



**BUREAU  
VERITAS**

CONSUMER PRODUCTS SERVICES DIVISION

**TERVIS TUMBLER CO**

**Technical Report: (5218)181-0118**

JULY 19, 2018

Date Received: JULY 03, 2018

Page 1 of 49

JEREMY CHUPP  
TERVIS TUMBLER CO  
201 TRIPLE DIAMOND BLVD., N. VENICE, FL 34275

Sample Description:	TUMBLERS		
Manufacturer:	TERVIS TUMBLER CO	Colorant Code:	CL2; BK2
No. of Samples:	6 EACH STYLE	SKU:	1025190 / 1025766 / 1028396 / 1049865 / 1001837 / 1001839
Country of Origin:	USA	Country of Destination:	USA
Color:	CLEAR; BLACK	Age Grade:	3+ YRS
Manufactured Date:	06/2018	Material:	CROSS-LINKED COPOLYESTER; POLYPROPYLENE
Protocol No.:	TERV-TY-08001-USA-CAN-MEX CPSD-HL-09067-CAN-MEX-USA- 3 STAR CPSD-AN-06001-USA-3 STAR CPSD-AN-06001.01-USA CPSD-AN-08444-USA	Previous Report No.:	N/A
Product End Use:	DRINKING ARTICLE (FOOD CONTACT)		
Type of Testing:	Full Protocol BPA (Various) Heavy Metals (ASTM F963-16, CCPSA) Phthalates (7P, Prop 65, CPSIA, WA, CCPSA) Lead (CPSIA, IL, CCPSA) FDA Food Contact Safety (Please see form attached) Cadmium (WA, CCPSA)		

Bureau Veritas Hong Kong Limited  
Kowloon Bay Office  
1/F Pacific Trade Centre, 2 Kai Hing Road,  
Kowloon Bay, Kowloon, Hong Kong  
Tel: (852) 2331-0888 Fax: (852) 2331-0889  
www.bureauveritas.com/cps

*This report is governed by, and incorporates by reference, CPS Conditions of Service as posted at the date of issuance of this report at <http://www.bureauveritas.com/home/about-us/our-business/cps/about-us/terms-conditions> and is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. Measurement uncertainty is only provided upon request for accredited tests. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence or if you require measurement uncertainty; provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.*



**RESULTS:**

- The total lead content of 100ppm requirements by composite testing in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).

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

**Test Method:** U.S. CPSC-CH-E1001-08.3:2012 or U.S. CPSC-CH-E1002-08.3:2012

Analyte	Lead
Requirement: Maximum allowable limit:	100 mg/kg

Analyte			Lead (Pb)	Conclusion
Sample Description			Result	
	Color / Component	Location	Style	(mg/kg)
(A)	Clear plastic	Body	/	LT 10 Pass
(B)	Black plastic	Lid	/	LT 10 Pass

LT = Less Than

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

\* = Average of duplicate analyses

- The initial total heavy metals content analysis for soluble heavy metals content in substrate requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.2(2)(b).

**TOTAL HEAVY METALS CONTENT – INITIAL ANALYSIS FOR SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-17, Section 4.3.5.2(2)(b))**

**Test Method:** ASTM International Standard ASTM F963-17, Section 8.3.1 and Annex A7.

Sample Identity	Color	Location	Style
Type I: Substrate other than modeling clay			
A.	Clear plastic	Body	/
B.	Black plastic	Lid	/

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Max. Limit Type I (mg/kg)	25	1000	75	60	60	90	60	500
Max. Limit Type II (mg/kg)	25	250	50	25	25	90	60	500

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Conclusion
Sample	Result (mg/kg)								
A	LT 7	LT 10	LT 10	LT 7	LT 5	LT 10	LT 10	LT 10	Pass
B	LT 7	LT 10	LT 10	LT 7	LT 5	LT 10	LT 10	LT 10	Pass

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

LT = Less Than

ND = None Detected

Detection limit (mg/kg): As and Cr = 7, Hg = 5, other elements = 10

Remark:

Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-17. The lead content analysis result of corresponding material herein is for client's reference only.

As = Arsenic, Ba = Barium, Cd = Cadmium,

Cr = Chromium, Hg = Mercury, Pb = Lead,

Sb = Antimony, Se = Selenium



- The total cadmium content requirements in surface coating and substrates material according to Washington Bill HB 2647 (Revised Code of Washington, Title 70, Chapter 70.240).

**TOTAL CADMIUM CONTENT IN SURFACE COATING AND SUBSTRATES (Washington Bill HB 2647, Revised Code of Washington, Title 70, Chapter 70.240)**

Element:				Cadmium	
Requirement: Maximum allowable limit: (mg/kg)				40	
Sample Description			Result (mg/kg)	Conclusion	
Color / Component	Location	Style			
(A)	Clear plastic	Body	/	LT 10	Pass
(B)	Black plastic	Lid	/	LT 10	Pass

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

- The total lead content of substrate materials requirements of Illinois Lead Poisoning Prevention Act, Public Act 095-1019, in client's specification (40ppm).

**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

Analyte	Lead	
Requirement: Maximum allowable limit:	40 mg/kg	

Analyte			Lead (Pb)	Conclusion
Sample Description			Result (mg/kg)	
Color / Component	Location	Style		
(A)	Clear plastic	Body	/	PASS
(B)	Black plastic	Lid	/	PASS

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



- The BBP, DBP, DEHP and DnHP content requirements of the client's specifications.

**CLIENT'S BBP/DBP/DEHP/DnHP PHTHALATES CONTENT REQUIREMENTS**

Color / Component		Location	Style
Composite of			
A.	Clear plastic	Body	A-C
	Black plastic	Lid	A-C

Test Parameter	BBP	DBP	DEHP	DnHP	
Limit (%)	0.1	0.1	0.1	0.1	
Sample	Result (%)				Conclusion
A	LT 0.005	LT 0.005	LT 0.005	LT 0.005	Pass

*Detection Limit :*

*BBP = Butyl benzyl phthalate (0.005%)*  
*DBP = Dibutyl phthalate (0.005%)*  
*DEHP = Di(2-ethylhexyl) phthalate (0.005%)*  
*DnHP = Dihexyl phthalate (0.005%)*

*Results reported in percentage*

*LT = Less than*  
*ND = None detected*

- The DNOP, DINP and DIDP content requirements of the client's specifications.

**CLIENT'S DNOP/DINP/DIDP PHTHALATES CONTENT REQUIREMENTS**

Color / Component		Location	Style
Composite of			
A.	Clear plastic	Body	A-C
	Black plastic	Lid	A-C

Test Parameter:	DNOP	DINP	DIDP	
Limit (%):	0.1	0.1	0.1	
Sample	Result (%)			Conclusion
A.	LT 0.005	LT 0.005	LT 0.005	Pass

*Detection Limit :*

*DNOP = Di-n-octyl phthalate (0.005%)*  
*DINP = Di-iso-nonyl phthalate (0.005%)*  
*DIDP = Di-iso-decyl phthalate (0.005%)*

*Results reported in percentage*

*LT = Less than*  
*ND = None detected*



TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**

JULY 19, 2018

Page 5 of 49

- The phthalates (BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP & DCHP) content requirements of the Consumer Product Safety Improvement Act (CPSIA) of 2008 Sec. 108(a) and 108(c), 16 CFR 1307).

**PHTHALATES CONTENT IN CHILDREN'S TOYS AND CHILD CARE ARTICLES (Consumer Product Safety Improvement Act (CPSIA) of 2008, Section 108(a) and 108(c), 16 CFR 1307)**

**Test Method:** With reference to U. S. CPSC-CH-C1001-09.3 (April 1, 2010) / CPSC-CH-C1001-09.4 (January 17, 2018).

Sample Identity	Color / Component	Location	Style
A.	Clear plastic	Body	A-C
	Black plastic	Lid	A-C

Test Parameter:	Listed Phthalates (See Remark)		
Requirement:	Each 0.1%		
Sample ID	Detected Analyte	Concentration (%)	Conclusion
A.	ND	ND	Pass

*Results reported in percentage*

*ND = None detected*

*Detection Limit: Each Phthalate (0.005%)*

LIST OF RESTRICTED PHTHALATES		
Number	Chemical Name	CAS Number
1.	Butyl benzyl phthalate (BBP)	85-68-7
2.	Dibutyl phthalate (DBP)	84-74-2
3.	Di(2-ethylhexyl) phthalate (DEHP)	117-81-7
4.	Di-iso-nonyl phthalate (DINP)	28553-12-0 & 68515-48-0
5.	Di-iso-butyl phthalate (DIBP)	84-69-5
6.	Di-n-pentyl phthalate (DPENP or DnPP)	131-18-0
7.	Di-n-hexyl phthalate (DHEXP or DnHP)	84-75-3
8.	Dicyclohexyl phthalate (DCHP)	84-61-7



- The phthalates content in children's products requirements by composite testing of the Washington Children's Safe Products Act (CSPA) - RCW Chapter 70.240.020.

**PHthalates Content in Children's Products by Composite Testing (Washington Children's Safe Products Act (CSPA) - RCW Chapter 70.240.020)**

Color / Component		Location	Style
Composite of			
A.	Clear plastic	Body	A-C
	Black plastic	Lid	A-C

Test Parameter	BBP	DBP	DEHP	DNOP	DINP	DIDP	Sum of 6 phthalates	
Limit (%)	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
Sample	Result (%)							Conclusion
A.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.030	Pass

*Detection Limit:*

*BBP* = Butyl benzyl phthalate (0.005%)  
*DBP* = Dibutyl phthalate (0.005%)  
*DEHP* = Di(2-ethylhexyl) phthalate (0.005%)  
*DNOP* = Di-n-octyl phthalate (0.005%)  
*DINP* = Di-iso-nonylphthalate(0.005%)  
*DIDP* = Di-iso-decyl phthalate (0.005%)

*Results reported in percentage*

*LT* = Less than  
*ND* = None detected

- The bisphenol A (BPA) content requirement of the client's specification.

**BISPHENOL A (BPA) CONTENT (Client's specification)**

Test Method: Sample was extracted with organic solvent and then analyzed by Liquid Chromatograph Mass Spectrometer.

