

Test Report No. BTO 210672/1a

Issue Date: 23rd February 2016

Amalgamating Test Report BTO210672/1 and BTO210672/2

The following sample was submitted and identified by the client as:

Sample Name: 40 Shelf Mobile Drying Rack (small)
Sample Reference: C1182
Sample Description: Black metal frame, white metal racks and wheels.
(Intended for educational purposes in schools)
Sample Submitted: 7th October 2015
Testing Period: Testing conducted between 3rd December 2015 and 16th December 2015
Additional testing conducted 21st January 2016 and 29th January 2016
Age Grading Applied: 12 Months +
Assessed Age Grading: 3 Years +
Testing Required: Although this item is not a toy SGS was requested to test for compliance with the European Standard on Safety Of Toys:

BSEN 71-1: 2014
(Excluding clause 6.0 at request of client)
 BSEN 71-2:2011+A1:2014
 BSEN71-3:2013

Result:

Pass⁽¹⁾

Pass⁽¹⁾

Pass⁽²⁾⁽³⁾

- ⁽¹⁾ See Appendix for labelling details
- ⁽²⁾ Confirmation testing is Non UKAS
- ⁽³⁾ Confirmation testing for Chromium (VI) on sample 4 was conducted at another laboratory within the SGS group of companies

Conclusion:

The submitted samples as detailed above, complied with the requirements as listed above.

Signed for and on behalf of
 SGS United Kingdom Ltd.



Chris Walker, BSc (Hons)
 Technical Manager

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APPENDIX A

**BSEN 71-1:2014
MECHANICAL AND PHYSICAL PROPERTIES**

| Clause: | Details: | Results: |
|-------------------|---|-----------------|
| <u>4</u> | <u>General Requirements</u> | |
| 4.1 | Material Cleanliness <i>Toys shall be visually clean and free from infestation (Visual Assessment).</i> | Pass |
| 4.2 | Assembly <i>A toy intended to be assembled by an adult shall carry the appropriate labelling and instructions.</i> <i>**No instructions were present when tested, however the client has confirmed that the appropriate instructions will be present</i> | Pass** |
| 4.7 | Edges <i>There shall be no non functional or hazardous sharp edges present. Functional sharp edges should be warned accordingly</i> | Pass |
| 4.8 | Points and Metallic Wires <i>There shall be no non functional or hazardous sharp points present. Functional sharp points should be warned accordingly.</i> | Pass |
| 4.9 | Protruding Parts <i>Shall not constitute a puncture hazard or have suitable protection.</i> | Pass |
| 4.10.3 | Hinges <i>Shall not have a gap along the hinge line of between 5mm and 12mm</i> | Pass |
| 4.16 | Heavy Immobile Toys <i>Shall be stable and not tip over on a 5° slope.</i> | Pass |
| <u>5.0</u> | <u>Toys Intended For Children Under 36 Months</u> <i>(See Comment 1)</i> | -- |
| 5.1 | General Requirements <i>Toys shall not produce small parts, sharp edges or sharp points before or after abuse testing.</i> | Pass |
| 6.0 | Packaging <i>Not Tested at request of client</i> | --- |
| <u>7</u> | <u>Warnings and Instructions for Use</u> <i>(See Comment 2 and Comment 3)</i> | -- |

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**BSEN 71-2:2011+A1:2014
FLAMMABILITY OF TOYS**

Clause: 4.1
Details: General Requirements
(See Comment 1)

Results:
Pass

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Comment 1

In order to comply with the requirements of this clause:

| | |
|---|--------------------------|
| Washing/Cleaning Label | <u>See Remark</u> |
| (Sub-content is extracted from the context of EN 71-1 and EN 71-2) | |
| According to Directive 2009/48/EC the following safety requirements apply regarding cleaning and washing: A toy intended for use by children under 36 months must be designed and manufactured in such a way that it can be cleaned. A textile toy must, to this end, be washable, except if it contains a mechanism that may be damaged if soak washed. The toy must fulfil the safety requirements also after having been cleaned in accordance with this point and the manufacturer's instructions. The manufacturer should, if applicable, provide instructions on how the toy has to be cleaned. | |
| Remark: Washing/cleaning label was not found on the item | |

