SMARTECH CO.,LTD

Technical Report: (9021)105-0172(Revision) MAY 26, 2021
Date Received: APR 15, 2021
Date Revised: OCT 14, 2021

CINDY WANG
SMARTECH CO.,LTD
NO.29,3 DONGBEISAN STREET,KAIFAQU
DISTRICT,DALIAN,CHINA

Sample Description:	PONYCYCLE-RIDE ON TOY		
Vendor:	SMARTECH CO.,LTD	Sample Size:	12 STYLES × 3 PCS
Buyer:	N/A	Style No(s):	UX321/UX324/UX326/UX368/UX302/UX304/UX421/UX424/UX426/UX468/UX402/UX404/U321/U324/U326/U368/U302/U304/U421/U424/U426/U468/U402/U404/Ux502/Ux504/Ux521/Ux524/Ux526
Manufacturer:	SMARTECH CO.,LTD	SKN/SKU No.:	N/A
Labeled Age Grade:	NOT PRESENT	PO No.:	3151
Appropriate Age Grade:	NOT REQUESTED	Ref #:	N/A
Client Specified Age Grade:	3-8	Assortment No.:	N/A
Tested Age Grade:	FROM 3 TO 8 YEARS OF AGE	Country of Destination:	AMERICA
Country of Origin:	CHINA	Color:	N/A
UPC Code:	N/A		

EXECUTIVE SUMMARY:

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

- 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 initial total heavy metals content analysis for soluble heavy metals content in surface coating requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.1(2).
- The soluble heavy metals content in surface coating requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.1(2).
- The initial total heavy metals content analysis for 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 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 90ppm requirements of 16 CFR 1303, “Ban of lead-containing paint and certain consumer products bearing lead-containing paint” as mandated by Congress in section 101(f) of the Consumer Products Safety Improvement Act (CPSIA) of 2008, Public Law 110-314.
- The total lead content of 100ppm requirements in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).

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- 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).

Note:

1. With the client's prior consent, * was subcontracted test item.

BVCPS (SHANGHAI)-QINGDAO BRANCH CONTACT INFORMATION FOR THIS REPORT

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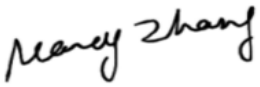
Mandy Zhang
Qingdao TOY Reporting Supervisor



Bureau Veritas
Consumer Product Services (Shanghai) - Qingdao Branch

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**
Tip Over	3 times	1500.53(b) (4)(i)
Torque	4-in-lbs	1500.53(e)
Tension	15 lbs	1500.53(f)
Pompom	15 lbs	1500.52(f)
Seam Tension	15 lbs	1500.53(f)(ii)
Compression	30 lbs	1500.53(g)
Flexure	15 lbs x 30 cycles	1500.52(d)

RESULTS:

PHYSICAL AND MECHANICAL HAZARDS (ASTM F963-17)

Section	Requirement	Result
4.1	Material Quality	M
4.3.7	Stuffing Materials	M
4.5	Sound-Producing Toys	M
4.6	Small Objects	N/A
4.7	Accessible Edges	M
4.8	Projections	M
4.9	Accessible Points	M
4.10	Wires and Rods	N/A
4.11	Nails and Fasteners	M
4.12	Plastic Film	M
4.13	Folding Mechanisms and Hinges	N/A
4.14	Cords, Straps and Elastics	N/A
4.15	Stability and Over-Load Requirements	M
4.16	Confined Spaces	N/A
4.17	Wheels, Tires, and Axles	M
4.18	Holes, Clearances and Accessibility of Mechanisms	M
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)	M
4.26	Toys Intended to be Attached to a Crib or Playpen	N/A
4.27	Stuffed and Beanbag-Type Toys	M
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

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)	N/A
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	M
5.17 & 5.3	Magnets	N/A
6.1	Definition and Description	M
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	M
7.2	Battery-Powered Ride-on Toys	N/A

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

RESULTS:

TOTAL HEAVY METALS CONTENT - INITIAL ANALYSIS FOR SOLUBLE HEAVY METALS CONTENT IN SURFACE COATING (ASTM F963-17, Section 4.3.5.1(2))

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

Sample Identity	Color	Location	Style
A.	Brown coating on metal	Pedals	/
B.	Blue/ rose/ white coating on leatherette	Rein	/
C.	Black/ white/ red coating on printed label	Printed label	/

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	
Max. Limit (mg/kg)	25	1000	75	60	60	90	60	500	