Analyte	Bisphenol A
Maximum allowable limit:	ND

Analyte	Test Component			Bisphenol A Result (mg/kg)	Conclusion
	Color/Component	Location	Style No.		
	Clear plastic	Body	A-C	ND	Pass
	Black plastic	Lid	A-C	ND	Pass

*mg/kg* = milligrams per kilogram (*ppm* = parts per million)  
*ND* = None Detected with detection limit at 0.1mg/kg



- The specifications in corresponding section(s) of the US Code of Federal Regulations (CFR) Chapter 21 (FDA), Parts 175-177, "Indirect food additives". The material identification(s) provided by the client/vendor were olefin-copolymer (COP) (177.1520).

**FDA Food Simulating Solvent Extractives –**

**INDIRECT FOOD ADDITIVES - POLYMERS: OLEFIN POLYMERS - OLEFIN BASIC COPOLYMERS**

**Test Method** : U.S. FDA 21 CFR 177.1520

Sample Identity	Color / Component	Location	Style
A.	Black plastic	Lid, slider	/

Analyte	Density	Total Extractive		Conclusion
		n-Hexane	Xylene	
Solvent	-	50 °C, 2 hours	Reflux temperature, 2 hours	
Condition	-			
Requirement	0.85 – 1.00 g/cm <sup>3</sup>	≤ 5.5 %	≤ 30 %	
Sample Identity	Results (g/cm <sup>3</sup> )	Results (%)		Conclusion
A.	0.897	2.98	6.62	Pass

< = Less than

> = Greater than

≤ = Less than or equal to

\* = Average of duplicated analysis

g/cm<sup>3</sup> = gram(s) per cubic centimeter

°C = degree Celsius

% = percent

- The specifications in corresponding section(s) of the US Code of Federal Regulations (CFR) Chapter 21 (FDA), Parts 175-177, "Indirect food additives". The material identification(s) provided by the client/vendor were polyester resins, cross-linked (177.2420).

**FDA FOOD SIMULATING SOLVENT EXTRACTIVES**

**POLYMERS: POLYESTER RESINS, CROSS-LINKED**

The samples were tested according to the Food and Drug Administration (FDA), Title 21, Code of Federal Regulations (CFR), Section 177.2420, "Indirect Food Additives: Polymers - Polyester Resins, Cross-Linked".

Sample Description			
	Color / Component	Location	Style
(A)	Clear plastic	tumbler	A-C

PARAMETER	RESULT	REQUIREMENT	CONCLUSION
- Distilled water	0.055 mg/sq.in.	≤ 0.1 mg/sq.in.	Pass
≤ = Less than or equivalent to mg/sq. in. = milligrams per square inch * = Average of duplicate analyses LT = Less Than.			



TERVIS TUMBLER CO  
Technical Report: **(5218)181-0118**

JULY 19, 2018

Page 8 of 49

Note: No accessible surface coating was present on the received sample(s). Consequently, the lead content analysis of surface coatings according to modified 16 CFR 1303, "Ban of lead-containing paint and certain consumer products bearing lead-containing paint" (Consumer Products Safety Improvement Act (CPSIA) of 2008), was not conducted.

Note: No accessible surface coating was present on the received sample(s). Consequently, the heavy metals content analysis of surface coatings according to ASTM F963-17, "Standard consumer safety specification on toy safety", Section 4.3.5.1(2), was not conducted.

Note: No accessible surface coating was found on the submitted samples. Consequently, heavy metals analysis on surface coatings was not conducted.



TERVIS TUMBLER CO  
Technical Report: **(5218)181-0118**  
JULY 19, 2018  
Page 9 of 49

**NOTE:** If there are questions or concerns regarding above report, please contact the appropriate lab persons.

Technical questions & concerns:

Abel Leung / Sammy Sin  
abel.leung@hk.bureauveritas.com  
sammy.sin@hk.bureauveritas.com

General enquiries:

Beryl Lui / Minnie Lam  
beryl.lui@hk.bureauveritas.com  
minnie.lam@hk.bureauveritas.com

BUREAU VERITAS HONG KONG LIMITED

Chan Chi Wai, Johnson  
Senior Manager  
Hardlines Department



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 10 of 49

<b>Protocol Number</b>	TERV-TY-08001-USA-CAN-MEX		<b>Version</b>	8
<b>Protocol Description</b>	CHILDREN DRINKING EQUIPMENT AND ICE BUCKET			
<b>Country</b>	United States-Canada-Mexico			
<b>Scope</b>	This protocol is applicable to children drinking equipment and ice bucket made of plastic and silicon.  As a client specification, all products are tested as children's products			
<b>Creation Date</b>	16/Jun/2016	<b>Last Revision Date</b>	02/Feb/2018	
<b>Client Approval Date</b>	05/FEB/2018	<b>Approver</b>	Jeremy Chupp	
<b>No of Sample</b>		US: Toys and Hardgoods (case by case for assortments): 3  CN: Toys and Hardgoods (case by case for assortments): 3  MX: Toys and Hardgoods (case by case for assortments): 2		
<b>No of Working Days</b>	5			

Keys				
A	Additional Charge For This Test	M	Mandatory	R Regulatory

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
<b>SUPPLEMENTARY PROTOCOL</b>						
Note: Additional cost, sample size & TAT may be required if testing to 1 or more supplemental protocol is necessary. Please refer to the below referenced supplemental protocol(s) for additional information.						
A	CPSIA requirements	CPSD-AN-PTCL-08444-USA	-	All samples shall be reviewed against the requirements of CPSIA Requirements supplemental protocol to determine if additional testing or labeling is required.	SEE PROTOCOL CPSD-08444-USA	/
A M	California Proposition 65	CPSD-AN-PTCL-06572-USA	-	The sample should be reviewed against the requirements of California Proposition 65 to determine if additional testing or labeling is required. For samples that fall under the scope of CA Prop 65 requirements with testing limit(s) but does not contain appropriate labeling (refer to image appendix for	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 11 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				detail), actual testing will be conducted. Otherwise, actual testing is not required and report as "Pass" if the sample contains appropriate labeling.		
A	Food Contact	CPSD-AN-PTCL-06001-USA	--	The sample shall meet the applicable requirements in CPSD-AN-PTCL-06001-USA as specified.	SEE PROTOCOL CPSD-06001-US	/
A	Packaging and Labeling Requirement	CPSD-HL-PTCL-09067-CAN-MEX-USA	-	The sample shall meet applicable packaging and labeling requirements in the supplemental protocol.	SEE PROTOCL CPSD-HL-09067-CAN-MEX-USA	/
<b>LABELING</b>						
R	Illinois lead warning label	Illinois Lead Poisoning Prevention Act		[US] Product may contain the following Illinois lead warning label per client's requirement. Refer to the analytical section for details.  "WARNING: CONTAINS LEAD. MAY BE HARMFUL IF EATEN OR CHEWED. COMPLIES WITH FEDERAL STANDARDS."	NA	/
	Age grading	CPSC Age Determination Guidelines / 16 CFR Part 1200	-	[US] All products shall be tested according to either the appropriate age grade, as determined by BVCPS, or the labeled age grade if it is more stringent. In the event the sample is not age labeled, BVCPS will determine the appropriate age grade and test accordingly	Label Age Grade: NOT PRESENT Tested Age Grade: CHILDREN PRODUCT, 3+ Appropriate Age Grade: CHILDREN PRODUCT, 3+	/
	Parts Labeling	CPSD-GB-01057-MTHD		[US, CN, MX] Parts Labeling shall match the actual content if present	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 12 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
	Accuracy or adequacy of instructions	CPSD-GB-01057-MTHD	-	[US, CN, MX] Instructions shall be legible and easy to understand. Instructions shall be consistent with sample performance	NA	/
	Claim verification - level 2	CPSD-GB-08612-MTHD	-	[US, CN, MX] Examine the retail packaging (or submitted artwork).  Record each objective (factual) claim which can be substantiated by the testing within the protocols and rate accordingly.  Record testing that extend beyond existing net quantity / dimensional testing on this protocol.  Record all other objective (factual) and subjective (opinion) claims as "NT" and rate as "DATA".  Record information evaluated between the graphic imagery and the product.  Record disclaimers on datasheet.	NA (WITHOUT PACKAGING)	/
	Flexible packaging film bags	SOR/2011-17 section 4 (Mod.)	--	[CN] The opening of the bag shall be less than 356 mm (14 inches) in circumference OR The bag shall • be made from film that is at least 0.019 mm (0.75 mil) thick, and • have printed legibly on it the following warning or equivalent in both official languages: PLASTIC BAGS CAN BE DANGEROUS. TO AVOID DANGER OF SUFFOCATION KEEP THIS BAG AWAY FROM BABIES AND CHILDREN. LES SACS DE PLASTIQUE PEUVENT ÊTRE DANGEREUX. POUR ÉVITER LE DANGER DE SUFFOCATION, NE LAISSEZ PAS CE SAC À LA PORTÉE DES BÉBÉS NI DES ENFANTS.  Modification : expanded scope to other products	NA	/
<b>ANALYTICAL</b>						
R	Heavy metal in	Model Toxics in	-	[US]	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
	packaging-Doc	Packaging Legislation of the Toxics in Packaging Clearinghouse (TPCH) / CPSD-GB-00001-MTHD		The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components shall not exceed 100 mg/kg (100 ppm) by weight. In lieu of testing, test report can be submitted if dated within One year.		
A R	Bisphenol A	US Various state laws (e.g. CT Public Act # 09-103 and MN Chapter 40 SF #247)/21 CFR 177.1580 / CPSD-AN-00169-MTHD	1	[US] The following products shall not contain any detectable levels of Bisphenol-A (BPA) (BV reporting limit is 0.1mg/kg): <ul style="list-style-type: none"> <li>- Infant formula/ baby food plastic container, jar or can</li> <li>- All reusable food or beverage containers including lids (if any)</li> <li>- Baby bottle liners</li> <li>- Pacifiers</li> <li>- Straws</li> </ul> "Infant formula" means a commercially available milk based or soy based powder, concentrated liquid or ready-to-feed substitute for human breast milk that is intended for infant consumption. "Baby food" means a commercially available prepared solid food consisting of a soft paste or an easily chewed food that is intended for consumption by children two years of age or younger. "Reusable food or beverage container" means a receptacle for storing food or beverages, including, but not limited to, baby bottles, spill-proof cups, sports bottles and thermoses, and excluding containers intended for disposal after initial use. Report actual results or include data table within report. Note: <ul style="list-style-type: none"> <li>- Vendors shall provide documentation or a bill of materials for material identification. If they cannot provide surface coating or substrate material information, all coatings (except lacquer and paint) and applicable substrates will be tested.</li> <li>- Vendors shall be responsible for the compliance of all other materials.</li> <li>- Testing will not be conducted on food contact polycarbonate resins in infant feeding bottles (baby bottles) and spill-proof cups including their closures and lids, designed to help train babies and toddlers to drink from cups (sippy cups), because food contact polycarbonate resins are banned in these products</li> </ul>	M (SEE RESULTS)	PASS



