

G 90765



Report No. : EFSH20220631
Date : 17-Oct-2022
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TEST REPORT

APPLICANT : ZHEJIANG KARRY PAINTING MATERIALS CO., LTD.
ADDRESS : SHUGUANG ROAD, LIGHT INDUSTRIAL PARK, LANXI,
ZHEJIANG, 321100, P.R. CHINA
SAMPLE DESCRIPTION : Water Color
BUYER : ARTOYS PTY LTD
COUNTRY OF DESTINATION : U.S.A / CANADA
SAMPLE RECEIVED DATE : 9-Oct-2022
TURN AROUND TIME : 9-Oct-2022 to 17-Oct-2022, 7 Working Days
REVISED DATE : N/A
TEST REQUESTED : Selected test(s) as requested by client
TEST METHOD : Please refer to next page(s)
TEST RESULTS : Please refer to next page(s)

The following test item(s) was/were performed on selected sample(s) and/or component(s) appointed by applicant.

Eurofins (Shanghai) contact information
Customer service: LucyZheng@eurofins.com / 021-61819261
Sales specialist: JackZhang@eurofins.com / 18601770010

***** FOR FURTHER DETAILS, PLEASE REFER TO THE FOLLOWING PAGE(S) *****

Signed for and on behalf of
Eurofins Product Testing Service (Shanghai) Co., Ltd

Terric Ji
Lab Manager

Results obtained refer only to samples, products or material received in Laboratory, as described in point related to sample description, and tested in conditions shown in present report. Eurofins Product Testing Service (Shanghai) Co., Ltd ensures that this job has been performed according to our Quality System and complying contract and legal conditions. If you happen to have any comments, please do it by sending email to sh.info@eurofins.com and referring to this report number. Reproduction of this document is only valid if it is done completely and under the written permission of Eurofins Product Testing Service (Shanghai) Co., Ltd.

SAMPLE PHOTO



EFSH20220631

TO BE CONTINUED

Introduction

LHAMA: The product, Water Color, was evaluated for compliance with ASTM D4236: determination of whether the product is expected to pose any significant chronic adverse health effects to humans when used as intended or under circumstances involving reasonable foreseeable misuse. This evaluation was conducted in general accordance with the US Code of Federal Regulations (CFR) Title 16 (CPSC) Part 1500.14(b)(8) "Art Materials", and ASTM Standard D 4236 "Standard Practice for Labeling Art Materials for Chronic Health Hazards". Chronic toxicity was evaluated in accordance with the guidelines specified by the Consumer Product Safety Commission in 16 CFR 1500.135.

TRA (US): The product, Water Color, was evaluated for its potential to be toxic (acute/chronic), corrosive, a skin/eye irritant, or strong sensitizer as defined in 16 CFR 1500.3(b)(5), (7)-(9) (Federal Hazardous Substances Act regulations). Chronic toxicity was evaluated in accordance with the guidelines specified by the Consumer Product Safety Commission in 16 CFR 1500.135.

TRA (CAN): The product, Water Color, was evaluated for its potential to be excessively toxic (acute), corrosive, a skin/eye irritant, or excessively strong sensitizer based on definitions set forth in the Toys Regulations (SOR/2011-17). Chronic toxicity was evaluated based on information provided in the Canada Consumer Product Safety Act (S.C. 2010, c. 21).

Disclaimer

This evaluation was conducted based solely on the product formulation and the information provided in the Consumer Product TRA Information Form (submitted October 19, 2015, revised November 03, 2015). It was assumed that all product formulation details are accurate and that there are no additional ingredients that are not listed. Chemical testing was not conducted as part of this product evaluation and chemical analyses data were not provided in support of this evaluation. It was also assumed that any ingredients provided in the product formulation do not contain any impurities and/or contaminants (e.g., heavy metal(s) or lead) or infectious agents that would cause toxicity in a consumer who may be exposed to them. This product was not evaluated for toxicological considerations related to physical or chemical properties of the formulation (e.g., pH, viscosity, volatility) and potential for physical injury (e.g., choking hazard, aspiration risk, or mechanical irritation) was not considered.

This evaluation is relevant solely to the conditions described herein. Any substitution of ingredients, increase in ingredient concentrations, or change in use pattern will necessitate a new evaluation.

Exposure Considerations

Consideration was given to consumer exposure with intended product use and under circumstances involving reasonable foreseeable misuse. This evaluation was conducted under the assumption that potential acute exposure to product ingredients is through the dermal route and possibly the oral route through accidental ingestion. Chronic exposure is only considered to occur via the dermal route given that chronic accidental ingestion is unlikely. The inhalation route was not evaluated since none of the chemicals in the product formulation were considered sufficiently volatile for inhalation exposure.

