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TEST REPORT

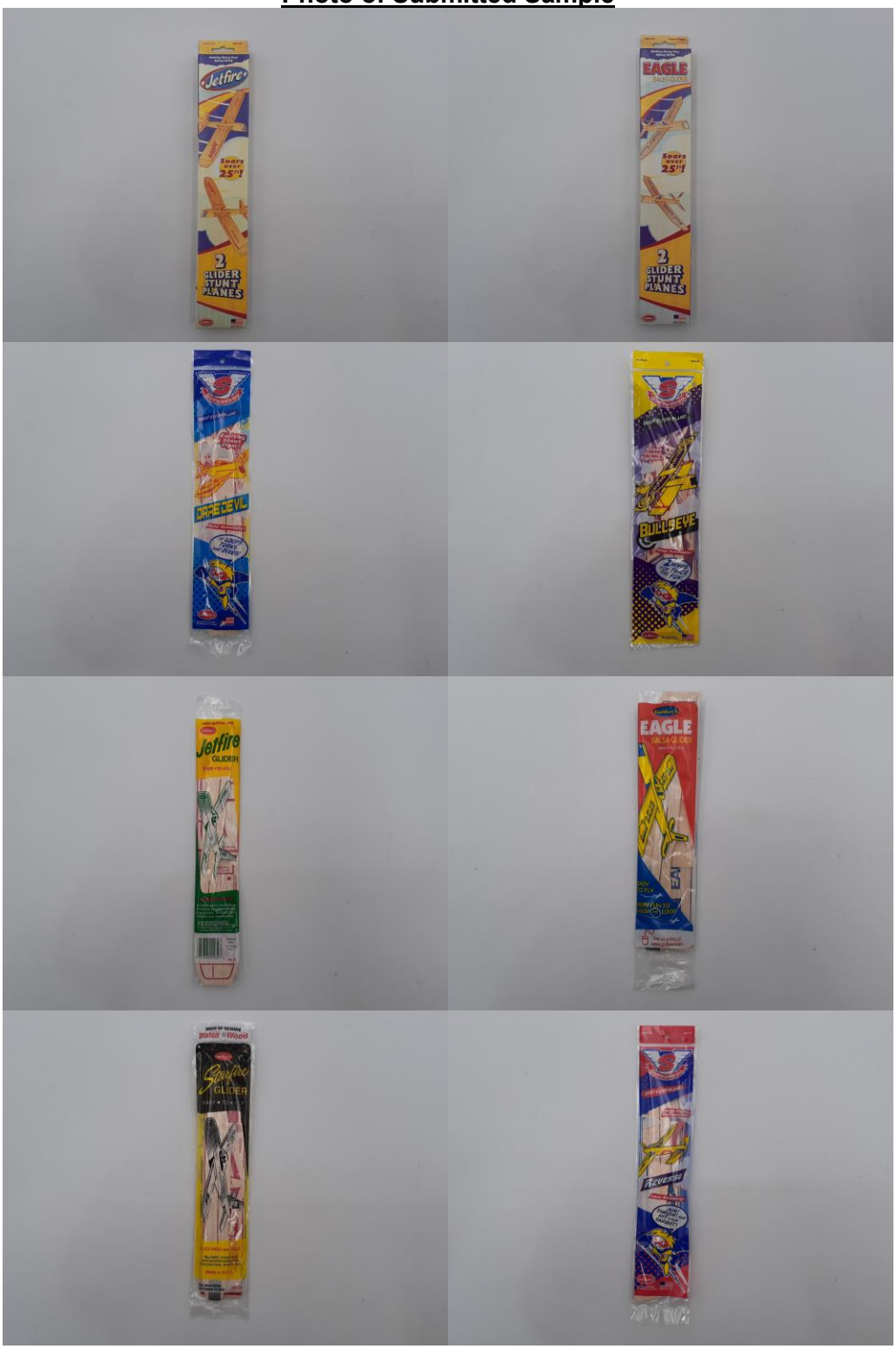
LAB LOCATION:	**HONG KONG**	**ISSUE DATE:**	**MAY 23, 2024**
REPORT NUMBER:	**EFYW24040629-T-01**	**PAGE:**	**1 of 15**