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 14 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				by 21 CFR 177.1580. - Composite all colors of surface coating to perform one test.  Client requirement		
A R	Total cadmium in surface coating	Washington Children's Safe Products Act (CSPA) – RCW Chapter 70.240.020 / CPSC-CH-E1003-09.1 (Mod) / CPSD-AN-00001-MTHD / CPSD-AN-00164-MTHD	1	[US] All accessible surface coatings, before and after use and abuse testing, on children's product under the age of twelve shall not exceed 40 ppm (0.004 % by weight) total cadmium. Note: - Limited to toys, cosmetics, jewelry, products designed or intended by the manufacturer to help a child with sucking or teething, to facilitate sleep, relaxation, or the feeding of a child, or to be worn as clothing by children, and child car seats. - Refer to CSPA Reporting Rule WAC 173-334 for the complete product list. - See RCW Chapter 70.240.010 for children's products that are exempt. - Products for children under 12 years of age that are subject to CPSIA cadmium requirements are exempt. - Composite up to 3 colors / like materials. - Individual materials will be analyzed if the composite result exceeds the adjusted limit (regulatory limit divided by the number of components). - Vendor shall be responsible for the compliance of all other materials.	NA	/
A R	Total cadmium in substrate	Washington Children's Safe Products Act (CSPA) – RCW Chapter 70.240.020 / CPSC-CH-E1001-08.3 (Mod) / CPSC-CH-E1002-08.3 (Mod) / CPSD-AN-00185-MTHD / CPSD-AN-00196-MTHD	1	[US] All accessible plastics and metals, before and after use and abuse testing, on children's product under the age of twelve shall not exceed 40 ppm (0.004 % by weight) total cadmium. Note: - Limited to toys, cosmetics, jewelry, products designed or intended by the manufacturer to help a child with sucking or teething, to facilitate sleep, relaxation, or the feeding of a child, or to be worn as clothing by children, and child car seats. - Refer to CSPA Reporting Rule WAC 173-334 for the complete product list. - See RCW Chapter 70.240.010 for children's products that are exempt. - Products for children under 12 years of age that are subject to CPSIA cadmium requirements are exempt. - Composite up to 3 colors / like materials (except metals).	M (SEE RESULTS)	PASS



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 15 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				<ul style="list-style-type: none"> <li>- Individual materials will be analyzed if the composite result exceeds the adjusted limit (regulatory limit divided by the number of components).</li> <li>- Vendor shall be responsible for the compliance of all other materials.</li> </ul>		
A R	Phthalates in children product	Washington Children's Safe Products Act (CSPA) – RCW Chapter 70.240.020 / CPSC-CH-C1001-09.3 (Mod) / CPSD-AN-00095-MTHD / CPSD-AN-00143-MTHD	1	<p>[US]</p> <p>All accessible components, before and after use and abuse testing, on children's product under the age of twelve shall not exceed a sum of 1000 ppm (0.10% by weight) of DEHP, BBP, DBP, DINP, DNOP, DIDP.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Limited to toys, cosmetics, jewelry, products designed or intended by the manufacturer to help a child with sucking or teething, to facilitate sleep, relaxation, or the feeding of a child, or to be worn as clothing by children, and child car seats.</li> <li>- Refer to CSPA Reporting Rule WAC 173-334 for the complete product list.</li> <li>- See RCW Chapter 70.240.010 for children's products that are exempt.</li> <li>- Products for children under 12 years of age that are subject to CPSIA phthalates requirements are exempt.</li> <li>- Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber), plasticizer print, scrapable surface coatings, decals, polymeric coated materials (unscrapable), adhesives and sealants (exclude adhesive for stickers), reusable packaging, electrical plug and cables.</li> <li>- Vendor shall be responsible for the compliance of all other materials.</li> <li>- Composite up to 3 colors / like materials.</li> <li>- Individual materials will be analyzed if the composite result exceeds the adjusted limit (regulatory limit divided by the number of components).</li> </ul>	M (SEE RESULTS)	PASS
A	Total heavy metal	Acid extraction with ICP analysis / CPSD-AN-00564-MTHD		<p>[US]</p> <p>APPLY TO: Products and parts of product that can be sucked, mouthed or ingested. The criteria for classification of product or parts likely to be sucked, mouthed or ingested: (1) All product parts intended to be mouthed or contact food or drink (2) Products intended for children less than 6 years of age, that is, all accessible parts and components where there is a probability that those parts and components may come into contact with the mouth.</p> <p>All accessible surface coating and substrates, before and after use and abuse testing, shall have total heavy metals content comply with the limits specified</p>	M (SEE RESULTS)	PASS



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 16 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				<p>in Table 1 of the standard. [Antimony (Sb) 60 mg/kg, Arsenic (As) 25 mg/kg, Barium (Ba) 1000 mg/kg, Cadmium (Cd) 75 mg/kg, Chromium (Cr) 60 mg/kg, Lead (Pb) 90 mg/kg, Mercury (Hg) 60 mg/kg, Selenium (Se) 500 mg/kg]</p> <p>Report actual results or include data table within report.            Component testing is allowed.            Compositing up to 3 like colors/ materials is allowed except metal.            Based on the standard, will composite up to 3 like colors/ materials except metal. If any material in the composite exceeds 80% of the limit based on the lowest weight component, soluble heavy metal content test with individual materials will be analyzed.</p> <p>Note: Test method and limit referenced ASTM F96317</p> <p>Client requirement</p>		
A R	Total lead in surface coating	Illinois Lead Poisoning Prevention Act / CPSC-CH-E1003-09.1/ CPSD-AN-00001-MTHD	-	<p>[US]            The following surface coatings shall contain less than 0.004% (40 ppm) lead or lead compounds in which the lead content is the weight of the total content or be labeled with the appropriate warning (refer to labeling section for details):            All accessible surface coatings, in the as received state, on jewelry for children under 12 years of age;            All accessible surface coatings, before and after use and abuse testing, on child care articles for children 6 years of age or younger, and on toys for children under 12 years of age.</p> <p>The warning label is not allowed for any sample with a result above the federal limit of 0.009% (90ppm).</p> <p>In case of insufficient coating for testing found on the number of samples specified in the protocol, vendor needs to provide additional samples/component parts (including raw materials) for testing. The vendor is responsible for compliance of all other products outside of the above scope.</p>	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 17 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				Report actual results or include data table within report. Component testing is allowed. Compositing is not allowed.		
A R	Total lead in substrate	Illinois Lead Poisoning Prevention Act / CPSC-CH-E1001-08.3/CPSC-CH-E1002-08.3 / CPSD-AN-00185-MTHD/CPSD-AN-00196-MTHD	-	<p>[US] The following substrate materials shall contain less than 0.004% (40 ppm) lead or lead compounds in which the lead content is the weight of the total content or be labeled with the appropriate warning (refer to labeling section for details):</p> <p>All accessible substrate materials, in the as received state, on jewelry for children under 12 years of age; All accessible substrate materials, before and after use and abuse testing, on child care articles for children 6 years of age or younger.</p> <p>The warning label is not allowed for any sample with a result above the federal limit of 0.010% (100ppm).</p> <p>In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide additional samples/components/parts for testing. Materials exempted from testing under CPSIA (e.g., textiles) under 16 CFR 1500.88 and 1500.91(d) and (e) will not be tested. The vendor is responsible for compliance of all other products outside of the above scope.</p> <p>Report actual results or include data table within report. Component testing is allowed. Compositing is not allowed.</p>	M (SEE RESULTS)	PASS
A R	Total lead in surface coating	Canada Surface Coating Materials Regulations (SOR/2016-193) Sec.6 / CPSD-AN-00566-MTHD	--	<p>[CN] All accessible surface coatings in the as received state on following products shall not contain lead or lead components in which the lead content is in excess of 90 mg/kg (0.009%) of the weight of the total content.</p> <p>a. products for children, including furniture; and b. pencils and artists' brushes.</p> <p>Note:</p>	NA (US)	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 18 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				<ul style="list-style-type: none"> <li>- Report actual results or include data table within report.</li> <li>- Component testing is allowed.</li> <li>- Composite up to 3 colors is allowed. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed.</li> <li>- In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components or dipped parts for testing.</li> </ul>		
A R	Total lead in article in contact with the user's mouth	Canada Consumer Products Containing Lead (Contact with Mouth) Regulations (SOR/2010-273, 2016-171) / CPSD-AN-00461-MTHD	--	<p>[CN]          Products for all ages (including adults) that have accessible surface coatings and substrates that come into contact with the user's mouth during normal use shall not contain lead or lead components in which the lead content is in excess of 90 mg/kg (0.009%) of the weight of the total content.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Report actual results or include data table within report.</li> <li>- Component testing is allowed.</li> <li>- Composite up to 3 colors is allowed. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed.</li> <li>- The following products are exclude:             <ul style="list-style-type: none"> <li>a. Kitchen utensils,</li> <li>b. Jewelry under Children's Jewelry Regulations</li> <li>c. Products subject to Glazed Ceramic and Glassware Regulations.</li> </ul> </li> <li>- Non-suspect materials as defined by the Consumer Products Safety Commission in 16 CFR 1500.88 and 16 CFR 1500.91 (d) and (e) will be exempted from testing. It is the vendor's responsibility to ensure compliance of these materials.</li> <li>- In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components or dipped parts for testing.</li> </ul>	NA (US)	/
A R	BBP/DBP/DEHP content	Canada Phthalates Regulations (SOR/2016-188) / CPSD-AN-00095-	--	<p>[CN]          Accessible vinyl (PVC) in a toy or child care article, in the as received state, shall not contain concentration of more than 1000mg/kg (ppm) BBP, DBP or DEHP individually.</p>	NA (US)	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 19 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
		MTHD / CPSD-AN-00143-MTHD		Note: - Report actual results or include data table within report. - Compositing up to 3 like materials is allowed. - In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components or parts for testing. - Vendor is responsible for compliance of all other types of vinyl.		
A R	DNOP/DINP/DIDP content	Canada Phthalates Regulations (SOR/2016-188) / CPSD-AN-00095-MTHD / CPSD-AN-00143-MTHD	--	[CN] Accessible vinyl (PVC) in any part of a toy or child care article, in the as received state, that can, in a reasonably foreseeable manner, be placed in the mouth of a child under 4 years of age shall not contain concentration of more than 1000mg/kg (ppm) DINP, DIDP or DnOP individually.  Note: - Report actual results or include data table within report. - Compositing up to 3 like materials is allowed. - In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components or parts for testing. - Vendor is responsible for compliance of all other types of vinyl.	NA (US)	/
A	Phthalate content	Solvent extraction, GC-MS/LC-MS analysis / CPSD-AN-00095-MTHD		[US]  Children products shall not contain concentrations of more than 0.1% BBP, DBP DEHP, DINP, DIDP, DnOP and DnHP individually:  Note: - Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber) and surface coatings. - Composite up to 3 colors / like materials. - Individual materials will be analyzed if the composite result exceeds the adjusted limit (regulatory limit divided by the number of components). - Report actual results or include data table within report. - Component testing is allowed.	M (SEE RESULTS)	PASS