Conclusions

LHAMA

Based on the available data, the submitted formulation would not be expected to pose any significant chronic adverse health effects to humans when used as intended or under circumstances involving reasonable foreseeable misuse. Chronic toxicity was evaluated in accordance with the guidelines specified by the Consumer Product Safety Commission in 16 CFR 1500.135.

The product will not require any additional chronic health hazard labeling according to ASTM D4236.

The product must bear the following statement:

TO BE CONTINUED

TEST RESULT

"Conforms to ASTM D4236."

Other requirements of 16 CFR 1500.14 pertaining to proper labeling of the product including format and placement of statements and additional precautionary statements must also be adhered to. Acute hazards (e.g., acute oral/dermal/inhalation toxicity) were not evaluated as part of the current assessment; labeling statements and signal word requirements may be necessary depending on acute hazards associated with the product.

TRA(US)

Based on available data, Water Color MEETS the requirements for classification as not toxic (acute/chronic), corrosive, a skin/eye irritant, or strong sensitizer as defined in 16 CFR 1500.3, when used as intended or under circumstances involving reasonable foreseeable misuse.

Additional Notes

- While not listed as strong sensitizers as per 16 CFR 1500.13, methyl 4-hydroxybenzoate (CAS No. 99-76-3) and propylparaben (CAS No. 94-13-3) may have sensitization potential, principally when exposure involves damaged or broken skin.

TRA(CAN)

Based on available data, Water Color MEETS the requirements for classification as not excessively toxic (acute), corrosive or irritant, or an excessively strong sensitizer based on requirements set forth in the Toys Regulations (SOR/2011-17), when used as intended or under circumstances involving reasonable foreseeable misuse. Additionally, Water Color MEETS the requirements for classification as not toxic (chronic), based on information provided in the Canada Consumer Product Safety Act (S.C. 2010, c. 21).

Additional Notes

- Methyl 4-hydroxybenzoate (CAS No. 99-76-3) and propylparaben (CAS No. 94-13-3) are recognized as substances that may have sensitization potential, principally when exposure involves damaged or broken skin.

Approval



(Signature)

Certified Toxicologist

(Title)

Geoff Goodfellow, Ph.D., DABT, ERT

(Name, printed)

October 17, 2022

(Date)

TO BE CONTINUED

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WS Trading Limited

1/F, Hong Kong Spinners Industrial Building, Phase I & II, 800 Cheung Sha Wan Road, Kowloon, Hong Kong

Report on the submitted samples said to be:

Sample Description:	24CT 20ML ACRYLIC PAINT JARS, 24CT 20ML WATERCOLOR PAINT JARS
Colour:	24 colours, 24 colours
Style/Item No.:	LF-PA9974, LF-PA9975
P.O. No.:	2875708
UPC No.:	1922345800130, 1922345800147
SKU No.:	4020275, 4020277
LOT No.:	WS081522
Country of Origin:	China
Country of Destination:	USA
Buyer:	1616 Holdings, Inc.
Supplier:	WS Trading Limited
Sample Receiving Date:	September 02, 2022
Lately Re-submit Date:	September 08, 2022
Testing Period:	September 02, 2022 - September 09, 2022
Result:	Pass

FINAL

Signed for and on behalf of

BACL

Candy Lin

Checked by: _____

Candy Lin



Gary Guo

Approved by: _____

Gary Guo

Lance Lee

Lance Lee



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Summary of Test Result:

TEST REQUEST

CONCLUSION

A. U.S. CPSC CFR Title 16 Part 1303 on Total Lead content	Pass
B. US Consumer Products Safety Improvement Act of 2008(H.R. 4040) title 1, section 101 for total lead content	Pass
C. US California Proposition 65. on Lead content	Pass*1
D. US California Proposition 65. on Cadmium content	Pass*1
E. Consumer Product Safety Commission 16 CFR Part 1307:Prohibition of Children' s Toys and Child Care Articles Containing Specified Phthalates	Pass
F. US California Proposition 65. on Phthalates content	Pass*1
G. Phthalates (DNOP) content	Pass*1
H. Phthalates (DBP, BBP, DEHP, DINP, DIDP, DnHP) content on Packaging	Pass*1
I. TPCH –The Toxics in Packaging Clearinghouse on Total Lead, Cadmium, Mercury and Hexavalent Chromium content	Pass
J. Label review by Five Below, Inc. Test Protocol for Stationery	Pass*1

Pass*1= Meet the requirement of Client.