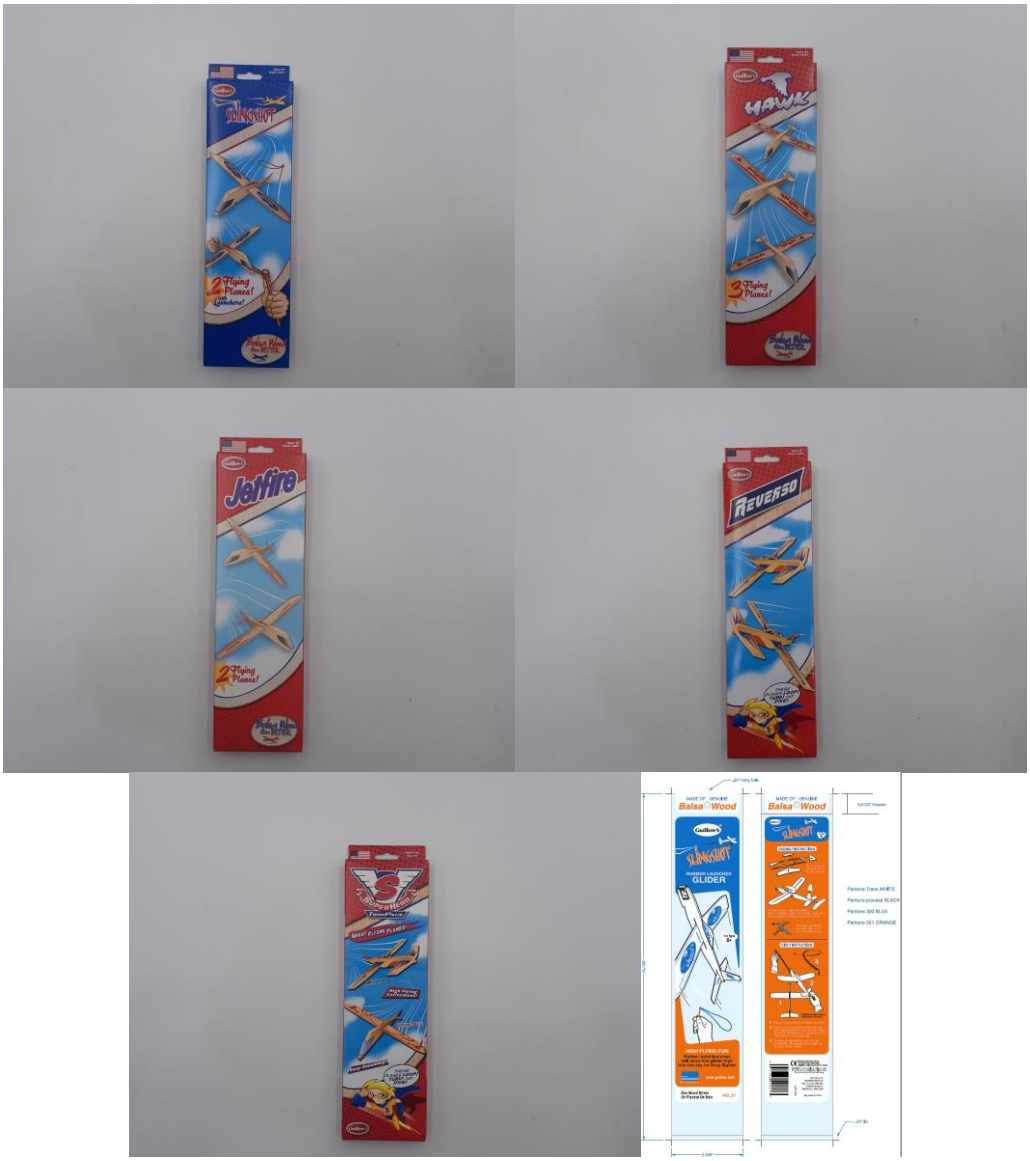
Applicant	:	PAUL K. Guillow, Inc. 40 New Salem Street, Wakefield MA 01880
Contact Person	:	Dale Bass
Sample Description	:	#25T Hawk 3 Pack, #26 Eagle, #30 Jetfire, #30T Jetfire Twin Pack, #32 Jetfire Twin Pack, #35 Starfire, #37 Sling Shot, #37T Sling Shot Twin Pack, #40 Reverso, #40T Reverso Twin Pack, #41 Dare Devil, #42 Super Hero Twin Pack, #43 Bullseye, #7006 Eagle Twin Pack
Style Number	:	25T, 26, 30, 30T, 32, 35, 37, 37T, 40, 40T, 41, 42, 43, 7006
Purchase Order Number	:	--
SKU #	:	Multiple
Batch #	:	Multiple
Buyer	:	--
Country of Origin	:	USA
Country of Destination	:	--
Date of Submission	:	APR 25, 2024
Test Performance Dates	:	APR 25, 2024 – MAY 23, 2024