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				Client requirement		
A	Identification of cellulose nitrate	Qualitative analysis and FTIR analysis / CPSD-AN-00042-MTHD		<p>[CN]            A product that is intended for use by a child, other than a ping-pong ball, shall not be made of or impregnated with celluloid or cellulose nitrate.</p> <p>Note:            - Perform this test when the result of Cellulose nitrate is positive (Refer to Cellulose nitrate test line for detail).            - Test method and limit with reference Canada Toys Regulations (SOR/2011-17) section 21</p> <p>Client requirement</p>	NA (US)	/
A	Heavy metal in plastic	Acid digestion, ICP analysis / CPSD-AN-00009-MTHD		<p>[CN]            APPLY TO : Products intended for child under 3 years old</p> <p>All accessible plastics, in the as received state, on toys that are intended for use by a child less than three years of age in learning or play, shall have soluble heavy metal contents comply with following limits:            Antimony (Sb) 60 mg/kg, Arsenic (As) 25 mg/kg, Barium (Ba) 1000 mg/kg, Cadmium (Cd) 75 mg/kg, Chromium (Cr) 60 mg/kg, Mercury (Hg) 60 mg/kg, Selenium (Se) 500 mg/kg</p> <p>Note:            - Report actual results or include data table within report.            - Component testing is allowed.            - Composite up to 3 colors is allowed for the total screening test. If the composite result exceeds 80% of the soluble limit (e.g., 48 ppm for antimony), based on the lowest weight component, individual materials will be analyzed by the ASTM F963 soluble method to demonstrate compliance.</p> <p>Note : Test method and limit with reference Canada Toys Regulations (SOR/2011-17) section 27(a)</p> <p>Client requirement</p>	NA (US)	/
<b>PHYSICAL MECHANICAL AND ELECTRICAL HAZARD</b>						



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 21 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
R	Small part	16 CFR 1501	1	[US] [Products intended for children under 36 months of age] Shall not include removable, liberated components, or fragments of products before or after use and abuse that are small part.	NA	/
	Small parts (Feeding products)	16 CFR 1501 (Mod)	1	[US] Feeding products such as drinking glasses, dishes and eating utensils, intended for children under 36 months of age shall not include removable, liberated components or fragments of products before or after use and abuse testing that are small part. Modification: Expand scope to cover feeding products.	NA	/
R	Sharp points	16 CFR 1500.48	1	[US] Items intended for children under 8 years of age shall not have accessible, potentially hazardous sharp points before or after use and abuse testing.	M	PASS
R	Sharp edges	16 CFR 1500.49	1	[US] Items intended for children under 8 years of age shall not have accessible, potentially hazardous sharp edges before or after use and abuse testing.	M	PASS
	Toys - physical and mechanical	SOR/2011-17 (Mod.)	--	[CN] Shall comply with the physical and mechanical (e.g. small parts, points, edges, auditory, etc...) requirements as specified in standard.  Modification : expand scope to non-toy products	NA	/
<b>FLAMMABILITY</b>						
R	Solids - Flammability	16 CFR 1500.3(c)(6)(vi) / 16 CFR 1500.44	1	[US] Shall not exceed the maximum allowable limit of no greater than 0.1 inches per second.	M	PASS
	Cellulose nitrate	SOR/2011-17 Section 21 modified		[CN] Shall not exhibit burn characteristics associated with materials in whole or in part, made of or impregnated with Celluloid or Cellulose Nitrate. (If the result is positive, verify the presence of Celluloid or Cellulose Nitrate by "Identification of cellulose nitrate")  Modification = Expanded scope to other products	NA	/
<b>PERFORMANCE</b>						
	Actual use -	CPSD-GB-01058-	1	[US, CN, MX]	M	PASS



	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
	functionality	MTHD		Shall function as intended. Report details of evaluation (materials used / features tested / consumables / method / etc.)		
A	Bite test	16 CFR 1500.51(c) / 16 CFR 1500.52(c) / Client requirement	1	[US, CN, MX] Products intended for child less than 3 years old shall withstand bite force as specified by regulation with no breakage.  Client requirement	NA	/
A	Dishwasher claim verification	CPSD-HL-01014- MTHD (Mod)	1	[US, CN, MX] [Product containing a dishwasher safe claim] Shall exhibit no surface degradation such as cracks, color fading, scratches, or deformation such as warping after 5 cycles. Modification: Modify the scope to product containing a dishwasher safe claim only.	M (TOP RACK) (TUMBLER ONLY)	PASS
A	Microwave claim verification	CPSD-HL-01024- MTHD (Mod)	1	[US, CN, MX] [Product containing a microwave safe claim] Sample is placed in condition room at 59 – 86 degree F (15 – 30 degree C) for at least 2 hours before the test. After removing the sample from condition room. Filled the test item with 75% water according to different types of item. Microwave the sample for 5 minutes with power of the microwave at 1000 W (or equivalent energy i.e. 300 kJ). Sample shall withstand test with no distortion, melting, surface deformation or staining after the test. For sample with handle, The temperature of the gripping area shall not exceed 140 degree F (60 degree C) and record the results as “Data Only.” Modification: Modify the scope to product containing a microwave safe claim only.	M (TUMBLER ONLY)	PASS
A	Freezer claim verification	CPSD-HL-01008- MTHD (Mod)	1	[US, CN, MX] [Product containing a freezer safe claim] Shall have no visual changes, functionality failure, structural failure and /or permanent deformation after a 4 hour exposure in a freezer chilled to 0 deg. F. Modification: Modify the scope to product containing a freezer safe claim	M	PASS



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
Technical Report: **(5218)181-0118**  
JULY 19, 2018  
Page 23 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
				only.		



IMPORTANT NOTE: The information presented under the "Criteria" of this protocol is for information only and does not replace the content of the standard. Details of the requirements should be referred to the original standards.

US use and abuse condition:

Testing Parameter	Age (Months)	Abuse Test Conditions
Drop Test	0 to ≤ 18	4.5 ft (1.37 m), 10 drops
	> 18 to ≤ 36	3 ft (0.91 m), 4 drops
	> 36 to ≤ 96	3 ft (0.91 m), 4 drops
Torque Test	0 to ≤ 18	2 in - lb (0.23 N - m)
	> 18 to ≤ 6	3 in - lb (0.34 N - m)
	> 36 to ≤ 96	4 in - lb (0.45 N - m)
Tension Test	0 to ≤ 18	10 lb (44.5 N)
	> 18 to ≤ 36	15 lb (66.8 N)
	> 36 to ≤ 96	15 lb (66.8 N)
Compression Test	0 to ≤ 18	20 lb (89 N)
	> 18 to ≤ 36	25 lb (111.3 N)
	> 36 to ≤ 96	30 lb (133.5 N)

CN use and abuse condition:

Testing Parameter	Age (Months)	Abuse Test Conditions
Drop Test	0 to ≤ 36	4.5 ft (1.37 m), 4 drops
	> 36 to ≤ 168	3 ft (0.91 m), 4 drops
Tension Test	0 to ≤ 168	10 lb (44.5 N)

Bite test condition:

Testing Parameter	Age (Months)	Test Load
Bite Test	0 to ≤ 18	25 lb (11.35 kg)
	> 18 to ≤ 36	50 lb (22.74 kg)
	> 36 to ≤ 96	100 lb (45.50 kg)



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 25 of 49

<b>Protocol Number</b>	CPSD-HL-09067-CAN-MEX-USA-3 STAR		<b>Version</b>	22
<b>Protocol Description</b>	PACKAGING AND LABELING REQUIREMENTS			
<b>Country</b>	Canada-Mexico-United States			
<b>Scope</b>	This protocol is applicable to sample with packaging or the sample require labeling			
<b>Creation Date</b>	29/Apr/0014	<b>Last Revision Date</b>	09/May/2018	
<b>Client Approval Date</b>		<b>Approver</b>		
<b>No of Sample</b>	3			
<b>No of Carton for Transit Test</b>	1			
<b>No of Working Days</b>	10			

