	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	PASS

Detection Limit :

BBP = Butyl benzyl phthalate (0.005%)
DBP = Dibutyl phthalate (0.005%)
DEHP = Di(2-ethylhexyl) phthalate (0.005%)
DnHP = Di-n-hexyl phthalate (0.005%)
DIDP = Di-iso-decyl phthalate (0.005%)

Results reported in percentage

LT = Less than
ND = None detected



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**TOTAL LEAD CONTENT IN CHILDREN PRODUCTS (CALIFORNIA PROPOSITION 65
SETTLEMENTS OF ALAMEDA SUPERIOR COURT RG 07356892)**

Test Method: Acid digestion followed by Atomic Absorption Spectrophotometry or Inductively Coupled Plasma Spectrometry

		Maximum allowable limit	
Analyte		Lead	
Type 1	Paint and surface coatings	90 mg/kg	
Type 2	Substrate materials	100 mg/kg	

Analyte				Lead (Pb)	Conclusion
Sample Description				Result	
Color / Component	Location	Style	(mg/kg)		
Type 2: Substrate materials					
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-	< 10	PASS
	Multi-color plastic (eraser set,B)	eraser set,B	-		

LT = Less Than

* = Average of duplicate analyses

mg/kg = milligrams per kilogram (ppm=parts per million)



**BUREAU
VERITAS**

TOTAL LEAD CONTENT IN OFFICE OR SCHOOL SUPPLIES (EXCLUDING ERASERS AND CALCULATORS) - CALIFORNIA PROPOSITION 65

Test Method : With reference to U. S. EPA 3050B: 1996 or with reference to U. S. EPA 3051A: 2007.

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Maximum Allowable Limit :	100 mg/kg
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-	Unit	Result
Test Item(s)	-	1+2
Parameter	-	-
Total Lead (Pb)	mg/kg	<10
Conclusion	-	PASS

Note / Key :

ND = Not detected “>” = Greater than
 mg/kg = milligram(s) per kilogram = ppm = part(s) per million 10 000 mg/kg = 1 %
 % = percent U. S. EPA = United States Environmental Protection Agency
 Detection Limit (mg/kg) : 10

Remark :

- Office or school supplies with main plastic material(s) that is (are) marketed as vinyl or polyvinyl chloride (PVC) such as vinyl pencil case(s), vinyl pen(s) and topper(s) for pen(s), vinyl clip board(s), vinyl flexible ruler(s), vinyl light-emitting diode (LED) book light, vinyl pencil sharpener(s) is (are) applicable to be tested with the exclusion for calculator(s) and (or) eraser(s).
- Apart from this requirement, Test Item(s) has (have) to comply together with the lead content requirement with the maximum allowable limit of 1.0 microgram..
- Acceptable documentation is required to verify the material type(s) as recommended by Bureau Veritas Consumer Products Services, Inc.
- If no or unacceptable documentation is provided by client, Beilstein test(s) is (are) required to conduct on all plastic substrates in confirming the presence of PVC.
- Vendor is responsible for the compliance of all other vinyl material(s) which was (were) not tested above.
- Product(s) with total lead content exceeding this maximum allowable limit has (have) to reformulate.



LEAD CONTENT IN OFFICE OR SCHOOL SUPPLIES (EXCLUDING ERASERS AND CALCULATORS) - CALIFORNIA PROPOSITION 65

Test Method : With reference to U. S. NIOSH Manual of Analytical Method 9100 (August 15, 1994).

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Whole product (eraser set,A)	eraser set,A	-
2	Whole product (eraser set,B)	eraser set,B	-

Maximum Allowable Limit :	1.0 mcg
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-	Unit	Result
Test Item(s)	-	1+2
Parameter	-	-
Lead (Pb)	mcg	< 1
Conclusion	-	PASS

Note / Key :

ND = Not detected “>” = Greater than mcg = microgram(s)
U. S. NIOSH = United States National Institute for Occupational Safety and Health
Detection Limit (mcg) : 1.0

Remark :

- Apart from this requirement, Test Item(s) has (have) to comply together with the total lead content requirement with the maximum allowable limit of 100 milligrams per kilogram.
- Product(s) with lead content exceeding this maximum allowable limit has (have) to reformulate.



