



Test Report

No.T31920261086TC

Date: SEP 25, 2019

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BIC GRAPHIC

14421 MYERLAKE CIRCLE CLEARWATER, PINELLAS, FL 33760, UNITED STATES

The following samples were submitted and identified by/on behalf of the client as:

ROZEN PEN

Item No. : 56004
P.O. No. : 3324_HK
Manufacturer Date : 2019
Shipment Order Number : PO 7095160
Country of Origin : CHINA
Country of Destination : CANADA, UNITED STATES
Sample Receiving Date : JUL 25, 2019
Testing Period : JUL 25, 2019 TO SEP 25, 2019

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Member of the SGS Group (SGS SA)



Test Requested		Conclusion
1.	Title 16, Code of Federal Regulations, Chapter II - Consumer Products Safety Commission of U.S.A. - Part 1303 - Ban of Lead - Containing Paint and Certain Consumer Products Bearing Lead - Containing Paint – Lead Content in the specified specimen(s) as listed	PASS
2.	CPSIA section 101 - Total Lead content in the specified specimen(s) as listed	--
2.1	CPSIA section 101(f) (1) – Lead in paint/similar surface coating material	PASS
2.2	CPSIA section 101(a) (2) – Lead in accessible substrate materials (Including Children’s Metal Jewelry)	PASS
3.	CPSIA section 108 – Phthalates in the specified specimen(s) as listed	PASS
4.	US 16 CFR Part 1307 – Phthalates in the specified specimen(s) as listed	PASS
5.	US California Proposition 65 (County of Los Angeles Case No. BC479596 & Out-of-court settlement for Erasers, Pens with vinyl/PVC charm toppers, Vinyl/PVC product including Eraser and sharpener, Pen, Pencil Cases, Clipboards, Calculator, LED booklight) – Lead Content in the specified specimen(s) as listed	PASS
6.	US California Proposition 65 (County of Santa Clara Case No. 1-12-CV-230462 & Settlement Agreement for Erasers, Pens with vinyl/PVC charm toppers, Vinyl/PVC product (including Eraser and sharpener, Pen, Pencil Cases, Clipboards, Calculator, LED booklight)) – Phthalates Content in the specified specimen(s) as listed	PASS
7.	Canada Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17) amended up to January 11, 2019 (Including amendments SOR/2012-71, SOR/2016-195, SOR/2016-302 and SOR/2018-138) - Section 23 (a) and Section 23 (c) - Lead and Mercury in surface coating material in the specified specimen(s) as listed	PASS

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

Signed for and on behalf of
SGS Hong Kong Ltd.



To Man Wah, Po
Technical Manager

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Test Results:

1. CPSC 16 CFR 1303 - Lead in Paint/Similar Surface Coating Materials

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Test Item(s)	Lead (Pb)
Permissible Limit (ppm)	90
Specimen Description	Result(s) (ppm)
1. Black coating (Barrel) (#1-56004 Black ABS plastic barrel)	ND
2. Navy coating (Barrel) (#2-56004 Navy ABS plastic barrel)	ND
3. Burgundy coating (Barrel) (#3-56004 Burgundy ABS plastic barrel)	ND
4. Champagne coating (Barrel) (#4-56004 Champagne ABS plastic barrel)	ND
5. Silvery coating (Barrel) (#5-56004 Silvery ABS plastic barrel)	ND

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

2.1 CPSIA - Lead in Paint/Similar Surface Coating Materials

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Test Item(s)	Lead (Pb)
Permissible Limit (ppm)	90
Specimen Description	Result(s) (ppm)
1. Black coating (Barrel) (#1-56004 Black ABS plastic barrel)	ND
2. Navy coating (Barrel) (#2-56004 Navy ABS plastic barrel)	ND
3. Burgundy coating (Barrel) (#3-56004 Burgundy ABS plastic barrel)	ND
4. Champagne coating (Barrel) (#4-56004 Champagne ABS plastic barrel)	ND
5. Silvery coating (Barrel) (#5-56004 Silvery ABS plastic barrel)	ND

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- Note:
- ppm = parts per million
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 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

2.2 CPSIA - Lead in Accessible Substrate Materials

Method (non-metallic materials): With reference to CPSC-CH-E1002-08.3 - Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product

Test Item(s)	Lead (Pb)
Permissible Limit ** (ppm)	100
Specimen Description	Result(s) (ppm)
1. Black plastic (Barrel) (#1-56004 Black ABS plastic barrel, #2-56004 Navy ABS plastic barrel, #3-56004 Burgundy ABS plastic barrel, #4-56004 Champagne ABS plastic barrel, #5-56004 Silvery ABS plastic barrel)	ND
2. White rubber (Grip) (#6-56004 White TPR rubber plastic grip)	ND

** Permissible Limit applies to a children's product manufactured after 14 August 2011 (Public Law 110-314 (Consumer Product Safety Improvement Act of 2008) and its Amendments Public Law 112-28)

- Note:
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 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit = 10 ppm
 - 1% = 10000 mg/kg = 10000 ppm

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3. CPSIA – Phthalates Content

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Accessible materials can be placed in the mouth

Test Item(s)	CAS No.	Result (s) (%)	MDL (%)	Permissible Limit (%)
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisononyl Phthalate (DINP)	28553-12-0 68515-48-0	ND	0.010	0.1
Di-n-octyl Phthalate (DNOP)	117-84-0	ND	0.003	0.1
Diisodecyl Phthalate (DIDP)	26761-40-0 68515-49-1	ND	0.010	0.1

Specimen Description:

- White ruber (Grip) (#6-56004 White TPR rubber plastic grip)

- Note:
- % = percentage by weight
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit
 - 1% = 10000 mg/kg = 10000 ppm