Keys					
A	Additional Charge For This Test	M	Mandatory	R	Regulatory

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
<b>LABELING</b>								
NOTE: Font size requirements will not evaluated based on a PDF, photo, or printout of artwork. Final retail packaging is required for font size evaluation.								
R	US Packaging labeling	F.P. and L. Act (16 CFR 500) OR NIST Uniform Laws and Regulations Handbook 130	Packaging shall be labelled with the following, Product Identification Net quantity of contents shall be expressed in terms of weight or mass, measure, numerical count, or combination so as to give accurate information to facilitate consumer comparison (U.S. and metric units) Manufacturer, packer, or distributor's name & address (City, State & Zip Code)	X	X	X	NA (WITHOUT PACKAGING)	/
	Country of	19 CFR 134	Shall indicate country of origin legibly, permanently, and in	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
R	origin marking		comparable size and close proximity to any mention of country other than country in which the article was manufactured or produced. Must be visible at point of purchase.				(WITHOUT PACKAGING)	
A R	EPA TSCA title VI- Composite wood- Declaration form and mill certification	40 CFR 770	<p>If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, B, and E of the Sample Declaration Form must always be completed.</p> <ul style="list-style-type: none"> <li>- If regulated composite wood <b>is not</b> present in the sample, result is N/A.</li> <li>- If regulated composite wood <b>is</b> present in the sample:               <ul style="list-style-type: none"> <li>- Section D of the Sample Declaration Form must also be completed</li> <li>- Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased</li> <li>- All information on the certificate shall be consistent with the Sample Declaration Form</li> </ul> </li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>- Include a copy of the Sample Declaration Form in the report</li> <li>- Regulated composite wood includes:               <ul style="list-style-type: none"> <li>- Hardwood plywood (HWPW)</li> <li>- Medium-density fiberboard (MDF)</li> <li>- Thin medium-density fiberboard (Thin MDF)</li> <li>- Particleboard (PB)</li> </ul> </li> <li>- <b>Mill certificate that denotes compliance with CARB's ATCM for formaldehyde will be accepted in lieu of a certificate denoting compliance with TSCA Title VI until March 22, 2019</b></li> <li>- Rating Schedule:               <ul style="list-style-type: none"> <li>- On or before May 31, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as data</li> <li>- On or after June 1, 2018: Compliant submission shall be rated as pass</li> </ul> </li> </ul>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			Non-compliant submission shall be rated as fail					
A R	EPA TSCA Title VI– Composite wood-Finished good labeling	40 CFR 770.45(c) & (e)	<p>Finished goods <b>containing regulated composite wood</b> shall comply with the labeling requirements found in 40 CFR 770.45(c) unless the finished good qualifies for the <i>de minimis</i> exception found in 40 CFR 770.45(e).</p> <ul style="list-style-type: none"> <li>· A finished good <b>does not</b> require labeling per 40 CFR 770.45(c) if the finished good <b>does</b> qualify for the <i>de minimis</i> exception in 40 CFR 770.45(e). If the finished good does qualify for the <i>de minimis</i> exception, result is N/A.</li> <li>· A finished good <b>does</b> require labeling per 40 CFR 770.45(c) if the finished good <b>does not</b> qualify for the <i>de minimis</i> exception in 40 CFR 770.45(e).               <ul style="list-style-type: none"> <li>- At a minimum, the label must be on the product OR the packaging</li> <li>- The label may be applied as a stamp, tag, or sticker</li> <li>- The label shall include, at a minimum, in legible English text:                   <ol style="list-style-type: none"> <li>1. Fabricator's name</li> <li>2. Date the finished good was produced (in month/year format)</li> <li>3. A statement of compliance to denote that the finished good complies with TSCA Title VI</li> </ol> </li> </ul> </li> </ul> <p>Example:            XXX Company            MM/YYYY            EPA TSCA Title VI compliant for formaldehyde</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>· A <i>de minimis</i> amount of regulated composite wood is defined as regulated composite wood content not exceeding 144 square inches, based on the surface area of the largest face of the finished good.</li> <li>· The <i>de minimis</i> exception is not available to finished goods or component parts that are designed to be used in combination</li> </ul>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			<p>or in multiples to create larger surfaces, finished goods, or component parts.</p> <ul style="list-style-type: none"> <li>• <b>When a statement of compliance is necessary, a statement of compliance that denotes the finished good complies with CARB's ATCM for formaldehyde will be accepted in lieu of a TSCA Title VI compliance statement until March 22, 2019.</b></li> <li>• Rating Schedule:               <ul style="list-style-type: none"> <li>- On or before May 31, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as data</li> <li>- On or after June 1, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail</li> </ul> </li> </ul>					
A R	EPA TSCA Title VI- Composite wood-Raw panel labeling	40 CFR 770.45(a)	<p>Panels or bundles of panels must be labeled with the following:</p> <ul style="list-style-type: none"> <li>- The panel producer's name</li> <li>- The lot number</li> <li>- The number of the EPA TSCA Title VI Third Party Certifier (TPC)</li> <li>- A statement of compliance to denote that the panels comply with TSCA Title VI</li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• A panel producer number may be used instead of a name to protect identity</li> <li>• Raw panels are regulated composite wood products that have not been used to create a finished good</li> <li>• <b>Compliance with CARB's ATCM for formaldehyde will be accepted in lieu of TSCA Title VI until March 22, 2019.</b></li> <li>• Rating Schedule:               <ul style="list-style-type: none"> <li>- On or before May 31, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as data</li> <li>- On or after June 1, 2018: Compliant submission shall be rated as pass</li> </ul> </li> </ul>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			Non-compliant submission shall be rated as data					
A R	CARB– Composite wood- Declaration form and mill certificate	Title 17, CA Code of Regulations §93120	<p>If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, C, and E of the Sample Declaration Form must always be completed.</p> <ul style="list-style-type: none"> <li>- If regulated composite wood <b>is not</b> present in the sample, result is N/A.</li> <li>- If regulated composite wood <b>is</b> present in the sample:               <ul style="list-style-type: none"> <li>- Section D of the Sample Declaration Form must also be completed</li> <li>- Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased</li> <li>- All information on the certificate shall be consistent with the Sample Declaration Form</li> </ul> </li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>- Include a copy of the Sample Declaration Form in the report</li> <li>- Regulated composite wood includes:               <ul style="list-style-type: none"> <li>- Hardwood plywood (HWPW)</li> <li>- Medium-density fiberboard (MDF)</li> <li>- Thin medium-density fiberboard (Thin MDF)</li> <li>- Particleboard (PB)</li> </ul> </li> </ul>	X	X	X	NA	/
A R	CARB– Composite wood-Finished good labeling	Title 17, CA Code of Regulations §93120.7(d)	<p>Finished goods <b>containing regulated composite wood</b> shall comply with the labeling requirements for fabricators found in §93120.7(d).</p> <ul style="list-style-type: none"> <li>- A finished good containing regulated composite wood requires the following:               <ul style="list-style-type: none"> <li>- At a minimum, the label must be on the product OR the packaging</li> <li>- The label shall be applied as a stamp, tag, sticker, or bar code</li> <li>- The label shall include, at a minimum:                   <ol style="list-style-type: none"> <li>1. Fabricator’s name</li> </ol> </li> </ul> </li> </ul>	X	X	X	NA	/



	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			<p>2. Date the finished good was produced (in month/year format)</p> <p>3. A statement of compliance to denote that the finished good complies with the ATCM</p> <p>Example:            XXX Company            MM/YYYY            California 93120 phase 2 compliant for formaldehyde</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>· If a finished good is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM <b>is not</b> required.</li> <li>· It <b>is not</b> required for the label to state the level of emissions (Phase 2, NAF, ULEF).</li> </ul> <p>Labels for finished goods should not include the number of the TPC associated with the composite wood products contained in the finished good.</p>					
A R	CARB– Composite wood-Raw panel labeling	Title 17, CA Code of Regulations §93120.3(e)	<ul style="list-style-type: none"> <li>· Panels or bundles of panels must be labeled with the following:               <ul style="list-style-type: none"> <li>- The panel producer's name</li> <li>- The lot number</li> <li>- The number of the Third Party Certifier (TPC)</li> <li>- A statement of compliance to denote that the panels comply with the ATCM</li> </ul> </li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>· If a panel or bundle of panels is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM <b>is not</b> required.</li> <li>· A panel producer number may be used instead of a name to protect identity</li> <li>· The TPC number is not required for panel producers using no-added formaldehyde-based (NAF) resins or ultra low-</li> </ul>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating										
			emitting formaldehyde (ULEF) resins Raw panels are composite wood products that have not been used to create a finished good															
R	Plastic bag warning statement	US Various state laws / CPSD-GB-01073-MTHD	Plastic bags with a thickness of less than 1 mil, in which a diameter is 5 inches or greater (when formed into a circle) used as packaging or packaging article for domestic/household use (e.g. laundry bag, garbage bag) shall contain warning statement similar to below in English: WARNING: To avoid danger of suffocation, keep this bag away from babies and children. Do not use in cribs, beds, carriages or playpens. This bag is not a toy. The warnings shall be printed clearly as to prevent the ink from smearing or upon a gummed label securely attached to the bag. It shall be contrasted by typography, layout or color from the contents of the bag and from other printed matter on the bag, if any. If the total length and width of the bag is more than 40 inches, the warning shall be repeated at intervals of 20-inches or less. Except laundry bag, the font size of the warning must adhere to the chart listed below: <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Total Length and Width of Bag</td> <td style="width: 50%;">Size of Print</td> </tr> <tr> <td>60 inches or more</td> <td>At least 24 points</td> </tr> <tr> <td>40 inches to less than 60 inches</td> <td>At least 18 points</td> </tr> <tr> <td>25 inches to less than 40 inches</td> <td>At least 14 points</td> </tr> <tr> <td>Less than 25 inches</td> <td>At least 10 points</td> </tr> </table> For laundry bag, the font size of the warning should be at least 36 points.	Total Length and Width of Bag	Size of Print	60 inches or more	At least 24 points	40 inches to less than 60 inches	At least 18 points	25 inches to less than 40 inches	At least 14 points	Less than 25 inches	At least 10 points	X	X	X	NA	/
Total Length and Width of Bag	Size of Print																	
60 inches or more	At least 24 points																	
40 inches to less than 60 inches	At least 18 points																	
25 inches to less than 40 inches	At least 14 points																	
Less than 25 inches	At least 10 points																	
R	Canada consumer packaging and labeling regulations	The Consumer Packaging and Labeling Act, R.S. 1985, c. C-38	Packaging shall be labelled with the following: Product Identification shall be English and French, on PDP with 1.6mm minimum type size. Product Net Quantity: Declaration must be in English and French, metric units, on PDP, type size based on PDP size	X	X	X	NA	/										