Comment 2

In order to comply with the requirements of this clause:

| | | | | | | | | | |
|--|--------------------------|-----------------------|----------------|----------------------------|-------------|------------------------|-------------|------------------------------------|-------------|
| CE mark, importer / manufacturer mark (name, address), product identification | <u>See Remark</u> | | | | | | | | |
| (Sub-content is extracted from the context of EN 71-1) | | | | | | | | | |
| Toys made available on the market must bear the CE marking. The CE marking must be subject to the general principles set out in Article 30 of Regulation (EC) No 765/2008. The CE marking must be affixed visibly, legibly and indelibly to the toy, to an affixed label or to the packaging. In the case of small toys and toys consisting of small parts, the CE marking may alternatively be affixed to a label or an accompanying leaflet. Where, in the case of toys sold in counter displays, that is not technically possible, and on condition that the counter display was originally used as packaging for the toy, the CE marking may be affixed to the counter display. Where the CE marking is not visible from outside the packaging, if any, it shall as a minimum be affixed to the packaging. Where specific legislation does not impose specific dimensions, the CE marking must be at least 5 mm high | | | | | | | | | |
| The manufacturer's name, registered trade name or registered trade mark and the address at which the manufacturer can be contacted must be indicated on the toy or, where that is not possible, on its packaging or in a document accompanying the toy. This requirement applies also to the name and address etc. of any importer. | | | | | | | | | |
| Manufacturers must ensure that their toys bear a type, batch, serial or model number or other element allowing their identification, or where the size or nature of the toy does not allow it, that the required information is provided on the packaging or in a document accompanying the toy. | | | | | | | | | |
| <table border="1"> <tr> <td>CE Mark (minimum 5mm)</td> <td>Not Applicable</td> </tr> <tr> <td>Manufacturers Name/Address</td> <td>Not Present</td> </tr> <tr> <td>Importers Name/Address</td> <td>Not Present</td> </tr> <tr> <td>Batch Code or Suitable Alternative</td> <td>Not Present</td> </tr> </table> | | CE Mark (minimum 5mm) | Not Applicable | Manufacturers Name/Address | Not Present | Importers Name/Address | Not Present | Batch Code or Suitable Alternative | Not Present |
| CE Mark (minimum 5mm) | Not Applicable | | | | | | | | |
| Manufacturers Name/Address | Not Present | | | | | | | | |
| Importers Name/Address | Not Present | | | | | | | | |
| Batch Code or Suitable Alternative | Not Present | | | | | | | | |
| (Remark: It is drawn to your attention that the product identification number, name and address of manufacturer and importer in EEC country together with CE-marking should appear as specified in Directive-2009/48/EC-Safety of toys) | | | | | | | | | |

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Comment 3

The following good practice should be considered

In the following good practice, the guidance documents ISO/IEC Guide 37, Instructions for use of products of consumer interest and CEN/CENELEC Guide 11, Product information relevant to consumers – Guidelines for standard developers have been considered and adopted where appropriate.

Good practice for visibility and legibility:

a) Emphasising the warning:

1) emphasise warnings e.g. by placing them in a prominent position on the toy and/or its *packaging*.

The prominent position does not necessarily mean the front panel of the *packaging*. Note that the age warning symbol alone (without the word "Warning") can be placed e.g. on the front of the *packaging*, provided that a complete warning (including the word "Warning") is present on another location of the *packaging*;

2) avoid large amounts of information;

3) do not mix safety information with commercial information;

4) the text of the warnings on the *packaging* should be conspicuous and reasonably related to the font, visibility, legibility and size of other printed matter on the *packaging*;

5) in multi-language text, clearly separate the individual languages, for example by a flag, spacing, country code or other means.

b) Contrast, background and colours:

1) the colour of the warning should be in sharp contrast with the colour of the background. Avoid using similar foreground and background colours such as white text on yellow background. Dark ink on bright paper or bright ink on dark paper provides good contrast;

2) when using the age warning symbol, ensure contrast between the red circle and the background on which the pictogram is placed;

3) for the background of the warning avoid strong background patterns or images that may interfere with the warning;

4) avoid red-green and blue-yellow colour combinations, as these may create problems for persons with colour-vision deficiency.

c) Reflecting surfaces and obscuring material:

1) avoid highly reflecting surfaces and highly reflecting glossy paper leading to poor legibility for surfaces displaying warning text. Avoid transparent *packaging* material that may obscure, blur or deform the warning text.

d) Font type:

1) preferably use sans-serif font types. Avoid the use of different font types in the warning text.

e) Font size:

1) no recommendations for a minimum font size have been set. Setting minimum recommendations might encourage the use of only the smallest specified font size. It is considered more appropriate to give recommendations on other factors that are important for the visibility and legibility of a warning text. However, it is strongly recommended that the font size is increased where possible to improve the visibility and legibility of text. Use font sizes that allow all target groups, including those with corrected vision, to read the warning and

2) consider using larger warning symbols than the minimum size as specified in 7.1 and 7.2.

f) Logical direction of text:

1) place the warning in the logical direction considering the lay-out of the information on the surrounding *packaging* or, if appropriate, the normal orientation of the toy."

