


**LAB LOCATION:** SHANG HAI      **REPORT NUMBER:** EFW524063937-CG-03  
**DATE IN:** June 19, 2024      **DATE OUT:** July 08, 2024

<b>Applicant:</b>	Polyconcept GBS		
<b>Contact:</b>	Kathy Lu		
<b>Address:</b>	Zhongshan Wanbo International Center, Room 301-303, No. 666 West Huaihai Road, Changning District, Shanghai, 200052, PRC		
<b>TEL:</b>	13918486858	<b>FAX:</b>	--
<b>E-mail:</b>	testprogram@pcna.com; kathy.lu@polyconceptgbs.com; claire.li@polyconceptgbs.com; kkolber@pcna.com		
<b>Copy To:</b>	--		

<b>OVERALL RATING</b>	
PASS	X
FAIL	--
PRELIM FAIL	--

### Sample Information

 EFW524063937-CG-03	<b>Sample Description:</b>	Elvin 28oz Recycled Stainless Flip Straw Bottle
	<b>PO Number:</b>	M000040715 M000040717 M000040718 M000040720
	<b>Article Number:</b>	SM-6965 BK/WH/GY/NY
	<b>Number of Sample Submitted:</b>	6pcs each
	<b>Factory Number:</b>	13851
	<b>Vendor Number:</b>	11104
	<b>Customer:</b>	BULLET
	<b>Country of Origin:</b>	China
	<b>Country of Destination:</b>	US/CAN
	<b>Retest – Previous Report No:</b>	/
<b>Remark:</b>		

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



**Chen Lin, Rain**  
Lab Director, Hardlines Division

<b>Test Result Summary</b>	
<b>Test Requested</b>	<b>Result</b>
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 [Olefin Polymers - Polypropylene Homopolymer] – U.S. FDA 21 CFR 177.1520	PASS
Material in Contact with Food Articles [Olefin Polymers - Polyethylene] – 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
FDA GRAS Specifications, Total Chromium in Stainless Steel Food Containers	PASS
19 CFR 134.11 Country of Origin Markings	PASS
Sharp Edges - Straws	PASS

**COMPONENT BREAKDOWN LIST:**

Test Item	Component Description
A	Elvin 28oz Recycled Stainless Flip Straw Bottle
A1	Black coating(on bottle)(SM-6965BK)
A2	White coating(on bottle)(SM-6965WH)
A3	Grey coating(on bottle)(SM-6965GR)
A4	Navy coating(on bottle)(SM-6965NY)
A5	Silver metal(bottle without coating)(all styles)
A6	Silver metal(pin on lid)(all styles)
A7	Silver metal(spring on pin)(all styles)
A8	Black plastic(nozzle/handle/button)(SM-6965BK)
A9	White plastic(nozzle/handle/button)(SM-6965WH)
A10	Grey plastic(nozzle/handle/button)(SM-6965GY)
A11	Navy plastic(nozzle/handle/button)(SM-6965NY)
A12	White plastic(main lid)(all styles)
A13	Transparent plastic(straw)(all styles)
A14	Black silicone(gasket)(SM-6965BK)
A15	White silicone(gasket)(SM-6965WH)
A16	Grey silicone(gasket)(SM-6965GY)
A17	Navy silicone(gasket)(SM-6965NY)
A18	Black silicone(nozzle stopper)(SM-6965BK)(same material as A14)
A19	White silicone(nozzle stopper)(SM-6965WH)(same material as A15)
A20	Grey silicone(nozzle stopper)(SM-6965GY)(same material as A14)
A21	Navy silicone(nozzle stopper)(SM-6965NY)(same material as A16)
A22	Black silicone(gasket on flap cover)(SM-6965BK)(same material as A14)
A23	White silicone(gasket on flap cover)(SM-6965WH)(same material as A15)
A24	Grey silicone(gasket on flap cover)(SM-6965GY)(same material as A16)
A25	Navy silicone(gasket on flap cover)(SM-6965NY)(same material as A17)
A26	Transparent Black plastic(flap cover)(SM-6965BK)
A27	Transparent White plastic(flap cover)(SM-6965WH)
A28	Transparent Grey plastic(flap cover)(SM-6965GY)
A29	Transparent Navy plastic(flap cover)(SM-6965NY)