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Result:

Tested part(s):

- (1) White paint(watercolor paint) [1]
- (2) Pink paint(watercolor paint) [1]
- (3) Black paint(watercolor paint) [1]
- (4) Pearly silvery paint(watercolor paint) [1]
- (5) Green paint(watercolor paint) [1]
- (6) Cyan paint(watercolor paint) [1]
- (7) Light green paint(watercolor paint) [1]
- (8) Pearly light blue paint(watercolor paint) [1]
- (9) Fuchsia paint(watercolor paint) [1]
- (10) Light blue paint(watercolor paint) [1]
- (11) Orange paint(watercolor paint) [1]
- (12) Pearly brown paint(watercolor paint) [1]
- (13) Red paint(watercolor paint) [1]
- (14) Light pink paint(watercolor paint) [1]
- (15) Purple paint(watercolor paint) [1]
- (16) Pearly pink paint(watercolor paint) [1]
- (17) Yellow paint(watercolor paint) [1]
- (18) Lilac paint(watercolor paint) [1]
- (19) Neon yellow paint(watercolor paint) [1]
- (20) Pearly rose golden paint(watercolor paint) [1]
- (21) Blue paint(watercolor paint) [1]
- (22) Sky blue paint(watercolor paint) [1]
- (23) Sapphire blue paint(watercolor paint) [1]
- (24) Pearly blue paint(watercolor paint) [1]
- (25) Silvery paint(acrylic paint) [2]
- (26) Metallic green paint(acrylic paint) [2]
- (27) Rose golden paint(acrylic paint) [2]
- (28) Metallic pink paint(acrylic paint) [2]
- (29) Metallic saffron yellow paint(acrylic paint) [2]
- (30) Metallic blue paint(acrylic paint) [2]
- (31) Black paint(acrylic paint) [2]

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- (32) Light green paint(acrylic paint) [2]
- (33) Orange paint(acrylic paint) [2]
- (34) Purple paint(acrylic paint) [2]
- (35) Neon yellow paint(acrylic paint) [2]
- (36) Sapphire blue paint(acrylic paint) [2]
- (37) Transparent glue with silvery glitter(acrylic paint) [2]
- (38) Transparent glue with green glitter(acrylic paint) [2]
- (39) Transparent glue with red glitter(acrylic paint) [2]
- (40) Transparent glue with purple glitter(acrylic paint) [2]
- (41) Transparent glue with golden glitter(acrylic paint) [2]
- (42) Transparent glue with blue glitter(acrylic paint) [2]
- (43) White paint(acrylic paint) [2]
- (44) Green paint(acrylic paint) [2]
- (45) Hot pink paint(acrylic paint) [2]
- (46) Red paint(acrylic paint) [2]
- (47) Yellow paint(acrylic paint) [2]
- (48) Blue paint(acrylic paint) [2]
- (49) Transparent plastic(body of jar) [1][2]
- (50) White plastic(lid of jar) [1][2]
- (51) Silvery/transparent plastic(seal of jar) [1][2]
- (52) Black printed white paper sticker(price label of packing box) [1][2]
- (53) Transparent plastic/glue with multi-color coating(cover film of packing box) [1][2]
- (54) Transparent plastic(tray) [1][2]
- (55) Transparent PVC(window of packing box) [1][2]

Remark: The results shown of tested parts (1)-(48) are the total weight of wet samples, the applicant will undertake all risk.

Note:

[1]Watercolor paint jars; [2]Acrylic paint jars

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A. U.S. CPSC CFR Title 16 Part 1303 on Total Lead content

Test method: CPSC-CH-E1003-09.1-2011

Item	Unit	MDL	Result						Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Limit
			(31)+(32)+(33)	(34)+(35)+(36)	(43)+(44)+(45)	(46)+(47)+(48)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

B. US Consumer Products Safety Improvement Act of 2008(H.R. 4040) title 1, section 101 for total lead content Total Lead content(In paint and similar surface-coating materials)

Test method: CPSC-CH-E1003-09.1-2011

Item	Unit	MDL	Result						Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Limit
			(31)+(32)+(33)	(34)+(35)+(36)	(43)+(44)+(45)	(46)+(47)+(48)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

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Total Lead content(In substrates)

Test method: CPSC-CH-E1001-08.3-2012;CPSC-CH-E1002-08.3-2012

Item	Unit	MDL	Result			Limit
			(37)+(38)+(39)	(40)+(41)+(42)	(49)+(50)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	100
Conclusion	/	/	Pass	Pass	Pass	/

C. US California Proposition 65. on Lead content

Total Lead content(In paint and similar surface-coating materials)

