

Sent: Wednesday, November 19, 2008 3:10 PM  
To: [REDACTED]  
Subject: [REDACTED] Heavy metals in printing inks

This responds to your request for information on heavy metals in printing inks.

The raw materials that we use in our production facilities to manufacture printing inks and other products do not contain any of the following heavy metals in their chemistry:

- lead
- hexavalent chromium
- cadmium
- mercury
- arsenic
- selenium
- antimony

There are a number of government regulations that legislate the trace content of heavy metals in printing inks and other surface coatings. We certify that our products are in full compliance with the following regulatory requirements:

| REGULATION:                  | LEAD                         | HEXAVALENT CHROMIUM | CADMIUM | MERCURY | ARSENIC | SELENIUM | ANTIMON |
|------------------------------|------------------------------|---------------------|---------|---------|---------|----------|---------|
| 1. CONEG                     | <100 ppm (total of 4 metals) |                     |         |         | NA      | NA       | NA      |
| 2. ASTM F963                 | <90 ppm                      | <60 ppm             | <75 ppm | <60 ppm | <25 ppm | <500 ppm | <60 ppm |
| 3. EN 71-3                   | <90 ppm                      | <60 ppm             | <75 ppm | <60 ppm | <25 ppm | <500 ppm | <60 ppm |
| 4. CFR Title 13 Section 1303 | <500 ppm                     | NA                  | NA      | NA      | NA      | NA       | NA      |

<sup>1</sup> CONEG (Coalition of Northeastern Governors) - Toxics In Packaging Legislation  
[www.toxicsinpackaging.org](http://www.toxicsinpackaging.org)

<sup>2</sup> ASTM F963-07 - US Toy Safety Standard [www.astm.org](http://www.astm.org)

<sup>3</sup> BS EN 71-3:1995 - European Toy Safety Standard  
<http://ec.europa.eu/enterprise/newapproach/standardization/harmstds/reflist/toys.html>

<sup>4</sup> CFR Title 13, Section 1303 - Ban of Lead-Containing Paint  
[http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title16/16cfr1303\\_main\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title16/16cfr1303_main_02.tpl)

In addition, we regularly conduct random testing through a certified analytical laboratory to further ensure that our products are in full regulatory compliance. The results from our most recent analytical testing found that, overall, the heavy metal content is below the limit of detection (ranging between 1.0 and 2.0 ppm), with some isolated data points showing trace levels of 5 ppm or less (well below any regulatory limit). Some printing inks (including warm reds such as Red Lake C) are formulated with pigments that contain barium in their chemistry. US and EU toy printing regulations require the use of printing inks that do not contain barium pigments. Alternate products are available and can be provided when printing toys and toy products.

We thank you for your continued interest in our products.

Sincerely,

[REDACTED]