



CONSUMER PRODUCTS SERVICES DIVISION

VISSTUN

Technical Report: (5114)115-0002C-REVISION
Date Received: May 21, 2014

July 31, 2014
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Sample Description:	REUSABLE V 3 SERIES LIDS	Sample Size:	136
Vendor:	N/A	Style No(s):	N/A
Manufacturer:	VARIOUS	SKN/SKU No.:	N/A
Buyer:	N/A	PO No.:	N/A
Labeled Age Grade:	NOT PRESENT	Ref #:	N/A
Appropriate Age Grade:	ADULT	Country of Origin:	UNITED STATES
Client Specified Age Grade:	3+	Assortment No.:	N/A
Tested Age Grade:	CHILDREN PRODUCTS, OVER 3 YEARS OF AGE		
UPC Code:	N/A		

EXECUTIVE SUMMARY:

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

- The limits set forth in Title 21, Code of Federal Regulations (CFR), Section 177.1520 "Indirect Food Additives: Polymers - Olefin Polymers - Olefin Basic Copolymers (Described in paragraph (a)(3)(i))", paragraph (c)3.1, for use in articles that contact food except for articles used for packing or holding food during cooking.
- The limits set forth in US Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 176.170, "Indirect Food Additives: Paper and Paperboard Components.
- The mechanical hazards requirements of 16 CFR 1500, "Federal Hazardous Substances Act Regulations." *
- The mechanical hazards requirements of 16 CFR 1500.53(c), "Bite test" (FHSA requirements). *
- The flammability requirements of 16 CFR 1500.3(c)(6)(vi), "Flammable solid" (FHSA regulations).
- The mechanical hazards requirements of ASTM F963-11, "Standard consumer safety specification for toy safety". *
- The heavy metals content in packaging requirements of Model Toxics Legislation of the Toxics in Packaging Clearinghouse, TPCH (formerly the Coalition of Northeastern Governors, CONEG).
- The total lead content of substrate materials requirements of Illinois Lead Poisoning Prevention Act, Public Act 095-1019.*
- The total lead content of surface coating requirements of Illinois Lead Poisoning Prevention Act, Public Act 095-1019.*
- The total lead content of 100ppm requirements in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).*



The sample(s) MEET the following requirement(s): *(continued)*

- The total lead content of 90ppm requirements of 16 CFR 1303, "Ban of lead-containing paint and certain consumer products bearing lead-containing paint" as mandated by Congress in section 101(f) of the Consumer Products Safety Improvement Act (CPSIA) of 2008, Public Law 110-314.*
- **The Lead and Cadmium requirements of CA Proposition 65 Health and Safety Code, "Safe Drinking Water and Toxic Enforcement Act", Section CGC-05-440811, set forth by the Superior Court of California, City and County of San Francisco.**
- The mechanical and physical properties requirements of the tested subclauses of the European Standard, "Safety of toys", EN71: Part 1:2011, clauses 1-6.*
- The heavy metals requirements of the European "Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste."
- The cadmium content requirement of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 23 (amended up to EU No. 835/2012).
- The E. coli requirement of the client's specification.
- The salmonella requirement of the client's specification.
- The pseudomonas aeruginosa requirement of the client's specification.
- The staphylococcus aureus requirement of the client's specification.
- The total coliform requirement of the client's specification.
- The total plate count requirement of the client's specification.
- The soluble heavy metals content requirement of client's specification.
- The requirements of Packaging Authorization for Trademark Vessels for use with vessels bearing trademarks of the Coca-Cola Company.

PK-SP-105 – Microbiological Cleanliness - Trademark Vessels
PK-SP-106 – Flammability - Trademark Vessels
PK-SP-107 – Mechanical Hazards - Trademark Vessels
PK-SP-110 – Environmental Regulations - Trademark Vessels
PK-SP-111 – Lead & Heavy Metals - Trademark Vessels
PK-SP-112 – Extraction - Trademark Vessels



Note: The sample(s) was not evaluated to the Normal Use testing requirements specified in ASTM F963-11, Section 8.5. It is the responsibility of the manufacturer, vendor or distributor to conduct tests that will simulate normal use conditions. These tests shall ensure that hazards are not generated through normal wear and deterioration of the sample(s). These tests shall also simulate the normal play mode of the toy and to simulate the expected mode of use of the particular toy. The tests shall be conducted in an expected use environment. These normal use tests shall simulate the intended use of the toy based on its estimated lifetime.