Test method: CPSC-CH-E1003-09.1-2011

Item	Unit	MDL	Result						Client's Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Client's Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result				Client's Limit
			(31)+(32)+(33)	(34)+(35)+(36)	(43)+(44)+(45)	(46)+(47)+(48)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	90
Conclusion	/	/	Pass	Pass	Pass	Pass	/

Total Lead content(In substrates)

Test method: CPSC-CH-E1002-08.3-2012;CPSC-CH-E1001-08.3-2012

Item	Unit	MDL	Result			Client's Limit
			(37)+(38)+(39)	(40)+(41)+(42)	(49)+(50)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	100
Conclusion	/	/	Pass	Pass	Pass	/

D. US California Proposition 65. on Cadmium content

Test method: EN 1122:2001(E);IEC 62321-5:2013

Item	Unit	MDL	Result						Client's Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Cadmium(Cd)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	See Remark
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

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Item	Unit	MDL	Result						Client's Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	(31)+(32)+(33)	(34)+(35)+(36)	
Cadmium(Cd)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	See Remark
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result					Client's Limit
			(37)+(38)+(39)	(40)+(41)+(42)	(43)+(44)+(45)	(46)+(47)+(48)	(49)+(50)	
Cadmium(Cd)	mg/kg	10	N.D.	N.D.	N.D.	N.D.	N.D.	See Remark
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	/

Limit Remark:

In coating :75mg/kg In substrate :100mg/kg

E. Consumer Product Safety Commission 16 CFR Part 1307:Prohibition of Children' s Toys and Child Care Articles Containing Specified Phthalates

Test method: CPSC-CH-C1001-09.4-2018

Item	Unit	MDL	Result						Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisobutyl phthalate(DIBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-pentyl Phthalate(DPENP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Dicyclohexyl Phthalate(DCHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result						Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	(31)+(32)+(33)	(34)+(35)+(36)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000

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Item	Unit	MDL	Result						Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	(31)+(32)+(33)	(34)+(35)+(36)	
Diisobutyl phthalate(DIBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-pentyl Phthalate(DPENP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Dicyclohexyl Phthalate(DCHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result					Limit
			(37)+(38)	(39)+(40)	(41)+(42)	(43)+(44)+(45)	(46)+(47)+(48)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisobutyl phthalate(DIBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-pentyl Phthalate(DPENP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Dicyclohexyl Phthalate(DCHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	/

F. US California Proposition 65. on Phthalates content

Test method: CPSC-CH-C1001-09.4-2018

Item	Unit	MDL	Result						Client's Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisodecyl Phthalate(DIDP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

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Item	Unit	MDL	Result						Client's Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	(31)+(32)+(33)	(34)+(35)+(36)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisodecyl Phthalate(DIDP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result					Client's Limit
			(37)+(38)	(39)+(40)	(41)+(42)	(43)+(44)+(45)	(46)+(47)+(48)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Diisodecyl Phthalate(DIDP)	mg/kg	60	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	/

G. Phthalates (DNOP) content

Test method: CPSC-CH-C1001-09.4-2018

Item	Unit	MDL	Result						Client's Limit
			(1)+(2)+(3)	(4)+(5)+(6)	(7)+(8)+(9)	(10)+(11)+(12)	(13)+(14)+(15)	(16)+(17)+(18)	
Di-n-Octyl Phthalate(DNOP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

Item	Unit	MDL	Result						Client's Limit
			(19)+(20)+(21)	(22)+(23)+(24)	(25)+(26)+(27)	(28)+(29)+(30)	(31)+(32)+(33)	(34)+(35)+(36)	
Di-n-Octyl Phthalate(DNOP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	Pass	/

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Item	Unit	MDL	Result					Client's Limit
			(37)+(38)	(39)+(40)	(41)+(42)	(43)+(44)+(45)	(46)+(47)+(48)	
Di-n-Octyl Phthalate(DNOP)	mg/kg	30	N.D.	N.D.	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	Pass	Pass	/

H. Phthalates (DBP, BBP, DEHP, DINP, DIDP, DnHP) content on Packaging

Test method: CPSC-CH-C1001-09.4-2018

Item	Unit	MDL	Result			Client's Limit
			(51)+(52)	(53)+(54)	(55)	
Dibutyl Phthalate(DBP)	mg/kg	30	N.D.	N.D.	N.D.	1000
Benzyl Butyl Phthalate(BBP)	mg/kg	30	N.D.	N.D.	N.D.	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	mg/kg	30	N.D.	N.D.	N.D.	1000
Diisononyl Phthalate(DINP)	mg/kg	60	N.D.	N.D.	N.D.	1000
Diisodecyl Phthalate(DIDP)	mg/kg	60	N.D.	N.D.	N.D.	1000
Di-n-hexyl Phthalate (DHEXP/DnHP)	mg/kg	30	N.D.	N.D.	N.D.	1000
Conclusion	/	/	Pass	Pass	Pass	/

