

# THE PENCIL GRIP, INC.

Technical Report: Date Received:	<b>(8821)106-0041(R1)</b> Apr 16, 2021		May 12, 2021 Page 1 of 49
THE PENCIL GRIP, INC. 21200 SUPERIOR STRE	ET UNIT A CA 91311 USA		
Sample Description:	THE PENCIL GRIP TPG-111,TP TPG-119,CROSSOVER GRIP TI GROOVY GRIP TPG-116,BUMP EXTREME GRIP TPG-165,TPG- CLAW GRIP TPG-211,TPG-212, THE CUP GRIP TPG-172,THE F	PG-177, TPG-178, TPG-180, PII Y GRIP TPG-120, POINTER G 169, MINI GRIP TPG-175, SOL TPG-213, TOPPER GRIP CHE	NCH GRIP TPG-127, GRIP TPG-121, O GRIP TPG-171,
Vendor: Manufacturer: Labeled Age Grade: Appropriate Age Grade: Client Specified Age Grade:	N/A N/A 3+ NOT REQUESTED 3+	Sample Size: Style No(s): SKN/SKU No.: PO No.: Ref #:	6 SEE ATTACHMENT NOT PROVIDE NOT PROVIDE NOT PROVIDE
Tested Age Grade: UPC Code: Test Starting Date:	OVER 3 YEARS OF AGE N/A APR 16, 2021	Country of Origin: Assortment No.: Resubmitted Sample Date: Test Finished Date:	NOT PROVIDE NOT PROVIDE APR 26, 2021 APR 29, 2021

#### **EXECUTIVE SUMMARY:**

The sample(s) MEETS the following requirement(s):

- (#)- Labeling requirements of "CE marking, manufacturer/ Importer name and address, and product identification" under "Directive 2009/48/EC Safety of Toy".
- (#)- The mechanical and physical properties requirements of the tested subclauses of the European Standard, "Safety of toys", EN71: Part 1:2014+A1:2018 clauses 1-7.

To be continued

BUREAU VERITAS SHENZHEN CO., LTD DONGGUAN BRANCH

Harvey Xue Manager, Analytical Lab

RT/Gary Wu



BUREAU VERITAS SHENZHEN CO., LTD DONGGUAN BRANCH

Xuechao Li Supervisor, Toys Lab

**REMARK** If there are questions or concerns on this report, please contact the following persons: Report Enquiry: (86) 0769 89952999 Ext. 8175 CPSAnalytical.DG@bureauveritas.com Business Contact: (86) 0769 85893595 This report shall not be reproduced except in full, without the written approval of our laboratory.

Bureau Veritas Shenzhen Co., Ltd., Dongguan Branch No.96, Houjie, Guantai Road., Houjie, Dongguan,Guangdong, China Tel: +86-769-89982098 Fax: +86-769-85991080 www.cps.bureauveritas.com

at <u>https://www.cps.bureauveritas.com/terms-conditions</u>and is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. Measurement uncertainty is only provided upon request for accredited tests. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence or if you require measurement uncertainty; provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute you unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.

This report is governed by, and incorporates by reference, CPS Conditions of Service as posted at the date of issuance of this report



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 2 of 49

#### **EXECUTIVE SUMMARY:**

The sample(s) MEETS the following requirement(s):

- (#)- The flammability requirements of the European Standard "Safety of Toys", EN 71: Part 2: 2011+A1: 2014.
- The flammability requirements of the European Standard "Safety of Toys", EN 71: Part 2: 2020.
- (#)- The mechanical and physical properties requirements of the tested subclauses of the British European Standard, "Safety of toys", BS EN71: Part 1:2014+A1:2018 clauses 1-7.
- (#)- The flammability requirements of the British European Standard "Safety of Toys", BS EN 71: Part 2: 2011+A1: 2014.
- The flammability requirements of the British European Standard "Safety of Toys", BS EN 71: Part 2: 2020.
- (#)- The labeling requirements of ASTM F963-17, "Standard consumer safety specification for toy safety".
- (#)- The mechanical hazards requirements of ASTM F963-17, "Standard consumer safety specification for toy safety".
- (#)- The flammability requirement of solids under ASTM F963-17 section 4.2 according to Annex A5, "Flammability testing procedure for solids and soft toys".
- (#)- The mechanical hazards requirements of the tested sections of Canada Consumer Product Safety Act, Toys Regulations, SOR/2011-17, and Schedule 2.
- (#)- The labeling requirements of the tested sections of the Canada Consumer Product Safety Act, Toys Regulations, SOR/2011-17.
- (#)- The cellulose nitrate requirements of Canada Toys Regulations, SOR/2011-17, section 21.
- The labeling requirements of the tested subclauses of the Australian/New Zealand Standard, "Safety of toys", AS/NZS ISO 8124: Part 1: 2019+A1:2020+A2:2020.
- The mechanical and physical properties requirements of the tested subclauses of the Australian/New Zealand Standard, "Safety of toys", AS/NZS ISO 8124: Part 1: 2019+A1:2020+A2:2020.
- (#)- The flammability requirements of the AS/NZS Standard, "Safety of toys", AS/NZS 8124: Part 2: 2016.

The tested component sample(s) MEETS the following requirement(s):

- (#)- EN71-3:2019 Migration of Certain Elements European Parliament and Council Directive 2009/48/EC, Annex II, Part III, Point 13 with its Latest Amendment (EU) 2019/1922.
- (#)- BS EN71-3:2019 Migration of Certain Elements European Parliament and Council Directive 2009/48/EC, Annex II, Part III, Point 13 with its Latest Amendment (EU) 2019/1922.
- (#)- Total Cadmium Content European Parliament and Council Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII, Item no. 23.
- (#)- The BBP, DBP ,DEHP and DIBP content requirements of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 51(amended up to EU No.2018/2005).

To be continued



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 3 of 49

#### **EXECUTIVE SUMMARY:**

The tested component sample(s) MEETS the following requirement(s):

- (#)- The DNOP, DINP and DIDP content requirements of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 52.
- (#)- The total lead content in substrate requirements of ASTM F963-17, "Standard consumer safety specification for toy safety", Section 4.3.5.2(2)(a).
- (#)- The soluble heavy metals content in substrate requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.2(2)(b).
- (#)- The total lead content of 100ppm requirements in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).
- (#)- The phthalates (BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP & DCHP) content requirements of the Consumer Product Safety Improvement Act (CPSIA) of 2008 Sec. 108(a) and 108(c), 16 CFR 1307).
- The total lead content requirements in children products according to the California Proposition 65 settlements of Alameda Superior Court RG 07356892.
- (#)- The BBP, DBP, DEHP, DnHP and DIDP content requirements in toys, child care articles and watches according to the California Proposition 65 settlements of County of Sacramento case number 07AS04683, and the Alameda Superior Court case numbers BG07350969, RG08367601, RG07351032 and RG08378050.
- (#)- The total lead content requirements of the Canada Consumer Product Safety Act, Consumer Products Containing Lead Regulations SOR/2018-83.
- (#)- The migration of certain elements requirements of the AS/NZS Standard, "Safety of toys", AS/NZS 8124: Part 3: 2012 with amendment no.1: 2016.
- The phthalates content requirement of the client's specification.
- Note: Tests with (#) accredited under CNAS testing standard.
- Note: At the request of the client, the sample(s) was evaluated for use by children 3+.
- Note: The manufacturer / importer information was present on the packaging only. It has to be noted that, or according to TSD 2009/48/EC, the manufacturers/ importer shall indicate their name, registered trade name registered trade mark and the address at which they can be contacted on the toy, or, where that is not possible, on its packaging or in a document accompanying the toy."
- Note: The product identification is present on the packaging only. It has to be noted that, According to TSD 2009/48/EC, manufacturers shall ensure that their toys bear a type, batch, serial or model number or other element allowing their identification, or, where the size or nature of the toy does not allow it, that the required information is provided on the packaging or in a document accompanying the toy.
- Note: Canada Consumer Product Safety Act Toys Regulations, SOR/2011-17 Sec. 27(a) with its Latest Amendment states that toys intended for children over the age of three years and their parts are not covered by this part of the standard. Therefore, the samples are exempt from the HEAVY METALS CONTENT requirements of Canada Consumer Product Safety Act - Toys Regulations, SOR/2011-17 Sec. 27(a) with its Latest Amendment.

To be continued



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 4 of 49

# **EXECUTIVE SUMMARY:**

- Note: The sample(s) submitted do not fall within the scope of The BBP, DBP and DEHP content requirements of the Canada Consumer Product Safety Act, Phthalate Regulations, SOR/2016-188 thus the corresponding testing has not been conducted.
- Note: The sample(s) submitted do not fall within the scope of The DNOP, DINP and DIDP content requirements of the Canada Consumer Product Safety Act, Phthalate Regulations, SOR/2016-188 thus the corresponding testing has not been conducted.
- Note: At the request of client, test(s) was conducted on the certain component(s) of the submitted samples(s) / submitted component(s).