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APPENDIX B

**EN71-3:2013
Migration of Certain Elements**

Method: With reference to EN71-3:2013.

Analysis of general elements was performed by ICP-MS. Category (III) scraped off toy material.

Adjusted Analytical Results: Results Quoted as mg of soluble element per Kg material.

| | Category Limits | | | Sample Reference | | | | |
|---------------------------|-----------------|-------|--------|----------------------------|-------------|-------------|-------------|-------------|
| | I | II | III | 1 | 2 | 3 | 4 | 5 |
| Aluminium (Al) | 5625 | 1406 | 70000 | <50 | <50 | <50 | <50 | <50 |
| Antimony (Sb) | 45 | 11.3 | 560 | <1 | <1 | <1 | <1 | <1 |
| Arsenic (As) | 3.8 | 0.9 | 47 | <0.15 | <0.15 | <0.15 | <0.15 | <0.15 |
| Barium (Ba) | 1500 | 375 | 18750 | 326.13 | 310.09 | <50 | <50 | <50 |
| Boron (B) | 1200 | 300 | 15000 | <50 | <50 | <50 | <50 | <50 |
| Cadmium (Cd) | 1.3 | 0.3 | 17 | <0.15 | <0.15 | <0.15 | <0.15 | <0.15 |
| Chromium (Cr) | - | - | - | 0.14 | 0.62 | 1.02 | 8.71 | 0.96 |
| Chromium (III) (Cr (III)) | 37.5 | 9.4 | 460 | Not Conducted# | | | | |
| Chromium(VI) (Cr (VI)) | 0.02 | 0.005 | 0.2 | Not Conducted# | | | | |
| Cobalt (Co) | 10.5 | 2.6 | 130 | <1 | <1 | <1 | <1 | <1 |
| Copper (Cu) | 622.5 | 156 | 7700 | <5 | <5 | <5 | <5 | <5 |
| Lead (Pb) | 13.5 | 3.4 | 160 | <0.15 | 0.17 | 0.78 | <0.15 | <0.15 |
| Manganese (Mn) | 1200 | 300 | 15000 | <50 | <50 | <50 | <50 | <50 |
| Mercury (Hg) | 7.5 | 1.9 | 94 | <0.25 | <0.25 | <0.25 | <0.25 | <0.25 |
| Nickel (Ni) | 75 | 18.8 | 930 | <50 | <50 | <50 | <50 | <50 |
| Selenium (Se) | 37.5 | 9.4 | 460 | <1 | <1 | <1 | <1 | <1 |
| Strontium (Sr) | 4500 | 1125 | 56000 | <50 | <50 | <50 | <50 | <50 |
| Tin (Sn) | 15000 | 3750 | 180000 | <0.1 | 1.54 | <0.1 | <0.1 | <0.1 |
| Organic Tin | 0.9 | 0.2 | 12 | Not Conducted [^] | | | | |
| Zinc (Zn) | 3750 | 938 | 46000 | <50 | 60.76 | 88.08 | 1399.03 | 3079.75 |

Results of Analysis – Pass - See Appendix C for Chromium confirmation on samples 2, 3, 5 and 6 and Appendix D for Chromium confirmation on sample 4

| Sample Ref: | Sample Description & Location | Category | | |
|-------------|---------------------------------------|----------|----|-----|
| | | I | II | III |
| 1. | White paint from frame ^{#1} | | | ✓ |
| 2. | Black paint from frame ^{#2} | | | ✓ |
| 3. | Black plastic wheel ^{#3} | | | ✓ |
| 4. | ***Metal bolt (14.044g) ^{#4} | | | ✓ |
| 5. | ***Metal nut (3.595g) | | | ✓ |

*** The ratio of solid to acid extractant exceeded 1:50.

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Adjusted Analytical Results: Results Quoted as mg of soluble element per Kg material.