I. TPCH –The Toxics in Packaging Clearinghouse on Total Lead, Cadmium, Mercury and Hexavalent Chromium content

Test method: IEC 62321-4:2013+AMD1:2017 CSV;IEC 62321-5:2013;IEC 62321-7-1:2015;IEC 62321-7-2:2017

Item	Unit	MDL	Result			Limit
			(51)+(52)	(53)+(54)	(55)	
Lead(Pb)	mg/kg	10	N.D.	N.D.	N.D.	-
Cadmium(Cd)	mg/kg	10	N.D.	N.D.	N.D.	-
Mercury(Hg)	mg/kg	10	N.D.	N.D.	N.D.	-
hexavalent chromium(Cr VI)	mg/kg	10	N.D.	N.D.	N.D.	-
sum of all	mg/kg	-	/	/	/	100
Conclusion	/	/	Pass	Pass	Pass	/

Note:

- N.D.= Not Detected or less than MDL

- MDL = Method Detection Limit

- "+" = Composite testing.

-The Result less than MDL are not taken into account while calculating the sum contents.

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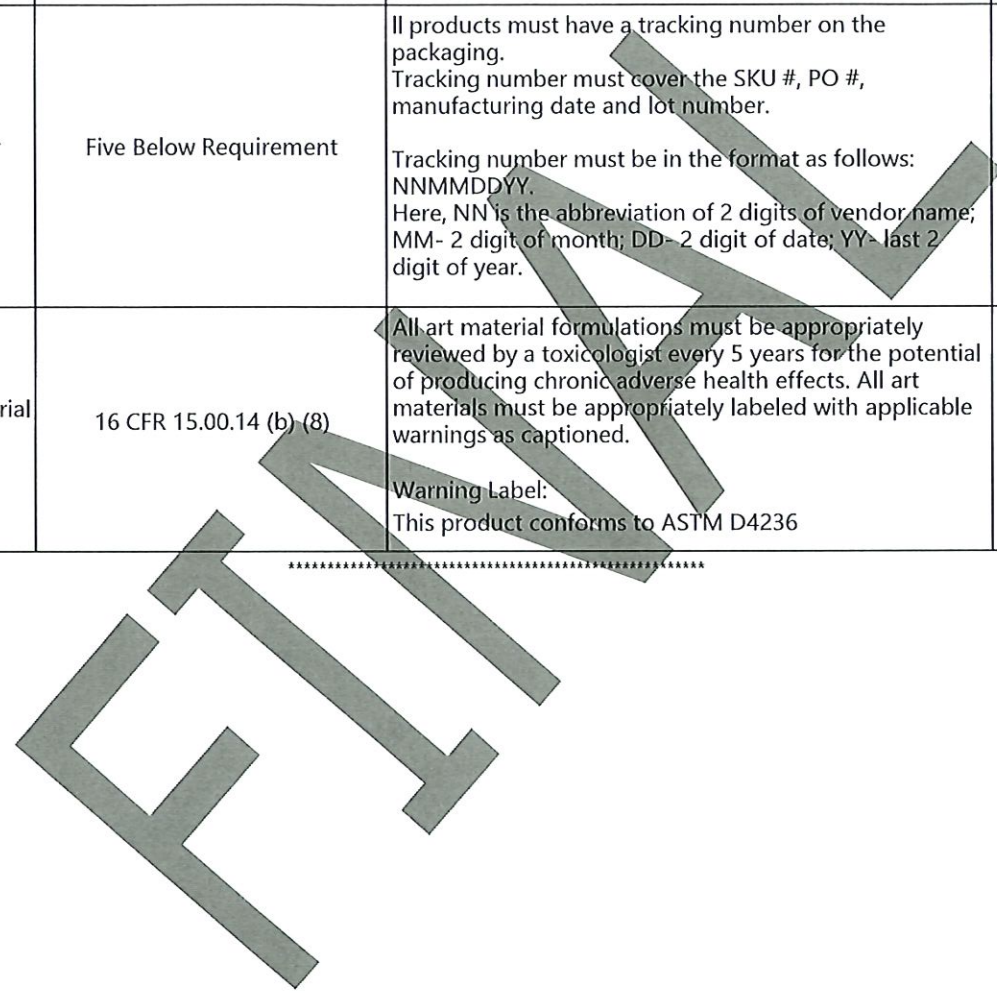
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J. Label review by Five Below, Inc. Test Protocol for Stationery

