


**POLYCONCEPT
TEST REPORT**

LAB LOCATION: SHANG HAI **REPORT NUMBER:** EFW524010513-H-01
DATE IN: January 03, 2024 **DATE OUT:** January 10, 2024

Applicant:	Polyconcept GBS		
Contact:	Kathy Lu		
Address:	4th Floor, Hongqiao Rongguang Building, 11 Changshun Road, Changning District, Shanghai, 200051, PRC		
TEL:	13918486858	FAX:	--
E-mail:	testprogram@pcna.com; kathy.lu@polyconceptgbs.com; claire.li@polyconceptgbs.com; kkolber@pcna.com		
Copy To:	--		

OVERALL RATING	
PASS	X
FAIL	--
PRELIM FAIL	--

Sample Information		
 EFW524010513-H-01	Sample Description:	Sienna Ceramic Mug 14oz
	PO Number:	2052968
	Article Number:	1626-41BK
	Number of Sample Submitted:	21pcs
	Factory Number:	12331
	Vendor Number:	11236
	Customer:	Leeds
	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
 Manager, Hardlines Division**

**POLYCONCEPT
TEST REPORT**

Test Result Summary	
Test Requested	Result
California Proposition 65 Total Lead Content in Surface Coatings and Substrates	PASS
California Proposition 65 Lead and Cadmium Content in External Decoration of Tableware (NIOSH)	PASS
FDA CPG Sec. 545.400 & 545.450 - Food Contact Materials - Leachable Lead (Pb) and Cadmium (Cd) in Ceramic (Interior)	PASS
Leachable Lead & Cadmium from Glassware and Ceramics – Lip & Rim	PASS
California Proposition 65, Leachable Lead and Cadmium in Tableware – Interior	PASS
California Proposition 65, Leachable Lead and Cadmium - Lip and Rim	PASS
SOR/2016-175 - Glazed Ceramics and Glassware Regulations - Leachable Lead (Pb) and Cadmium (Cd) (Interior)	PASS
SOR/2016-175 - Glazed Ceramics and Glassware Regulations - Leachable Lead (Pb) and Cadmium (Cd) (Lip & Rim)	PASS
19 CFR 134.11 Country of Origin Markings	PASS
Thermal Shock	PASS

COMPONENT BREAKDOWN LIST:

Test Item	Component Description
A	Sienna Ceramic Mug 14oz
A1	White/Grey ceramic mug

TEST RESULT:

Total Lead Content – Client’s Requirement according to the Consent Decrees of California Proposition 65

Test Item	Classification	Total Lead (Pb) (mg/kg)		Conclusion
		Result	Maximum Permissible Limit	
A1	Substrate	25	100	PASS

Method: Sample was digested with reference to EPA 3051. The lead content was analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: The maximum permissible limit(s) was / were quoted from the client’s protocol constructed according to various Consent Decrees. Compliance with the above stated limit(s) does not show compliance with Proposition 65 or a guarantee against possible legal action but provides a relative level of assurance against potential lawsuits.

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

TEST RESULT:

California Proposition 65 Lead and Cadmium Content in External Decoration of Tableware (NIOSH)

Test Item	Result (µg)		Conclusion
	Ghost Wipe Lead (Pb)	Ghost Wipe Cadmium (Cd)	
A	<1.0	<1.0	PASS (See Remark)

Method: With reference to NIOSH Method 9100. The lead and cadmium contents are determined by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
The reformulation levels set forth in the Consent Decrees of similar products to the Sample are:

Any 1 of 6 units containing 1.0 µg and 4.0 µg for Lead and Cadmium respectively in NIOSH Method; or

The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

Note: µg/mL = microgram per milliliter
“<” = less than

TEST RESULT:

FDA CPG Sec. 545.400 & 545.450 - Food Contact Materials - Leachable Lead (Pb) and Cadmium (Cd) in Ceramic (Interior)

Test Item	Internal Depth (mm)	Unit	Leaching Volume (mL)	Result (mg/L)	
				Lead	Cadmium
A	88	(1)	400	<0.05	<0.01
		(2)	400	<0.05	<0.01
		(3)	400	<0.05	<0.01
		(4)	400	<0.05	<0.01
		(5)	400	<0.05	<0.01
		(6)	400	<0.05	<0.01
		Average	400	<0.05	<0.01
Limit (For Cups & Mugs – Any 1 of 6 units)				0.5	0.5
Conclusion				PASS	

Method: ASTM C738-94 (Reapproved 2020). The lead and cadmium contents are determined by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

The Definition of Food Contact materials are:

- a) Flatware - Ceramic articles have an internal depth not exceeding 25 mm, measured vertically from the lowest interior point to a horizontal plane passing through the upper rim or the point of overflow.
- b) Hollow ware - Ceramic articles have an internal depth greater than 25 mm, measured vertically from the lowest interior point to a horizontal plane passing through the upper rim or the point of overflow.
 - i. Small hollow ware - A capacity of less than 1.1 liter
 - ii. Large hollow ware - A capacity of 1.1 liter or more
- c) Cups and mugs - Small ceramic hollow ware vessels commonly used for consumption of beverages, for example, coffee or tea at above room temperature. Cups and mugs normally, but not exclusively, have a capacity of about 240 ml or 8 fl. oz. and are manufactured with a handle. Cups normally have a base and curved sides while a mug has cylindrical sides.
- d) Pitchers - Large ceramic hollow ware vessels (sometimes known as jugs) commonly used for the storing and dispensing of fruit and vegetable juices or other acidic beverages at or below room temperature which are normally manufactured without a lid but with a handle and lip spout.