# ATTACHMENT:

Style No(s):

TPG-111,TPG-112,TPG-113,TPG-114,TPG-116,TPG-118,TPG-119,TPG-120,TPG-121,TPG-127,TPG-165, TPG-169,TPG-171,TPG-172,TPG-173,TPG-175,TPG-177,TPG-178,TPG-180,TPG-211,TPG-212,TPG-213,TPG-883



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 5 of 49

# Tested Component(s) Description List:

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
1001	Pink soft plastic	Pencil grip	-
1002	Green soft plastic	Pencil grip	-
1003	blue soft plastic	Pencil grip	-
1004	Orange soft plastic	Pencil grip	-
1005	Yellow soft plastic	Pencil grip	-
1006	Grass green plastic	Pencil grip	-
1007	Sky blue soft plastic	Pencil grip	-
1008	Transparent yellow soft plastic	Pencil grip	-
1009	Transparent blue soft plastic	Pencil grip	-
l010	Transparent orange soft plastic	Pencil grip	-
I011	Transparent rose red soft plastic	Pencil grip	-
l012	Transparent red soft plastic	Pencil grip	-
I013	Red soft plastic	Pencil grip	-
l014	navy blue soft plastic	Pencil grip	-
l015	Silver gray soft plastic	Pencil grip	-



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 6 of 49

# **RESULTS:**

# APPROPRIATE AGE GRADE DETERMINATION

CEN ISO/T	The Appropriate Age Grade is determined with reference to the EN71 : Part 1 : 2014+A1:2018, CEN ISO/TR 8124-8:2016 Safety of toys - Part 8: Age determination guidelines prepared by Technical Committee CEN/TC 52 and					
Age Grade	Determination Guidelines of the Consumer Product Safety Commission (CPSC).					
Note :	The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.					
Note :	If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.					

## EXPLANATION OF THE ABBREVIATIONS FOR PART 1, 2 & 6

Symbol	Explanation						
NM	The sample(s) DOES I	The sample(s) DOES NOT MEET the requirement of this Subclause					
М	The sample(s) MEET t	he requiren	nent of this Subclause				
N/A	Not Applicable						
NR	Not Requested						
NE	Not Evaluated						
NP	None Present						
NT	Not Tested	Not Tested					
Р	Present	Present					
R	Refer to Comment Sec	ction of this	report				
Symbol	Language Present	Symbol	Language Present	Symbol	Language Present		
В	Belgian language	G	German language	PR	Portuguese language		
D	Danish language	GR	Greek language	S	Spanish language		
E	English language H Dutch language SD Swedish language						
F	Finnish language	I	Italian language	SZ	Swiss language		
FR	French language	N	Norwegian language				



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 7 of 49

#### MECHANICAL & PHYSICAL PROPERTIES (EN 71: PART 1 – 2014+A1 – 2018)

Subclause	Requirement	Result
4.1	Material cleanliness	М
4.2	Assembly	NA
4.3	Flexible plastic sheeting	NA
4.4	Toy Bags	NA
4.5	Glass	NA
4.6	Expanding materials	NA
4.7 & 7.6	Edges	М
4.8 & 7.6	Points and metallic wires	М
4.8e	Splinters	М
4.9	Protruding parts	NA
4.10.1	Folding and sliding mechanisms	NA
4.10.2	Driving mechanisms	NA
4.10.3	Hinges	NA
4.10.4	Springs	NA
4.11	Mouth actuated toys and other toys intended to be put in the mouth	NA
4.12 & 7.3	Balloons	NA
4.13 & 7.9	Cord of toy kites and other flying toys	NA
4.14.1	Toys which a child can enter	NA
4.14.2 & 7.8	Masks and helmets	NA
4.15.1	Toys propelled by child	
4.15.1.2 & 7.10.1 & 7.10.2 & 7.10.3 & 7.10.4 & 7.16	Toys propelled by child – Instructions for use	NA
4.15.1.3	Toys propelled by child – Strength	NA
4.15.1.4	Toys propelled by child – Stability	NA
4.15.1.5	Toys propelled by child – Braking	NA
4.15.1.6	Toys propelled by child - Transmission	NA
4.15.1.7	Toys propelled by child – insertion mark	NA
4.15.1.8	Electrically-driven ride-on toys	NA
4.15.2	Toy bicycles	
4.15.2.2 & 7.15	Toy bicycles – Warnings and instructions for use	NA
4.15.2.3	Toy bicycles – Braking	NA
4.15.3 & 7.16 & 7.19	Rocking horses and similar toys	NA
4.15.4 & 7.16	Toys not propelled by child	NA
4.15.5 & 7.18	Toy scooters	NA

**RESULTS:** 



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 8 of 49

# **RESULTS:**

Subclause	Requirement	Result
4.16	Heavy immobile toys	NA
4.17.2	All projectiles	NA
4.17.3 & 7.7	Projectile toys with stored energy	NA
4.17.4 & 7.26	Certain projectiles toys without stored energy	NA
4.18 & 7.4	Aquatic toys and inflatable toys	NA
4.19 & 7.13 & 7.14	Percussion caps	NA
4.20.2.1- 4.20.2.4, 4.20.2.6-4.20.2.12 & 7.14	Acoustics	NA
*4.20.2.5	Acoustics- Toys using headphones or earphones	NA
4.21	Toys containing a non-electrical heat source	NA
4.22 & 7.2	Small balls	NA
4.23	Magnet	
4.23.2 a, b & c	Toy other than magnetic / electrical experimental sets intended for children over 8 years	NA
4.23.3 & 7.20	Magnetic / electrical experimental sets intended for children over 8 years	NA
4.24	Yo-yo ball	NA
4.25	Toys attached to food	NA
4.26	Toy Disguise Costumes	NA
4.27.1	Flying toys – General	NA
4.27.2 & 7.25.1	Rotors and propellers on flying toys	NA
4.27.3 & 7.25.2	Rotors and propellers on remote controlled flying toys	NA
	FOR TOYS INTENDED FOR CHILDREN UNDER 36 MONTHS	
5.1	General	NA
5.1a	Small parts – as received	NA
5.1b	Small parts, sharp points, sharp edges – after tests	NA
5.1c	Cross section <2mm metal points & wires	NA
5.1e	Toys contain glue	NA
5.1f	Casing of toys	NA
5.2	Fillings, coverings and seams	NA
5.3	Adhesion of plastic sheeting	NA
5.4.2	Cords and chains in toys intended for children under 18 months	NA



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 9 of 49

# **RESULTS:**

Subclause	Requirement	Result
5.4.3 & 7.22	Cords and chains in toys intended for children of 18 months or over but under 36 months	NA
5.4.4	Fixed loops, tangled loops and nooses	NA
5.4.5	Cords and chains on pull along toys	NA
5.4.6 & 7.21	Electrical cables	NA
5.4.7	Cross-sectional dimension of certain cords	NA
5.4.8	Self-retracting cords	NA
5.4.9 & 7.11 & 7.23	Toys attached to or intended to be strung across a cradle, cot or perambulator	NA
5.5 & 7.12	Liquid filled toys	NA
5.6	Electrically driven toys	NA
5.7	Glass and porcelain	NA
5.8	Shape and size	NA
5.9 & 7.17	Monofilament fibres	NA
5.10	Small balls	NA
5.11	Play figures	NA
5.12	Hemispheric shaped toys	NA
5.13	Suction cups	NA
5.14	Straps intended to be worn fully or partially around the neck	NA
5.15 & 7.24	Sledges with cords for pulling	NA
6	Packaging	М
	WARNINGS, INSTRUCTIONS FOR USE	
7.1	General	М
7.2	Toys not intended for children under 36 months	М
7.5	Functional toys	NA

### 2009/48/EC General Labeling Requirement

Requirement	Result
CE Mark	М
Manufacturer/ Importer name and address	М
Product Identification	М