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Conclusion
Sample	Result (mg/kg)								
A.	ND	22432	ND	39.3	ND	ND	ND	ND	Data
B.	ND	492	ND	ND	ND	ND	ND	ND	Pass
C.	ND	ND	ND	ND	ND	ND	36.1	ND	Pass

mg/kg = milligrams per kilogram (ppm=parts per million) *As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium,*
ND = None Detected *Hg = Mercury, Pb = Lead, Sb = Antimony, Se = Selenium*
Detected limit (mg/kg): As, Cr & Hg= 10; Ba & Se=40; Cd, Pb & Sb=20

Remark:
1. On an initial analysis for soluble heavy metals content, any component of greater than 80% of the set limit, the result is inconclusive for the requirement and therefore were retested with soluble heavy metals analysis of ASTM F963-17, Sections 8.3.2 to 8.3.4 as specified in Section 8.3.1.3. The result herein is for reference only (show Data), please refer to soluble heavy metals content analysis for the corresponding conclusive results.

RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SURFACE COATING (ASTM F963-17, Section 4.3.5.1(2))

Test Method: ASTM International Standard ASTM F963-17, Section 8.3.2 to 8.3.4

Sample Identity	Color	Location	Style
A.	Brown coating on metal	Pedals	/

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	
Maximum Limit (mg/kg)	25	1000	75	60	60	90	60	500	
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%	

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount	Conclusion
Sample	Result (mg/kg)								(g)	
A.	ND	326	ND	7.4	ND	ND	ND	ND	0.0116	Pass

LT = Less Than
CR = adjusted analytical result
mg/kg = milligrams per kilogram (ppm=parts per million)
** = Average of duplicate analysis*
As = Arsenic, Ba = Barium, Cd = Cadmium,
Cr = Chromium, Hg = Mercury, Pb = Lead,
Sb = Antimony, Se = Selenium
Detection limit (mg/kg): Pb = 9.0, Ba = 100, Cd = 7.5, Cr = 6.0, As = 2.5, Hg = 6.0, Sb = 6.0, Se = 50.0

RESULTS:

TOTAL HEAVY METALS CONTENT – INITIAL ANALYSIS FOR SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-17, Section 4.3.5.2(2)(b))

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

Sample Identity	Color	Location	Style
Type I: Substrate other than modeling clay			
A.	White foam	Inner of body	/
B.	White sponge	Inner of saddle	/
C.	Brown leatherette	Rein	/
D.	Black leatherette	Feet	/
E.	Soft black plastic White plastic Transparent plastic gasket	Wheel Wheel Rod fixed point	/ / /
F.	White non-woven fabric	Inner of head	/
G.	Brown plastic teeth Brown plastic top stop/bottom stop Transparent plastic	Zipper Zipper Eyes	/ / /
H.	Brown plastic White plastic gasket Dark brown plastic	Eyes Back of eyes Handbrake	/ / /
I.	White plastic Black plastic thread Dark black plastic	Handbrake Handbrake thread Pedals	/ / /

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Max. Limit Type I (mg/kg)	25	1000	75	60	60	90	60	500
Max. Limit Type II (mg/kg)	25	250	50	25	25	90	60	500

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Conclusion
Sample	Result (mg/kg)								
A	ND	ND	ND	ND	ND	ND	ND	ND	Pass
B	ND	ND	ND	ND	ND	ND	ND	ND	Pass
C	28.4	321	ND	ND	ND	ND	ND	ND	Data
D	46.5	99.5	ND	ND	ND	16.6	ND	ND	Data
E	ND	ND	ND	ND	ND	ND	ND	ND	Pass
F	ND	ND	ND	ND	ND	ND	ND	ND	Pass
G	ND	ND	ND	ND	ND	ND	35.0	ND	Data

RESULTS:

H	ND	18.1	ND	ND	ND	10.4	ND	ND	Pass
I	ND	ND	ND	ND	ND	ND	ND	ND	Pass

mg/kg = milligrams per kilogram (ppm=parts per million) *As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium,*
ND = None Detected *Hg = Mercury, Pb = Lead, Sb = Antimony, Se = Selenium*
Detection limit (mg/kg): As = 16, Sb = 30, Se = 50, other elements =10

Remark:

1. On an initial analysis for soluble heavy metals content, any individually tested component of greater than the set limit or any composite tested components of greater than 80% of the set limit, the result is inconclusive for the requirement and therefore were retested with soluble heavy metals analysis of ASTM F963-17, Sections 8.3.5 (excluding 8.3.5.5(3)) as specified in Section 8.3.1.3. The result herein is for reference only (show data), please refer to soluble heavy metals content analysis for the corresponding conclusive result.

RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-17, Section 4.3.5.2(2)(b))

Test Method:ASTM International Standard ASTM F963-17, Section8.3.5 (Excluding 8.3.5.5(3))

Sample Identity	Color	Location	Style
Type I: Substrate other than modeling clay			
A	Brown leatherette	Rein	/
B	Black leatherette	Feet	/
C	Brown plastic teeth	Zipper	/
D	Brown plastic top stop/bottom stop	Zipper	/
E	Transparent plastic	Eyes	/
F	White label without coating	Printed label	/
G	Black lace	Lace	/
H	Brown fabric with teeth and fixed thread	Zipper	/
I	Light brown plush fabric	Body	/
J	Black plush fabric	Mane/ tail	/
K	White plush fabric	Feet	/
L	White sewing thread	Seam	/
M	Brown hook	Adhesive clip button	/
N	Brown loop	Adhesive clip button	/
O	Orange sewing thread	Seam	/
P	Black sewing thread	Seam	/
Q	Filling fiber	Inner of body	/

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	
Max. Limit Type I (mg/kg)	25	1000	75	60	60	90	60	500	
Max. Limit Type II (mg/kg)	25	250	50	25	25	90	60	500	
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%	

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount	Conclusion
Sample	Result (mg/kg)								(g)	

RESULTS:

A.	ND	ND	ND	ND	ND	ND	ND	ND	0.0427	Pass
B.	ND	ND	ND	ND	ND	ND	ND	ND	0.0391	Pass
C.	ND	ND	ND	ND	ND	ND	ND	ND	0.0167	Pass
D.	ND	ND	ND	ND	ND	ND	ND	ND	0.0240	Pass
E.	ND	ND	ND	ND	ND	ND	ND	ND	0.0137	Pass
F.	ND	ND	ND	ND	ND	-	ND	ND	0.0232	Pass
G.	ND	ND	ND	ND	ND	-	ND	ND	0.0345	Pass
H.	ND	ND	ND	ND	ND	-	ND	ND	0.0858	Pass
I.	ND	ND	ND	ND	ND	-	ND	ND	0.0361	Pass
J.	ND	ND	ND	ND	ND	-	ND	ND	0.0499	Pass
K.	ND	ND	ND	ND	ND	-	ND	ND	0.0760	Pass
L.	ND	ND	ND	ND	ND	-	ND	ND	0.0462	Pass
M.	ND	ND	ND	ND	ND	-	ND	ND	0.0454	Pass
N.	ND	ND	ND	ND	ND	-	ND	ND	0.0338	Pass
O.	ND	ND	ND	ND	ND	-	ND	ND	0.0273	Pass
P.	ND	ND	ND	ND	ND	-	ND	ND	0.0342	Pass
Q.	ND	ND	ND	ND	ND	-	ND	ND	0.0439	Pass

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

ND = None Detected

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

Detection limit (mg/kg): Pb = 9.0, Ba = 100, Cd = 7.5, Cr = 6.0, As = 2.5, Hg = 6.0, Sb = 6.0, Se = 50.0

Remark: Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-17.

RESULTS:

TOTAL LEAD CONTENT IN SURFACE COATING ("Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint", Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method: U.S. CPSC-CH-E1003.09.1: 2011

Analyte	Lead	
Requirement: Maximum allowable limit:	90 mg/kg	

Analyte				Lead (Pb)	Conclusion
Sample Description				Result (mg/kg)	
	Color / Component	Location	Style		
(A)	Brown coating on metal	Pedals	/	ND	Pass
(B)	Blue/ rose/ white coating on leatherette	Rein	/	ND	Pass
(C)	Black/ white/ red coating on printed label	Printed label	/	ND	Pass

ND = None detected (with detection limit: 10 mg/kg) *mg/kg =milligrams per kilogram (ppm=parts per million)*
** = Average of duplicate analyses*

RESULTS:

TOTAL LEAD CONTENT IN SUBSTRATE (100PPM) (Consumer Product Safety Improvement Act (CPSIA) of 2008)
Test Method: U.S. CPSC-CH-E1001-08.1 (June 21, 2010) or U.S. CPSC-CH-E1002-08.1 (June 21, 2010).