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4. US 16 CFR Part 1307 – Phthalates Content

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Test Item(s)	CAS No.	Result (s) (%)	MDL (%)	Permissible Limit (%)
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisononyl Phthalate (DINP)	28553-12-0 68515-48-0	ND	0.010	0.1
Di-n-Hexyl phthalate (DHP/DnHP/DHEXP)	84-75-3	ND	0.003	0.1
Diisobutyl phthalate (DIBP)	84-69-5	ND	0.003	0.1
Di-n-pentyl phthalate(DPP/DPEP/DPENP)	131-18-0	ND	0.003	0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	ND	0.003	0.1

Specimen Description:

- White ruber (Grip) (#6-56004 White TPR rubber plastic grip)

- Note:
- % = percentage by weight
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit
 - 1% = 10000 mg/kg = 10000 ppm

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5. California Proposition 65 – Total Lead Content

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Method (non-metallic materials): With reference to CPSC-CH-E1002-08.3 - Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

Test Item(s)	Lead (Pb)
Specimen Description	Result(s) (ppm)
1. Black plastic (Barrel) (#1-56004 Black ABS plastic barrel, #2-56004 Navy ABS plastic barrel, #3-56004 Burgundy ABS plastic barrel, #4-56004 Champagne ABS plastic barrel, #5-56004 Silvery ABS plastic barrel)	ND
2. White rubber (Grip) (#6-56004 White TPR rubber plastic grip)	ND
3. Black coating (Barrel) (#1-56004 Black ABS plastic barrel)	ND
4. Navy coating (Barrel) (#2-56004 Navy ABS plastic barrel)	ND
5. Burgundy coating (Barrel) (#3-56004 Burgundy ABS plastic barrel)	ND
6. Champagne coating (Barrel) (#4-56004 Champagne ABS plastic barrel)	ND
7. Silvery coating (Barrel) (#5-56004 Silvery ABS plastic barrel)	ND

- Note:
- ppm = parts per million
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit =10 ppm
 - 1% = 10000mg/kg=10000ppm

Remark: Summary of permissible limit(s) of Lead requirement:

Requirement(s)	Permissible Limit of Lead (ppm)	Effective Date
California Proposition 65 (County of Los Angeles Case No. BC479596)	100	Current
California Proposition 65 (Out-of-court settlement for Erasers, Pens with vinyl/PVC charm toppers, Vinyl/PVC product including Eraser and sharpener, Pen, Pencil Cases, Clipboards, Calculator, LED booklight)	100	Current

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6. ifornia Prop 65 Phthalates Content

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Test Item(s)	CAS No.	Result(s) (%)	MDL (%)
Specimen No.	--	1	
Dibutyl phthalate (DBP)	84-74-2	ND	0.003
Benzyl butyl phthalate (BBP)	85-68-7	ND	0.003
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003

Specimen Description:

1. White ruber (Grip) (#6-56004 White TPR rubber plastic grip)

- Note:
- % = percentage by weight
 - MDL = Method Detection Limit
 - ND = Not Detected (lower than MDL)
 - 1% = 10000 mg/kg = 10000 ppm

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Summary of Permissible Limit of Requirement(s):

Requirement(s)	Permissible Limit
California Proposition 65 (County of Santa Clara Case No. 1-12-CV-230462)	
<ul style="list-style-type: none"> - Automobile accessories including dashboard-related items - Watches, - Clocks - Bags and Purses/wallets - Ear plugs, buds and related accessories - Temporary tattoos, - Charms - Plastic figures, small novelties and stationery-related items/sundries - Bathroom accessories - Bath/kitchen floor and door/welcome mats - Bandage 	<p>< 0.1% DEHP (For Bandage)</p> <p>< 0.1% DEHP, BBP, DBP(For other product)</p>
California Proposition 65 (Settlement Agreement)	
<ul style="list-style-type: none"> - Erasers - Pens with vinyl/PVC charm toppers - Vinyl/PVC product (including Eraser and sharpener, Pen, Pencil Cases, Clipboards, Calculator, LED booklight) 	<p>< 0.1% DEHP</p>

7. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17) amended up to January 11, 2019 (Including amendments SOR/2012-71, SOR/2016-195, SOR/2016-302 and SOR/2018-138) - Section 23 (a) and Section 23 (c) - Lead and Mercury in surface coating material

Method: With reference to Canada Health Product Safety Bureau, Reference Manual Book 5 – Laboratory Policies and Procedures, Part B: Test Methods Section, Method C-02.2:2017 and C-07:2018

Test Item(s)	Pb	Hg
Permissible Limit (mg/kg)	90	ND
Specimen Description	Result(s) (mg/kg)	
1. Black coating (Barrel) (#1-56004 Black ABS plastic barrel)	ND	ND
2. Navy coating (Barrel) (#2-56004 Navy ABS plastic barrel)	ND	ND
3. Burgundy coating (Barrel) (#3-56004 Burgundy ABS plastic barrel)	ND	ND
4. Champagne coating (Barrel) (#4-56004 Champagne ABS plastic barrel)	ND	ND
5. Silvery coating (Barrel) (#5-56004 Silvery ABS plastic barrel)	ND	ND

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- Note:
- mg/kg = milligram per kilogram
 - ND = Not Detected (lower than MDL)
 - MDL = Method Detection Limit
 - MDL for Pb = 10 mg/kg
 - MDL for Hg = 10 mg/kg
 - The action level of Mercury is 10 mg/kg according to the Industry guide to Health Canada's Safety Requirements for Children's Toys and Related Products, 2012

Sample Photo:



SGS authenticate the photo on original report only

*** End of Report ***

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