M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section NT=Not Test



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 10 of 49

# **RESULTS:**

# **REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 1**

Sub-clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method
4.3	8.25.1	4.15.1.5	8.26.1	4.22	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.32	5.4.5	8.40
4.5	8.5, 8.7, 8.11, 8.12	4.15.1.8	8.29	4.23	8.2, 8.3, 8.4.2.1, 8.4.2.2, 8.5, 8.6, 8.7, 8.8, 8.34, 8.35	5.4.6	8.40
4.6	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.14	4.15.2.4	8.26.2	4.24	8.37	5.4.7	8.20
4.7	8.11	4.15.3	8.21, 8.23.1	4.25	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.32.1	5.7.8	8.39
4.8	8.12, 8.13	4.15.4	8.21, 8.23.1	4.26	8.38	5.5	8.15
4.9	8.4.2.3, 8.11, 8.12	4.15.5	8.11, 8.12, 8.21, 8.22, 8.26.3, 8.27	4.27.1	8.43	5.6	8.29
4.10.1	8.18.2, 8.18.3	4.16	8.23.2	4.27.2	8.4.2.6	5.8	8.16
4.10.2	8.5, 8.6, 8.7, 8.11, 8.12	4.17.1	8.3, 8.4.2.1, 8.7, 8.8, 8.42	4.27.3	8.4.2.6	5.10	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.9, 8.32
4.11	8.2, 8.3, 8.4.2.1, 8.9, 8.17	4.17.2	8.3, 8.4.2.4,8.7, 8.8, 8.32.1, 8.43, 8.44	5.1	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.9, 8.11, 8.12	5.11	8.33
4.13	8.19	4.17.3	8.3, 8.4.2.3, 8.4.2.5, 8.11, 8.12, 8.24, 8.42	5.3	8.4.2.1, 8.25	5.12	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.9,
4.14.1	8.31.1, 8.31.2	4.17.4	8.3, 8.4.2.3, 8.4.2.5, 8.11, 8.12, 8.24, 8.42	5.4.1	8.40	5.13	8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.32
4.14.2	8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.11, 8.12	4.18	8.2, 8.3, 8.4.2.1	5.4.2	8.38, 8.40, 8.41	5.14	8.38
4.15.1.3	8.11, 8.12, 8.21, 8.22	4.20	8.28	5.4.3	8.38, 8.40, 8.41	6	8.3, 8.4.2.1, 8.25.1, 8.32.1
4.15.1.4	8.23.1	4.21	8.30	5.4.4	8.36, 8.38		



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 11 of 49

## **RESULTS:**

# FLAMMABILITY (EN 71 PART 2: 2011+A1: 2014)

Subclause	Requirement	Result
4.1	Cellulose nitrate	NP
4.1	Surface flash on a piled surface	NA
*4.1	Flammable gases	NA
*4.1	Extremely flammable liquids, highly flammable liquids, flammable liquids and flammable gels	NA
4.2	Toys to be worn on the head	NA
4.3	Toy disguise costumes and toys intended to be worn by child in play	NA
4.3	warning on product and packaging (10 - 30 mm/s)	NA
4.4	Toys intended to be entered by a child	NA
4.4	warning on product and packaging (10 – 30 mm/s)	NA
4.5	Soft-filled toys	NA

# REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 2

Sub-clause	Test Method	Sub-clause	Test Method	Sub-clause	Test Method	Sub-clause	Test Method
4.2.2	5.2	4.2.4	5.3	4.3	5.4	4.5	5.5
4.2.3	5.3	4.2.5	5.4	4.4	5.4	-	-

\* Note: Subclause indicated with \* are not accredited.



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 12 of 49

## **RESULTS:**

# FLAMMABILITY (EN 71 PART 2: 2020)

Subclause	Requirement	Result
4.1	Cellulose nitrate	NP
4.1	Highly flammable solids	NP
4.1	Surface flash on a piled surface	NA
*4.1	Flammable gases	NA
*4.1	Extremely flammable liquids, highly flammable liquids, flammable liquids and flammable gels	NA
4.2	Toys to be worn on the head	NA
4.3	Toy disguise costumes and toys intended to be worn by child in play	NA
4.3	warning on product and packaging (10 - 30 mm/s)	NA
4.4	Toys intended to be entered by child	NA
4.4	warning on product and packaging (10 – 30 mm/s)	NA
4.5	Soft-filled toys	NA

# REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 2

Sub-clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method
4.2.2	5.2	4.2.4	5.3	4.3	5.4	4.5	5.5
4.2.3	5.3	4.2.5	5.4	4.4	5.4	-	-

\* Note: Subclause indicated with \* are not accredited.

Remark:

EN 71 PART 2: 2020 FLAMMABILITY is not accredited under CNAS testing standard.



THE PENCIL GRIP, INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 13 of 49

# **RESULTS:**

# APPROPRIATE AGE GRADE DETERMINATION

CEN ISO/TR 8	The Appropriate Age Grade is determined with reference to the BS EN71 : Part 1 : 2014+A1:2018, CEN ISO/TR 8124-8:2016 Safety of toys - Part 8: Age determination guidelines prepared by Technical Committee CEN/TC 52 and					
Age Grade De	Age Grade Determination Guidelines of the Consumer Product Safety Commission (CPSC).					
Note :	The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.					
Note :	If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.					

	EXPLANATION OF THE ABBREVIATIONS FOR PART 1, 2 & 6								
Symbol	Explanation								
NM	The sample(s) DOES I	NOT MEET	the requirement of this Su	ubclause					
М	The sample(s) MEET t	he requiren	nent of this Subclause						
N/A	Not Applicable								
NR	Not Requested								
NE	Not Evaluated								
NP	None Present	None Present							
NT	Not Tested	Not Tested							
Р	Present								
R	Refer to Comment Sec	ction of this	report						
Symbol	Language Present	Symbol	Language Present	Symbol	Language Present				
В	Belgian language	G	German language	PR	Portuguese language				
D	Danish language	Danish language GR Greek language S Spanish language							
E	English language H Dutch language SD Swedish language								
F	Finnish language	I	Italian language	SZ	Swiss language				
FR	French language	Ν	Norwegian language						



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 14 of 49

## MECHANICAL & PHYSICAL PROPERTIES (BS EN 71: PART 1 – 2014+A1 – 2018)

Subclause	Requirement	Result
4.1	Material cleanliness	М
4.2	Assembly	NA
4.3	Flexible plastic sheeting	NA
4.4	Toy Bags	NA
4.5	Glass	NA
4.6	Expanding materials	NA
4.7 & 7.6	Edges	М
4.8 & 7.6	Points and metallic wires	М
4.8e	Splinters	М
4.9	Protruding parts	NA
4.10.1	Folding and sliding mechanisms	NA
4.10.2	Driving mechanisms	NA
4.10.3	Hinges	NA
4.10.4	Springs	NA
4.11	Mouth actuated toys and other toys intended to be put in the mouth	NA
4.12 & 7.3	Balloons	NA
4.13 & 7.9	Cord of toy kites and other flying toys	NA
4.14.1	Toys which a child can enter	NA
4.14.2 & 7.8	Masks and helmets	NA
4.15.1	Toys propelled by child	
4.15.1.2 & 7.10.1 & 7.10.2 & 7.10.3 & 7.10.4 & 7.16	Toys propelled by child – Instructions for use	NA
4.15.1.3	Toys propelled by child – Strength	NA
4.15.1.4	Toys propelled by child – Stability	NA
4.15.1.5	Toys propelled by child – Braking	NA
4.15.1.6	Toys propelled by child - Transmission	NA
4.15.1.7	Toys propelled by child – insertion mark	NA
4.15.1.8	Electrically-driven ride-on toys	NA
4.15.2	Toy bicycles	
4.15.2.2 & 7.15	Toy bicycles – Warnings and instructions for use	NA
4.15.2.3	Toy bicycles – Braking	NA
4.15.3 & 7.16 & 7.19	Rocking horses and similar toys	NA
4.15.4 & 7.16	Toys not propelled by child	NA
4.15.5 & 7.18	Toy scooters	NA

**RESULTS:** 



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 15 of 49

# **RESULTS:**

Subclause	Requirement	Result
4.16	Heavy immobile toys	NA
4.17.2	All projectiles	NA
4.17.3 & 7.7	Projectile toys with stored energy	NA
4.17.4 & 7.26	Certain projectiles toys without stored energy	NA
4.18 & 7.4	Aquatic toys and inflatable toys	NA
4.19 & 7.13 & 7.14	Percussion caps	NA
4.20.2.1- 4.20.2.4, 4.20.2.6-4.20.2.12 & 7.14	Acoustics	NA
*4.20.2.5	Acoustics- Toys using headphones or earphones	NA
4.21	Toys containing a non-electrical heat source	NA
4.22 & 7.2	Small balls	NA
4.23	Magnet	
4.23.2 a, b & c	Toy other than magnetic / electrical experimental sets intended for children over 8 years	NA
4.23.3 & 7.20	Magnetic / electrical experimental sets intended for children over 8 years	
4.24	Yo-yo ball	NA
4.25	Toys attached to food	NA
4.26	Toy Disguise Costumes	NA
4.27.1	Flying toys – General	NA
4.27.2 & 7.25.1	Rotors and propellers on flying toys	NA
4.27.3 & 7.25.2	Rotors and propellers on remote controlled flying toys	NA
	FOR TOYS INTENDED FOR CHILDREN UNDER 36 MONTHS	
5.1	General	NA
5.1a	Small parts – as received	NA
5.1b	Small parts, sharp points, sharp edges – after tests	NA
5.1c	Cross section <2mm metal points & wires	NA
5.1e	Toys contain glue	NA
5.1f	Casing of toys	NA
5.2	Fillings, coverings and seams	NA
5.3	Adhesion of plastic sheeting	NA
5.4.2	Cords and chains in toys intended for children under 18 months	NA