<u>Testing and Evaluation</u>	<u>Citations/Method</u>	<u>Requirements</u>	<u>Result</u>
Packaging Labeling	Fair Packaging and Labeling Act 16 CFR 500	Product Identifications; manufacturer, or distributor's name & address (city, state, & zip code); Net quantity of contents; Country of Origin and UPC bar code information must present on the packaging.	Pass
Tracking Number	Five Below Requirement	<p>All products must have a tracking number on the packaging. Tracking number must cover the SKU #, PO #, manufacturing date and lot number.</p> <p>Tracking number must be in the format as follows: NNMMDDYY. Here, NN is the abbreviation of 2 digits of vendor name; MM- 2 digit of month; DD- 2 digit of date; YY- last 2 digit of year.</p>	Pass
Hazardous Art Material - LHAMA Label	16 CFR 15.00.14 (b) (8)	<p>All art material formulations must be appropriately reviewed by a toxicologist every 5 years for the potential of producing chronic adverse health effects. All art materials must be appropriately labeled with applicable warnings as captioned.</p> <p>Warning Label: This product conforms to ASTM D4236</p>	Pass



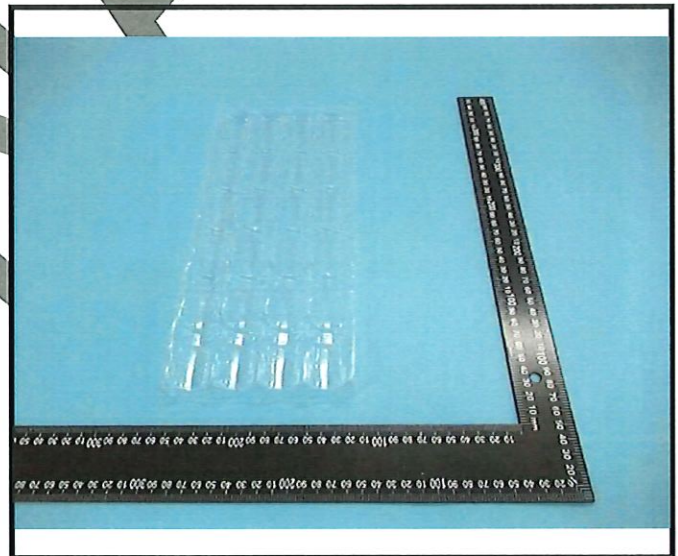
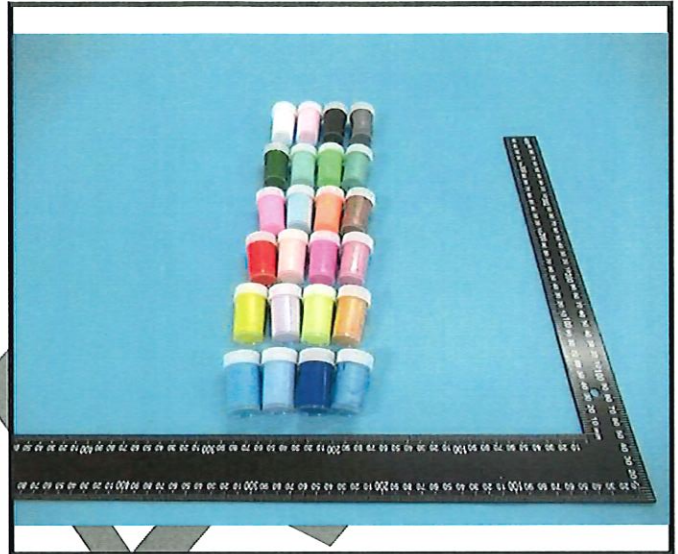
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Photograph of Sample



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BACL authenticate the photo on original report only

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Statement:

- 1.This report cannot be reproduced except in full, without prior written approval of the Company.
- 2.Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.
- 3.This report is valid only with a valid digital signature. The digital signature may be available only under the Adobe software above version 7.0.
- 4.Otherwise required by the applicant or Product Regulations, Decision Rule in this report did not consider the uncertainty.
- 5.The information which provided by the applicant, such as sample description, sample name, material component, style/item No. , P.O. No. , manufacturer, age phase, the laboratory is not responsible for its authenticity and this information can affect the validity of the result in the test report.
- 6.The test samples were in good condition before testing.

*** End of Report ***

FINAL

ATTACHMENT

Data issues or limitations that were identified during the assessment for each ingredient in the product are discussed below. Additional lines of evidence such as human experience that provide evidence for the safe use of the ingredient in the product are also described. While included in the discussion below, assessment of mucous membrane irritation potential was not conducted as part of the TRA (CAN) evaluation.