For and on behalf of
Eurofins MTS Consumer Product Testing Hong Kong Limited

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

Photo of Submitted Sample




Jetfire
REVERSO
HAWK
Balsa Wood
GLIDER

TEST RESULT SUMMARY	
Test Requested	**Results**
ASTM F963-17 Standard Consumer Safety Specification for Toy Safety, Physical and Mechanical Tests	**PASS**
Federal Hazardous Substances Act Regulations 16 CFR 1500.3 (c)(6)(vi) Flammable Solid	**PASS**
Total Lead Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101	**PASS**
Total Lead Content in Toys and Child Care Articles – Client's Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: Alameda Superior Court RG08378050 / San Francisco Superior Court 07-462991)	**PASS**
Soluble Heavy Metals Content in Similar Surface Coating Materials and Toys Substrate Materials – ASTM F963-17 Section 4.3.5.1(2) & 4.3.5.2(2)(b)	**PASS**
Phthalates Content – 16CFR part 1307, amended U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 108	**PASS**
Phthalates Content – California Assembly Bill Law No. 1108	**PASS**
Phthalates Content in Toys and Childcare Articles – Client's Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: Sacramento Superior Court 07AS04683 / Alameda Superior Court BG07350969 / RG08367601 / RG07351032 / RG08378050)	**PASS**
Toxics in Packaging – Model Toxics in Packaging Legislation of the Toxics in Packaging Clearinghouse (TPCH)	**PASS**

TEST DATA:

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

AGE GRADE EVALUATION:

Client requested age grade: Not Requested
Labeled age grade: Over 8 years of age
Appropriate age grade: Over 8 years of age
Age grade for testing: Over 8 years of age

RESULTS:

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

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

7.1	Producer's Markings	P
7.2	Battery-Powered Ride-On Toys	NA
7.3	Toy Chest	NA

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

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

RESULTS:

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

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

COMPONENT BREAKDOWN LIST:

Test Item	Component Description
A	#25T
A1	Brown wood with red print (body) - style A, C, D, E, F, I
A2	Brown wood (body) - style A, B, C, D, E, F, G, H, I, J, K, L, M
A3	Silver metal (plate / body) - style A, B, C, D, E, F, G, I, K, L
A4	Multicolor coating (box) - style A, D, E, G, J, L, M - packaging
A5	Brown paper (box) - style A, J, L - packaging
A6	Transparent plastic with multicolor print (bag) - style A, B, C, D, E, F, H, I, J, K, L - packaging
B	#26
B1	Brown wood with blue print (body) - style B, G, H, J, L, M
C	#30
D	#30T
D1	Brown paper (box) - style D, E, G, M - packaging
E	#32
F	#35
G	#37T
G1	Orange plastic (launcher)
G2	Brown soft plastic (elastic band)
H	#40
H1	Red plastic (holder) - style H, J, K, M
I	#41
J	#42
K	#43
K1	Brown wood with purple print (body)
L	#7006
M	#40T

TEST RESULT:

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

Test Item	Accessibility (Remark 1)	Classification	Total Lead (Pb) (ppm)		Conclusion
			Result	Limit	
A1+B1+K1	Accessible as received	Accessible substrate	<10	100	PASS
A3	Accessible as received	Accessible substrate	<10	100	PASS
G1+G2+H1	Accessible as received	Accessible substrate	<10	100	PASS

Method:

1) Lead in paint and other similar surface coatings:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings, February 25, 2011 (CPSC-CH-E1003-09.1)
2) Lead in metals:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry), November 15, 2012 (CPSC-CH-E1001-08.3)
3) Lead in other non-metal materials including plastics, glass and leather material:
The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in

Non-Metal Children's Products, November 15, 2012 (CPSC-CH-E1002-08.3)

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

Note: ppm = part per million = mg/kg (milligram per kilogram)
"<" = less than

2. Total Lead Content in Toys and Child Care Articles – Client's Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: Alameda Superior Court RG08378050 / San Francisco Superior Court 07-462991)

Test Item	Result – Total Lead (Pb) (ppm)	Conclusion
A1	<10	PASS **(See Remark)**
A3	<10	PASS **(See Remark)**
B1	<10	PASS **(See Remark)**
G1	<10	PASS **(See Remark)**
G2	<10	PASS **(See Remark)**
H1	<10	PASS **(See Remark)**
K1	<10	PASS **(See Remark)**

Method: Sample was digested with reference to EPA 3052. The lead content was analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
The reformulation levels set forth in the Consent Decrees of similar products to the Sample are **90 ppm (Accessible surface coating) / 100 ppm (Accessible substrate) / 200 ppm (Baby bibs)**. The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the

safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

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

Note: ppm = part per million
"<" = less than
">" = more than
NA = Not applicable

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

Test Item	Mass of Trace Amount (mg)	Result – Soluble Heavy Metals (mg/kg)								Conclusion
		Sb	As	Ba	Cd	Cr	Pb	Hg	Se	
A1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
A2	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
G1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
G2	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
H1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
K1	NA	<10	<10	<10	<10	<10	<10	<10	<10	PASS
Limit for Surface Coatings and Substrates Other Than Modeling Clay		60	25	1000	75	60	90	60	500	-
Limit for Modeling Clays		60	25	250	50	25	90	25	500	-