**BUREAU  
VERITAS**

Evaluation	Citation / Method	Criteria	1	2	3	Result	Rating												
			Star	Star	Star														
	and Regulations, C.R.C., c. 417	<table border="1"> <tr> <td>Principal Display Panel</td> <td>Minimum Type</td> </tr> <tr> <td>&lt; 32 cm<sup>2</sup> (5 ln<sup>2</sup>)</td> <td>1.6 mm (1/16 ln)</td> </tr> <tr> <td>&gt; 32 cm<sup>2</sup> but &lt; 258 cm<sup>2</sup> (40 ln<sup>2</sup>)</td> <td>3.2 mm (1/8 ln)</td> </tr> <tr> <td>&gt; 258 cm<sup>2</sup> but &lt; 645 cm<sup>2</sup> (100 ln<sup>2</sup>)</td> <td>6.4 mm (1/4 ln)</td> </tr> <tr> <td>&gt; 645 cm<sup>2</sup> but &lt; 25.8 dm<sup>2</sup> (400 ln<sup>2</sup>)</td> <td>9.5 mm (3/8 ln)</td> </tr> <tr> <td>&gt; 25.8 dm<sup>2</sup> (400 ln<sup>2</sup>)</td> <td>12.7 mm (1/2 ln)</td> </tr> </table> <p>Manufacturer or distributor's name &amp; address (City &amp; Postal Code). Minimum 1.6 mm type size.          Placed anywhere except bottom - English or French.          Where a prepackaged product is wholly manufactured or produced in a country other than Canada, the marking shall consist of one of the following:          -The name and address of a Canadian dealer preceded by the words "imported by" ("importé par") or "imported for" ("importé pour"); or          -The statement of geographic origin located immediately adjacent to the name and address of a Canadian dealer; or          -The name and address of the dealer outside Canada</p>	Principal Display Panel	Minimum Type	< 32 cm <sup>2</sup> (5 ln <sup>2</sup> )	1.6 mm (1/16 ln)	> 32 cm <sup>2</sup> but < 258 cm <sup>2</sup> (40 ln <sup>2</sup> )	3.2 mm (1/8 ln)	> 258 cm <sup>2</sup> but < 645 cm <sup>2</sup> (100 ln <sup>2</sup> )	6.4 mm (1/4 ln)	> 645 cm <sup>2</sup> but < 25.8 dm <sup>2</sup> (400 ln <sup>2</sup> )	9.5 mm (3/8 ln)	> 25.8 dm <sup>2</sup> (400 ln <sup>2</sup> )	12.7 mm (1/2 ln)					
Principal Display Panel	Minimum Type																		
< 32 cm <sup>2</sup> (5 ln <sup>2</sup> )	1.6 mm (1/16 ln)																		
> 32 cm <sup>2</sup> but < 258 cm <sup>2</sup> (40 ln <sup>2</sup> )	3.2 mm (1/8 ln)																		
> 258 cm <sup>2</sup> but < 645 cm <sup>2</sup> (100 ln <sup>2</sup> )	6.4 mm (1/4 ln)																		
> 645 cm <sup>2</sup> but < 25.8 dm <sup>2</sup> (400 ln <sup>2</sup> )	9.5 mm (3/8 ln)																		
> 25.8 dm <sup>2</sup> (400 ln <sup>2</sup> )	12.7 mm (1/2 ln)																		
R	Quebec bilingual requirement - Charter of French Language	Quebec, R.S.Q., c. C-11	Every inscription on a product, on its container or on its wrapping, or on a document or object supplied with it, including the directions for use and the warranty certificates, must be drafted in French. The French inscription may be accompanied with a translation or translations, but no inscription in another language may be given greater prominence than that in French	X	X	X	NA	/											
R	Country of origin marking	Canada Customs Tariff / Marking of Imported Goods Regulations / SOR-94-10 / Marking of Imported	a) Imported goods shall indicate country of origin. b) Must be legible and sufficiently permanent to remain on the goods until it reaches the purchaser. c) For goods from NAFTA countries, the language may be English, French or Spanish. d) For goods from non-NAFTA countries, language may be English or French and marking should appear on individual articles. e) If the packaging conceals the Country of Origin mark, then the packaging must also be marked. f) There is a provision to mark only the container providing that	X	X	X	NA	/											



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 33 of 49

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
		Goods Memorandum D11-3-1	certain conditions are met, such that the ultimate purchaser will see the marked container.					
R	Mexico packaging labeling	Mexican Official Standard NOM - 050 - SCFI - 2004 / Commercial information - General regulations required for products	<p>The following information is required on product labels:            The trademark, name and/or company name and address of manufacturer or importer.            The name or generic denomination of the product.            A quantity designation according to NOM-030-SCFI, "Declaration of quantity in label specifications."            A message indicating the country of origin.            Risk warnings, if appropriate.            Instructions for use and warnings, where applicable, are to be included in a manual. The label shall read: "SEE MANUAL", or "OPERATION MANUAL."            An expiration date or preferred consumption date.</p>	X	X	X	NA	/
R	Mexico language and terms	Mexican Official Standard NOM - 050 - SCFI - 2004 / Commercial information - General regulations required for products	<p>Information contained in labels shall:            Be in Spanish without precluding presentation in other languages. Information presented in other languages should also be in Spanish in at least the same font size.            Be expressed in legible and understandable terms that are clear to consumers.            Comply with NOM -008-SCFI, General system of measurement units" and NOM - 030-SCFI, "Declaration of quantity in label specifications", without precluding other systems. Information expressed in a different system should also have the same font size.            Be included on a label that remains with the item until the moment of use by the consumer.            Be placed on the principal display panel.</p>	X	X	X	NA	/
R	Mexico operation and direction manuals	Mexican Official Standard NOM - 050 - SCFI - 2004 / Commercial	<p>Manuals should be written in Spanish according to the General System of Measurement Units without precluding the addition of other unit systems. Information expressed in other units should also appear in Spanish with the same font size. They shall be issued without additional charge to the consumer. Manuals should clearly and precisely indicate conditions for normal use, handling,</p>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating												
		information - General regulations required for products	and assembly and include appropriate warnings relative to the safe and reliable handling of the product. They shall include: The name or trademark of the producer or importer; Identification of the product Procedures to install, connect, assemble or maintain the product for adequate functioning.																	
R	Mexico statement of quantity	Mexican Official Standard NOM-030-SCFI-2006, "Statement of Quantity on Labels"	<p>Net contents and dry weight must be located on the main display surface and should be free of any extraneous information. If applicable, the declared drained mass must be located adjacent to the declaration of the net contents (see example below).</p> <p>MARCA            Cont. Net.: XXX            Massa Drenada: XXX            Where the unofficial English translation is:            TRADEMARKS            Net Contents: XXX            Drained Mass: XXX</p> <p>The content and weight data labeling height is a function of the display surface and must correspond to the following:</p> <table border="1"> <thead> <tr> <th>Principal exhibition surface in square centimeters (cm<sup>2</sup>)</th> <th>Minimum height of the numbers and letters in millimeters (mm)</th> </tr> </thead> <tbody> <tr> <td>Up to: 32</td> <td>1.5</td> </tr> <tr> <td>Greater than: 32 to 161</td> <td>3</td> </tr> <tr> <td>Greater than: 161 to 645</td> <td>4.5</td> </tr> <tr> <td>Greater than: 645 to 2,580</td> <td>6</td> </tr> <tr> <td>Greater than: 2,680</td> <td>12</td> </tr> </tbody> </table> <p>For products that express their quantity in units of mass or volume, text height must correspond to the following:</p>	Principal exhibition surface in square centimeters (cm <sup>2</sup> )	Minimum height of the numbers and letters in millimeters (mm)	Up to: 32	1.5	Greater than: 32 to 161	3	Greater than: 161 to 645	4.5	Greater than: 645 to 2,580	6	Greater than: 2,680	12	X	X	X	NA	/
Principal exhibition surface in square centimeters (cm <sup>2</sup> )	Minimum height of the numbers and letters in millimeters (mm)																			
Up to: 32	1.5																			
Greater than: 32 to 161	3																			
Greater than: 161 to 645	4.5																			
Greater than: 645 to 2,580	6																			
Greater than: 2,680	12																			



**BUREAU  
VERITAS**

Evaluation	Citation / Method	Criteria	1	2	3	Result	Rating														
			Star	Star	Star																
		<table border="1"> <thead> <tr> <th>Net contents</th> <th>Minimum height of the numbers and letters in millimeters (mm)</th> </tr> </thead> <tbody> <tr> <td>Up to: 50 g or mL</td> <td>1.5</td> </tr> <tr> <td>Greater than: 50 g or mL up to 200 g or mL</td> <td>2</td> </tr> <tr> <td>Greater than: 200 g or mL up to 750 g or mL</td> <td>3</td> </tr> <tr> <td>Greater than: 750 g or mL up to 1 kg or L</td> <td>4.5</td> </tr> <tr> <td>Greater than: 1 kg or L up to 5 kg or L</td> <td>5</td> </tr> <tr> <td>Greater than: 5 kg or L</td> <td>6</td> </tr> </tbody> </table>	Net contents	Minimum height of the numbers and letters in millimeters (mm)	Up to: 50 g or mL	1.5	Greater than: 50 g or mL up to 200 g or mL	2	Greater than: 200 g or mL up to 750 g or mL	3	Greater than: 750 g or mL up to 1 kg or L	4.5	Greater than: 1 kg or L up to 5 kg or L	5	Greater than: 5 kg or L	6					
Net contents	Minimum height of the numbers and letters in millimeters (mm)																				
Up to: 50 g or mL	1.5																				
Greater than: 50 g or mL up to 200 g or mL	2																				
Greater than: 200 g or mL up to 750 g or mL	3																				
Greater than: 750 g or mL up to 1 kg or L	4.5																				
Greater than: 1 kg or L up to 5 kg or L	5																				
Greater than: 5 kg or L	6																				
ARR	Characteristic s of the labeling of containers	Mexican Official Standard NOM-004-SSA1-2013 / NOM-003-SSA1-2006 Sec. 6	<p>Sanitary legends must be preceded by the word WARNING, placed in the center the box and must be placed in such a way that are written and framed by a line of contrasting color with the bottom of the label.</p> <p>Sanitary legends (% of the total area of label) based on products formulation shall meet the labeling requirements as specified in the standard.</p> <p>When the products are imported, the information must appear in the Spanish language and comply with the requirement established by this standard as well as the name of country of origin preceded by the word "product" and the name and the commercial address of the importer.</p> <p>The products at the time of their sale must be packed in sealed containers, in good condition, safe, provided with labels with legible indications. Containers designated containing products of human consumption may not be used.</p> <p>Note: Vendor shall provide the formulation of the product and shall be responsible for the accuracy of information contained.</p>	X	X	X	NA	/													
ARR	Labeling of paint, ink, varnish, lacquer and enamel	Mexican Official Standard NOM-004-SSA1-2013 / NOM-003-SSA1-2006 Sec. 5.2 /	<p>Products for the classification based on the lead content shall meet the labeling requirements as specified in the standard.</p> <p>Note: vendor shall provide the formulation of the product and shall be responsible for the accuracy of information contained.</p>	X	X	X	NA	/													