LHAMA

- Assessment of chronic toxicity potential of xanthan gum (CAS No. 11138-66-2), calcium carbonate (CAS No. 471-34-1), methyl 4-hydroxybenzoate (CAS No. 99-76-3), propylparaben (CAS No. 94-13-3), pigment red 170 (CAS No. 2786-76-7), hansa yellow 10G (CAS No. 6486-23-3), CI pigment blue 15 (CAS No. 147-14-8), titanium dioxide (CAS No. 13463-67-7), pigment green 7 (CAS No. 1328-53-6), and pigment violet 23 (CAS No. 6358-30-1) was based on available animal data and/or human experience/use information (refer to discussion of animal data and/or human experience/use data in TRA (US) text below).
- Assessment of carbon black (CAS No. 1333-86-4) was based on the assumption that pigment used in this product was not prepared by the "impingement" or "channel" process, as suggested by the U.S. FDA (21 CFR 81.10). Assessment of chronic toxicity potential of carbon black was based on available animal data and human experience/use information (refer to discussion of animal data and human experience/use data in TRA (US) text below).

US TRA/CAN TRA

- Assessment of acute dermal toxicity, irritation, and chronic toxicity potential of xanthan gum (CAS No. 11138-66-2) was based on consideration of human experience/use information and other lines of evidence supporting the safe use of xanthan gum in the product. As a high molecular weight polysaccharide gum, dermal penetration of xanthan gum is expected to be minimal. Xanthan gum is designated as an approved food additive by the EU (listed as E 415). Xanthan gum is listed in the EU Cosmetic Ingredients and Substances database with no use restrictions. Based on the available information, xanthan gum is not considered to pose a safety concern at the concentration present in the product.
- Assessment of acute dermal toxicity, mucous membrane irritation, sensitization, and chronic toxicity potential of calcium carbonate (CAS No. 471-34-1) was based on consideration of human experience/use information. Assessment of chronic toxicity potential was based on available animal data and human experience/use information. Calcium carbonate was granted generally recognized as safe (GRAS) status by the U.S. FDA (21 CFR 184.1191). Calcium carbonate is also a colorant allowed in cosmetic products according to the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009), subject to purity criteria, and is approved in the EU as a food additive (listed as E170). Calcium carbonate is listed in the Health Canada Natural Health Products Ingredients Database as a non-medicinal ingredient with no use restrictions. Based on the available information, calcium carbonate is not considered to pose a safety concern at the concentration present in the product.
- Assessment of acute dermal toxicity potential of methyl 4-hydroxybenzoate (CAS No. 99-76-3) and propylparaben (CAS No. 94-13-3) was based on consideration of available animal data and/or human experience/use information. According to the Cosmetic Ingredient Review and the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009), methyl 4-hydroxybenzoate (listed as methylparaben) and propylparaben are considered safe as used in cosmetics at a total concentration of up to 0.8% for paraben mixtures. Methyl 4-hydroxybenzoate and propylparaben may have sensitization potential, principally when exposure involves damaged or broken skin. Based on the available information, methyl 4-hydroxybenzoate and propylparaben are not considered to pose a safety concern at the concentrations present in the product.
- Assessment of acute dermal toxicity, corrosivity, irritation, sensitization, and chronic toxicity potential of pigment red 170 (CAS No. 2786-76-7) was based on consideration of limited available animal data and professional judgement. Based on the available information and professional judgement, pigment red 170 is not considered to pose a safety concern at the concentration present in the product.