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

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

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

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

2. The accessibility of the submitted sample is verified according to ASTM F963-17 before and after abuse.

3. The material type of tested component(s) is / are classified as below per clause 8.3 of this standard.

Material Type Classification	Test Item
Polymeric and similar materials	G1, G2, H1
Other Materials, whether mass colored or not	A1, A2, K1

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

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

Test Item	Result – Phthalates Content (%)								Conclusion
	DBP	BBP	DEHP	DIBP	DCHP	DINP	DnHP/ DHEXP	DPP/ DPENP	
G1+G2+H1	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	PASS
Limit	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	-

List of Phthalates:

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

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

Remark: 1. Phthalates were not tested for this material as the material is claimed by applicant to be PP, PE, HIPS, ABS, GPPS, MIPS or SHIPS. These types of materials are exempted by CPSC for Phthalates test.

Note: % = percentage
"<" = less than
">" = more than

5. Phthalates Content – California Assembly Bill Law No. 1108

Test Item	Result (%) (Remark)						Conclusion
	Part A			Part B			
	DBP	BBP	DEHP	DNOP	DIDP	DINP	
G1+G2+H1	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	PASS
Limit	0.1	0.1	0.1	0.1	0.1	0.1	-

List of Phthalates:

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

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

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

Note: % = percentage
"<" = less than

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

Test Item	Result (%)					Conclusion
	DBP	BBP	DEHP	DIDP	DnHP	
G1+G2+H1	<0.005	<0.005	<0.005	<0.005	<0.005	PASS **(See Remark)**

List of Phthalates:

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

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

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
The reformulation level set forth in the Consent Decrees of similar products to the Sample is **0.1% (each)**. The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

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

Note: % = percentage
"<" = less than
">" = more than

7. Toxics in Packaging – Model Toxics in Packaging Legislation of the Toxics in Packaging Clearinghouse (TPCH)

Test Item	Result – Total Heavy Metals (mg/kg)					Conclusion
	Pb	Cd	Cr (VI)	Hg	Total	
A4	<10	<10	<10	<10	<40	PASS
A5+D1	<10	<10	<10	<10	<40	PASS
A6	<10	<10	<10	<10	<40	PASS
Limit					100	-

Pb = Lead, Cd = Cadmium, Cr (VI) = Chromium (VI), Hg = Mercury

Method: Sample was digested completely and tested by EPA 3052.

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

NOTE:

Test uncertainties not reported are at client's disposal, for those in which it is possible to evaluate or estimate the test uncertainty. The statement of conformity is based on a 95% coverage probability for the expanded uncertainty of the measured result (guard band):

Rule 1:
For any requirement state to be "Maximum"
PASS - The measured result is below a specification limit minus guard band.
INCONCLUSIVE - The measured result is inside the guard band and below the specification limit and the measured result is above the specification limit but below the specification limit added to the guard band.
FAIL - The measured result is above a specification limit added to the guard band.
DATA – There is no specification limit required which is not possible to state the conformity.

Rule 2:
For any requirement state to be "Minimum"
PASS - The measured result is above a specification limit plus guard band.
INCONCLUSIVE- The measured result is inside the guard band and above the specification limit and the measured result is below the specification limit but above the specification limit added to the guard band.
FAIL - The measured result is below a specification limit minus guard band.
DATA – There is no specification limit required which is not possible to state the conformity.

Rule 3:
For any requirement state to be "a range (Between Upper to Lower specification limit)
PASS - The measured result is within a range of upper and lower acceptance limit.
INCONCLUSIVE- The measured result is inside the guard band at either side of specification limits
FAIL - The measured result is outside a specification limit minus/added to the guard band.
DATA – There is no specification limit required which is not possible to state the conformity.

The above rules will be applied by default unless a statement of conformity to a specification or standard is provided or you indicate a decision rule to the contrary.
Any decision rule proposed by the client must satisfy the requirements of ISO 17025:2017 to include consideration of the measurement uncertainty and will be included in the test report.
MTS reserves the right to refuse to apply decision rules that do not satisfy these conditions.

The rules is uploaded and shared to http://www.mts-global.com/Decision_Rule.html
Division had maintained and keep updated the decision rule per their testing for the result review

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

Technical question & concern:

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

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