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
		CPSD-AN-00730-MTHD						
A R	Labeling of paint, ink, varnish, lacquer and enamel - general information	Mexican Official Standard NOM-004-SSA1-2013 / NOM-003-SSA1-2006 Sec. 7	<p>Must contain the number or code of manufacturing, assigned by the manufacturer for its identification, as well as the lot number and date of manufacture.            Should include pictogram below in an area of no less than 1.5% of the total surface of the label. The frame of the pictogram must be red, the symbol black and the background besides the following reading:            a) All products object of this standard, except those manufactured for school use:</p> <div style="text-align: center;">  <p><b>ATENCION</b> <b>NOCIVO EN CASO DE INGESTION</b></p> </div> <p>b) The products manufactured for school use</p>	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			  <b>ATENCION NO SE INGIERA</b>					
A R	Made in USA origin claims-Doc	FTC Act Section 5a / California BPC Division 7 Part 3 Chapter 1 Article 2 Section 17533.7	<p>Products with a "Made in USA" or equivalent claim must be "all or virtually all" made in the US in accordance with FTC's criteria. It is unlawful for any person, firm, corporation or association to sell or offer for sale in California any merchandise with a "Made in USA" or equivalent claim when the merchandise or any article, unit, or part thereof, has been entirely or substantially made, manufactured, or produced outside of the United States. Vendor must submit a letter of guarantee that a product with such claim fits the FTC and California requirements to carry such a statement. Qualifying statements such as "Made in USA of imported material" are acceptable but the letter of guarantee is still required for the unqualified portions.</p> <p>Note: Compliance with the FTC or California requirements can not be verified.</p>	X	X	X	M (GUARANTEE LETTER PROVIDED)	PASS
<b>ANALYTICAL</b>								
A R	Heavy metal in packaging	Model Toxics in Packaging Legislation of the Toxics in Packaging	<p>The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components shall not exceed 100 mg/kg (100 ppm) by weight.</p> <p>Note: - Total chromium (Cr) is determined first. Confirmation of</p>	X	X	X	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 38 of 49

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
		Clearinghouse (TPCH) / CPSD-AN-00065-MTHD	hexavalent chromium (Cr VI) will be performed when concentration of total chromium is above the detection limit and sum of concentration of four heavy metals is exceeded the limit.					
A R	Heavy metal in packaging-Doc	Model Toxics in Packaging Legislation of the Toxics in Packaging Clearinghouse (TPCH) / CPSD-GB-00001-MTHD	The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components shall not exceed 100 mg/kg (100 ppm) by weight. In lieu of testing, test report can be submitted if dated within One year.	X	X	X	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 39 of 49

<b>Protocol Number</b>	CPSD-AN-06001-USA-3 STAR		<b>Version</b>	12
<b>Protocol Description</b>	FOOD CONTACT ARTICLE			
<b>Country</b>	United States			
<b>Scope</b>	This protocol covers the food grade tests for articles intended to contact with food and beverage.			
<b>Creation Date</b>	29/Apr/2014	<b>Last Revision Date</b>	05/May/2017	
<b>Client Approval Date</b>		<b>Approver</b>		
<b>No of Sample</b>	Please refer to supplemental protocols.			
<b>No of Carton for Transit Test</b>	Please refer to supplemental protocols.			
<b>No of Working Days</b>	Please refer to supplemental protocols.			

Keys					
A	Additional Charge For This Test	M	Mandatory	R	Regulatory

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Results	Rating
<b>SUPPLEMENTARY PROTOCOL</b>								
A	Plastic	CPSD-AN-PTCL-06001.01-USA	Shall meet the applicable requirements in CPSD-AN-PTCL-06001.01-USA as specified.	X	X	X	SEE PROTOCOL CPSD-06001.01-USA	/
A	Paper and paperboard	CPSD-AN-PTCL-06001.02-USA	Shall meet the applicable requirements in CPSD-AN-PTCL-06001.02-USA as specified.	X	X	X	NA	/
A	Ceramic, porcelain, glass	CPSD-AN-PTCL-06001.03-USA	Shall meet the applicable requirements in CPSD-AN-PTCL-06001.03-USA as specified.	X	X	X	NA	/
A	Wood	CPSD-AN-PTCL-06001.04-USA	Shall meet the applicable requirements in CPSD-AN-PTCL-06001.04-USA as specified.	X	X	X	NA	/
A	Metal, metal alloy and enamel	CPSD-AN-PTCL-06001.05-USA	Shall meet the applicable requirements in CPSD-AN-PTCL-06001.05-USA as specified.	X	X	X	NA	/
<b>ANALYTICAL</b>								
A R	GRAS in non-metal material-Doc	21 CFR 170-189 FDA Generally Recognized as	Non-metal material intended to come into contact with food shall meet FDA GRAS requirement. All additives in that material, such as glue shall also meet FDA GRAS requirement. Client shall provide the	X	X	X	NA	/



	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Results	Rating
		Safe (GRAS) Guidelines/FDA Opinion / CPSD-AN-G00007-STIP01 / CPSD-AN-G00007-STIP02 / CPSD-GB-00001-STIP03	documentation with material bill or composition for material identification. It is acceptable for the client to submit either a FDA approval letter or, if there is information from FDA showing the material is acceptable, a guarantee letter indicating the material is the only food grade material used in the manufacturing process can also be accepted.					
A R	Scrapable coatings on food contact areas	21 CFR 170-189 FDA Generally Recognized as Safe (GRAS) Guidelines / CPSD-AN-G00007-STIP02 / CPSD-AN-00002-STIP01	Scrapable coatings on the food contact area are prohibited. This includes all food contact products, including glass, plastic, metal, ceramic and wood. Excludes resinous and polymeric coatings that comply with 21 CFR 175.300.	X	X	X	NA	/
A R	Toxicological risk assessment in liquid and gel	16 CFR 1500.3(b)(5) and 1500.3(b)(7)-(9) / CPSD-AN-00033-MTHD	Sealed liquids and gels in food contact components or products that have the potential to accidentally leak into food or drinks, must not be toxic, skin irritant, eye irritant, corrosive, or a strong sensitizer. Toxicity risk assessment shall be conducted to substantiate the compliance of the regulation. Note: Products including but not limited to double walled cups and reusable ice cubes.	X	X	X	NA	/

Note 1: CPSD-AN-PTCL-06001.04-US will be offered to program client only.



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 41 of 49

<b>Protocol Number</b>	CPSD-AN-06001.01-USA		<b>Version</b>	14
<b>Protocol Description</b>	PLASTIC FOOD CONTACT ARTICLE			
<b>Country</b>	United States			
<b>Scope</b>	This protocol covers the food grade tests for articles, which are made of plastic, intended to contact with food and beverage.			
<b>Creation Date</b>	12/Feb/2010	<b>Last Revision Date</b>	04/Jan/2017	
<b>Client Approval Date</b>		<b>Approver</b>		
<b>No of Sample</b>	4	Additional sample may be requested if insufficient.		
<b>No of Working Days</b>	7			

Keys					
A	Additional Charge For This Test	M	Mandatory	R	Regulatory

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
<b>SUPPLEMENTARY PROTOCOL</b>						
A M	California Proposition 65	CPSD-AN-PTCL-06572-USA	-	The sample should be reviewed against the requirements of California Proposition 65 to determine if additional testing or labeling is required. For samples that fall under the scope of CA Prop 65 requirements with testing limit(s) but does not contain appropriate labeling (refer to image appendix for detail), actual testing will be conducted. Otherwise, actual testing is not required and report as "Pass" if the sample contains appropriate labeling.	NA	/
<b>ANALYTICAL</b>						
A R	Resinous and polymeric coating	FDA 21 CFR 175.300 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21 CFR 175.300 requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface. - BPA-based epoxy resin coatings are not allowed to use in food contact packaging for infant formula.	NA	/
A R	Acrylic and modified acrylic plastic	FDA 21 CFR 177.1010 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21 CFR 177.1010 requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface.	NA	/
A	Closures with	FDA 21 CFR	-	Closure-sealing gasket of closures shall comply with FDA 21CFR 177.1210	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 42 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
R	sealing gaskets	177.1210 / CPSD-AN-00002-MTHD		requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface. - Gaskets are only tested according to gasket requirements of FDA 21 CFR 177.1210. Vendor shall be responsible for the compliance of the material requirements, unless testing of material is requested.		
A R	Ethylene vinyl acetate copolymers	FDA 21 CFR 177.1350 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21CFR 177.1350 requirements. Note: - Apply tests stated in 21CFR 177.1350 section (b)(1) only. - No test for dry food. Dry food means no free fat or oil on the surface.	NA	/
A R	Melamine-formaldehyde resins in molded articles	FDA 21 CFR 177.1460 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21CFR 177.1460 requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface.	NA	/
A R	Nylon resins or polyamide	FDA 21 CFR 177.1500 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21CFR 177.1500 requirements. Note: - Applicable to nylon resins stated in FDA 21 CFR 177.1500 section (b) table, except Nylon 6/12 resins in point 13.1 and 13.2, Nylon 6/69 resins in point 14 and Nylon resin PA 6-3-T in point 16.	NA	/
A R	Olefin polymers	FDA 21 CFR 177.1520 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21CFR 177.1520 requirements. Note: - Applicable to olefin polymers, including but not limited to polypropylene (PP) homopolymer, polypropylene (PP) copolymer and polyethylene (PE).	M (SEE RESULTS)	PASS
A R	Polycarbonate resins	FDA 21 CFR 177.1580 / CPSD-AN-00002-MTHD	-	Shall comply with FDA 21CFR 177.1580 requirements. Note: - Apply tests stated in 21CFR 177.1580 section (c)(2) only. - Polycarbonate resins is not allowed to use in infant feeding bottles (baby bottles) and spill-proof cups including their closures and lids, designed to help train babies and toddlers to drink from cups (sippy cups).	NA	/
A R	Polyethylene phthalate polymers	FDA 21 CFR 177.1630 / CPSD-	-	Shall comply with FDA 21CFR 177.1630 requirements. Note:	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 43 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
		AN-0002-MTHD		- Applicable to article with condition of use stated in 21CFR 177.1630 section (f), (g) and (i) only.		
A R	Polystyrene or rubber-modified polystyrene	FDA 21 CFR 177.1640 / CPSD-AN-00134-MTHD	-	Shall comply with FDA 21CFR 177.1640 requirements. Note: - Apply tests stated in 21CFR 177.1640 section (c) only.	NA	/
A R	Styrene block polymer	FDA 21 CFR 177.1810 / CPSD-AN-0002-MTHD	-	Shall comply with FDA 21CFR 177.1810 requirements. Note: - Apply solubility and maximum extractable fraction tests only.	NA	/
A R	Styrene-methyl methacrylate copolymer	FDA 21 CFR 177.1830 / CPSD-AN-0002-MTHD	-	Shall comply with FDA 21CFR 177.1830 requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface.	NA	/
A R	Urea-formaldehyde resins in molded articles	FDA 21 CFR 177.1900 / CPSD-AN-0002-MTHD	-	Shall comply with FDA 21CFR 177.1900 requirements. Note: - No test for dry food. Dry food means no free fat or oil on the surface.	NA	/
A R	Polyvinyl chloride	FDA 21 CFR 177.1975 (draft) / CPSD-AN-00099-MTHD	-	Shall comply with FDA 21CFR 177.1975 (draft) requirements.	NA	/
A R	Phenolic resins in molded articles	FDA 21 CFR 177.2410 / CPSD-AN-00427-MTHD	-	Shall comply with FDA 21CFR 177.2410 requirements. Note: - Applicable to repeated use articles in contact with non-acid food (pH above 5.0) only.	NA	/
A R	Crosslinked polyester resins	FDA 21 CFR 177.2420 / CPSD-AN-0002-MTHD	-	Shall comply with FDA 21CFR 177.2420 requirements. Note: - Applicable to repeated use articles or components of articles intended to contact with food. - No test for dry food. Dry food means no free fat or oil on the surface.	M (SEE RESULTS)	PASS
A R	Polyoxymethylene copolymer	FDA 21 CFR 177.2470 / CPSD-	-	Shall comply with FDA 21CFR 177.2470 requirements. Note:	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 44 of 49