Note: The sample(s) was analyzed using analytical procedures taken from the following chapters of the U.S. Food and Drug Administration, Bacteriological Analytical Manual:

- Chapter 3- Aerobic Plate Count: January 2001
- Chapter 4- Enumeration of *Escherichia coli* and the Coliform Bacteria: September 2002
- Chapter 5- *Salmonella*: April 2003; Updated September 2005, December 2005, June 2006, and December 2007
- Chapter 12- *Staphylococcus aureus* : January 2001
- Chapter 18- Yeasts, Molds and Mycotoxins: January 2001

Note: Tests indicated with an asterisk (*) were conducted at the client's request.

Note: This report has been revised to include CA Prop65 data.

BVCPS Buffalo Contact Information for this Report:

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/cq

cc: MONIQUE FAVREAU, VISSTUN



RESULTS:

Sample #	(5114)115-0002 (A)
Sample ID:	Reusable V 3 Series Lids (Without Lining)

TEST	LIMIT	RESULT
Total Plate Count	< 250 cfu/premium	< 10 cfu/premium
Total Coliform	< 10 MPN/premium	< 0.3 MPN/premium
<i>E. coli</i>	Negative	Negative
<i>Staphylococcus aureus</i>	Negative	Negative
<i>Pseudomonas aeruginosa</i>	Negative	Negative
<i>Salmonella</i>	Negative	Negative

Sample #	(5114)115-0002 (B)
Sample ID:	Reusable V 3 Series Lids (With Paper Lining)

TEST	LIMIT	RESULT
Total Plate Count	< 250 cfu/premium	< 10 cfu/premium
Total Coliform	< 10 MPN/premium	< 0.3 MPN/premium
<i>E. coli</i>	Negative	Negative
<i>Staphylococcus aureus</i>	Negative	Negative
<i>Pseudomonas aeruginosa</i>	Negative	Negative
<i>Salmonella</i>	Negative	Negative

Sample received and tested in good condition unless otherwise noted.

est. = Refers to actual plate counts not in the range of 25 to 250 colonies. When these counts are performed on diluted samples, the final count may appear to be within this range, when in actuality it was not.

cfu = colony forming units

g = gram

< = less than

RESULTS:

CADMIUM CONTENT (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 23)

Category:				Plastics			
Element:				Cadmium			
Test Method				BS EN 1122: 2001, Method B			
Maximum Allowable Limit:				100 mg/kg (0.01% by weight)			
Sample Description				Reading 1	Reading 2	Average	Conclusion
Color / Component	Location	Style	Result (mg/kg)				
(A) White plastic	Lids	-	LT 5.00	LT 5.00	LT 5.00	Pass	
(B) Black plastic	Lids	-	LT 5.00	LT 5.00	LT 5.00	Pass	
(C) Clear plastic	Lids	-	LT 5.00	LT 5.00	LT 5.00	Pass	

LT = Less than

= Insufficient sample for duplicate analyses

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

Category:				Paints	
Element:				Cadmium	
Test Method:				In house acid digestion	
Maximum Allowable Limit:				100 mg/kg (0.1% by weight)	
Test Component				Result	Conclusion
Colour/Component	Location	Style	(mg/kg)		
(D) Multi-color coating	Paper lids	-	LT 5.00	Pass	
(E) Multi-color coating	Plastic lids	-	LT 5.00	Pass	

LT = Less than

* = Average of duplicate analyses

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



RESULTS:

TOTAL LEAD CONTENT IN SUBSTRATES (Illinois General Assembly, Public Act 095-1019)

Test Method: Acid digestion followed by Atomic Absorption Spectrophotometry or Inductively Coupled Plasma Spectrometry

Element:			Lead	
Requirement: Maximum allowable limit: (mg/kg)			40 mg/kg	
Sample Description			Result (mg/kg)	Conclusion
Color / Component	Location	Style		
(A) White plastic	Lids	-	LT 5.00	Pass
(B) Black plastic	Lids	-	LT 5.00	Pass
(C) Clear plastic	Lids	-	LT 5.00	Pass
(F) White coated paperboard	Lids	-	LT 5.00	Pass

LT = Less Than *mg/kg = milligrams per kilogram (ppm = parts per million)*
 * = Average of duplicate analyses

TOTAL LEAD CONTENT IN SURFACE COATING (Illinois General Assembly, Public Act 095-1019)