Analyte	Lead	
Requirement: Maximum allowable limit:	100 mg/kg	

Analyte				Lead (Pb)	Conclusion
Sample Description				Result (mg/kg)	
	Color / Component	Location	Style		
(A)	Silvery hexagon wrench	Tools	/	ND	Pass
(B)	Silvery wrench	Tools	/	ND	Pass
(C)	Grey puller	Zipper	/	13.6	Pass
(D)	Grey solider base	Zipper	/	16.4	Pass
(E)	Grey solider nose	Zipper	/	18.4	Pass
(F)	Silvery rivet	Rein	/	ND	Pass
(G)	Silvery ring	Rein	/	ND	Pass
(H)	Small silvery nut	Inner of head	/	ND	Pass
(I)	Silvery round gasket	Inner of head	/	ND	Pass
(J)	Long silvery screw	Inner of head	/	ND	Pass
(K)	Silvery tube	Inner of head	/	ND	Pass
(L)	Silvery ellipsoid with solder	/	/	ND	Pass
(M)	Round head screw	Soles	/	ND	Pass
(N)	Big silvery nut	Soles	/	ND	Pass
(O)	Silvery u-ring	Soles	/	ND	Pass
(P)	Silvery fixed base	Back sole	/	ND	Pass
(Q)	Silvery spring	Back sole	/	ND	Pass
(R)	Silvery wire	Back sole	/	ND	Pass
(S)	Silvery cylinder	Back sole	/	18.8	Pass
(T)	Silvery prism	Back sole	/	ND	Pass
(U)	Silvery tapered screw	Pedals	/	ND	Pass
(V)	Silvery long rod	Pedals	/	ND	Pass
(W	Silvery pedal without coating	Pedals	/	ND	Pass
(X)	Thin silver screw	Handbrake	/	ND	Pass

RESULTS:

(Y)	Small silvery conical cap	Handbrake	/	ND	Pass
(Z)	White foam	Inner of body	/	ND	Pass
(AA	White sponge	Inner of saddle	/	ND	Pass
(BB	Brown leatherette	Rein	/	ND	Pass
(CC	Black leatherette	Feet	/	16.6	Pass
(DD	Soft black plastic White plastic Transparent plastic gasket	Wheel Wheel Rod fixed point	/ / /	ND	Pass
(EE	White non-woven fabric	Inner of head	/	ND	Pass
(FF	Brown plastic teeth Brown plastic top stop/bottom stop Transparent plastic	Zipper Zipper Eyes	/ / /	ND	Pass
(GG	Brown plastic White plastic gasket Dark brown plastic	Eyes Back of eyes Handbrake	/ / /	10.4	Pass
(HH	White plastic Black plastic thread Dark black plastic	Handbrake Handbrake thread Pedals	/ / /	ND	Pass

ND = None detected (with detection limit: 10 mg/kg) mg/kg = milligrams per kilogram (ppm = parts per million)
** = Average of duplicate analyses*

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-C1001-09.3 (April 1, 2010).

Sample Identity	Color / Component	Location	Style
A.	White foam	Inner of body	/
B.	White sponge	Inner of saddle	/
C.	Brown leatherette	Rein	/
D.	Black leatherette	Feet	/
E.	Soft black plastic White plastic Transparent plastic gasket	Wheel Wheel Rod fixed point	/ / /
F.	White non-woven fabric	Inner of head	/
G.	Brown plastic teeth Brown plastic top stop/bottom stop Transparent plastic	Zipper Zipper Eyes	/ / /
H.	Brown plastic White plastic gasket Dark brown plastic	Eyes Back of eyes Handbrake	/ / /
I.	White plastic Black plastic thread Dark black plastic	Handbrake Handbrake thread Pedals	/ / /

Test Parameter:	Listed Phthalates (See Remark)		
Requirement:	Each 0.1%		
Sample ID	Detected Analyte	Concentration (%)	Conclusion
A.	DINP	0.0079	Pass
B.	ND	ND	Pass
C.	ND	ND	Pass
D.	ND	ND	Pass
E.	ND	ND	Pass
F.	ND	ND	Pass
G.	ND	ND	Pass
H.	ND	ND	Pass
I.	ND	ND	Pass

Results reported in percentage
ND = None detected
Detection Limit: Each Phthalate (0.005%)

RESULTS:

LIST OF RESTRICTED PHTHALATES		
Number	Chemical Name	CAS Number
1.	Butyl benzyl phthalate (BBP)	85-68-7
2.	Dibutyl phthalate (DBP)	84-74-2
3.	Di(2-ethylhexyl) phthalate (DEHP)	117-81-7
4.	Di-iso-nonyl phthalate (DINP)	28553-12-0 & 68515-48-0
5.	Di-iso-butyl phthalate (DIBP)	84-69-5
6.	Di-n-pentyl phthalate (DPENP or DnPP)	131-18-0
7.	Di-n-hexyl phthalate (DHEXP or DnHP)	84-75-3
8.	Dicyclohexyl phthalate (DCHP)	84-61-7

RESULTS:

EXHIBIT # 1

Report No.:
90211050172

EXHIBIT # 2

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90211050172

RESULTS:

EXHIBIT # 3

Report No.:
90211050172

EXHIBIT # 4

Report No.:
90211050172

RESULTS:

EXHIBIT # 5

Report No.:
90211050172

EXHIBIT # 6

Report No.:
90211050172

RESULTS:

End of report