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

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
A	(1)	400	260	<0.05	<0.01
	(2)	400	260	<0.05	<0.01
	(3)	400	260	<0.05	<0.01
	(4)	400	260	<0.05	<0.01
	(5)	400	260	<0.05	<0.01
	(6)	400	260	<0.05	<0.01
Limit (Any 1 of 6 units)				4	0.4
Conclusion				PASS	

Method: ASTM C927-80 (Reapproved 2019). 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:

California Proposition 65, Leachable Lead and Cadmium in Tableware – Interior

Test Item	Unit	Internal Depth (mm)	Internal Volume (mL)	Leaching Volume (mL)	Concentration relative to Internal Volume (mg/L)	
					Lead	Cadmium
A	(1)	88	400	400	<0.05	<0.01
	(2)	88	400	400	<0.05	<0.01
	(3)	88	400	400	<0.05	<0.01
	(4)	88	400	400	<0.05	<0.01
	(5)	88	400	400	<0.05	<0.01
	(6)	88	400	400	<0.05	<0.01
	(7)	88	400	400	<0.05	<0.01
	(8)	88	400	400	<0.05	<0.01
	(9)	88	400	400	<0.05	<0.01
	(10)	88	400	400	<0.05	<0.01
	(11)	88	400	400	<0.05	<0.01
	(12)	88	400	400	<0.05	<0.01
Conclusion					PASS (See Remark)	

Method: ASTM C738-94 (Reapproved 2020). The lead and cadmium contents are determined by Inductively Coupled Argon Plasma Spectrometer / Atomic Absorption Spectrophotometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

The reformulation levels set forth in the Consent Decrees of similar products to the Sample are

For Lead (Pb):

0.226 mg/L for Flatware and 0.1 mg/L for Hollowware.

For Cadmium (Cd):

1.853 mg/L for Flatware, 0.189 mg/L for Small Hollowware and 0.049 mg/L for Large Hollowware.

The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

The Definition of Food Contact materials are:

- b. Flatware - Ceramic articles have an internal depth not exceeding 25 mm, measured vertically from the lowest interior point to a horizontal plane passing through the upper rim or the point of overflow.
- c. Hollow ware - Ceramic articles have an internal depth greater than 25 mm, measured vertically from the lowest interior point to a horizontal plane passing through the upper rim or the point of overflow.
 - i. Small hollow ware - A capacity of less than 1.1 liter
 - ii. Large hollow ware - A capacity of 1.1 liter or more

Note: mL = milliliter
mm = millimeter
mg/L = milligram per liter
“<” = less than

TEST RESULT:

California Proposition 65, Leachable Lead and Cadmium - Lip and Rim

Test Item	Unit	Internal Volume (mL)	Leaching Volume (mL)	Concentration relative to Internal Volume (µg/mL)	
				Lead	Cadmium
A	(1)	400	260	<0.05	<0.01
	(2)	400	260	<0.05	<0.01
	(3)	400	260	<0.05	<0.01
	(4)	400	260	<0.05	<0.01
	(5)	400	260	<0.05	<0.01
	(6)	400	260	<0.05	<0.01
Conclusion				PASS (See Remark)	

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

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

The reformulation levels set forth in the Consent Decrees of similar products to the Sample are:

- Any 1 of 6 units containing 0.5 µg/mL and 2 µg/mL for Lead and Cadmium respectively in ASTM method.**

The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

Note: mL = milliliter
µg/mL = microgram per milliliter
“<” = less than

TEST RESULT:

SOR/2016-175 - Glazed Ceramics and Glassware Regulations - Leachable Lead (Pb) and Cadmium (Cd) (Interior)

Test Item	Internal Depth (mm)	Unit	Leaching Volume (mL)	Result (mg/L)	
				Lead	Cadmium
A	88	(1)	400	<0.05	<0.01
		(2)	400	<0.05	<0.01
		(3)	400	<0.05	<0.01
		(4)	400	<0.05	<0.01
		(5)	400	<0.05	<0.01
		(6)	400	<0.05	<0.01
		Average	400	<0.05	<0.01
Conclusion				PASS	

Requirement:

Category	Leachability Limit (mg/L)	
	Lead	Cadmium
Flatware	3.0	0.5
Small hollowware, other than cups or mugs	2.0	0.5
Large hollowware, other than pitchers	1.0	0.25
Cups & Mugs	0.5	0.5
Pitchers	0.5	0.25

Method: ISO 6486-1:2019, Ceramic ware, glass-ceramic ware and glass dinnerware in contact with food — Release of lead and cadmium — Part 1: Test Method, second edition, 1999-12-15. The lead and cadmium contents are determined by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

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

TEST RESULT:

SOR/2016-175 - Glazed Ceramics and Glassware Regulations - Leachable Lead (Pb) and Cadmium (Cd) (Lip & Rim)

Test Item	Unit	Internal Volume (ml)	Leaching Volume (ml)	Concentration relative to Internal Volume (mg/L)	
				Lead	Cadmium
A	(1)	400	260	<0.05	<0.01
	(2)	400	260	<0.05	<0.01
	(3)	400	260	<0.05	<0.01
	(4)	400	260	<0.05	<0.01
	(5)	400	260	<0.05	<0.01
	(6)	400	260	<0.05	<0.01
Limit (Any 1 of 6 units)				4	0.4
Conclusion				PASS	

Method: With reference to ASTM C927-80 (Reapproved 2019) by using the parameter described in Schedule of the Regulation. 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	Not Applicable	Per Review	Not Applicable	Products Manufactured outside of USA.	PASS
Thermal Shock	ASTM C149-86-Modified	Per Glass/Ceramic product	Product shall not crack or shatter after being subjected to extreme temperature change: Ceramic mugs & dinnerware: 212 °F to 68°F	Products Manufactured outside of USA.	PASS

*****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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