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 16 of 49

# **RESULTS:**

Subclause	Requirement	Result
5.4.3 & 7.22	Cords and chains in toys intended for children of 18 months or over but under 36 months	NA
5.4.4	Fixed loops, tangled loops and nooses	NA
5.4.5	Cords and chains on pull along toys	NA
5.4.6 & 7.21	Electrical cables	NA
5.4.7	Cross-sectional dimension of certain cords	NA
5.4.8	Self-retracting cords	NA
5.4.9 & 7.11 & 7.23	Toys attached to or intended to be strung across a cradle, cot or perambulator	NA
5.5 & 7.12	Liquid filled toys	NA
5.6	Electrically driven toys	NA
5.7	Glass and porcelain	NA
5.8	Shape and size	NA
5.9 & 7.17	Monofilament fibres	NA
5.10	Small balls	NA
5.11	Play figures	NA
5.12	Hemispheric shaped toys	NA
5.13	Suction cups	NA
5.14	Straps intended to be worn fully or partially around the neck	NA
5.15 & 7.24	Sledges with cords for pulling	NA
6	Packaging	М
	WARNINGS, INSTRUCTIONS FOR USE	
7.1	General	М
7.2	Toys not intended for children under 36 months	М
7.5	Functional toys	NA

## 2009/48/EC General Labeling Requirement

Requirement	Result
CE Mark	М
Manufacturer/ Importer name and address	М
Product Identification	М

M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section NT=Not Test



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 17 of 49

# **RESULTS:**

# **REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 1**

Sub-clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method
4.3	8.25.1	4.15.1.5	8.26.1	4.22	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.32	5.4.5	8.40
4.5	8.5, 8.7, 8.11, 8.12	4.15.1.8	8.29	4.23	8.2, 8.3, 8.4.2.1, 8.4.2.2, 8.5, 8.6, 8.7, 8.8, 8.34, 8.35	5.4.6	8.40
4.6	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.14	4.15.2.4	8.26.2	4.24	8.37	5.4.7	8.20
4.7	8.11	4.15.3	8.21, 8.23.1	4.25	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.32.1	5.7.8	8.39
4.8	8.12, 8.13	4.15.4	8.21, 8.23.1	4.26	8.38	5.5	8.15
4.9	8.4.2.3, 8.11, 8.12	4.15.5	8.11, 8.12, 8.21, 8.22, 8.26.3, 8.27	4.27.1	8.43	5.6	8.29
4.10.1	8.18.2, 8.18.3	4.16	8.23.2	4.27.2	8.4.2.6	5.8	8.16
4.10.2	8.5, 8.6, 8.7, 8.11, 8.12	4.17.1	8.3, 8.4.2.1, 8.7, 8.8, 8.42	4.27.3	8.4.2.6	5.10	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.9, 8.32
4.11	8.2, 8.3, 8.4.2.1, 8.9, 8.17	4.17.2	8.3, 8.4.2.4,8.7, 8.8, 8.32.1, 8.43, 8.44	5.1	8.2, 8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.9, 8.11, 8.12	5.11	8.33
4.13	8.19	4.17.3	8.3, 8.4.2.3, 8.4.2.5, 8.11, 8.12, 8.24, 8.42	5.3	8.4.2.1, 8.25	5.12	8.3, 8.4.2.1, 8.5, 8.6, 8.7, 8.8, 8.9,
4.14.1	8.31.1, 8.31.2	4.17.4	8.3, 8.4.2.3, 8.4.2.5, 8.11, 8.12, 8.24, 8.42	5.4.1	8.40	5.13	8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.32
4.14.2	8.3, 8.4.2.1, 8.5, 8.7, 8.8, 8.11, 8.12	4.18	8.2, 8.3, 8.4.2.1	5.4.2	8.38, 8.40, 8.41	5.14	8.38
4.15.1.3	8.11, 8.12, 8.21, 8.22	4.20	8.28	5.4.3	8.38, 8.40, 8.41	6	8.3, 8.4.2.1, 8.25.1, 8.32.1
4.15.1.4	8.23.1	4.21	8.30	5.4.4	8.36, 8.38		



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 18 of 49

## **RESULTS:**

# FLAMMABILITY (BS EN 71 PART 2: 2011+A1: 2014)

Subclause	Requirement	Result
4.1	Cellulose nitrate	NP
4.1	Surface flash on a piled surface	NA
*4.1	Flammable gases	NA
*4.1	Extremely flammable liquids, highly flammable liquids, flammable liquids and flammable gels	NA
4.2	Toys to be worn on the head	NA
4.3	Toy disguise costumes and toys intended to be worn by child in play	NA
4.3	warning on product and packaging (10 - 30 mm/s)	NA
4.4	Toys intended to be entered by a child	NA
4.4	warning on product and packaging (10 – 30 mm/s)	NA
4.5	Soft-filled toys	NA

# REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 2

Sub-clause	Test Method	Sub-clause	Test Method	Sub-clause	Test Method	Sub-clause	Test Method
4.2.2	5.2	4.2.4	5.3	4.3	5.4	4.5	5.5
4.2.3	5.3	4.2.5	5.4	4.4	5.4	-	-

\* Note: Subclause indicated with \* are not accredited.



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 19 of 49

## **RESULTS:**

# FLAMMABILITY (BS EN 71 PART 2: 2020)

Subclause	Requirement	Result
4.1	Cellulose nitrate	NP
4.1	Highly flammable solids	NP
4.1	Surface flash on a piled surface	NA
*4.1	Flammable gases	NA
*4.1	Extremely flammable liquids, highly flammable liquids, flammable liquids and flammable gels	NA
4.2	Toys to be worn on the head	NA
4.3	Toy disguise costumes and toys intended to be worn by child in play	NA
4.3	warning on product and packaging (10 - 30 mm/s)	NA
4.4	Toys intended to be entered by child	NA
4.4	warning on product and packaging (10 – 30 mm/s)	NA
4.5	Soft-filled toys	NA

# REQUIREMENTS & TEST METHODS CROSS REFERENCE TABLE FOR PART 2

Sub-clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method	Sub- clause	Test Method
4.2.2	5.2	4.2.4	5.3	4.3	5.4	4.5	5.5
4.2.3	5.3	4.2.5	5.4	4.4	5.4	-	-

\* Note: Subclause indicated with \* are not accredited.

Remark:

BS EN 71 PART 2: 2020 FLAMMABILITY is not accredited under CNAS testing standard.



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 20 of 49

# **RESULTS:**

EN71-3:2019 Migration of Certain Elements - European Parliament and Council Directive 2009/48/EC, Annex II, Part III, Point 13 with its Latest Amendment (EU) 2019/1922.

Test Method: European Standard EN 71 Part 3: 2019, Section 9.

Class:

Category III - Scraped off toy material

	Requirement	Result (mg/kg)					
Analyte	(mg/kg)	Test Item(s)					
	Category III	1001	1002	1003	1004	1005	
Aluminium (Al)	28130	2	LT 2	LT 2	LT 2	LT 2	
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2	
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2	
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2	
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2	
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2	
Chromium III (Cr III)	460	LT 0.053	LT 0.053	LT 0.053	LT 0.053	LT 0.053	
Chromium VI (Cr VI)	0.053	LT 0.053				LT 0.053	
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	LT 2	
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2	
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2	
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2	
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2	
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2	
Selenium (Se)	460	LT 2	LT 2	LT 2	LT 2	LT 2	
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2	
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2	
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2	
Zinc (Zn)	46000	46000 LT 2		LT 2	LT 2	LT 2	
Mass of trace amo	ount (gram)	-	-	-	-	-	
Conclusi	on	PASS	PASS	PASS	PASS	PASS	



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 21 of 49

# **RESULTS:**

	Requirement	Result (mg/kg)				
Analyte	(mg/kg)		Test Item(s)			
	Category III	1006	1007	1008	1009	1010
Aluminium (Al)	28130	LT 2	LT 2	LT 2	LT 2	LT 2
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2
Chromium III (Cr III)	460	LT 0.053	LT 0.053	LT 0.053	LT 0.053	LT 0.053
Chromium VI (Cr VI)	0.053	LT 0.053				
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	LT 2
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2
Selenium (Se)	460	2	LT 2	LT 2	LT 2	LT 2
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2
Zinc (Zn)	46000		LT 2	LT 2	LT 2	LT 2
Mass of trace am	ount (gram)	-	-	-	-	-
Conclusi	ion	PASS	PASS	PASS	PASS	PASS



#### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 22 of 49

# **RESULTS:**

	Requirement	Result (mg/kg)						
Analyte	(mg/kg)	Test Item(s)						
	Category III	l011	1012	1013	l014	1015		
Aluminium (Al)	28130	LT 2	LT 2	LT 2	LT 2	2		
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2		
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2		
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2		
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2		
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2		
Chromium III (Cr III)	460			LT 0.053	LT 0.053			
Chromium VI (Cr VI)	0.053	LT 0.053	LT 0.053			LT 0.053		
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	13		
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2		
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2		
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2		
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2		
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2		
Selenium (Se)	460	LT 2	LT 2	LT 2	LT 2	LT 2		
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2		
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2		
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2		
Zinc (Zn)	46000	LT 2	LT 2	LT 2	LT 2	LT 2		
Mass of trace ame	ount (gram)	-	-	-	-	-		
Conclusi	on	PASS	PASS	PASS	PASS	PASS		

mg/kg = milligrams per kilogram (ppm=parts per million)

LT = Less Than

Organic tin = migration of total organic tin is expressed as tributyl tin cation content in mg/kg

# = Verified results (see note)

Remark:

- Results of Cr III and Cr VI were reported as sum of soluble Chromium content unless specified.

- Result(s) of organic tin was (were) calculated while assuming the tin content wholly contributed from tributyltin cation unless specified.

Note:

If soluble chromium content or soluble tin content exceeded the screening limits of soluble chromium (VI) or organic tin content, the results were verified by below method

- Chromium VI: EN71 part 3:2019, Annex F.
- Organic tin: EN71 part 3:2019, Annex G.



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 23 of 49

# **RESULTS:**

BS EN71-3:2019 Migration of Certain Elements - European Parliament and Council Directive 2009/48/EC, Annex II, Part III, Point 13 with its Latest Amendment (EU) 2019/1922.

Test Method: BS European Standard EN 71 Part 3: 2019, Section 9.

Class:

Category III - Scraped off toy material

	Requirement	Result (mg/kg)							
Analyte	(mg/kg)		Test Item(s)						
	Category III	1001	1002	1003	1004	1005			
Aluminium (Al)	28130	2	LT 2	LT 2	LT 2	LT 2			
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2			
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2			
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2			
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2			
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2			
Chromium III (Cr III)	460	LT 0.053	LT 0.053	LT 0.053	LT 0.053	LT 0.053			
Chromium VI (Cr VI)	0.053	LT 0.053				LT 0.055			
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	LT 2			
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2			
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2			
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2			
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2			
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2			
Selenium (Se)	460	LT 2	LT 2	LT 2	LT 2	LT 2			
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2			
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2			
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2			
Zinc (Zn)	46000	LT 2	LT 2	LT 2	LT 2	LT 2			
Mass of trace amo	ount (gram)	-	-	-	-	-			
Conclusi	on	PASS	PASS	PASS	PASS	PASS			



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 24 of 49

# **RESULTS:**

	Requirement	Result (mg/kg)				
Analyte	(mg/kg)			Test Item(s)		
	Category III	1006	1007	1008	1009	1010
Aluminium (Al)	28130	LT 2	LT 2	LT 2	LT 2	LT 2
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2
Chromium III (Cr III)	460	LT 0.053	LT 0.053	LT 0.053	LT 0.053	LT 0.053
Chromium VI (Cr VI)	0.053	LT 0.053				LT 0.053
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	LT 2
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2
Selenium (Se)	460	2	LT 2	LT 2	LT 2	LT 2
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2
Zinc (Zn)	nc (Zn) 46000		LT 2	LT 2	LT 2	LT 2
Mass of trace am	ount (gram)	-	-	-	-	-
Conclusi	ion	PASS	PASS	PASS	PASS	PASS



#### THE PENCIL GRIP, INC. Technical Report: (8821)106-0041(R1) May 12, 2021 Page 25 of 49

# **RESULTS:**

	Requirement	Result (mg/kg)						
Analyte	(mg/kg)	Test Item(s)						
	Category III	l011	1012	1013	l014	1015		
Aluminium (Al)	28130	LT 2	LT 2	LT 2	LT 2	2		
Arsenic (As)	47	LT 2	LT 2	LT 2	LT 2	LT 2		
Boron (B)	15000	LT 2	LT 2	LT 2	LT 2	LT 2		
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2		
Cadmium (Cd)	17	LT 2	LT 2	LT 2	LT 2	LT 2		
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2		
Chromium III (Cr III)	460			LT 0.053	LT 0.053			
Chromium VI (Cr VI)	0.053	LT 0.053	LT 0.053			LT 0.053		
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	13		
Mercury (Hg)	94	LT 2	LT 2	LT 2	LT 2	LT 2		
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2		
Nickel (Ni)	930	LT 2	LT 2	LT 2	LT 2	LT 2		
Lead (Pb)	23	LT 2	LT 2	LT 2	LT 2	LT 2		
Antimony (Sb)	560	LT 2	LT 2	LT 2	LT 2	LT 2		
Selenium (Se)	460	LT 2	LT 2	LT 2	LT 2	LT 2		
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2		
Organic tin	12	LT 2	LT 2	LT 2	LT 2	LT 2		
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2		
Zinc (Zn)	46000	LT 2	LT 2	LT 2	LT 2	LT 2		
Mass of trace ame	ount (gram)	-	-	-	-	-		
Conclusi	on	PASS	PASS	PASS	PASS	PASS		

mg/kg = milligrams per kilogram (ppm=parts per million)

LT = Less Than

Organic tin = migration of total organic tin is expressed as tributyl tin cation content in mg/kg

# = Verified results (see note)

Remark:

- Results of Cr III and Cr VI were reported as sum of soluble Chromium content unless specified.

- Result(s) of organic tin was (were) calculated while assuming the tin content wholly contributed from tributyltin cation unless specified.

Note:

If soluble chromium content or soluble tin content exceeded the screening limits of soluble chromium (VI) or organic tin content, the results were verified by below method

- Chromium VI: BS EN71 part 3:2019, Annex F. \_
- Organic tin: BS EN71 part 3:2019, Annex G.



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 26 of 49

# **RESULTS:**

Total Cadmium Content – European Parliament and Council Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII, Item no. 23

Test Method	: BS EN 1122: 2001, Method B or Acid digestion followed by Atomic Absorption
	Spectrophotometry or Inductively Coupled Plasma Spectrometry.

	Type I	Paints on Painted Article: 1000 mg/kg
Maximum	Type II	Plastics: 100 mg/kg
Allowable Limit :	Type III	Metals in Jewellery: 100 mg/kg
	Type IV	Wet Paints: 100 mg/kg

	Turne	Result	l la it	Canalysian	
Test Item(s)	Туре	Total Cadmium (Cd)	Unit	Conclusion	
1001	II	ND	mg/kg	PASS	
1002	II	ND	mg/kg	PASS	
1003	II	ND	mg/kg	PASS	
1004	II	ND	mg/kg	PASS	
1005	II	ND	mg/kg	PASS	
1006	II	ND	mg/kg	PASS	
1007	П	ND	mg/kg	PASS	
1008	Ш	ND	mg/kg	PASS	
1009	II	ND	mg/kg	PASS	
1010	II	ND	mg/kg	PASS	
1011	П	ND	mg/kg	PASS	
1012	Ш	ND	mg/kg	PASS	
1013	II	ND	mg/kg	PASS	
l014	II	ND	mg/kg	PASS	
l015	II	ND	mg/kg	PASS	

Note / key:

ND = Not detected

mg/kg = milligram(s) per kilogram

Detection Limit: 10 mg/kg



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 27 of 49

# **RESULTS:**

BBP/DBP/DEHP/DIBP Contents in Toys and Childcare Articles – European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 51

Test Method : With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Test Parameter:	BBP	DBP	DEHP	DIBP	SUM	-
Limit (%):		0.1 (Su	im of Four phth	alates)		-
Test Item(s)			Result (%)			Conclusion
1001	ND	ND	ND	ND	ND	PASS
1002	ND	ND	ND	ND	ND	PASS
1003	ND	ND	ND	ND	ND	PASS
1004	ND	ND	ND	ND	ND	PASS
1005	ND	ND	ND	ND	ND	PASS
1006	ND	ND	ND	ND	ND	PASS
1007	ND	ND	ND	ND	ND	PASS
1008	ND	ND	ND	ND	ND	PASS
1009	ND	ND	ND	ND	ND	PASS
1010	ND	ND	ND	ND	ND	PASS
1011	ND	ND	ND	ND	ND	PASS
1012	ND	ND	ND	ND	ND	PASS
1013	ND	ND	ND	ND	ND	PASS
1014	ND	ND	ND	ND	ND	PASS
1015	ND	ND	ND	ND	ND	PASS

