

TEST REPORT

Applicant: PEN COMPANY OF AMERICA - AAWI
1301 S PARK AVENUE,
LINDEN, NJ 07036
USA

Number: HKGH02958358

Date: Jan 11, 2023

Attn: COLLEEN SHEA

Sample and Information provided by customer :

Item Name : **Pencil Heroes #2 pencils with eraser capes**
Item No. : **PH950 - PH951 - PH952 - PH 953**
Quantity : 24 pencils 9 capes
Labelled Age Group : Not specified
Packaging Provided : No
Manufacturer : Pen Company of America
Country of Origin : USA

For and on behalf of :
Intertek Testing Services HK Ltd.



Cindy I.K. Chan
Vice President



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Conclusion:

The submitted sample was tested under the following requirements requested by the applicant, subject to the information stated in the remark and attached page(s) for details :

<u>Requirement</u>	<u>Result</u>
(1) U.S. CFR Title 16 (CPSC Regulations) - Part 1500.48 Sharp point test - Part 1500.49 Sharp edge test	Pass
(2) U.S. CFR Title 16 (CPSC Regulations) - Part 1500.3(c)(6)(vi) - Flammability test on rigid and pliable solids	Pass
(3) Consumer Product Safety Improvement Act (CPSIA) 2008 Section 103 - Tracking labels for children products	Pass
(4) U.S. Consumer Product Safety Improvement Act 2008 Title I Section 101 - Total Lead content in non-surface coating materials (substrate)	Pass
(5) U.S. CFR Title 16 (CPSC Regulations) - Part 1303 - Total Lead content in surface coating	Pass
U.S. Consumer Product Safety Improvement Act 2008 Title I Section 101 - Total Lead content in surface coating	Pass
(6) US CPSC 16 CFR Part 1307 Prohibition of Children's Toys and Child Care Articles Containing Specified Phthalates - Phthalate content	Pass
(7) California Proposition 65 for Writing Instruments:Erasers, pens, pencils, markers, highlighters, sharpeners, and pencil cups; Set/kit in self-contained pouches/bags, Consent Judgement no. CGC-09-485784 - Total Lead (Pb) content	Pass
(8) California Proposition 65 for Writing Instruments:Erasers, pens, pencils, markers, highlighters, sharpeners, and pencil cups; Set/kit in self-contained pouches/bags, Consent Judgement no. CV-230462,CGC-09-485784 - Phthalate content	Pass

Decision Rule(s):

When a statement of conformity to a specification or standard is provided on test report, the decision rule shall be applied. For details, please refer to Intertek's "Decision Rule Document" and is available on Intertek's website. <https://intertekhk.qrd.by/decision-rule-doc..>
If decision rule already inhaled in the requested specification or standard, Intertek's "Decision Rule Document" is not applicable and indication of "∞" was shown as above table.



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(1) Mechanical and Physical Test

Test Standard : U.S. code of Federal Regulations Title 16 Part 1500.50, the hazards of sharp points, sharp edge and small parts are assessed both before and after applicable use and abuse tests.

Age group for testing : For Ages Over 4 Years

	<u>No. of sample tested</u>	<u>Sharp point (1500.48)</u>	<u>Sharp edge (1500.49)</u>	<u>Small part (1501)</u>
As Received	1	P	NA	NA
Impact (1500.53 (b))	1	P	NA	
Flexure (1500.53 (d))	0	NA	NA	NA
Torque (1500.53 (e))	1	P	NA	NA
Tension (1500.53 (f))	1	P	NA	NA
Compression (1500.53 (g))	1	P	NA	NA

Abbreviation : P= Pass F = Fail NA = Not applicable

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(2) Flammability Tests

Test Standard : U.S. Code of Federal Regulations Title 16 Part 1500.44 for rigid and pliable solids.

<u>Sample</u>	<u>Ignition point</u>	<u>Burn length</u> <u>(inch)</u>	<u>Time (sec)</u>	<u>Burn Rate</u> <u>(inch/sec)</u>	<u>Limit (inch/sec)</u>
Eraser	Edge	0.5	60	0.01	0.10

The above result only showed the most severe burn rate of the samples and components.

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(3) Tracking Label Assessment

Test Standard : Consumer Product Safety Improvement Act (CPSIA) 2008 Section 103 tracking labels for children products.

Tracking label found on the product:

Perfect Promos America
10/2022 #7609 NJ, USA

Note: The tracking label assessment was based on the submitted sample and the information provided by the applicant. There was no verification on the validity of such information.

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(4) Total Lead (Pb) Content in Non-Surface Coating Materials (Substrate)

Test Method : Standard Operating Procedures for Determining Total Lead (Pb) in Children's Products, test methods CPSC-CH-E1002-08.3 and/or CPSC-CH-E1001.08.3, analysed by Inductively Coupled Argon Plasma Spectrometry.

Tested Component	Result in ppm	Limit in ppm
(1/2/3)	<20	100
(4/5/6)	<20	100
(7/8/9)	<20	100
(10)	<20	100

The above limit was quoted according to U.S. Consumer Product Safety Improvement Act 2008 Title I, Section 101.

ppm = parts per million = mg/kg

Tested Components:

- (1) Red plastic (eraser).
- (2) Orange plastic (eraser).
- (3) Yellow plastic (eraser).
- (4) Green plastic (eraser).
- (5) Olive green plastic (eraser).
- (6) Blue plastic (eraser).
- (7) Dark blue plastic (eraser).
- (8) Purple plastic (eraser).
- (9) Pink plastic (eraser).
- (10) Black graphite (all pencil).

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(5) Total Lead (Pb) Content in Surface Coating

Test Method : Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings, test method CPSC-CH-E1003-09.1, analysed by Inductively Coupled Argon Plasma Spectrometry.

