

SPINDEL 4
INSULINDESTRAT 66
VLAARDINGEN
3131ZD
NETHERLANDS

Attn: Klaas Van Asch

Test Report No. BTO 332423/1
Issue Date: 27 March 2025

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

Sample Name: SPINDEL 4
Sample Reference: Game Pad
Sample Description: Black & white printed A5 size paper pad with card backing.
Sample Submitted: 06th March 2025
Testing Period: Testing conducted between 17th March 2025 and 19th March 2025
Labelled Age Grading: 8 years+
Assessed Age Grading: 36 Months +
Age Grading Applied: 10-12months+ (Children who can sit up unaided)
Testing Required: For compliance with the European Standard on Safety of Toys:

	Result:
BSEN 71-1:2014+A1:2018	Pass ⁽¹⁾
BSEN 71-2:2020	Pass
BSEN 71-3:2019+A1:2021	Pass ⁽²⁾
BSEN 71-3:2019+A2:2024	Pass ⁽²⁾⁽³⁾

⁽¹⁾ See Appendix for labelling details

⁽²⁾ Confirmation testing has been conducted for Chromium (VI) on sample(s) 1 and 2. Confirmation testing is Non UKAS accredited

⁽³⁾ Non UKAS accredited

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

Signed for and on behalf of
SGS United Kingdom Ltd.



.....
Chris Walker, BSc (Hons)
Technical Manager

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APPENDIX A

BSEN 71-1:2014+A1:2018
MECHANICAL AND PHYSICAL PROPERTIES

Clause:	Details:	Results:	Comment:
4	<u>General Requirements</u>	---	
4.1	Material Cleanliness	Pass	#4.1
4.7	Edges	Pass	#4.7
4.8	Points And Metallic Wires	Pass	#4.8
5.0	<u>Toys Intended For Children Under 36 Months</u> (See Comment α)	----	
5.1	General Requirements	---	
	5.1a Small Parts On Toys And Removable Components	Pass	#5.1a
7	<u>Warnings and Instructions for Use</u> (See Comment β and γ)		#7.0

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BSEN 71-1:2014+A1:2018 - MECHANICAL AND PHYSICAL PROPERTIES

Comment:	Details:
#4.1	<i>Toys shall be visually clean and free from infestation (Visual Assessment).</i>
#4.7	<i>There shall be no hazardous sharp edges present.</i>
#4.8	<i>There shall be no hazardous sharp points present.</i>
#5.1a	<i>No hazardous components present.</i>
#7.0	<i>No hazardous components were produced on product during testing. Therefore warning is not required.</i>

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APPENDIX B

BSEN 71-2: 2020			
FLAMMABILITY OF TOYS			
Clause:	Details:	Results:	Comment:
4.1	General Requirements	Pass	## ^{4.1}
	<i>Unless otherwise stated only one sample/material has been tested to the above clauses.</i>		

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BSEN 71-2: 2020 – FLAMMABILITY OF TOYS	
Comment:	Details:
## ^{4.1}	<i>The toy(s) was not washed prior to testing.</i>

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APPENDIX C
(Non UKAS Accredited)

The following assessments are informative only and do not form part of the results given for the EN71-1:2014+A1:2018 and or EN71-2:2020 assessment. The information given in this appendix is informative only and is drawn to your attention to ensure compliance with the Toy Safety Regulations/Directive.

Comment α

In order to comply with the requirements of the Toy Safety Regulations/Directive please consider the following should it be applicable to your product:

<u>Washing/Cleaning Label</u>	<u>See Remark</u>
(Sub-content is extracted from the context of EN 71-1:2014+A1:2018 and EN 71-2:2011 + A1:2014)	
According to Directive 2009/48/EC the following safety requirements apply regarding cleaning and washing: A toy intended for use by children under 36 months must be designed and manufactured in such a way that it can be cleaned. A textile toy must, to this end, be washable, except if it contains a mechanism that may be damaged if soak washed. The toy must fulfil the safety requirements also after having been cleaned in accordance with this point and the manufacturer's instructions. The manufacturer should, if applicable, provide instructions on how the toy has to be cleaned.	
<u>Remark:</u> Washing/cleaning label was not found on the toy	

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Comment β

In order to comply with the requirements of the Toy Safety Regulations/Directive please consider the following should it be applicable to your product:

CE/UKCA mark, importer / manufacturer mark (name, address), product identification	See Remark								
(Sub-content is extracted from the context of EN 71-1:2014+A1:2018)									
The text of this note is for information only and the indents do not constitute requirements of this European Standard. The information is not exhaustive and Directive 2009/48/EC and/or Toy (Safety) Regulation 2011 and the associated guidance documents should be consulted for further details. Toys made available on the market must bear the CE and/or UKCA marking. The CE and/or UKCA marking is subject to the general principles set out in Article 30 of Regulation (EC) No 765/2008 and/or UK Gov website as appropriate. The CE and/or UKCA marking must be affixed visibly, legibly and indelibly to the toy, to an affixed label or to the packaging. In the case of small toys and toys consisting of small parts, the CE and/or UKCA marking may alternatively be affixed to a label or an accompanying leaflet. Where, in the case of toys sold in counter displays, that is not technically possible, and on condition that the counter display was originally used as packaging for the toy, the CE and/or UKCA marking may be affixed to the counter display. Where the CE and/or UKCA marking is not visible from outside a packaging, it shall as a minimum be affixed to the packaging. Where specific legislation does not impose specific dimensions, the CE and/or UKCA marking must be at least 5 mm high. The manufacturer's name, registered trade name or registered trade mark and the address at which the manufacturer can be contacted must be indicated on the toy or, where that is not possible, on its packaging or in a document accompanying the toy. This requirement applies also to the name and address etc. of any importer. Manufacturers must ensure that their toys bear a type, batch, serial or model number or other element allowing their identification, or where the size or nature of the toy does not allow it, that the required information is provided on the packaging or in a document accompanying the toy. Manufacturers and importers must ensure that the toy is accompanied by instructions and safety information in a language or languages easily understood by consumers, as determined by the Member State concerned. A Member State may, within its territory, stipulate that warnings and safety instructions shall be written in a language or languages easily understood by consumers, as determined by that Member State. Information relating to the age grading of toys and, in particular, which toys are intended for children under 36 months and which toys are not, can be found in CR 14379, the CPSC Age determination guidelines, CEN Guide 11 and the European Commission's Guidance Documents.									
CE Mark									
<table border="1"> <tr> <td>CE Mark (minimum 5mm)</td> <td>Not Present</td> </tr> <tr> <td>Manufacturers Name/Address**</td> <td>Not Present</td> </tr> <tr> <td>Importers Name/Address**</td> <td>Not Present</td> </tr> <tr> <td>Batch Code or Suitable Alternative</td> <td>Not Present</td> </tr> </table>	CE Mark (minimum 5mm)	Not Present	Manufacturers Name/Address**	Not Present	Importers Name/Address**	Not Present	Batch Code or Suitable Alternative	Not Present	** one of these required to be in the EU
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UKCA Mark (minimum 5mm)	Not Present								
Manufacturers Name/Address***	Not Present								
Importers Name/Address***	Not Present								
Batch Code or Suitable Alternative	Not Present								
(Remark: It is drawn to your attention that the product identification number, name and address of manufacturer and importer in EEC country together with CE-marking and/or UKCA-marking should appear as specified in Directive-2009/48/EC-Safety of toys and/or Toy (Safety) Regulation 2011)									

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Comment y

In order to comply with the requirements of the Toy Safety Regulations/Directive the following good practice should be considered

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

Good practice for visibility and legibility:

a) Emphasising the warning:

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

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

2) avoid large amounts of information;

3) do not mix safety information with commercial information;

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

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

b) Contrast, background and colours:

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

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

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

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

c) Reflecting surfaces and obscuring material:

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

d) Font type:

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

e) Font size:

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

the visibility and legibility of text. Use font sizes that allow all target groups, including those with corrected vision, to read the warning and

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

f) Logical direction of text:

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

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Appendix D
BSEN 71-3:2019+A1:2021
Migration of Certain Elements

Method: With reference to BSEN 71-3

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

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

	Category Limits			Sample Reference		
	I	II	III	1	2	3
Aluminium (Al)	2250	560	28130	<50	<50	117
Antimony (Sb)	45	11.3	560	<1	<1	<1
Arsenic (As)	3.8	0.9	47	<0.15	<0.15	<0.15
Barium (Ba)	1500	375	18750	<50	<50	<50
Boron (B)	1200	300	15000	<50	<50	<50
Cadmium (Cd)	1.3	0.3	17	<0.15	<0.15	<0.15
Chromium (Cr)	-	-	-	0.13	0.12	<0.053
Chromium (III) (Cr (III)) ^{#1}	37.5	9.4	460	<5	<5	#
Chromium(VI) (Cr (VI)) ^{#2}	0.02	0.005	0.053	<0.053	<0.053	#
Cobalt (Co)	10.5	2.6	130	<1	<1	<1
Copper (Cu)	622.5	156	7700	<5	<5	<5
Lead (Pb)	2	0.5	23	<0.5	<0.5	<0.5
Manganese (Mn)	1200	300	15000	<50	<50	<50
Mercury (Hg)	7.5	1.9	94	<0.25	<0.25	<0.25
Nickel (Ni)	75	18.8	930	<5	<50	<5
Selenium (Se)	37.5	9.4	460	<1	<1	<1
Strontium (Sr)	4500	1125	56000	<50	<50	<50
Tin (Sn)	15000	3750	180000	<0.1	<0.1	<0.1
Organic Tin	0.9	0.2	12	Not Conducted [^]		
Zinc (Zn)	3750	938	46000	<50	<50	<50

Results of Analysis – PASS Further analysis has been conducted to determine levels of Chromium (VI) on samples 1 and 2.