| | Category Limits | | | Sample Reference | |
|---------------------------|-----------------|-------|--------|----------------------------|-------------|
| | I | II | III | 6 | 7 |
| Aluminium (Al) | 5625 | 1406 | 70000 | <50 | <50 |
| Antimony (Sb) | 45 | 11.3 | 560 | <1 | <1 |
| Arsenic (As) | 3.8 | 0.9 | 47 | 0.19 | <0.15 |
| Barium (Ba) | 1500 | 375 | 18750 | <50 | <50 |
| Boron (B) | 1200 | 300 | 15000 | <50 | <50 |
| Cadmium (Cd) | 1.3 | 0.3 | 17 | <0.15 | <0.15 |
| Chromium (Cr) | - | - | - | 0.95 | 0.29 |
| Chromium (III) (Cr (III)) | 37.5 | 9.4 | 460 | Not Conducted# | |
| Chromium(VI) (Cr (VI)) | 0.02 | 0.005 | 0.2 | Not Conducted# | |
| Cobalt (Co) | 10.5 | 2.6 | 130 | <1 | <1 |
| Copper (Cu) | 622.5 | 156 | 7700 | <5 | <5 |
| Lead (Pb) | 13.5 | 3.4 | 160 | <0.15 | <0.15 |
| Manganese (Mn) | 1200 | 300 | 15000 | <50 | <50 |
| Mercury (Hg) | 7.5 | 1.9 | 94 | <0.25 | <0.25 |
| Nickel (Ni) | 75 | 18.8 | 930 | <50 | <50 |
| Selenium (Se) | 37.5 | 9.4 | 460 | <1 | <1 |
| Strontium (Sr) | 4500 | 1125 | 56000 | <50 | <50 |
| Tin (Sn) | 15000 | 3750 | 180000 | <0.1 | <0.1 |
| Organic Tin | 0.9 | 0.2 | 12 | Not Conducted ^a | |
| Zinc (Zn) | 3750 | 938 | 46000 | 556.19 | <50 |

| Sample Ref: | Sample Description & Location | Category | | |
|-------------|-------------------------------------|----------|----|-----|
| | | I | II | III |
| 6. | ***Metal washer (978mg) | | | ✓ |
| 7. | Black plastic from stopper on frame | | | ✓ |

*** The ratio of solid to acid extractant exceeded 1:50.

^{#1} Client has confirmed that this material is also present on samples 1232, 1264, 1270, 1275, 1135, 1162, 1275, 1167, 1169, 1182, 1164, 116, C1273

^{#2} Client has confirmed that this material is also present on samples 1196, 1135, 1162, C4635, 1166, 1167, 1169, 1182, 1164

^{#3} Client has confirmed that this material is also present on sample C4635

^{#4} Client has confirmed that this material is also present on sample C4635

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Note : - mg/kg = milligram per kilogram
- 1% = 10000 mg/kg = 10000 ppm

- # Levels of Soluble Chromium (III) & Chromium (VI) were not separately determined.

As the level of Soluble Chromium on sample **2, 3, 4, 5, 6, 7** detected exceeded the stricter limit for Chromium (VI) as specified in EN71-3:2013 further testing is recommended to determine the levels of Chromium (VI)

See Appendix C for Chromium confirmation on samples 2, 3, 5 and 6.

See Appendix D for Chromium confirmation on sample 4

- ^ The level of Soluble Organic Tin was not determined.

The level of Soluble Tin, after conversion, detected on samples did not exceed the stricter limit for Organic Tin as specified in EN71-3: 2013.

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APPENDIX C – Non UKAS

BSEN71-3:2013 – Migration of Certain Elements Confirmation of Chromium (VI)

Category (III) scraped off toy material.

Method:

Indicative test by UV-Vis.

Chromium (III) was obtained by calculation, Chromium (VI) was analysed by UV-Vis.

Analytical Results: Results Quoted as mg of soluble element per Kg material.

| Sample Limits | Chromium III 460mg/kg | Chromium VI 0.2mg/kg |
|--|----------------------------------|---------------------------------|
| 2. Black paint from frame | <5 | <0.2 |
| 3. Black plastic wheel | <5 | <0.2 |
| 5. Metal nut | <5 | <0.2 |
| 6. Metal washer | <5 | <0.2 |
| 7. Black plastic from stopper on frame | <5 | <0.2 |

Note : - mg/kg = milligram per kilogram
 - 1% = 10000 mg/kg = 10000 ppm

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APPENDIX D – Non UKAS

Test Results:

1. EN 71 Part 3:2013 + A1:2014 – Safety of Toys – Part 3 - Migration of Certain Elements

Category III: Scraped off toy material

Method: With reference to EN 71 Part 3: 2013 + A1:2014. Analysis of general elements was performed by ICP-OES. by Chromium (III) was obtained by calculation, chromium (VI) was analyzed by IC-UV/VIS.

| Test Item(s) | Result(s) | MDL | Permissible Limit |
|---|-----------|------|-------------------|
| Specimen No. | 1 | -- | -- |
| Mass of trace amount (mg) | -- | -- | -- |
| Soluble Chromium (III) (Cr (III)) (mg/kg) | 8.71 | 1 | 460 |
| Soluble Chromium (VI) (Cr (VI)) (mg/kg) | ND | 0.12 | 0.2 |

Specimen Description:

1. Metal bolt

Note:

- mg/kg = milligram per kilogram
- mg = milligram
- ND = Not Detected (lower than MDL)
- MDL = Method Detection Limit
- 1% = 10000mg/kg = 10000ppm

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*** End of Report ***

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