Test Method: Acid digestion followed by Atomic Absorption Spectrophotometry or Inductively Coupled Plasma Spectrometry

Element:			Lead	
Requirement: Maximum allowable limit: (mg/kg)			40 mg/kg	
Sample Description			Result (mg/kg)	Conclusion
Color / Component	Location	Style		
(D) Multi-color coating	Paper lids	-	LT 5.00	Pass
(E) Multi-color coating	Plastic lids	-	LT 5.00	Pass

LT = Less Than *mg/kg = milligrams per kilogram (ppm = parts per million)*
 * = Average of duplicate analyses



RESULTS:

HEAVY METALS PRESENT IN PACKAGING (European Council Directive 94/62/EC on Packaging and Packaging Waste)

Sample Identity	Color / Component	Location	Product style
(A)	White plastic	Lids	-
(B)	Black plastic	Lids	-
(C)	Clear plastic	Lids	-
(D)	Multi-color coating	Paper lids	-
(E)	Multi-color coating	Plastic lids	-
(F)	White coated paperboard	Lids	-

Sample Identity:	(A)	(B)	(C)	(D)	Maximum Allowable Limit (mg/kg)
Parameter:	The sum of lead, cadmium, mercury and hexavalent chromium				
Element	Result (mg/kg (ppm))				
Cadmium	LT 5.00	LT 5.00	LT 5.00	LT 5.00	-----
Chromium	LT 5.00	LT 5.00	LT 5.00	LT 5.00	-----
Mercury	LT 5.00	LT 5.00	LT 5.00	LT 5.00	-----
Lead	LT 5.00	LT 5.00	LT 5.00	LT 5.00	-----
Sum	LT 20.0	LT 20.0	LT 20.0	LT 20.0	100
Conclusion:	Pass	Pass	Pass	Pass	-----

LT = Less Than

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

Sample Identity:	(E)	(F)	Maximum Allowable Limit (mg/kg)
Parameter:	The sum of lead, cadmium, mercury and hexavalent chromium		
Element	Result (mg/kg (ppm))		
Cadmium	LT 5.00	LT 5.00	-----
Chromium	LT 5.00	LT 5.00	-----
Mercury	LT 5.00	LT 5.00	-----
Lead	LT 5.00	LT 5.00	-----
Sum	LT 20.0	LT 20.0	100
Conclusion:	Pass	Pass	-----

LT = Less Than

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



RESULTS:

TOTAL LEAD CONTENT IN SUBSTRATE (100PPM) (Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method: U.S. CPSC-CH-E1001-08.1 (June 21, 2010) or U.S. CPSC-CH-E1002-08.1 (June 21, 2010).

Analyte			Lead	
Requirement: Maximum allowable limit:			100 mg/kg	
Sample Description			Result (mg/kg)	Conclusion
Color / Component	Location	Style		
(A) White plastic	Lids	-	LT 5.00	Pass
(B) Black plastic	Lids	-	LT 5.00	Pass
(C) Clear plastic	Lids	-	LT 5.00	Pass
(F) White coated paperboard	Lids	-	LT 5.00	Pass

LT = Less Than

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

* = Average of duplicate analyses

TOTAL LEAD CONTENT IN SURFACE COATING ("Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint", Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method: U.S. CPSC-CH-E1003.09.1

Analyte:			Lead	
Requirement: Maximum allowable limit:			90 mg/kg	
Sample Description			Result (mg/kg)	Conclusion
Color / Component	Location	Style		
(D) Multi-color coating	Paper lids	-	LT 5.00	Pass
(E) Multi-color coating	Plastic lids	-	LT 5.00	Pass

LT = Less Than

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

* = Average of duplicate analyses

Remark:

In some cases, the tested component cannot be tested individually due to overlapped coatings.



RESULTS:

Heavy Metals Content in Packaging or Packaging Materials - United States Toxics in Packaging Clearinghouse (TPCH), Model Toxics in Packaging Legislation with Revisions up to December 2008

Test Method I : With reference to U.S. EPA 3050B: 1996.

Test Method II : With reference to U.S. EPA 3051/3052: 1996.

