POLYCONCEPT TEST REPORT

LAB LOCATION:	**SHANG HAI**	**REPORT NUMBER:**	**EFW524111871-CG-01**
DATE IN:	**December 06, 2024**	**DATE OUT:**	**December 23, 2024**

Applicant:	Polyconcept GBS		
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Copy To:	--		

OVERALL RATING

PASS	**X**
FAIL	**--**
PRELIM FAIL	**--**

Sample Information

EFW524111871-CG-01

Sample Description:	Lagom 16oz Tumbler w/ SS Straw
PO Number:	M000043214 1 1 M000043216 1 1 M000043215 1 1 M000043217 1 1
Article Number:	SM-6908BK/ SM-6908RVGR/ SM-6908WH/ SM-6908NY
Number of Sample Submitted:	6pcs per SKU, 24pcs total; add 10pcs straw heads and silicone rings per SKU.
Factory Number:	12918
Vendor Number:	11104
Customer:	Bullet
Country of Origin:	China
Country of Destination:	US/CAN
Retest – Previous Report No:	/
Remark:	

For and on behalf of
Eurofins MTS Consumer Product Testing (Shanghai) Co., Ltd.

Chen Lin, Rain
Lab Director, Hardlines Division

Test Result Summary	
Test Requested	**Result**
16 CFR 1303 - Total Lead Content in Paints & Surface Coatings	PASS
California Proposition 65 Total Lead Content in Surface Coatings and Substrates	PASS
Canadian Consumer Products Containing Lead Regulation (SOR/2018-83) - Total Lead in Substrate	PASS
Phthalate Content (10P)	PASS
Total Bisphenol A Content	PASS
Material in Contact with Food Articles [Acrylonitrile Copolymer and Resins] – U.S. FDA 21 CFR 181.32	PASS
Material in Contact with Food Articles [Olefin Polymers - Polypropylene Homopolymer] – U.S. FDA 21 CFR 177.1520	PASS
Material in Contact with Food Articles [Closures with Sealing Gaskets for Food Containers] – U.S. FDA 21 CFR 177.1210	PASS
Material in Contact with Food Articles [Rubber Article Intended for Repeated Use] – U.S. FDA 21 CFR 177.2600	PASS
Material in Contact with Food Articles [Polyester Resins, Crosslinked] – U.S. FDA 21 CFR 177.2420	PASS
FDA GRAS Specifications, Total Chromium in Stainless Steel Food Containers	PASS
Leachable Lead & Cadmium from Glassware and Ceramics – Lip & Rim	PASS
19 CFR 134.11 Country of Origin Markings	PASS
Sharp Edges - Straws	PASS

COMPONENT BREAKDOWN LIST:

Test Item	Component Description
A	Lagom 16oz Tumbler w/ SS Straw
A1	Black coating (on outer) (SM-6908BK)
A2	Navy coating (on outer) (SM-6908NY)
A3	Green coating (on outer) (SM-6908RVGR)
A4	White coating (on outer) (SM-6908WH)
A5	Transparent black plastic (main lid) (all styles)
A6	Transparent black plastic (slider) (all styles)
A7	Black plastic (inner) (all styles)
A8	Black rubber (straw) (SM-6908BK)
A9	Navy rubber (straw) (SM-6908NY)
A10	Green rubber (straw) (SM-6908RVGR)
A11	White rubber (straw) (SM-6908WH)
A12	Transparent silicone (gasket) (all styles)
A13	Black foam (bottom)(all styles)
A14	Silver metal (straw)(all styles)
A15	Silver metal (outer without coating)(all styles)
A16	Lagom 16oz Tumbler w/ SS Straw (SM-6908BK)
A17	Lagom 16oz Tumbler w/ SS Straw (SM-6908NY)
A18	Lagom 16oz Tumbler w/ SS Straw (SM-6908RVGR)
A19	Lagom 16oz Tumbler w/ SS Straw (SM-6908WH)

TEST RESULT:

16 CFR 1303 - Total Lead Content in Paints & Surface Coatings

Test Item	Accessibility (Remark 1)	Classification	Total Lead (Pb) (ppm)		Conclusion
			Result	Limit	
A1+A2	Accessible as received	Paint or similar surface coating	<10	90	PASS
A3+A4	Accessible as received	Paint or similar surface coating	13	90	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)