**TEST RESULT:****16 CFR 1303 - Total Lead Content in Paints & Surface Coatings**

Test Item	Accessibility	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	<10	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

**TEST RESULT:**
**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	<10	90	PASS
A5+A6+A7	Substrate	<10	100	PASS
A8	Substrate	<10	100	PASS
A9+A10	Substrate	<10	100	PASS
A11+A12+A13	Substrate	<10	100	PASS
A14+A15+A16	Substrate	<10	100	PASS
A17+A26	Substrate	<10	100	PASS
A27+A28+A29	Substrate	<10	100	PASS

Method:

- 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)
- 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)
- 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

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

Test Item	Total Lead (Pb) (mg/kg)		Conclusion
	Result	Limit	
A5+A6+A7	<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

**TEST RESULT:**
**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
A8	<0.005 (individual)	<0.1 (individual)	PASS
A9+A10	<0.005 (individual)	<0.1 (individual)	PASS
A11+A12+A13	<0.005 (individual)	<0.1 (individual)	PASS
A14+A15+A16	<0.005 (individual)	<0.1 (individual)	PASS
A17+A26	<0.005 (individual)	<0.1 (individual)	PASS
A27+A28+A29	<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	
A8	ND	ND	PASS
A9	ND	ND	PASS
A10	ND	ND	PASS
A11	ND	ND	PASS
A12	ND	ND	PASS
A13	ND	ND	PASS
A14	ND	ND	PASS
A15	ND	ND	PASS
A16	ND	ND	PASS
A17	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 [Olefin Polymers - Polypropylene Homopolymer] – U.S. FDA 21 CFR 177.1520**

Extracting condition: n-Hexane Extractives (reflux temperature, 2h), Xylene Extractives (Stir at 120°C until the sample dissolve completely)

Parameter	Unit	Result					Limit
		A8	A9	A10	A11	A12	
Density	g/cm <sup>3</sup>	0.911	0.912	0.900	0.905	0.910	0.88 - 0.913
n-Hexane Extractives	% w/w	0.2	<0.2	0.3	0.2	0.3	≤6.4
Xylene Extractives	% w/w	2.7	2.6	2.9	4.7	5.5	≤9.8
Melting Point	°C	174	178	176	174	176	160 - 180
Conclusion		PASS	PASS	PASS	PASS	PASS	-

Method: U.S. FDA 21 CFR 177.1520

Note: g/cm<sup>3</sup> = gram per cubic centimetre  
% w/w = percent weight by weight  
“<” = less than  
“≤” = less than or equal to

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

Extracting condition: n-Hexane Extractives (50°C, 2hr.), Xylene Extractives (reflux temperature, 2hr.)

*For use in articles that contact food except for articles used for packing or holding food during cooking*

Parameter	Unit	Result	Limit
		A13	
Density	g/cm <sup>3</sup>	0.932	0.85 - 1.00
n-Hexane Extractives	% w/w	1.0	≤5.5
Xylene Extractives	% w/w	2.0	≤11.3
Conclusion		PASS	-

Method: U.S. FDA 21 CFR 177.1520

Note: g/cm<sup>3</sup> = 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
		A14	A15	A16	
Chloroform - Soluble Extractives					
Distilled Water	ppm	<10	<10	<10	≤50
n-Heptane	ppm	<10	23	22	≤50
8 % Alcohol	ppm	<10	<10	16	≤50
Conclusion		PASS	PASS	PASS	-

Parameter	Unit	Result			Limit
		A17	A18	A19	
Chloroform - Soluble Extractives					
Distilled Water	ppm	<10	<10	<10	≤50
n-Heptane	ppm	24	17	18	≤50
8 % Alcohol	ppm	18	<10	<10	≤50
Conclusion		PASS	PASS	PASS	-