Test Item(s)	Item / Component Description(s)	Location(s)	Style(s)
(A)	White plastic	Lids	-
(B)	Black plastic	Lids	-
(C)	Clear plastic	Lids	-
(D)	Multi-color coating	Paper lids	-
(E)	Multi-color coating	Plastic lids	-
(F)	White coated paperboard	Lids	-

Element(s)	Lead (Pb)	Cadmium (Cd)	Mercury (Hg)	Hexavalent Chromium (Cr VI)
Maximum Allowable Limit (mg/kg)		100 mg/kg (Sum)		

-	Unit	Result		
Test Item(s)	-	A	B	C
Test Method	-	II	II	II
Parameter	-	-	-	-
Sum of Pb, Cd, Hg & Cr VI	mg/kg	LT 20.0	LT 20.0	LT 20.0
Conclusion	-	Pass	Pass	Pass

-	Unit	Result		
Test Item(s)	-	D	E	F
Test Method	-	II	II	II
Parameter	-	-	-	-
Sum of Pb, Cd, Hg & Cr VI	mg/kg	LT 20.0	LT 20.0	LT 20.0
Conclusion	-	Pass	Pass	Pass

Note / Key :

ND = Not detected LT = Less than * = average of duplicate analysis
 mg/kg = milligram(s) per kilogram = ppm = part(s) per million 10000 mg/kg = 1 %
 ** = sample did not digest EPA = Environmental Protection Agency
 ISO = International Organization of Standardization
 Detection Limit (mg/kg) : Sum 20



RESULTS:

Heavy Metals Content in Packaging or Packaging Materials - United States Toxics in Packaging Clearinghouse (TPCH), Model Toxics in Packaging Legislation with Revisions up to December 2008
(continued)

Remark :

- This legislation was originally drafted by the Source Reduction Council of the Coalition of Northeastern Governors (CONEG).
- According to Model Toxics in Packaging Legislation with Revisions up to December 2008, Section 5(c), exemption were granted to recycled material containing up to 200 milligrams per kilogram for the sum of lead, cadmium, mercury and hexavalent chromium.
- Unless further specified, the reported result(s) of Test Item(s) was (were) performed by total metal(s) content analysis through complete decomposition.
- Test Item(s) marked as "recycled" was (were) claimed as recycled material by client. Therefore, this (these) Test Item(s) containing the found sum of lead, cadmium, mercury and hexavalent chromium level should be exempted.
- Total chromium (Cr) may have been detected in the result(s). Therefore, Test Method(s), with reference to U.S. EPA 3060A: 1996 and (or) with reference to International Standard ISO 3613: 2010, was (were) further performed on this (these) Test Item(s) in confirming the presence of hexavalent chromium.



RESULTS:

SOLUBLE HEAVY METALS CONTENT (Client's specification)

Sample Identity	Color	Location	Style
(G)	White plastic	Lid	-
(H)	Clear plastic	Lid	-
(I)	Black plastic	Lid	-
(J)	White coated paperboard	Lid	-
(K)	Multi-color coating	Plastic lid	-
(L)	Multi-color coating	Paper lid	-

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Maximum Limit (mg/kg)	25	1000	75	60	60	90	60	500
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount (g)	Conclusion
Sample	Result (mg/kg)								(g)	
G.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	-	Pass
H.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	-	Pass
I.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	-	Pass
J.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	-	Pass
K.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	0.0163	Pass
L.	LT 2.5	LT 100	LT 7.5	LT 6.0	LT 6.0	LT 9.0	LT 6.0	LT 50	-	Pass

LT = Less Than
 CR = adjusted analytical result
 mg/kg = milligrams per kilogram (ppm=parts per million)
 * = Average of duplicate analysis

As = Arsenic, Ba = Barium, Cd = Cadmium,
 Cr = Chromium, Hg = Mercury, Pb = Lead,
 Sb = Antimony, Se = Selenium



RESULTS:

**FDA FOOD SIMULATING SOLVENT EXTRACTIVES
 POLYMERS: OLEFIN POLYMERS - OLEFIN BASIC COPOLYMERS**

The samples were tested according to the Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 177.1520 "Indirect Food Additives: Polymers - Olefin Polymers - Olefin Basic Copolymers (Described in paragraph (a)(3)(i))".

Sample Description: Clear, white, black plastic VK12F, VWT6N, VKT8N (side wall, center), VW12C (side wall))

Condition of Use: For use in articles that contact food except for articles used for packing or holding food during cooking.