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

California Proposition 65 Total Lead Content in Surface Coatings and Substrates

Test Item	Classification	Total Lead (Pb) (mg/kg)		Conclusion
		Result	Maximum Permissible Limit	
A1+A2	Surface coating	<10	90	PASS
A3+A4	Surface coating	13	90	PASS
A5+A6+A7	Substrate	<10	100	PASS
A8+A9+A10	Substrate	<10	100	PASS
A11+A12+A13	Substrate	<10	100	PASS
A14+A15	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)

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

TEST RESULT:

Canadian Consumer Products Containing Lead Regulation (SOR/2018-83) - Total Lead in Substrate

Test Item	Total Lead (Pb) (mg/kg)		Conclusion
	Result	Limit	
A14+A15	<10	90	PASS

Method: Sample was digested with nitric acid and analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Plasma Mass Spectrometer.

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

Phthalate Content (10P)

Test Item	Phthalates Content (%)		Conclusion
	Result	Client's requirement	
A1+A2	<0.005 (individual)	<0.1 (individual)	PASS
A3+A4	<0.005 (individual)	<0.1 (individual)	PASS
A5+A6+A7	<0.005 (individual)	<0.1 (individual)	PASS
A8+A9+A10	<0.005 (individual)	<0.1 (individual)	PASS
A11+A12+A13	<0.005 (individual)	<0.1 (individual)	PASS

List of Phthalates:

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Butyl benzyl phthalate (BBP)	85-68-7
Di-2-ethylhexyl phthalate (DEHP) / Dioctyl phthalate (DOP)	117-81-7	Di-iso-butyl phthalate (DIBP)	84-69-5
Di-iso-nonyl phthalate (DINP)	28553-12-0/ 68515-48-0	Di-iso-decyl phthalate (DIDP)	26761-40-0/ 68515-49-1
Di-n-octyl phthalate (DNOP)	117-84-0	Di-n-hexyl phthalate (DNHP/ DHEXP)	84-75-3
Dicyclohexyl phthalate (DCHP)	84-61-7	Dipentyl phthalate (DPP / DPENP)	131-18-0

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)

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

TEST RESULT:

Total Bisphenol A Content

Test Item	Bisphenol A [CAS No. 80-05-7] (mg/kg)		Conclusion
	Result	Client's Requirement	
A1	ND	ND	PASS
A2	ND	ND	PASS
A3	ND	ND	PASS
A4	ND	ND	PASS
A5	ND	ND	PASS
A6	ND	ND	PASS
A7	ND	ND	PASS
A8	ND	ND	PASS
A9	ND	ND	PASS
A10	ND	ND	PASS
A11	ND	ND	PASS
A12	ND	ND	PASS

ND = Not detected (Laboratory Reporting Limit = 1mg/kg)

Method: Sample was extracted with organic solvent and then analyzed by Liquid Chromatograph Mass Spectrometer.

Note: mg/kg = milligram per kilogram

TEST RESULT:

Material in Contact with Food Articles [Acrylonitrile Copolymer and Resins] – U.S. FDA 21 CFR 181.32

Extracting condition: Acetic Acid (120°F 2hrs.)

Parameter	Unit	Result	Limit
		A5	
Acrylonitrile Monomer 3% Acetic Acid	mg/in^2	<0.003	≤0.003
Conclusion		PASS	-

Method: U.S. FDA 21 CFR 181.32

Remark: According to U.S. FDA 21 CFR 181.32, the acrylonitrile content of test item must be less than 30%, in turn the nitrogen content of test item must be less than 8% for undergoing the official method.

Note: mg/in^2 = milligrams per square
"<" = less than
"≤"= less than or equal to

Material in Contact with Food Articles [Olefin Polymers - Polypropylene Homopolymer] – U.S. FDA 21 CFR 177.1520

Extracting condition: n-Hexane Extractives (reflux temperature, 2hr.), Xylene Extractives (Stir at 120℃ until the sample dissolve completely)

Parameter	Unit	Result	Limit
		A7	
Density	g/cm^3	0.901	0.88 - 0.913
n-Hexane Extractives	% w/w	0.3	≤6.4
Xylene Extractives	% w/w	4.1	≤9.8
Melting Point	°C	171	160 - 180
Conclusion		PASS	-