**DI(2-ETHYLHEXYL) PHTHALATE (DEHP) CONTENT IN OFFICE OR SCHOOL SUPPLIES
(EXCLUDING ERASERS) - CALIFORNIA PROPOSITION 65**

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Maximum Allowable Limit :	0.1 %
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Test Item(s)	Result	Unit	Conclusion
1+2	< 0.005	%	PASS

Note / Key :

ND = Not detected “>” = Greater than % = percent
1 % = 10 000 mg/kg mg/kg = milligram(s) per kilogram = ppm = part(s) per million
Detection Limit (%) : 0.005

Remark :

- Office or school supplies with main plastic material(s) that is (are) marketed as vinyl or polyvinyl chloride (PVC) such as vinyl pencil case(s), vinyl pen(s) and topper(s) for pen(s), vinyl clip board(s), vinyl flexible ruler(s), vinyl light-emitting diode (LED) book light, vinyl pencil sharpener(s) is (are) applicable to be tested with the exclusion for eraser(s).
- Acceptable documentation is required to verify the material type(s) as recommended by Bureau Veritas Consumer Products Services, Inc.
- If no or unacceptable documentation is provided by client, Beilstein test(s) is (are) required to conduct on all plastic substrates in confirming the presence of PVC.
- Vendor is responsible for the compliance of all other vinyl material(s) which was (were) not tested above.
- Product(s) with DEHP content exceeding this maximum allowable limit has (have) to reformulate.



PHTHALATES CONTENT IN WRITING INSTRUMENTS - CALIFORNIA PROPOSITION 65

Test Method : Solvent extraction and analysis by Gas Chromatograph Mass Spectrometer (GC-MS) or Liquid Chromatograph Mass Spectrometer (LC-MS).

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Maximum Allowable Limit :	Each of the listed phthalates - 0.1 %
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Test Item(s)	Result			Conclusion
	Detected Analyte(s)	Conc.	Unit	
1+2	DBP BBP DEHP	< 0.005 < 0.005 < 0.005	%	PASS

Note / Key :

- ND = Not detected
- % = percent
- mg/kg = milligram(s) per kilogram = ppm = part(s) per million
- Detection Limit (%) - Each of the listed phthalates : 0.005
- ">" = Greater than
- 1 % = 10 000 mg/kg
- Conc. = Concentration

Remark :

- The list of phthalates is summarized in table of Appendix.
- Accessible plastic substrate(s) [Including natural and synthetic rubber] and surface coating(s) of writing instrument(s) such as eraser(s), pen(s), pencil(s), marker(s), highlighter(s), sharpener(s), pencil cup(s), set(s) or kit(s) in self-contained pouch(es) and bag(s) are applicable to be tested. Vendor is responsible for the compliance of all other material(s) which was (were) not tested.
- Product(s) with phthalate(s) content exceeding this maximum allowable limit has (have) to reformulate.

APPENDIX

List of Phthalates [California Proposition 65 - Writing Instruments] :					
No.	Name of Analyte(s)	CAS-No.	No.	Name of Analyte(s)	CAS-No.
1	Butyl benzyl phthalate (BBP)	85-68-7	3	Di-2-ethylhexyl phthalate (DEHP)	117-81-7
2	Di-n-butyl phthalate (DBP)	84-74-2	-	-	-

CAS-No. = Chemical Abstracts Service registry number



TOTAL LEAD CONTENT IN WRITING INSTRUMENTS - CALIFORNIA PROPOSITION 65

Test Method : With reference to U. S. EPA 3050B: 1996 or with reference to U. S. EPA 3051A: 2007.

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1	Multi-color plastic (eraser set/pin,A)	eraser set/pin,A	-
2	Multi-color plastic (eraser set,B)	eraser set,B	-

Maximum Allowable Limit :	100 mg/kg
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-	Unit	Result
Test Item(s)	-	1+2
Parameter	-	-
Total Lead (Pb)	mg/kg	<10
Conclusion	-	PASS

Note / Key :
 ND = Not detected “>” = Greater than
 mg/kg = milligram(s) per kilogram = ppm = part(s) per million 10 000 mg/kg = 1 %
 % = percent U. S. EPA = United States Environmental Protection Agency
 Detection Limit (mg/kg) - 10

- Remark :
- Accessible substrate(s) and surface coating(s) of writing instrument(s) such as eraser(s), pen(s), pencil(s), marker(s), highlighter(s), sharpener(s), pencil cup(s) and set(s) or kit(s) in self-contained pouch(es) and bag(s) are applicable to be tested with the exclusion for non-suspect materials (Except leather) as defined by the United States Consumer Products Safety Commission (CPSC) in Code of Federal Regulations (CFR), Title 16, Sections 1500.91 (d) and (e). Vendor is responsible for the compliance of non-suspect material(s) which was (were) not tested.
 - Product(s), which is (are) not primarily intended for use by individuals twelve years of age or younger with total lead content exceeding this maximum allowable limit has (have) to comply with the labeling and warning utilization requirement.