PARAMETER	RESULT	REQUIREMENT	CONCLUSION
- Density	0.89 g/cc	0.85-1.00 g/cc	Pass
- Hexane Extractables	3.1 %	≤5.5%	Pass
- Solubles Xylene	10.4 %	≤30.0%	Pass

g/cc = grams per cubic centimetre
 ≤ = Less than or equivalent to
 * = Average of duplicate analyses
 LT = Less Than

**FDA FOOD SIMULATING SOLVENT EXTRACTIVES
 INDIRECT FOOD ADDITIVES – COMPONENTS OF PAPER AND PAPERBOARD IN CONTACT WITH AQUEOUS AND FATTY FOODS**

The sample(s) was evaluated according to the US Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 176.170, "Indirect Food Additives: Paper and Paperboard".

Condition of Use: (C) - Hot filled or pasteurized above 150°F

Sample Description		
Color / Component	Location	Style
(A) PE coated paper (VW12c)	-	-

Parameter	Result (mg/sq. in)	Maximum Allowable Limit (mg/sq. in)	Conclusion
• Distilled water	0.2	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:

MODIFIED NIOSH WIPE TEST

Element:			Cadmium	Lead	
Requirement: Maximum allowable limit:			8 µg/wipe	1.0 µg/wipe	
Sample Description			Result		Conclusion
Color / Component	Location	Style	(µg/wipe)		
(A) All color coating	Decoration on lid	VW12F	LT 4.0	LT 1.0	Pass

LT = Less than

** = Average of duplicate analyses*

mg/wipe = micrograms per wipe



BUREAU VERITAS TEST PROTOCOL FOR
CPSD - 06572 - US
CALIFORNIA PROPOSITION 65 (V72)

Evaluation	Citation / Method	Criteria	Results	Rating
SCOPE:				
This protocol covers the California Proposition 65 requirements and warning statements for specific products, from various Consent Decrees of the State of California.				
ANALYTICAL				
NOTE:				
1) Please notify Bureau Veritas if you have any settlements that are different from the requirements listed below.				
2) Actual testing will be conducted on substrates only, except specified in test line.				
3) The requirements listed below do not involve composite testing (except specified in test line), and if you want to have compositing, please notify Bureau Veritas to test to CPSD-AN-PTCL-06572.01-US-CALIFORNIA PROPOSITION 65 protocol.				
36. Lead and cadmium content on food and beverage use products - external decoration	San Francisco Superior Court, CGC-04-436429 / NIOSH method 9100 modified / EPA 3050B modified / CPSD-AN-00108-MTHD	<p>[Plastic and Metallic Ware Food and Beverage Use Products]</p> <p>Plastic and metallic ware food and beverage use product with exterior decoration shall comply one of the following requirements:</p> <p>a. Without decoration in the lip and rim area, the exterior surface shall produce a result of 1.0 micrograms or less lead and 8.0 micrograms or less cadmium, in Ghost Wipe™ test, or</p> <p>b. With decoration in the lip and rim area, all colored markings shall contain 600 ppm (0.06%) or less total lead and 4800 ppm (0.48%) or less total cadmium.</p> <p>Products exceed either the limit shall utilize a warning statement.</p> <p>Please reference to image appendix for labeling requirement and the warning statement.</p> <p>Note:</p> <ul style="list-style-type: none"> - For requirement (a), compositing is not allowed. - For requirement (b), composite up to 3 colors is allowed if component is test together with CPSIA, transfer the CPSIA lead result here for compliance. - Applicable to plastic or metallic product intended to come in contact with food or liquid, including plastic, resin, vacuum metalizing, dolomite and metal beverage containers, except cookware. - Decorations include color on top of the base material. 	M	PASS



Key:

* Additional Charge For This Test
 ** Mandatory Requirement
 # By Request Only

Result Key:

C Claimed
 R Recorded
 M Meets
 NM Does Not Meet
 NA Not Applicable
 NT Not Tested

Rating Key:

PASS Pass
 FAIL Fail
 NR Not Requested

No. Of Samples Required for Complete Testing	6
No. Of (Fully Packed) Cartons For Transit Testing:	1
No. Of Working Days For Complete Testing:	7

See below pricing chart for exceptions

Client Approval: /
 Creation Date: FEBRUARY 24, 2004
 Last Revision Date: APRIL 22, 2014
 Pricing Review Date: DECEMBER 01, 2005
 Technical Review Date: MAY 18, 2010

EXHIBIT # 1



ORIGINAL SAMPLE PRODUCT

EXHIBIT # 2



SAMPLE PRODUCT