Method: U.S. FDA 21 CFR 177.1520

Note: g/cm^3 = gram per cubic centimetre
% w/w = percent weight by weight
"<" = less than
"≤"= less than or equal to

TEST RESULT:

Material in Contact with Food Articles [Closures with Sealing Gaskets for Food Containers] – U.S. FDA 21 CFR 177.1210

Condition of use: C) Hot filled or pasteurized above 150°F

Extracting condition: Water (Fill boiling, cool to 100°F), Heptane (120°F, 15min.), 8% Alcohol (Fill boiling, cool to 100°F)

Parameter	Unit	Result	Limit
		A12	
Chloroform - Soluble Extractives			
Distilled Water	ppm	16.4	≤50
n-Heptane	ppm	<10	≤50
8 % Alcohol	ppm	25.7	≤50
Conclusion		PASS	-

Method: U.S. FDA 21 CFR 177.1210

Remark: 1) Maximum extractives tolerances of different types of closure-sealing gasket composition:

Type of closure-sealing gasket composition	Maximum Extractives Tolerances (in ppm)		
	Chloroform fraction of water extractives	Chloroform fraction of heptane extractives	Chloroform fraction of alcohol extractives
1. Plasticized polymers, including unvulcanized or vulcanized or otherwise cured natural and synthetic rubber formed in place as overall discs or annular rings from a hot melt, solution, plastisol, organisol, mechanical dispersion, or latex	50	500	50
2. Performed overall discs or annular rings of plasticized polymers, including unvulcanized natural or synthetic rubber	50	250	50
3. Performed overall discs or annular rings of vulcanized plasticized polymers, including natural or synthetic rubber	50	50	50
4. Performed overall discs or annular rings of polymeric or resinous-coated paper, paperboard, plastic, or metal foil substrates	50	250	50
5. Closures with sealing gaskets or sealing compositions as described in 1 ,2 , 3and 4, and including paper, paperboard, and glassine used for dry foods only	Not applicable	Not applicable	Not applicable

Note: ppm = part per million
"<" = less than
"≤"= less than or equal to

TEST RESULT:

Material in Contact with Food Articles [Rubber Article Intended for Repeated Use] – U.S. FDA 21 CFR 177.2600

Rubber articles intended for repeated use, in contact with aqueous food

Parameter	Unit	Result				Limit
		A8	A9	A10	A11	
Total Extractives in Distilled Water						
(i) During the first 7 hours of extraction	mg/in^2	1.0	1.1	1.2	1.3	≤20
(ii) During the succeeding 2 hours of extraction	mg/in^2	0.1	0.1	0.1	0.2	≤1
Conclusion		PASS	PASS	PASS	PASS	-

Rubber articles intended for repeated use, in contact with fatty foods

Parameter	Unit	Result				Limit
		A8	A9	A10	A11	
Total Extractives in n-Hexane						
(i) During the first 7 hours of extraction	mg/in^2	10.3	11.5	9.1	11.7	≤175
(ii) During the succeeding 2 hours of extraction	mg/in^2	3.0	3.0	3.1	3.0	≤4
Conclusion		PASS	PASS	PASS	PASS	-

Method: U.S. FDA 21 CFR 177.2600

Note: mg/in^2 = milligram per square inch
"<" = less than
"≤"= less than or equal to

TEST RESULT:

Material in Contact with Food Articles [Polyester Resins, Crosslinked] – U.S. FDA 21 CFR 177.2420

Condition of use: D) Hot filled or pasteurized below 150°F

Extracting condition: Water (150°F, 2hr.), Heptane (100°F, 30min.), 8% Alcohol (150°F, 2hr.), 50% Alcohol (150°F, 2hr.)

Parameter	Unit	Result	Limit
		A6	
Chloroform - Soluble Extractives			
Distilled Water	mg/in^2	<0.05	≤0.1
8 % Alcohol	mg/in^2	0.05	≤0.1
50 % Alcohol	mg/in^2	<0.05	≤0.1
Nonvolatile Extractives			
n-Heptane	mg/in^2	0.06	≤0.1
Conclusion		PASS	-

Method: U.S. FDA 21 CFR 177.2420

Note: mg/in^2 = milligrams per square inch of coated surface
"<" = less than
"≤"= less than or equal to