Sample Ref:	Sample Description & Location	Category		
		I	II	III
1.	CMYK printed cover sheet			✓
2.	Black printed inner sheet			✓
3.	Cardboard base			✓

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

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

The level of Soluble Chromium detected on all samples did not exceed the stricter limit for Chromium (III) as specified in BSEN 71-3:2019+A1:2021

The level of Soluble Chromium detected on samples 3 did not exceed the stricter limit for Chromium (VI) as specified in BSEN 71-3:2019+A1:2021

As the level of Soluble Chromium on samples 1 and 2 detected exceeded the stricter limit for Chromium (VI) as specified in BSEN 71-3:2019+A1:2021 further testing has been conducted to determine the levels of Chromium (VI)

#1 – Non UKAS – Chromium (III) levels are determined from: Chromium level – Chromium (VI) level (or reported as <5ppm ~ *whichever is greater*)

#2 – Non UKAS – Chromium (VI) levels assessed and determined by IC-UV method.

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

The level of Soluble Tin, after conversion, detected on all samples did not exceed the stricter limit for Organic Tin as specified in BSEN 71-3:2019+A1:2021

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Appendix E (Non UKAS Accredited)
BSEN 71-3:2019+A2:2024
Migration of Certain Elements

Method: With reference to BSEN 71-3

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

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Boron (B)	1200	300	15000	<50	<50	<50
Cadmium (Cd)	1.3	0.3	17	<0.15	<0.15	<0.15
Chromium (Cr)	-	-	-	0.13	0.12	<0.053
Chromium (III) (Cr (III)) ^{#1}	37.5	9.4	460	<5	<5	#
Chromium(VI) (Cr (VI)) ^{#2}	0.02	0.005	0.053	<0.053	<0.053	#
Cobalt (Co)	10.5	2.6	130	<1	<1	<1
Copper (Cu)	622.5	156	7700	<5	<5	<5
Lead (Pb)	2	0.5	23	<0.5	<0.5	<0.5
Manganese (Mn)	1200	300	15000	<50	<50	<50
Mercury (Hg)	7.5	1.9	94	<0.25	<0.25	<0.25
Nickel (Ni)	75	18.8	930	<5	<50	<5
Selenium (Se)	37.5	9.4	460	<1	<1	<1
Strontium (Sr)	4500	1125	56000	<50	<50	<50
Tin (Sn)	15000	3750	180000	<0.1	<0.1	<0.1
Organic Tin	0.9	0.2	12	Not Conducted [^]		
Zinc (Zn)	3750	938	46000	<50	<50	<50

Results of Analysis – PASS Further analysis has been conducted to determine levels of Chromium (VI) on samples 1 and 2.

Sample Ref:	Sample Description & Location	Category		
		I	II	III
1.	CMYK printed cover sheet			✓
2.	Black printed inner sheet			✓
3.	Cardboard base			✓

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 - 1% = 10000 mg/kg = 10000 ppm

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

The level of Soluble Chromium detected on all samples did not exceed the stricter limit for Chromium (III) as specified in BSEN 71-3:2019+A2:2024

The level of Soluble Chromium detected on sample 3 did not exceed the stricter limit for Chromium (VI) as specified in BSEN 71-3:2019+A2:2024

As the level of Soluble Chromium on samples 1 and 2 detected exceeded the stricter limit for Chromium (VI) as specified in BSEN 71-3:2019+A2:2024 further testing has been conducted to determine the levels of Chromium (VI)

#1 – Non UKAS – Chromium (III) levels are determined from: Chromium level – Chromium (VI) level (or reported as <5ppm ~ *whichever is greater*)

#2 – Non UKAS – Chromium (VI) levels assessed and determined by IC-UV method.

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

The level of Soluble Tin, after conversion, detected on all samples did not exceed the stricter limit for Organic Tin as specified in BSEN 71-3:2019+A2:2024

Note: Any statement of conformity made in this report unless otherwise stated in the above test specification(s) is in line with SGS United Kingdom (Bradford) Decision rule BRAD-GEN-049. Details can be found on the following link [SGS United Kingdom Ltd \(Bradford\) – ISO 17025 Clause 7.1.3 – Decision Rule V6](#)

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*** End of Report ***

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