

BIO RISK

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RISK ASSESSMENT FOR ART MATERIALS

(LHAMA, CALIFORNIA PROPOSITION 65, US TOXICITY RISK ASSESSMENT, CANADIAN HAZARDOUS (TOYS) REGULATIONS and EU TOY STANDARD EN71-3: 2013

NON-CONFIDENTIAL

December 20, 2019

ART MATERIAL: Crayon Rocks from Barbara Lee, its Franchisees,
Distributors and Dealers

INGREDIENTS: MAJOR

Wax
Calcium Carbonate
Pigments – Confidential

OVERALL EVALUATION

TOXICITY

The wax is semi solid food grade wax. It should not be of acute or chronic concern from a toxicity point of view. It is used in making candles and soap. It has no TLV.

Calcium carbonate is not considered acutely toxic. No long-term toxicity is expected from this material. It has no TLV.

EXPOSURE

Crayon Rocks are classified as crayon and therefore are exempt from the size requirement for children under 3 years of age. Crayon Rocks weigh approximately 4.5-5.0 grams and are approximately 1.2 inches long by 3/4 inches wide by 5/8 inches tall. They are solid, made primarily from waxes and calcium carbonate and pigments. Inhalation exposure would not be expected from using these crayon rocks. The exposure to these metal and metal salts pigments or inclusion pigments will be essentially zero. The pigments and inclusion pigments will be dispersed in the wax crayon and skin contact with any significant amount of pigments is very unlikely. Oral exposure would be possible if crayon rocks are placed in the mouth. A child could mistake crayon Rocks as a candy. Skin contact is expected during use.

. All migration level of elements in crayon are in compliance with European Standard for Toy Safety - EN 71-3 -Part 3, CPSTA- ASTM 963-17 clause 4.3.5 , and AZ/NZS ISO 8124 Part 3 .(Report to Barbara Lee #4563740-CH01-R-1 from SGS dated 12/18/2019)

RISK CHARACTERIZATION

Chronic Toxicity

No concerns under proposed use conditions.

Acute Toxicity

Non-irritating to skin and eye. No concerns under proposed use conditions.

CONCLUSION

Crayon Rocks are made from primarily from waxes. The use of this art material under normal conditions should not produce any acute or chronic health effect. Some pigments are considered toxic (carcinogens, skin and eye irritants), but the solid crayon rock should be non-toxic as the pigments are encapsulated in the wax crayon.

Because children could mistake the Crayon Rocks as candy, it is recommended that they be used under adult supervision to prevent accidental ingestion.

No labeling other than the statement “conforms to ASTM D 4236” is required for chronic toxicity.. No labeling is required under the FHSA or under California Proposition 65.

Crayon Rocks are not classified, under the Canadian Hazardous (toys) Regulation (Toxicological Hazards - Schedule I and II), as toxic, corrosive, flammable, quick skin bonding agent or are they sold in pressured containers.

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