



CONSUMER PRODUCTS SERVICES DIVISION

## THE ART AND CREATIVE MATERIALS INSTITUTE INC

**Technical Report:** (5123)251-0042  
**Date Received:** SEPTEMBER 8, 2023

OCTOBER 18, 2023  
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MARK MORRISON  
ABROLI LLC  
515 WEST AVENUE PH81  
NORWALK CT 06850  
UNITED STATES

Product Name:	MONSTER COLOR WASHABLE TEMPERA POUCH	Brand Name #1:	ABROLI
Product Category:	PAINTS TEMPERA (LIQUID)	Brand Name #2:	N/A
Manufacturer ID:	N/A	Brand Name #3:	N/A
3 <sup>rd</sup> Party Manufacturer:	D.K. ART & CRAFT CO., LTD	Licensee Brand #1:	N/A
4 <sup>th</sup> Party Manufacturer:	N/A	Licensee Company Name:	N/A
Labeled Age Grade:	4+	Total # of Colors:	35
Appropriate Age Grade:	NOT REQUESTED	SKU:	SEE TABLE
Client Specified Age Grade:	4+		
Tested Age Grade:	4+		

### Toxicity Assessment

This evaluation was conducted based solely on the product formulation submitted to Intrinsik by Bureau Veritas (refer to the Product Formulation Table) and the information provided in the test request form. Evaluation of the final product was conducted through consideration of the toxicity of the individual ingredients with consideration given to potential interactive effects with the mixture of ingredients when such effects may be anticipated based on the available data.

The following health endpoints are considered:

- Acute toxicity (oral, dermal, inhalation)
- Irritation/corrosion (eye, skin, respiratory tract)
- Sensitization (dermal, respiratory)
- Aspiration
- Chronic toxicity (general organ and tissue toxicity, genotoxicity, carcinogenicity, neurotoxicity, reproductive and developmental toxicity)

Toxicity limits, incorporating appropriate safety factors and risk assessment models, are established based on a review of several regulatory and scientific databases including those provided by US EPA, Health Canada, European Chemicals Agency, and California's Office of Environmental Health Hazard Assessment (OEHHA).

### Exposure Assessment

The product, *Abrolí Monster Color Washable Tempera Pouch*, consists of colored liquid paint formulations intended for use by children 4 years of age and older for arts and crafts purposes by. The product is intended to be applied using a brush or a sponge. The product is packaged in small pouches for easy dispensing. Consideration was given to consumer exposure with intended product use and under circumstances involving reasonably foreseeable misuse. Intentional product misuse was not considered within the scope of the assessment. This evaluation was conducted under the assumption that potential exposure to product ingredients is through the dermal route and possibly the oral route through accidental ingestion. The inhalation route was not evaluated since none of the chemicals in the product formulation were considered sufficiently volatile for inhalation exposure.

The following exposure assumptions were considered:

- Oral (liquid or solids): lessor of product size and the child incidental ingestion amount of 1.25 g, and lessor of the product size and product specific hand-to-mouth exposure (chronic)
- Dermal (liquid or solids): product specific based on surface area of hands, arms, face, etc.
- Inhalation: 100% of any vapor or aerosol is absorbed

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### Considerations

It was assumed that all product formulation details are accurate and that there are no additional ingredients that are not listed (note: chemical testing was not conducted as part of this product evaluation and chemical analyses data were not provided in support of this evaluation). It was also assumed that any ingredients provided in the product formulation do not contain any impurities and/or contaminants (e.g., heavy metal(s) or lead) or infectious agents that would cause toxicity in a consumer who may be exposed to them. This product was not evaluated for toxicological considerations related to physical or chemical properties of the formulation (e.g., pH, viscosity, volatility) and potential for physical injury (e.g., choking hazard or mechanical irritation) was not considered.

This evaluation constitutes a regulatory review for the regulations cited above, and provides hazard warning guidance, if necessary. Detailed labeling requirements (i.e., label content, prominence, placement, and conspicuousness, and any relevant exemptions) beyond any necessary hazard warning guidance were not considered.

This evaluation is relevant solely to the conditions described herein. Any substitution of ingredients, increase in ingredient concentrations, or change in use pattern will necessitate a new evaluation.

### Evaluation Conclusions

#### LHAMA

Based on the available data, the submitted formulation would not be expected to pose any significant chronic adverse health effects to humans when used as intended or under circumstances involving reasonable foreseeable misuse. Chronic toxicity was evaluated in accordance with the guidelines specified by the Consumer Product Safety Commission in 16 CFR 1500.135. The product will not require any additional chronic health hazard labeling according to ASTM D-4236.

The product must bear the following statement:

"Conforms to ASTM D-4236."

Other requirements of 16 CFR 1500.14 pertaining to proper labeling of the product including format and placement of statements and additional precautionary statements must also be adhered to.