FDA GRAS Specifications, Total Chromium in Stainless Steel Food Containers

Test Item	Total Chromium (Cr) (%)		Conclusion
	Result	Limit	
A14	17.71	≥16	PASS

Method: Acid digestion, analysis by ICP-OES

TEST RESULT:

Leachable Lead & Cadmium from Glassware and Ceramics – Lip & Rim

Test Item	Unit	Internal Volume (ml)	Leaching Volume (ml)	Concentration relative to Internal Volume (mg/L)	
				Lead	Cadmium
A16	(1)	176	176	<0.1	<0.01
	(2)	176	176	<0.1	<0.01
	(3)	176	176	<0.1	<0.01
	(4)	176	176	<0.1	<0.01
	(5)	176	176	<0.1	<0.01
	(6)	176	176	<0.1	<0.01
Limit (Any 1 of 6 units)				4.0	0.4
Conclusion				PASS	

Test Item	Unit	Internal Volume (ml)	Leaching Volume (ml)	Concentration relative to Internal Volume (mg/L)	
				Lead	Cadmium
A17	(1)	176	176	<0.1	<0.01
	(2)	176	176	<0.1	<0.01
	(3)	176	176	<0.1	<0.01
	(4)	176	176	<0.1	<0.01
	(5)	176	176	<0.1	<0.01
	(6)	176	176	<0.1	<0.01
Limit (Any 1 of 6 units)				4.0	0.4
Conclusion				PASS	

Test Item	Unit	Internal Volume (ml)	Leaching Volume (ml)	Concentration relative to Internal Volume (mg/L)	
				Lead	Cadmium
A18	(1)	176	176	<0.1	<0.01
	(2)	176	176	<0.1	<0.01
	(3)	176	176	<0.1	<0.01
	(4)	176	176	<0.1	<0.01
	(5)	176	176	<0.1	<0.01
	(6)	176	176	<0.1	<0.01
Limit (Any 1 of 6 units)				4.0	0.4
Conclusion				PASS	

Test Item	Unit	Internal Volume (ml)	Leaching Volume (ml)	Concentration relative to Internal Volume (mg/L)	
				Lead	Cadmium
A19	(1)	176	176	<0.1	<0.01
	(2)	176	176	<0.1	<0.01
	(3)	176	176	<0.1	<0.01
	(4)	176	176	<0.1	<0.01
	(5)	176	176	<0.1	<0.01
	(6)	176	176	<0.1	<0.01
Limit (Any 1 of 6 units)				4.0	0.4
Conclusion				PASS	

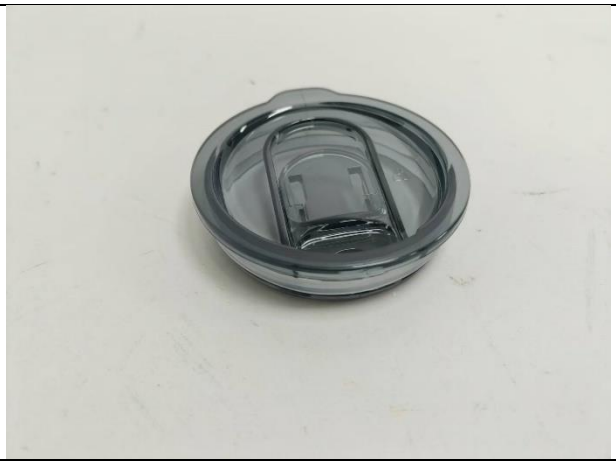
Method: ASTM C927-80 (2019e1). The lead and cadmium contents are determined by Inductively Coupled Argon Plasma Spectrometer / Atomic Absorption Spectrophotometer / Inductively Coupled Plasma Mass Spectrometer.

Note: mL = milliliter
mg/L = milligrams per liter
"<" = less than

TEST RESULT:

Test Property	Method	Applicable Components	Limits	Notes	Result
19 CFR 134.11 Country of Origin Markings	Marking Review	All Finished Products	COO product marking must be present and permanent	Products Manufactured outside of USA	All styles: PASS
Sharp Edges - Straws	16 CFR 1500.49	Rigid Straws	No sharp edges	/	PASS

Photo of Exhibit

Exhibit 1	Exhibit 2
	
Exhibit 3	Exhibit 4
	

**********End of Test Report**********

NOTE:

If there is question or concern regarding the above results, please contact us via email coco.yu@cpt.eurofinscn.com

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