	Evaluation	Citation / Method	No. of Samples	Criteria	Results	Rating
		AN-00002-MTHD		<ul style="list-style-type: none"> <li>- Applicable to both finished product and raw material.</li> <li>- Applicable to repeated use articles or components of articles intended to contact with food, but use temperature shall not exceed 250 °F.</li> <li>- No test for dry food. Dry food means no free fat or oil on the surface.</li> <li>- Apply tests stated in 21CFR 177.2470 section (d) only.</li> </ul>		
A R	Polyoxymethylene homopolymer	FDA 21 CFR 177.2480 / CPSD-AN-00002-MTHD	-	<p>Shall comply with FDA 21CFR 177.2480 requirements.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Applicable to both finished product and raw material.</li> <li>- Applicable to repeated use articles or components of articles intended to contact with food, but use temperature shall not exceed 250 °F.</li> <li>- No test for dry food. Dry food means no free fat or oil on the surface.</li> <li>- Apply tests stated in 21CFR 177.2480 section (c)(3-4) and (d) only.</li> <li>- For finished product, apply density, melting point and soluble extractive tests only.</li> <li>- For raw material, apply density, melting point, formaldehyde release and soluble extractive tests only.</li> </ul>	NA	/
A R	Rubber intended for repeated use	FDA 21 CFR 177.2600 / CPSD-AN-00002-MTHD	-	<p>Shall comply with FDA 21CFR 177.2600 requirements.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Not applicable to rubber nursing-bottle nipples.</li> </ul>	NA	/
A R	Acrylonitrile copolymer and resins	FDA 21 CFR 181.32 / CPSD-AN-00155-MTHD	-	<p>Shall comply with FDA 21CFR 181.32 requirements.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Test acrylonitrile copolymer and resins with acrylonitrile less than 30% only.</li> </ul>	NA	/
A R	Polyethersulfone resins	FDA 21 CFR 177.2440 / CPSD-AN-00002-MTHD	30g	Shall comply with FDA 21CFR 177.2440 requirements.	NA	/



**BUREAU  
VERITAS**

TERVIS TUMBLER CO  
 Technical Report: **(5218)181-0118**  
 JULY 19, 2018  
 Page 45 of 49

<b>Protocol Number</b>	CPSD-AN-08444-USA		<b>Version</b>	31
<b>Protocol Description</b>	CPSIA REQUIREMENTS SUPPLEMENT			
<b>Country</b>	United States			
<b>Scope</b>	This protocol applies to toys, children products and child care article as defined by CPSIA, all furniture, including adult furniture, and household paint.			
<b>Creation Date</b>	29/Apr/2014	<b>Last Revision Date</b>	05/Jun/2018	
<b>Client Approval Date</b>		<b>Approver</b>		
<b>No of Sample</b>	6			
<b>No of Working Days</b>	7			

Keys					
A	Additional Charge For This Test	M	Mandatory	R	Regulatory

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
<b>LABELING</b>								
R	Tracking label for children's products	CPSIA 103	A permanent and distinguishing mark or code on the product and its packaging, to the extent practicable, allows the manufacturer and purchaser to ascertain the name of the manufacturer or private labeler, location and date of production of the product. Verified the presence only. The accuracy of tracking label will not be verified. Note: Manufacturer or Private Labeler name can not be coded.	X	X	X	M	PASS
A R	Registration for durable nursery product	CPSIA Sec. 104(d) / 16 CFR 1130	Consumer registration requirement: Required to provide consumers with a postage-paid consumer registration form with each such product and to permanently place the manufacturer name and contact information, model name and number, and the date of manufacture on each durable infant or toddler product. Requirements for registration form: The registration form shall (A) include spaces for a consumer to provide the consumer's name, address, telephone number, and e-mail address;	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			(B) include space sufficiently large to permit easy, legible recording of all desired information; (C) be attached to the surface of each durable infant or toddler product so that, as a practical matter, the consumer must notice and handle the form after purchasing the product; (D) include the manufacturer's name, model name and number for the product, and the date of manufacture; (E) include a message explaining the purpose of the registration and designed to encourage consumers to complete the registration; (F) include an option for consumers to register through the Internet; and (G) include a statement that information provided by the consumer shall not be used for any purpose other than to facilitate a recall of or safety alert regarding that product. "Durable infant or toddler product" means full-size cribs and nonfull-size cribs, toddler beds, high chairs, booster chairs, hook-on chairs, bath seats, gates and other enclosures for confining a child, play yards, stationary activity centers, infant carriers, strollers, walkers, swings, bassinets and cradles, children's folding chairs, changing tables, bouncers, infant bath tubs, bed rails and infant sling.					
<b>ANALYTICAL</b>								
A R	Total lead in surface coating	16 CFR 1303/Consumer Product Safety Improvement Act of 2008 / CPSC-CH-E1003-09.1 / CPSD-AN-00001-MTHD	All accessible surface coatings, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead or lead components in which the lead content is in excess of 0.009% (90ppm) of the weight of the total content. In case of insufficient coating for testing found on number of samples specified in the protocol, vendor needs to provide additional component parts (including raw materials) for testing. Report actual results or include data table within report. Issue a third party test report. Component testing is allowed. Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72 ppm), based on the	X	X	X	NA	/



**BUREAU  
VERITAS**

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
			lowest weight component, individual colors will be analyzed.					
A R	Total lead in surface coating	16 CFR 1303/Consumer Product Safety Improvement Act of 2008 / CPSC-CH-E1003-09.1 / CPSD-AN-00001-MTHD	All accessible surface coatings in the assembled state on adult furniture [exempt factory applied coatings on metal components/parts] and household paint shall not contain lead or lead components in which the lead content is in exceed of 0.009% (90ppm) of the weight of the total content. In case of insufficient coating for testing found on number of samples specified in the protocol, vendor needs to provide dipped parts or components/parts for testing. Report actual results or include data table within report. Issue a program audit report. Component testing is allowed. Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed.	X	X	X	NA	/
A R	Total lead in substrate	Consumer Product Safety Improvement Act of 2008 / CPSC-CH-E1001-08.3/CPSC-CH-E1002-08.3 / CPSD-AN-00185-MTHD/CPSD-AN-00196-MTHD	All accessible substrates, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead in excess of 0.01% (100ppm) of the weight of the total content. In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing. Report actual results or include data table within report. Issue a third party test report. Component testing is allowed. Compositing up to 3 like materials is allowed except metal.	X	X	X	M (SEE RESULTS)	PASS
A R	Total lead in children metal jewelry	Consumer Product Safety Improvement Act of 2008 / CPSC-CH-E1001-08.3 / CPSD-AN-00185-MTHD	Any accessible metal component of jewelry intended for children ages 12 and under shall not contain lead in excess of 0.01% (100ppm) of the weight of the total content. Report actual results or include data table within report Issue a third party test report Component testing is allowed Compositing is not allowed	X	X	X	NA	/
A R	Phthalates content	16 CFR 1307 / CPSC-CH-	Children's toys and childcare articles, before and after use and abuse testing, shall not contain concentrations of more than 0.1%	X	X	X	M (SEE	PASS



Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
	C1001-09.3 (Mod) / CPSC-CH-C1001-09.4 (Mod) / CPSD-AN-00143-MTHD	<p>BBP, DBP, DEHP, DINP, DIBP, DPENP(=DnPP), DHEXP(=DnHP) or DCHP individually.</p> <p>Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber) (excluding materials listed below), plasticizer print, scrapable surface coatings, decals, polymeric coated materials (unscrapable), adhesives and sealants (exclude adhesive for stickers), toy nail polish, reusable packaging, electrical plug and cables.</p> <p>Polypropylene (PP), polyethylene (PE), acrylonitrile butadiene styrene (ABS), general purpose polystyrene (GPPS), medium-impact polystyrene (MIPS), high-impact polystyrene (HIPS), and super high-impact polystyrene (SHIPS), and their additives as listed in 16 CFR 1308 are exempt from testing, however, they are not exempt from compliance or certification.</p> <p>If material identification is not provided, phthalate testing will be conducted on all plastic materials.</p> <p>Vendor shall be responsible for the compliance of all other accessible materials, including additives in the exempt plastic materials.</p> <p>In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing.</p> <p>Report actual results or include data table within report.</p> <p>Component testing is allowed.</p> <p>Compositing up to 3 like materials is allowed.</p> <p>Product manufactured and imported as of April 25, 2018 must comply.</p>				RESULTS)	

IMPORTANT NOTE: The information presented under the "Criteria" of this protocol is for information only and does not replace the content of the standard. Details of the requirements should be referred to the original standards.



TERVIS TUMBLER CO  
Technical Report: **(5218)181-0118**  
JULY 19, 2018  
Page 49 of 49