Note / key:

BBP = Butyl benzyl phthalate DEHP = Di(2-ethylhexyl) phthalate ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (%) : Each 0.005 DBP = Dibutyl phthalate DIBP= Diisobutyl phthalate % = percent

10000 mg/kg = 1 %



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 28 of 49

# **RESULTS:**

DNOP/DINP/DIDP Contents in Toys and Childcare Articles which can be placed in the Mouth by the Children – European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 52

Test Method

: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Test Parameter:	DIDP	DINP	DNOP	SUM	-
Limit (%):		0.1 (Sum of the	ree phthalates)		-
Test Item(s)		Resu	lt (%)		Conclusion
1001	ND	ND	ND	ND	PASS
1002	ND	ND	ND	ND	PASS
1003	ND	ND	ND	ND	PASS
1004	ND	ND	ND	ND	PASS
1005	ND	ND	ND	ND	PASS
1006	ND	ND	ND	ND	PASS
1007	ND	ND	ND	ND	PASS
1008	ND	ND	ND	ND	PASS
1009	ND	ND	ND	ND	PASS
1010	ND	ND	ND	ND	PASS
1011	ND	ND	ND	ND	PASS
1012	ND	ND	ND	ND	PASS
1013	ND	ND	ND	ND	PASS
1014	ND	ND	ND	ND	PASS
1015	ND	ND	ND	ND	PASS

Note / key:

DNOP = Di-n-octyl phthalate ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (%) : Each 0.005

DINP = Di-iso-nonyl phthalate % = percent

DIDP = Di-iso-decyl phthalate10000 mg/kg = 1 %



#### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 29 of 49

# **RESULTS:**

# APPROPRIATE AGE GRADE DETERMINATION

The Appropriate Age Grade is determined with reference to the Age Determination Guidelines of the Consumer Product Safety Commission (CPSC); and the ASTM F963-17, "Standard Consumer Safety Specification on Toy Safety". Annex A1

Note : The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.

Note : If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.

### **USE AND ABUSE TESTS**

The samples were undergo the tests in accordance with section 8.6 through 8.16, whichever is applicable						
Test	Test Parameters	Standard Reference				
Impact Test	4 x 3 ft	1500.53(b)				
Torque Test	4 in-lbs	1500.53(e)				
Tension Test	15 lbs	1500.53(f)				
Compression Test	30 lbs	1500.53(g)				



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 30 of 49

# **RESULTS:**

PHYSICAL AND MECHANICAL HAZARDS (ASTM F963-17)							
Section	Requirement	Result M					
4.1	Material Quality						
4.3.7	Stuffing Materials	N/A					
4.5	Sound-Producing Toys	N/A					
4.6	Small Objects	N/A					
4.7	Accessible Edges	М					
4.8	Projections	N/A					
4.9	Accessible Points	М					
4.10	Wires and Rods	N/A					
4.11	Nails and Fasteners	N/A					
4.12	Plastic Film	М					
4.13	Folding Mechanisms and Hinges	N/A					
4.14	Cords, Straps and Elastics	N/A					
4.15	Stability and Over-Load Requirements	N/A					
4.16	Confined Spaces	N/A					
4.17	Wheels, Tires, and Axles	N/A					
4.18	Holes, Clearances and Accessibility of Mechanisms	N/A					
4.19	Simulated Protective Devices	N/A					
4.20	Pacifiers	N/A					
4.21	Projectile Toys	N/A					
4.22	Teethers and Teething Toys	N/A					
4.23	Rattles	N/A					
4.24	Squeeze Toys	N/A					
4.25	Battery-Operated Toys (exclude Section 4.25.10 Battery-powered ride-on toys & Section 4.25.11 Toys that Contain Secondary Cells or Secondary Batteries)	N/A					
4.26	Toys Intended to be Attached to a Crib or Playpen	N/A					
4.27	Stuffed and Beanbag-Type Toys	N/A					
4.30	Toy Gun Marking	N/A					
4.32	Certain Toys with Nearly Spherical Ends	N/A					
4.34	Small Balls	N/A					
4.35	Pompoms	N/A					
4.36	Hemispheric-Shaped Objects	N/A					
4.37	Yo Yo Elastic Tether Toys	N/A					
4.38	Magnets	N/A					
4.39	Jaw Entrapment in Handles and Steering Wheels	N/A					
4.40	Expanding Materials	N/A					

M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 31 of 49

## **RESULTS:**

# LABELING AND INSTRUCTIONAL REQUIREMENT (ASTM F963-17)

Section	Requirement	Result		
5.4 & 5.3	Aquatic Toys	N/A		
5.5 & 5.3	Crib and Playpen Toys	N/A		
5.6 & 5.3	Mobiles	N/A		
5.7 & 5.3	Stroller and Carriage Toys	N/A		
5.8 & 5.3	Toys Intended to be Assembled by an Adult	N/A		
5.9 & 5.3	Simulated Protective Devices	N/A		
5.10 & 5.3	Toys with Functional Sharp Edges or Sharp Points	N/A		
5.11	Small Objects, Small Balls, Marbles and Balloons (16 CFR 1500.19)	М		
5.12	Toy Caps (16CFR1500.86)	N/A		
5.13	Art Materials (16 CFR 1500.14(b)(8))	N/A		
5.15	Battery-Operated Toys (exclude 5.15.1 and 5.15.2)	N/A		
5.15.1 & 5.3	Battery-Powered Ride-On Toys	N/A		
5.15.2 & 5.3	Button or Coin Cell Batteries	N/A		
5.16	Promotional Materials	М		
5.17 & 5.3	Magnets	N/A		
6.1	Definition and Description	М		
6.2	Crib and Playpen Toys	N/A		
6.3	Mobiles	N/A		
6.4 & 5.3	Toys Intended to be Assembled by an Adult	N/A		
6.5	Battery-Operated Toys	N/A		
6.6	Battery-Powered Ride-On Toys	N/A		
6.7	Toys in Contact with Food	N/A		
7.1	Producer's Name and Address	М		
7.2	Battery-Powered Ride-on Toys	N/A		

M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section

# FLAMMABILITY (16 CFR SECTION 1500.3(c)6)(vi))

Requirement	Test Method Reference	Findings		
Burn rate no greater than 0.1 of an inch per second	16 CFR 1500.44	Most rapid burn rate less than 0.1 of an inch per second.		



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 32 of 49

# **RESULTS:**

## Total Lead Content in Substrate – ASTM International Standard ASTM F963-17, Section 4.3.5.2(2)(a)

Test Method : ASTM International Standard ASTM F963-17, Section 8.3.1 and Annex A7.

Maximum Allowable Limit :	100 mg/kg			
Test Item(s)	Result	Unit	Conclusion	
Test Item(s)	Total Lead (Pb)	Unit	Conclusion	
1001	ND	mg/kg	PASS	
1002	ND	mg/kg	PASS	
1003	ND	mg/kg	PASS	
1004	ND	mg/kg	PASS	
1005	ND	mg/kg	PASS	
1006	ND	mg/kg	PASS	
1007	ND	mg/kg	PASS	
1008	ND	mg/kg	PASS	
1009	ND	mg/kg	PASS	
1010	ND	mg/kg	PASS	
I011	ND	mg/kg	PASS	
1012	ND	mg/kg	PASS	
1013	ND	mg/kg	PASS	
1014	ND	mg/kg	PASS	
1015	ND	mg/kg	PASS	

Note / key:

ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (mg/kg) : 10



# THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 33 of 49

# **RESULTS:**

# Soluble Heavy Metals Content in Substrate -ASTM F963-17, Section 4.3.5.2(2)(b)

Test Method	: AS	TM Intern	ational S	tandard A	STM F96	63-17, Se	ection 8	.3.5 (Exc	luding 8.3	.5.5(3	3))	
Analyte			As	Ва	Ba Cd		Cr		lg Pb		Sb	Se
Max. Limit Type I (mg/kg)			25	1000	75	6	0	60	90	6	60	500
Max. Limit Type II (mg/kg)			25	250	50	2	25		90	60		500
Analytical Cor	rection (%	5)	60	30	30	3	30 50		30	6	60	60
Analyte	As	Ва	Cd	Cr	Hg	Pb	Sb	Se	Mass Trac Amou	ce	Conclusion	
Type I: Substr	ate other	than moc	leling clay									
Test Item(s)				Result (	(mg/kg)		1		(g)	)		
1001	ND	ND	ND	ND	ND	ND	ND	ND	-		PASS	
1002	ND	ND	ND	ND	ND	ND	ND	ND	-		PASS	
1003	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1004	ND	ND	ND	ND	ND	ND	ND	ND	-	- [		PASS
1005	ND	ND	ND	ND	ND	ND	ND	ND	-	- F		PASS
1006	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1007	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1008	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1009	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1010	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1011	ND	ND	ND	ND	ND	ND	ND	ND	-		PASS	
1012	ND	ND	ND	ND	ND	ND	ND	ND	-		PASS	
1013	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS
1014	ND	ND	ND	ND	ND	ND	ND	ND	-		PASS	
1015	ND	ND	ND	ND	ND	ND	ND	ND	-		F	PASS