TO BE CONTINUED

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- Assessment of acute toxicity, corrosivity, irritation, sensitization, and chronic toxicity potential of hansa yellow 10G (CAS No. 6486-23-3) was based on consideration of human experience/use information. Hansa yellow 10G (listed as 2-[(4-chloro-2-nitrophenyl)azo]-N-(2-chlorophenyl)-3-oxobutyramide and CI 11710) is a coloring agent allowed for use in cosmetic products not applied to mucous membranes, according to the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009). Based on the available information, hansa yellow 10G is not considered to pose a safety concern at the concentration present in the product.
- Assessment of acute oral toxicity, skin and eye irritation, sensitization, and chronic toxicity potential of CI pigment blue 15 (CAS No. 147-14-8) was based on available animal data and human experience/use information. Assessment of acute dermal toxicity and mucous membrane irritation potential was based on professional judgement. CI Pigment blue 15 (listed as (29H,31H-phthalocyaninato(2-)-N29,N30,N31,N32)copper and CI 71460) is a colorant allowed in cosmetic products with no use conditions according to the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009). CI Pigment blue 15 (listed as copper phthalocyanine) is listed in the Health Canada Natural Health Products Ingredients Database as colour additive for topical application. Based on the available information, CI pigment blue 15 is not considered to pose a safety concern at the concentration present in the product.
- Assessment of chronic toxicity potential of titanium dioxide (CAS No. 13463-67-7) was based on consideration of available animal data and human experience/use information. Titanium dioxide is approved for use in drugs and cosmetics generally, including those for the eye area by the U.S. FDA (subject to Good Manufacturing Practices). Titanium dioxide is a colorant allowed in cosmetic products according to the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009), subject to purity criteria. Titanium dioxide is also approved in the EU as a food additive (listed as E171). Based on the available information, titanium dioxide is not considered to pose a safety concern at the concentration present in the product.
- Assessment of acute dermal toxicity, mucous membrane irritation, and chronic toxicity potential of pigment green 7 (CAS No. 1328-53-6) was based on consideration of available animal data and human experience/use information. According to the EU Cosmetics Regulation (Regulation (EC) No. 1223/2009), pigment green 7 (listed as CI 74260 and polychloro copper phthalocyanine) is a colorant allowed in cosmetic products, except in eye products. Based on the available information, pigment green 7 is not considered to pose a safety concern at the concentration present in the product.
- Assessment of acute toxicity, corrosivity, irritation, sensitization, and chronic toxicity potential of pigment violet 23 (CAS No. 6358-30-1) was based on consideration of limited available toxicological data and human experience/use information. The U.S. EPA Structure Activity Team found pigment violet 23 to be of low systemic and developmental concern (dermal exposure) based on estimated properties for this chemical, molecular structure, similarity to well-studied chemicals, and other factors. Limited available data indicate that pigment violet 23 has low acute (oral and dermal) toxicity and is not a skin irritant (animal data). Pigment violet 23 may be a potential eye irritant; however, potential for eye irritation is not considered severe enough to warrant product classification given consideration of human experience/use information and the low concentration in the product. Pigment violet 23 (listed as carbazole violet) is approved for use in contact lenses by the U.S. FDA (21 CFR 73.3107), subject to Good Manufacturing Practices. Pigment violet 23 (listed as 8,18-dichloro-5,15-diethyl-5,15-dihydrodiindolo[3,2-b:3',2'-m]triphenodioxazine and CI 51319) is listed as a colorant allowed in rinse-off cosmetic products according to the EU Cosmetic Regulation (Regulation (EC) No. 1223/2009). Based on the available information, pigment violet 23 is not considered to pose a safety concern at the concentrations present in the product.

TO BE CONTINUED

ATTACHMENT

- Assessment of carbon black (CAS No. 1333-86-4) was based on the assumption that pigment in this product was not prepared by the "impingement" or "channel" process, as suggested by the U.S. FDA (21 CFR 81.10). Assessment of sensitization and chronic toxicity potential of carbon black was based on consideration of limited available toxicity data and human experience/use information. Available data indicate that carbon black may be carcinogenic, based on inhalation and intratracheal rodent studies; however, potential for carcinogenicity does not warrant product classification given the nature of the product. Carbon black (listed as carbon black and CI 77266) is a colorant allowed in cosmetic products according to the EU Cosmetics Regulation (Regulation (EC) No 1223/2009), subject to purity criteria. Carbon black (listed as D&C black No. 2) is listed as a coloring agent allowed for use in cosmetic products by the U.S. FDA (21 CFR 74.2052), subject to Good Manufacturing Practices. Based on the available information, carbon black is not considered to pose a safety concern at the concentration present in the product.

Table 1: Product Formulation

Chemical Name	CAS Number	% by Weight
Water	7732-18-5	83.3%
Calcium carbonate	471-34-1	10%
Xanthan gum	11138-66-2	1.5%
Methyl 4-hydroxybenzoate	99-76-3	0.1%
Propylparaben	94-13-3	0.1%
Pigment red 170	2786-76-7	up to 5%
Hansa yellow 10G	6486-23-3	up to 5%
Titanium dioxide	13463-67-7	up to 5%
Carbon black	1333-86-4	up to 5%
Pigment violet 23	6358-30-1	up to 4%
Pigment green 7	1328-53-6	up to 2%
CI Pigment blue 15	147-14-8	up to 1.5%

- a Toxicological data for primary particles of titanium dioxide (i.e., >100 nm in size) were used in the current product evaluation; toxicity associated with exposure to ultrafine grades (i.e., nanoparticles) of titanium dioxide (i.e., <100 nm) was not considered.

*** END OF THE REPORT ***