Tested Component	Result in ppm	Limit in ppm
(1)	<20	90

The Above limit was quoted according to U.S. CFR Title 16 Part 1303 and U.S. Consumer Product Safety Improvement Act 2008 Title I, Section 101.

ppm = parts per million = mg/kg

Tested Component:

(1) Coatings on wood (pattern of all pencil).

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(6) Phthalate Content Test

Test Method : Standard Operating Procedure for Determining Phthalates, test method CPSC-CH-C1001-09.4 was used and phthalate content was determined by Gas Chromatographic-Mass Spectrometric (GC-MS) analysis.

Compound	Result (% w/w)			Limit (% w/w)
	(1)	(2/3/4)	(5/6/7)	
Dibutyl phthalate (DBP)	<0.01	<0.01	<0.01	0.1
Diethyl hexyl phthalate (DEHP)	<0.01	<0.01	<0.01	0.1
Benzyl butyl phthalate (BBP)	<0.01	<0.01	<0.01	0.1
Diisononyl phthalate (DINP)	<0.015	<0.015	<0.015	0.1
Diisobutyl phthalate (DIBP)	<0.01	<0.01	<0.01	0.1
Di-n-pentyl phthalate (DPP) / (DPENP)	<0.01	<0.01	<0.01	0.1
Di-n-hexyl phthalate (DNHP) / (DHEXP)	<0.01	<0.01	<0.01	0.1
Dicyclohexyl phthalate (DCHP)	<0.01	<0.01	<0.01	0.1

Compound	Result (% w/w)	Limit (% w/w)
	(8/9/10)	
Dibutyl phthalate (DBP)	<0.01	0.1
Diethyl hexyl phthalate (DEHP)	<0.01	0.1
Benzyl butyl phthalate (BBP)	<0.01	0.1
Diisononyl phthalate (DINP)	<0.015	0.1
Diisobutyl phthalate (DIBP)	<0.01	0.1
Di-n-pentyl phthalate (DPP) / (DPENP)	<0.01	0.1
Di-n-hexyl phthalate (DNHP) / (DHEXP)	<0.01	0.1
Dicyclohexyl phthalate (DCHP)	<0.01	0.1



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The above limits are quoted from Federal Register, Vol. 82, No. 207, October 27, 2017, Rules and Regulations, Final rule for 16 CFR Part 1307 "Prohibition of Children's Toys and Child Care Articles Containing Specified Phthalates" effective from April 25, 2018.

Tested Components:

- (1) Coatings on wood (pattern of all pencil).
- (2) Red plastic (eraser).
- (3) Orange plastic (eraser).
- (4) Yellow plastic (eraser).
- (5) Green plastic (eraser).
- (6) Olive green plastic (eraser).
- (7) Blue plastic (eraser).
- (8) Dark blue plastic (eraser).
- (9) Purple plastic (eraser).
- (10) Pink plastic (eraser).

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(7) Total Lead (Pb) Content

Test Method : Acid digestion and analysed by Inductively Coupled Argon Plasma Spectrometry.

Tested Component	Result in ppm	Limit in ppm
(1)	<20	100
(2/3/4)	<20	100
(5/6/7)	<20	100
(8/9/10)	<20	100
(11)	<20	100

ppm = parts per million = mg/kg

The above limit was quoted from the Consent Judgement no. CGC-09-485784 settled by Superior Court of the State of California for the County of San Francisco, for Writing Instruments: Erasers, pens, pencils, markers, highlighters, sharpeners, and pencil cups; Set/kit in self-contained pouches/bags based on the California Proposition 65.

Tested Components:

- (1) Coatings on wood (pattern of all pencil).
- (2) Red plastic (eraser).
- (3) Orange plastic (eraser).
- (4) Yellow plastic (eraser).
- (5) Green plastic (eraser).
- (6) Olive green plastic (eraser).
- (7) Blue plastic (eraser).
- (8) Dark blue plastic (eraser).
- (9) Purple plastic (eraser).
- (10) Pink plastic (eraser).
- (11) Black graphite (all pencil).

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(8) Phthalate Content Test

Test Method : By solvent extraction and Gas Chromatographic-Mass Spectrometric (GC-MS) analysis.

Compound	Result (% w/w)			Limit (% w/w)
	(1)	(2/3/4)	(5/6/7)	
Dibutyl phthalate (DBP)	<0.01	<0.01	<0.01	0.1
Diethyl hexyl phthalate (DEHP)	<0.01	<0.01	<0.01	0.1
Benzyl butyl phthalate (BBP)	<0.01	<0.01	<0.01	0.1
Diisononyl phthalate (DINP)	<0.01	<0.01	<0.01	--

Compound	Result (% w/w)	Limit (% w/w)
	(8/9/10)	
Dibutyl phthalate (DBP)	<0.01	0.1
Diethyl hexyl phthalate (DEHP)	<0.01	0.1
Benzyl butyl phthalate (BBP)	<0.01	0.1
Diisononyl phthalate (DINP)	<0.01	--

The above limit was quoted from the Consent Judgement no. CV-230462,CGC-09-485784 settled by Superior Court of the State of California for the County of Santa Clara, San Francisco, for Writing Instruments:Erasers, pens, pencils, markers, highlighters, sharpeners, and pencil cups; Set/kit in self-contained pouches/bags based on the California Proposition 65.

Tested Components:

- (1) Coatings on wood (pattern of all pencil).
- (2) Red plastic (eraser).
- (3) Orange plastic (eraser).
- (4) Yellow plastic (eraser).
- (5) Green plastic (eraser).
- (6) Olive green plastic (eraser).
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End of report

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