Parameter	Unit	Result			Limit
		A20	A21	A22	
Chloroform - Soluble Extractives					
Distilled Water	ppm	<10	<10	<10	≤50
n-Heptane	ppm	14	16	14	≤50
8 % Alcohol	ppm	<10	<10	<10	≤50
Conclusion		PASS	PASS	PASS	-

Parameter	Unit	Result			Limit
		A23	A24	A25	
Chloroform - Soluble Extractives					
Distilled Water	ppm	<10	<10	<10	≤50
n-Heptane	ppm	17	18	15	≤50
8 % Alcohol	ppm	<10	<10	<10	≤50
Conclusion		PASS	PASS	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 , 3 and 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:****FDA GRAS Specifications, Total Chromium in Stainless Steel Food Containers**

Test Item	Total Chromium (Cr) (%)		Conclusion
	Result	Limit	
A5	18.56	≥16	PASS

Method: Acid digestion, analysis by ICP-OES

**TEST RESULT:**

Test Property	Method	Applicable Components	Limits	Notes	Result
19 CFR 134.11 Country of Origin Markings	Not Applicable	Per Review	Not Applicable	Products Manufactured outside of USA.	All styles: PASS
Sharp Edges - Straws	16 CFR 1500.49	Rigid Straws	No sharp edges	/	All styles: PASS

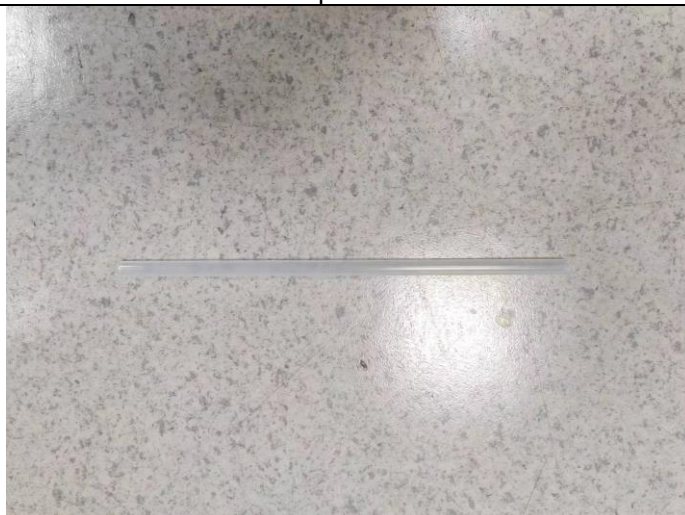
Photo of Exhibit



Components 3



Components 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](mailto:coco.yu@cpt.eurofinscn.com)

*This test report is governed by the Terms and Conditions, available on request or attached to the end of this test report. Attention is especially drawn to the limitations of liability, indemnification and jurisdictional provisions defined therein. This report is issued strictly based on the testing of the samples submitted by you. The test results in this report refer only to the sample(s) actually tested and do not refer or be deemed to refer to any bulk production from which such sample(s) may be said to have been obtained. In the event that Eurofins MTS Consumer Product Testing (Shanghai) Co., Ltd ("ERF") was requested to survey and test any bulk production quantity of samples, ERF, in the absence of any contrary written instructions, performed random sampling of bulk production for testing purposes. Variations in the conditions under which samples are stored, transported, etc., may lead to variations in the test results. ERF cannot anticipate and shall not be held responsible for variations in test results that may be due to factors beyond ERF control, such as, sample cross-contamination, evaporation of volatile substances due to storage temperature, humidity, etc. This report does not constitute a recommendation, actual or implied, for any specific course of action. Other than the expressed warranties made in the Terms and Conditions of the ERF Test Request Form, ERF makes no warranties or representations either express or implied with respect to this report. In no circumstances whatsoever shall ERF be liable for any consequential, special or incidental damages arising out of, or in connection with, this report. As per regulation of China Metrology Accreditation (CMA), a report without CMA accreditation logo will not serve as testimonial to the public for the purpose defined by CMA regulations.*