#### TRA (US)

Based on available data, the product, *Abroli Monster Color Washable Tempera Pouch*, MEETS the requirements for classification as not flammable, toxic (acute/chronic), corrosive, a skin/eye irritant, or a strong sensitizer as defined in 16 CFR 1500.3, when used as intended or under circumstances involving reasonable foreseeable misuse.

#### LHAMA / TRA (US) / ACMI Labelling Recommendations

Hazard labeling is not required.

An **AP (Approved Product)** label is appropriate for the product. The product, *Abroli Monster Color Washable Tempera Pouch*, is safe and certified to contain no materials in sufficient quantities to be toxic or injurious to humans, including children, or to cause acute or chronic health problems. Such product is to be labeled in accordance with the Federal Hazardous Substance Act (FHSA) 15 U.S.C 1261 – 1278 (p)(1), the chronic hazard labeling standard, ASTM D 4236, and the U. S. Labeling of Hazardous Art Materials Act (LHAMA).

**Label Review:** An AP label is appropriate for the product. The label provided for the product, *Abroli Monster Color Washable Tempera Pouch (Red)*, is appropriate; however, it should be noted that the label does not currently bear an AP seal. Although the product includes a choking hazard warning due to the presence of small parts, as long as the small parts do not present a toxicological risk, the product may bear the AP Seal.

#### 16 CFR 1500.17 and California Proposition 65 List Review

In addition, the ingredients in the product are not included in the list of banned hazardous substances cited in 16 CFR 1500.17.

The following ingredients in the product are listed on the California Proposition 65 List (August 11, 2023):

- Titanium dioxide (CAS No. 13463-67-7) [listed as titanium dioxide (airborne, unbound particles of respirable size)], carbon black [listed as carbon black (airborne, unbound particles of respirable size)], and quartz [listed as silica, crystalline (airborne particles of respirable size)] are listed on the California Proposition 65 List, as chemicals known to the State of California to cause cancer; however, given the nature and physical form of the product (i.e., liquid paint), airborne respirable particles would not likely be released from the product and therefore the listed forms of titanium dioxide, carbon black, and silica, crystalline are not relevant for the product.

It should be noted that the product is composed of numerous proprietary mixtures; only those ingredients disclosed in the safety data sheets (SDSs) for these mixtures were reviewed against 16 CFR 1500.17 and the California Proposition 65 List (August 11, 2023).



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**Additional Notes**

- Assessment of carbomer [poly(acrylic acid)] (CAS No. 9003-01-4) was based on the assumption that this ingredient is present in the product as a fully reacted/cured, stable, and high molecular weight polymer with minimal residual monomers. If this is not the case, reassessment of the product is required.
- Methyl p-hydroxybenzoate (CAS No. 99-76-3) may have sensitization potential, principally when exposure involves damaged or broken skin.

**PRODUCT EVALUATION APPROVAL**

**Charles Lambert, Ph.D., DABT, ERT**

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Name, printed)

**Certified Toxicologist**

**October 17, 2023**

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

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Bureau Veritas

Consumer Products Services, Inc.

Danielle Eckl

Product Test Engineer

Toy and Juvenile Products Department

/AN



**Table of Colors / SKUs**

Brand Name	Color Name	SKU	ACMI Label	Summary of Hazards
Abroli Monster Color Washable Tempera Pouch	White	WHP4-01	AP	NA
	Black	BLP4-02	AP	NA
	Red	RDP4-03	AP	NA
	Dark Blue	DBP4-04	AP	NA
	Green	GRP4-05	AP	NA
	Yellow	YEP4-06	AP	NA
	Orange	ORP4-07	AP	NA
	Brown	BRP4-08	AP	NA
	Magenta	MGP4-09	AP	NA
	Pink	PKP4-10	AP	NA
	Turquoise	TQP4-11	AP	NA
	Purple	PPP4-12	AP	NA
	Lavender	LVP4-13	AP	NA
	Light Blue	LBP4-14	AP	NA
	Metallic Blue	MT-B-5	AP	NA
	Metallic Green	MT-G-10	AP	NA
	Metallic Red	MT-R-5	AP	NA
	Metallic Purple	MT-P-8	AP	NA
	Metallic Pink	MT-PK-9	AP	NA
	Metallic Gold	MT-G-5	AP	NA
	Metallic Silver	MT-S-11	AP	NA
	Neon Blue	NE-B-5	AP	NA
	Neon Green	NE-G-5	AP	NA
	Neon Red	NE-R-5	AP	NA
	Neon Purple	NE-P-5	AP	NA
	Neon Pink	NE-PK-5	AP	NA
	Neon Orange	NE-O-5	AP	NA
	Neon Yellow	NE-Y-5	AP	NA
	Glitter Blue	GT-B-5	AP	NA
	Glitter Green	GT-G-5	AP	NA
	Glitter Red	GT-R-5	AP	NA
	Glitter Purple	GT-P-5	AP	NA
	Glitter Pink	GT-PK-5	AP	NA
	Glitter Gold	GT-D-5	AP	NA
	Glitter Silver	GT-S-5	AP	NA
<b>Total # of Colors: 35</b>				