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 34 of 49

## **RESULTS:**

Note / key:

As = ArsenicBa = BariumCd = CadmiumCr = ChromiumHg = MercuryPb = LeadSb = AntimonySe = SeleniumND = Not detectedg = gram(s)% = percentmg/kg = milligram(s) per kilogram (ppm=parts per million)Detection Limit (mg/kg) :For Type I – As : 2.5; Ba : 100; Cd : 7.5; Each (Cr, Hg, & Sb) : 6.0; Pb : 9.0; Se : 50For Type II – Each (As, Cr & Hg) : 2.5; Ba : 25; Cd : 5.0; Sb : 6.0; Pb : 9.0; Se : 50

Remark:

 Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-17. The lead content analysis result of corresponding material herein is for client's reference only.



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 35 of 49

# **RESULTS:**

# Total Lead Content in Substrate Materials – Consumer Product Safety Improvement Act (CPSIA) of 2008 Sec. 101(a)(2)

Test Method : U.S. CPSC-CH-E1002-08.3:2012 and U.S. CPSC-CH-E1001-08.3:2012

Maximum Allowable Limit :	100 mg/kg		
Toot Itom(a)	Result	Unit	Conclusion
Test Item(s)	Total Lead (Pb)	Unit	Conclusion
1001	ND	mg/kg	PASS
1002	ND	mg/kg	PASS
1003	ND	mg/kg	PASS
1004	ND	mg/kg	PASS
1005	ND	mg/kg	PASS
1006	ND	mg/kg	PASS
1007	ND	mg/kg	PASS
1008	ND	mg/kg	PASS
1009	ND	mg/kg	PASS
1010	ND	mg/kg	PASS
1011	ND	mg/kg	PASS
1012	ND	mg/kg	PASS
1013	ND	mg/kg	PASS
1014	ND	mg/kg	PASS
1015	ND	mg/kg	PASS

Note / key:

ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (mg/kg) : 10



## THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 36 of 49

# **RESULTS:**

# PHTHALATES CONTENT IN CHILDREN'S TOYS AND CHILD CARE ARTICLES (Consumer Product Safety Improvement Act (CPSIA) of 2008, Section 108(a) and 108(c), 16 CFR 1307)

Test Method : With reference to U. S. CPSC-CH-C1001-09.4 (January 17, 2018)

Test Parameter:	BBP	DBP	DEHP	DINP	DIBP	DPENP	DHEXP	DCHP	-
Limit (%):	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	-
Test Item(s)	Result (%)							Conclusion	
1001	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1002	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1003	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1004	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1005	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1006	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1007	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1008	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1009	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1010	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1011	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1012	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1013	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1014	ND	ND	ND	ND	ND	ND	ND	ND	PASS
1015	ND	ND	ND	ND	ND	ND	ND	ND	PASS

Note / key:

DEHP = Di(2-ethylhexyl) phthalate DHEXP(DnHP) = Di-n-hexyl phthalate DPENP(DnPP) = Di-n-pentyl phthalate ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (%) : Each 0.005 DBP = Dibutyl phthalate DIBP = Di-iso-butyl phthalate DCHP = Dicyclohexyl phthalate % = percent

BBP = Butyl benzyl phthalate DINP = Di-iso-nonyl phthalate

10000 mg/kg = 1 %



### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 37 of 49

## **RESULTS:**

Total Lead Content in Children Products (California Proposition 65 settlements of Alameda Superior court RG 07356892)

Test Method :	est Method : EPA 3050B (Mod) / EPA 3051A (Mod)									
Maximum	Type I Paint and surface coatings: 90 mg/kg									
Allowable Limit:	Type II	Substrate materials: 100 mg/kg	ubstrate materials: 100 mg/kg							
	_	Result								
Test Item(s)	Туре	Total Lead (Pb)	Unit	Conclusion						
1001	II	ND	mg/kg	PASS						
1002	II	ND	mg/kg	PASS						
1003	II	ND	mg/kg	PASS						
1004	П	ND	mg/kg	PASS						
1005	II	ND	mg/kg	PASS						
1006	П	ND	mg/kg	PASS						
1007	I	ND	mg/kg	PASS						
1008	I	ND	mg/kg	PASS						
1009	I	ND	mg/kg	PASS						
1010	П	ND	mg/kg	PASS						
1011	II	ND	mg/kg	PASS						
1012	II	ND	mg/kg	PASS						
1013	II	ND	mg/kg	PASS						
1014	II	ND	mg/kg	PASS						
1015	II	ND	mg/kg	PASS						

Note / key:

ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (mg/kg) : 10

Remark:

California Proposition 65 Total Lead content is not accredited under CNAS testing standard.



### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 38 of 49

## **RESULTS:**

BBP/DBP/DEHP/DnHP/DIDP Phthalates Content Requirements in Toys, Child Care Articles and Watches – California Proposition 65 settlements of County of Sacramento case number 07AS04683, and the Alameda Superior Court case numbers BG07350969, RG08367601, RG07351032 and RG08378050

Test Method : With reference to U. S. CPSC-CH-C1001-09.4 (January 17, 2018)							
Test Parameter:	BBP	DBP	DEHP	DnHP	DIDP	-	
Limit (%):	0.1	0.1	0.1	0.1	0.1	-	
Test Item(s)			Result (%)			Conclusion	
1001	ND	ND	ND	ND	ND	PASS	
1002	ND	ND	ND	ND	ND	PASS	
1003	ND	ND	ND	ND	ND	PASS	
1004	ND	ND	ND	ND	ND	PASS	
1005	ND	ND	ND	ND	ND	PASS	
1006	ND	ND	ND	ND	ND	PASS	
1007	ND	ND	ND	ND	ND	PASS	
1008	ND	ND	ND	ND	ND	PASS	
1009	ND	ND	ND	ND	ND	PASS	
1010	ND	ND	ND	ND	ND	PASS	
1011	ND	ND	ND	ND	ND	PASS	
1012	ND	ND	ND	ND	ND	PASS	
1013	ND	ND	ND	ND	ND	PASS	
1014	ND	ND	ND	ND	ND	PASS	
1015	ND	ND	ND	ND	ND	PASS	

Note / key:

BBP = Butyl benzyl phthalate DnHP = Di-n-hexyl phthalate ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (%) : Each 0.005 DBP = Dibutyl phthalate DIDP = Di-iso-decyl phthalate % = percent DEHP = Di(2-ethylhexyl) phthalate

10000 mg/kg = 1 %



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 39 of 49

## **RESULTS:**

## APPROPRIATE AGE GRADE DETERMINATION

The Appropriate Age Grade is recommended with reference to the Toys: Age Classification Guidelines (1998-01-13) of the Product Safety Bureau, Health Canada.

Note : The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.

Note : If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.

