



Test Report

No.T32120250545TC

Date: APR 22, 2021

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KOOZIE GROUP

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

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

SOUVENIR® DAVEN PEN

Item No. : 56035
Manufacture Date : 2021
Test Request Form No. : 5109_HK
Shipment Order No. : 7128640
Country of Origin : CHINA
Country of Destination : CANADA, UNITED STATES
Sample Receiving Date : APR 15, 2021
Further Information Date : APR 22, 2021
Testing Period : APR 15, 2021 TO APR 22, 2021

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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.	US California Proposition 65 (County of Los Angeles Case No. BC479596 & Out-of-court Settlement for Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight) – Lead Content in the specified specimen(s) as listed	PASS
4.	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. Purple coating w/ silvery undercoat (On barrel) (1#-56035 purple ABS plastic barrel)	ND
2. Black coating (On barrel) (2#-56035 black ABS plastic barrel)	ND
3. Blue coating w/ silvery undercoat (On barrel) (3#-56035 blue ABS plastic barrel)	ND
4. Red coating w/ silvery undercoat (On barrel) (4#-56035 red ABS plastic barrel)	ND
5. Green coating w/ silvery undercoat (On barrel) (5#-56035 green ABS plastic barrel)	ND
6. Transparent rubber coating (On grip & clip) (6#-56035 purple ABS plastic grip & clip) (7#-56035 black ABS plastic grip & clip) (8#-56035 blue ABS plastic grip & clip) (9#-56035 red ABS plastic grip & clip) (10#-56035 green ABS plastic grip & clip)	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. Purple coating w/ silvery undercoat (On barrel) (1#-56035 purple ABS plastic barrel)	ND
2. Black coating (On barrel) (2#-56035 black ABS plastic barrel)	ND
3. Blue coating w/ silvery undercoat (On barrel) (3#-56035 blue ABS plastic barrel)	ND
4. Red coating w/ silvery undercoat (On barrel) (4#-56035 red ABS plastic barrel)	ND
5. Green coating w/ silvery undercoat (On barrel) (5#-56035 green ABS plastic barrel)	ND
6. Transparent rubber coating (On grip & clip) (6#-56035 purple ABS plastic grip & clip) (7#-56035 black ABS plastic grip & clip) (8#-56035 blue ABS plastic grip & clip) (9#-56035 red ABS plastic grip & clip) (10#-56035 green ABS plastic grip & clip)	ND

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 - 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. Dark grey plastic (Barrel) (1#-56035 purple ABS plastic barrel) (3#-56035 blue ABS plastic barrel) (4#-56035 red ABS plastic barrel) (5#-56035 green ABS plastic barrel)	ND
2. Black plastic (Barrel) (2#-56035 black ABS plastic barrel)	ND
3. Purple plastic (Grip & clip) (6#-56035 purple ABS plastic grip & clip)	ND
4. Black plastic (Grip & clip) (7#-56035 black ABS plastic grip & clip)	ND
5. Blue plastic (Grip & clip) (8#-56035 blue ABS plastic grip & clip)	ND
6. Red plastic (Grip & clip) (9#-56035 red ABS plastic grip & clip)	ND
7. Green plastic (Grip & clip) (10#-56035 green ABS plastic grip & clip)	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. US 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. Dark grey plastic (Barrel) (1#-56035 purple ABS plastic barrel) (3#-56035 blue ABS plastic barrel) (4#-56035 red ABS plastic barrel) (5#-56035 green ABS plastic barrel)	ND
2. Black plastic (Barrel) (2#-56035 black ABS plastic barrel)	ND
3. Purple plastic (Grip & clip) (6#-56035 purple ABS plastic grip & clip)	ND
4. Black plastic (Grip & clip) (7#-56035 black ABS plastic grip & clip)	ND
5. Blue plastic (Grip & clip) (8#-56035 blue ABS plastic grip & clip)	ND
6. Red plastic (Grip & clip) (9#-56035 red ABS plastic grip & clip)	ND
7. Green plastic (Grip & clip) (10#-56035 green ABS plastic grip & clip)	ND
8. Purple coating w/ silvery undercoat (On barrel) (1#-56035 purple ABS plastic barrel)	ND
9. Black coating (On barrel) (2#-56035 black ABS plastic barrel)	ND
10. Blue coating w/ silvery undercoat (On barrel) (3#-56035 blue ABS plastic barrel)	ND
11. Red coating w/ silvery undercoat (On barrel) (4#-56035 red ABS plastic barrel)	ND
12. Green coating w/ silvery undercoat (On barrel) (5#-56035 green ABS plastic barrel)	ND
13. Transparent rubber coating (On grip & clip) (6#-56035 purple ABS plastic grip & clip) (7#-56035 black ABS plastic grip & clip) (8#-56035 blue ABS plastic grip & clip) (9#-56035 red ABS plastic grip & clip) (10#-56035 green ABS plastic grip & clip)	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 otherwise warning label required:

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 Vinyl/PVC stationery products include but not limited to eraser and sharpener, pen, pencil cases, clipboards calculator and LED booklight)	100	Current

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4. 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-07:2019

Test Item(s)	Pb	Hg
Permissible Limit (mg/kg)	90	ND
Specimen Description	Result(s) (mg/kg)	
1. Purple coating w/ silvery undercoat (On barrel) (1#-56035 purple ABS plastic barrel)	ND	ND
2. Black coating (On barrel) (2#-56035 black ABS plastic barrel)	ND	ND
3. Blue coating w/ silvery undercoat (On barrel) (3#-56035 blue ABS plastic barrel)	ND	ND
4. Red coating w/ silvery undercoat (On barrel) (4#-56035 red ABS plastic barrel)	ND	ND
5. Green coating w/ silvery undercoat (On barrel) (5#-56035 green ABS plastic barrel)	ND	ND
6. Transparent rubber coating (On grip & clip) (6#-56035 purple ABS plastic grip & clip) (7#-56035 black ABS plastic grip & clip) (8#-56035 blue ABS plastic grip & clip) (9#-56035 red ABS plastic grip & clip) (10#-56035 green ABS plastic grip & clip)	ND	ND

- 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

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Remark:

When statement of conformity is made, unless the decision rule was mentioned in above specified test items, the decision rule would be based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability, $w = U_{95}$) in ILAC-G8:09/2019 Clause 4.2.3.

“Pass - the measured value is within (or below / above) the acceptance limit, where the acceptance limit is below / above to the guard band.” or “Pass - The measured values were observed in tolerance at the points tested. The specific false accept risk is up to 2.5%.”

“Fail - the measured value is out of (or below / above) the tolerance limit added / subtracted to the guard band.” or “Fail - One or more measured values were observed out of tolerance at the points tested”. The specific false reject risk is up to 2.5%.

“Inconclusive – It is not possible to state the conformity. Either one or more measured values were observed in the portion of the expanded measurement uncertainty intervals at the points tested where the specific risk is up to 50%.”

Sample Photo:



SGS authenticate the photo on original report only

*** End of Report ***

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