

November 18, 2008

Ms. Terri Roggenkamp  
 Malloy Litho  
 5411 Jackson Road  
 Ann Arbor, MI 48103

Dear Ms. Roggenkamp

I am writing you in reply to your request for information on the chemical hazards of our ink products and their compliance with the Consumer Product Safety Improvement Act (CPSIA) of 2008. The CPSIA limits the concentration of lead and other heavy metals, as well as phthalates in children's products/childcare articles on which printing inks are used. It also sets up timetables for 3<sup>rd</sup> party testing requirements. The limits and timetables are listed below.

**General Lead Ban**

The CPSIA bans children's products containing lead in the following concentrations:

Lead Concentration (PPM)	Effective Date	Certification/Testing
600	Feb. 10, 2009	General Conformity Certification (GCC)
300	Aug. 14, 2009	Third party testing/certification required
100*	Aug. 14, 2011	Third party testing/certification required

\*If technologically feasible

**Phthalates Ban**

The CPSIA bans products containing more than 0.1% of the phthalates listed below:

<b>Permanent Ban</b>	<b>Effective Date</b>	<b>General Conformity Certification Required</b>	<b>3<sup>rd</sup> Party Testing Required</b>
di-(2-ethylhexyl) phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009
dibutyl phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009
benzyl phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009
<b>Interim Ban</b>			
diisononyl phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009
diodecyl phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009
di-n-octyl phthalate	Feb. 10, 2009	Feb. 10, 2009	Sept. 2009

According to the Consumer Product Safety Commission, packaging is generally not intended for use by children, given that most packaging is discarded and is not used as a children's product. However, if the package is intended to be reused, or used in conjunction with the children's product, such as a heavy gauge bag used to hold blocks, it becomes a component or part of the product, and would be subject to the lead requirements of CPSIA.

**Adoption of ASTM F963-07 as a Consumer Product Safety Standard**

The CPSIA adopts ASTM F903-07 as a Consumer Product Safety Commission standard. Accordingly, this action places limits on the amount of heavy metals, namely antimony, arsenic, barium, cadmium, chromium, mercury and selenium based on the soluble portion of that material, using a specified extraction methodology given in the standard. Toys manufactured after

