



## FUN-TIME INTERNATIONAL

**Technical Report:** (5109)056-0246  
Date Received: February 25, 2009

March 20, 2009  
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Sample Description:	KRAZY STRAW - PURPLE (G15-9656);GREEN (G45-6163); YELLOW (G55-3900);PINK (G65-7351); BLUE (G15-8842);RED (G65-6836)		
Vendor:	FUN-TIME INTERNATIONAL	Sample Size:	72
Manufacturer:	FUN-TIME INTERNATIONAL INC.	Style No(s):	KRAZY STRAW
Buyer:	N/A	SKN/SKU No.:	N/A
Labeled Age Grade:	N/A	PO No.:	N/A
Appropriate Age Grade:	N/A	Ref #:	N/A
Client Specified Age Grade:	CHILDREN PRODUCTS, ALL AGES	Country of Origin:	MEXICO
Tested Age Grade:	CHILDREN PRODUCTS, ALL AGES	Assortment No.:	N/A
UPC Code:	N/A		

### **EXECUTIVE SUMMARY:**

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

- The mechanical hazards requirements of 16 CFR 1500, "Federal Hazardous Substances Act Regulations".
- The flammability requirements of 16 CFR 1500.3(c)(6)(vi), "Flammable solid" (FHSA regulations).
- The limits set forth in US Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 177.1630, "Indirect Food Additives: Polyethylene phthalate polymers."
- The total lead content of 600ppm requirements in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).
- The phthalates content requirements of The Consumer Product Safety Improvement Act of 2008 (HR4040) restricting the use of certain phthalates and banning the use of others in toys and childcare products.

Note: No accessible surface coating was present on the received sample(s). Consequently, the heavy metals content analysis of surface coatings according to 16 CFR 1303, "Ban of lead-containing paint and certain consumer products bearing lead-containing paint," was not conducted.

For general inquiries, please contact Bureau Veritas at (716) 505-3300.

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**RESULTS:**

**TOTAL LEAD CONTENT IN SUBSTRATE BY COMPOSITE TESTING (Consumer Product Safety Improvement Act (CPSIA) of 2008)**

Element:			Lead	
Requirement: Maximum allowable limit:				
February 10, 2009:			600 mg/kg	
August 14, 2009:			300 mg/kg	
Sample Description			Result (mg/kg)	Conclusion
Color / Component	Location	Style		
(A) Comp blue, red, green plastic	Straws	-	LT 8.33	Pass with comment 1
(B) Comp yellow, pink, purple plastic	Straws	-	LT 7.90	Pass with comment 1

*LT = Less Than*

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

*\* = Average of duplicate analyses*

Remark:

- Comment 1: Compliance with CPSIA lead content of 600ppm requirement in substrate as of February 10, 2009 and CPSIA lead content of 300ppm requirement in substrate as of August 14, 2009.
- Comment 2: Compliance with CPSIA lead content of 600ppm requirement in substrate as of February 10, 2009 but non-compliance with CPSIA lead content of 300ppm requirement in substrate as of August 14, 2009.



**RESULTS:**

**FDA FOOD SIMULATING SOLVENT EXTRACTIVES**  
**INDIRECT FOOD ADDITIVES – POLYETHYLENE PHTHALATE POLYMERS**

The sample(s) was evaluated according to the US Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 177.1630, "Indirect Food Additives: Polyethylene phthalate polymers."

Condition of Use: The plastics are used for packaging, transporting, or holding food, excluding alcoholic beverages, at temperatures not to exceed 250°F.

Sample Description: Krazy Straw Purple, Pink, Red

Parameter	Result (mg/sq. in)	Maximum Allowable Limit (mg/sq. in)	Conclusion
• Distilled water 250°F, 2hrs.	0.1	0.5	Pass
• n-Heptane 150°F, 2 hrs.	LT 0.1	0.5	Pass

LT = Less Than

N/A = Not Applicable

mg/sq. in. = milligrams per square inch (of food-contact surface)

\* = An average of duplicate analyses.

**FDA FOOD SIMULATING SOLVENT EXTRACTIVES**  
**INDIRECT FOOD ADDITIVES – POLYETHYLENE PHTHALATE POLYMERS**

The sample(s) was evaluated according to the US Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 177.1630, "Indirect Food Additives: Polyethylene phthalate polymers."

Condition of Use: The plastics are used for packaging, transporting, or holding food, excluding alcoholic beverages, at temperatures not to exceed 250°F.

Sample Description: Krazy Straw Green, Blue, Yellow

Parameter	Result (mg/sq. in)	Maximum Allowable Limit (mg/sq. in)	Conclusion
• Distilled water 250°F, 2hrs.	0.2	0.5	Pass
• n-Heptane 150°F, 2 hrs.	LT 0.1	0.5	Pass

LT = Less Than

N/A = Not Applicable

mg/sq. in. = milligrams per square inch (of food-contact surface)

\* = An average of duplicate analyses.



**RESULTS:**

**PHTHALATES CONTENT IN TOYS AND CHILDCARE ARTICLES (Consumer Product Safety Improvement Act of 2008)**

**Component**

- A. Comp red/pink/purple Straw
- B. Comp yellow/green/blue Straw

**Results:**

<i>Phthalate</i>								
	BBP, % by wt	DBP, % by wt	DEHP, % by wt	DNOP, % by wt	DINP, % by wt	DIDP, % by wt	Limits, % by wt	<b>Conclusion</b>
A.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	0.1	Pass
B.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	0.1	Pass

**Key:**

- BBP = Butyl benzyl phthalate
- DBP = Dibutyl phthalate
- DEHP = Di(2-ethylhexyl) phthalate
- DNOP = Di-n-octyl phthalate
- DINP = Di-iso-nonyl phthalate
- DIDP = Di-iso-decyl phthalate

- Results reported in percentage*
- LT = Less than
- ND = None detected
- GT = Greater than

- Note: 1) According to CPSIA, DEHP, BBP and DBP shall not be used as substances or as constituents of preparations, at concentrations of greater than 0.1 % by mass of the plasticized material, in toys of children ages 12 and under, and childcare articles of children 3 and under.
- 2) According to CPSIA, DINP, DIDP and DNOP shall not be used as substances or as constituents of preparations, at concentrations of greater than 0.1 % by mass of the plasticized material, in toys of children ages 12 and under which can be placed in the mouth, and childcare articles of children 3 and under which can be placed in the mouth.

**EXHIBIT # 1**



**SAMPLE PRODUCT**