### CANADA CONSUMER PRODUCT SAFETY ACT

#### Test Method : CANADA CONSUMER PRODUCT SAFETY ACT

REASONABLY FORESEEABLE USE TESTS						
Test Test Parameters						
Drop	4 x 3 ft					
Push/Pull	10 lbs					



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 40 of 49

## **RESULTS:**

## CANADA CONSUMER PRODUCT SAFETY ACT, TOYS REGULATIONS, SOR/2011-17

Section	Parameter / Requirement	Result
Mechanica	l Hazards	
4	Flexible film bag used for package	М
7	Small Toys and Detachable component	NA
8	Metal edge	NA
9	Wires frames	NA
10	Plastic Edges	М
11	Wood	NA
12	Glass	NA
13	Nails and fasteners	NA
14	Safety stops/Locking Device for Folding product	NA
15 (a, b)	Moving Mechanism	NA
15 (c)	Non- Detachable Winding Key Clearance	NA
15 (d)	Detachable Key	NA
16	Projectile Toy	NA
17	Enclosures	NA
18	Stability	NA
19	Auditory hazards	NA
Specific Pr	oducts - Dolls, Plush Toys and Soft Toys	
28	Exposed Sharp Points and Edges	NA
29. (a)	Stuffing Materials shall be clean and free from vermin	NA
29. (b)	Stuffing Materials shall be free from hard and sharp foreign matter	NA
30	Squeaker, Reed and Valve	NA
31	Eyes and Nose	NA
Specific Pr	oducts	
35*&36*	Plant seeds	NA
37	Pull and Push toys	NA
38*	Toys Steam engine Boilers	NA
39*	Finger Paints	NA
40(a)	Rattles – Sharp wire	NA
40(b, c)	Rattles – Impaction	NA
41	Elastic	NA
42	Yo-Yo type balls	NA
43	Magnetic force	NA
44	Educational experimental kit - Labeling	NA



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 41 of 49

## **RESULTS:**

### CANADA CONSUMER PRODUCT SAFETY ACT, SCHEDULE 2

Section	Parameter / Requirement	Result				
Mechanical Hazards						
1*	Jequirity Beans	М				
8*	Kites	NA				
9	Kite strings	NA				
14*	Lawn, darts with elongated tips	NA				

M = Meet

\* = Non-accreditated section

NM = Not Meet

NA = Not Applicable NT = Not Tested R = Refer to Comment Section

# FLAMMABILITY OF CELLULOSE NITRATE TOY REGULATIONS, SOR/2011-17 SECTION 21

Requirement Reference	Observation	Flammability Classification		
Section 21	No Flash Effect	М		

M = Meet NM-See comment = Not Meet - Refer to Comment Section NA = Not Applicable

NT = Not Tested R = Refer to Comment Section \* = Non-accreditated section



### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 42 of 49

## **RESULTS:**

TOTAL LEAD CONTENT (Canada Consumer Product Safety Act – Consumer Products Containing Lead Regulations SOR/2018-83)

Test Method	:	Health Canada, Product Safety Laboratory, Reference Manual, Book 5-Laboratory Policies
		and Procedures, Method C-02.2(2016)

Maximum Allowable Limit :	90 mg/kg			
	Result	11-3	Ormalusian	
Test Item(s)	Total Lead (Pb)	Unit	Conclusion	
1001	ND	mg/kg	PASS	
1002	ND	mg/kg	PASS	
1003	ND	mg/kg	PASS	
1004	ND	mg/kg	PASS	
1005	ND	mg/kg	PASS	
1006	ND	mg/kg	PASS	
1007	ND	mg/kg	PASS	
1008	ND	mg/kg	PASS	
1009	ND	mg/kg	PASS	
1010	ND	mg/kg	PASS	
I011	ND	mg/kg	PASS	
1012	ND	mg/kg	PASS	
1013	ND	mg/kg	PASS	
1014	ND	mg/kg	PASS	
1015	ND	mg/kg	PASS	

Note / key:

ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (mg/kg) :10



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 43 of 49

## **RESULTS:**

## APPROPRIATE AGE GRADE DETERMINATION

The Appropriate Age Grade is determined with reference to the Age-grading guidelines of the Annex A of the Australian/New Zealand Standard, "Safety of toys", AS/NZS ISO 8124: Part 1:2019+A1:2020+A2:2020.

Note : The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.

Note : If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 44 of 49

# **RESULTS:**

## MECHANICAL & PHYSICAL PROPERTIES - (AS/NZS ISO 8124.1:2019+A1:2020+A2:2020)

Subclause	Requirement	Result
4.1	Normal use	М
4.2	Reasonably foreseeable abuse	М
4.3	Material	М
4.4	Small parts	М
4.5	Shape, size and strength of certain toys	NA
4.6	Edges	М
4.7	Points	М
4.8	Projections	NA
4.9	Metal wires and rods	NA
4.10	Plastic film or plastic bags in packaging and in toys	М
4.11	Cords	NA
4.12	Folding mechanisms	NA
4.13	Holes, clearances and accessibility of mechanisms	NA
4.14	Springs	NA
4.15	Stability and overload requirements	NA
4.16	Enclosures	NA
4.17	Simulated protective equipment	NA
4.18	Projectile toys	NA
4.19	Flying toys	NA
4.20	Aquatic toys	NA
4.21	Braking	NA
4.22	Toy bicycles	NA
4.23	Speed limitation of electrically driven ride-on toys	NA
4.24	Toys containing a heat source	NA
4.25	Liquid-filled toys	NA
4.26	Mouth-actuated toys	NA
4.27	Toy roller skates, toy inline skates and toy skateboards	NA
4.28	Percussion caps specifically designed for use in toys	NA
4.29	Acoustic requirement	NA
4.30	Toy scooters	NA
4.31	Magnets and magnetic components	NA
4.32	Yo-yo balls	NA
4.33	Straps intended to be worn fully or partially around the neck	NA



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 45 of 49

## **RESULTS:**

### MECHANICAL & PHYSICAL PROPERTIES - (AS/NZS ISO 8124.1:2019+A1:2020+A2:2020)

Subclause	Requirement				
4.34	Sledges and toboggans with cords for pulling	NA			
4.35	Jaw entrapment in handles and steering wheels	NA			
4.36	Assembly	NA			

M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section

Remark:

AS/NZS ISO 8124.1:2019+A1:2020+A2:2020 Mechanical & Physical Properties content is not accredited under CNAS testing standard. AS/NZS ISO 8124.1:2019+A1:2020+A2:2020 The labeling requirements is not accredited under CNAS testing standard.



THE PENCIL GRIP, INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 46 of 49

## **RESULTS:**

# FLAMMABILITY (AS/NZS 8124.2: 2016)

Subclause	Requirement	Result
4.1	Celluloid (cellulose nitrate)	NP
4.1	Surface flash on a piled surface	NA
4.1	Flammable Gases	NA
4.1	Extremely flammable liquids, highly flammable liquids, flammable liquids and flammable gels	NA
4.2	Toys to be worn on the head	NA
4.3	Toy disguise costumes and toys intended to be worn by a child in play	NA
4.3	warning on product and packaging (10 - 30 mm/s)	NA
4.4	Toys intended to be entered by a child	NA
4.4	warning on product and packaging (10 - 30 mm/s)	NA
4.5	Soft - filled toys	NA

M = Meet

NM = Not Meet P = Present NP = Not Present N/A = Not Applicable

R = Refer to Comment Section



### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 47 of 49

### **RESULTS:**

#### Migration of Certain Elements -AS/NZS 8124.3:2012 + A1:2016

Test Method : AS/NZS 8124.3:2012 + A1:2016

Motorial				Limit (r	ng/kg)					
Material	As	Ва	Cd	Cr	Hg	Pb	Sb	Se		
All materials except modelling clay	25	1000	75	60	60	90	60	500		
Modelling clay	25	250	50	25	25	90	60	500		
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%		
Analyte	As	Ва	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount	Conclusion
Test Item(s)				Result (	(mg/kg)				(g)	
1001	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1002	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1003	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1004	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1005	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1006	ND	ND	ND	ND	ND	ND	ND	2	-	PASS
1007	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1008	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1009	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1010	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
I011	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1012	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1013	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1014	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS
1015	ND	ND	ND	ND	ND	ND	ND	ND	-	PASS

#### Note / key:

Cd = Cadmium Sb = Antimony % = percent Cr = Chromium Se = Selenium



#### THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 48 of 49

## **RESULTS:**

### Phthalates Content – Client's Specification

Test Method : With reference to U. S. CPSC-CH-C1001-09.4 (January 17, 2018)

	[		[	
Test Parameter:	DNHP	DNPP	DCHP	-
Limit (%):	0.1	0.1	0.1	-
Test Item(s)	Result (%)			Conclusion
1001	ND	ND	ND	PASS
1002	ND	ND	ND	PASS
1003	ND	ND	ND	PASS
1004	ND	ND	ND	PASS
1005	ND	ND	ND	PASS
1006	ND	ND	ND	PASS
1007	ND	ND	ND	PASS
1008	ND	ND	ND	PASS
1009	ND	ND	ND	PASS
1010	ND	ND	ND	PASS
1011	ND	ND	ND	PASS
1012	ND	ND	ND	PASS
1013	ND	ND	ND	PASS
1014	ND	ND	ND	PASS
1015	ND	ND	ND	PASS

#### Note / key:

DNHP = Di-n-hexyl phthalate ND = Not detected mg/kg = milligram(s) per kilogram Detection Limit (%) : Each 0.005 DCHP= dicyclohexyl phthalate % = percent

DNPP= di-n-pentyl phthalate 10000 mg/kg = 1 %

#### Remark:

Client's Specification Phthalates content is not accredited under CNAS testing standard. This report is to Supersede BV(Dong guan) report No. (8821)106-0041 dated on Apr 29, 2021.



THE PENCIL GRIP,INC. Technical Report: **(8821)106-0041(R1)** May 12, 2021 Page 49 of 49

**RESULTS:** 



END OF REPORT