

Stevenson, Todd

From: Keith Jenkins (SS&A) [kjenkins@ssa-dc.com]
Sent: Tuesday, February 17, 2009 5:01 PM
To: Lead Determinations
Subject: Gildan Activewear Comments - Section 101 Determinations of Certain Materials or Products NPR
Attachments: Gildan Activewear - Sec 101 Determinations of Certain Materials or Products NPR - 02.17.09.pdf

On behalf of Gildan Activewear, please find the attached written comments to the CPSC regarding Section 101 Determinations of Certain Materials or Products NPR.

Thank you,

Keith

Keith A. Jenkins

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**COMMENTS TO THE CONSUMER PRODUCT SAFETY COMMISSION
SECTION 101 DETERMINATIONS OF CERTAIN MATERIALS OR
PRODUCTS - NOTICE OF PROPOSED RULEMAKING**

February 17, 2009

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway,
Bethesda, Maryland 20814
Email: Sec101Determinations@cpsc.gov
Fax: (301) 504-0127

These Comments are filed on behalf of Gildan Activewear (“Gildan”) in response to the Consumer Product Safety Commission’s (CPSC) request for written comments on its notice of proposed rulemaking (NPR)¹ concerning preliminary determinations on certain natural, untreated and unadulterated materials and metals that have not been found to exceed the lead content limits prescribed under section 101(a) of the Consumer Product Safety Improvement Act of 2008 (CPSIA). Gildan is a vertically integrated global manufacturer, importer, marketer, and distributor of basic apparel, with a 52.7 percent U.S. market share in t-shirts and a 51.9 percent U.S. market share in all activewear products.²

Gildan appreciates and shares with the CPSC, the Congress, consumers and other private-industry stakeholders the goal of ensuring that products sold in the United States are free from lead at levels that pose risks to children’s health. It is of course in everyone’s interest that consumers have full confidence that products purchased are compliant with the new standards enacted by Congress through the CPSIA, thus securing the health of consumers as well as the continued viability of markets in which they are sold. Similarly, we hope the CPSC will implement the CPSIA in a manner that focuses its resources on those items posing the greatest risk to the consuming-population, thus ensuring the strongest enforcement of the new lead limits while minimizing the costs of compliance for both sellers and buyers of consumer products.

¹ 74 Fed. Reg. 2433 (January 15, 2009).

² Nine months ended September 30, 2008 (based on unit sales (%)) shipments from wholesale distributors to U.S. screenprinters - Gildan Activewear Annual Report 2008: www.gildan.com/corporate/IR/overview.cfm.

Gildan applauds the CPSC for utilizing its authorities under section 3 of the CPSIA to solicit comments on the proposed rule that would, in effect, relieve certain materials or products from the testing requirement of section 102 of the CPSIA for purposes of supporting the required certification. Gildan urges the CPSC to include in the final rule a determination that certain **textile and apparel products**, if wholly manufactured from fibers and materials determined by CPSC to not exceed the CPSIA lead limits, are themselves determined not to exceed the CPSIA lead limits. Gildan urges the addition of such textile and apparel products because the final product would be wholly composed of materials that have not been found to exceed the CPSIA lead limits. The testing and certification of the final product, as required under CPSIA³ absent this proposed determination, would add an unnecessary financial burden on importers and distributors. Unfortunately, the resulting financial testing burden will inevitably be passed on to the consumer while providing no additional safeguard from unsafe lead content.

In response to CPSC's Requests for Comments under Paragraph C of the NPR, Gildan respectfully submits comments on other materials, which by their nature, would not exceed the lead content limits:

I. THE CPSC SHOULD DETERMINE THAT CERTAIN TEXTILE PRODUCTS, WHETHER DERIVED FROM NATURAL OR MAN-MADE FIBERS, DO NOT EXCEED THE CPSIA LEAD LIMITS

The proposed CPSC rule⁴ that outlines the Commission's determinations of materials that have not been found to exceed the CPSIA lead limits should be expanded to include not only natural fibers such as cotton, silk, wool, hemp, flax and linen, but also certain man-made fibers that have not been found to exceed the CPSIA lead limits. These fibers include but are not limited to acrylic, nylon, polyester, and spandex. Gildan's testing regime, which tests our products at every stage of their production (yarn formation, fabrics, greige goods, and the finished products), demonstrates that our products formed of materials from varied fiber composition register well below the lead limit of the CPSIA.⁵

As an example, we have enclosed data showing our test results for products of both natural and man-made fiber origin, including finished products such as socks, t-shirts, and underwear. Socks for example can be composed of a blend of natural fibers and man-made fibers. The testing results found these finished apparel products, and their components and trim items, whether dyed or undyed, composed of natural, man-made or a blended combination, to be well below the CPSIA's lead standard.

It is logical to determine that if certain natural and man-made fibers do not inherently contain lead, then the textile products manufactured from these fibers will contain virtually no lead either. For example, evidence shows that lead cannot be detected in cotton at levels as low as 2 ppm, and the CPSC has acknowledged this by placing cotton on its proposed list of materials

³ Consumer Product Safety Improvement Act, Section 101, Public Law 110-314, 122 Stat. 3016 (August 14, 2008).

⁴ 74 Fed. Reg. 2433 (January 15, 2009).

⁵ See enclosed testing data with this submission.

determined to not exceed the CPSIA's lead limits.⁶ The manufacturing process for cotton textiles, including those using dyes, has been shown to introduce virtually no lead to the already virtually lead-free fibers.⁷ As the CPSC knows, the U.S. textile and apparel industry has provided data similar to Gildan's data showing not only that the incidence of lead in textiles is small, but that where it is found, it tends to be from accessories, such as buttons, zippers, snaps and rhinestones. For these reasons, where fibers do not contain accessories, the textiles themselves will be virtually lead free.⁸

We appreciate the CPSC's decision, pursuant to its Enforcement Policy issued on February 6, 2009,⁹ not to seek any penalties for dyed or undyed textiles and understand this to mean that the CPSC is in substantial agreement that products made entirely of materials that have not been found to exceed CPSIA lead content limits, whether dyed or undyed, are themselves not found to exceed the CPSIA lead limits. We respectfully ask that the CPSC's final rule concerning materials determined by the CPSC to have not been found to exceed the CPSIA lead limits include the same materials that it outlined in its enforcement policy. As it stands now, the CPSC's proposed rule simply lists materials it finds not to exceed the lead limit so long as they have "neither been treated or adulterated with the addition of materials or chemicals, such as pigments, dyes coatings, finishes or other substance, nor undergone any processing that could result in the addition of lead into the product or material[:]"¹⁰ Given that the Enforcement Policy specifically covers dyed textiles, the CPSC should determine that such dyed textiles do not exceed the CPSIA lead limits.

II. THE CPSC SHOULD CLARIFY THAT CERTAIN APPAREL PRODUCTS, WHETHER COMPOSED OF NATURAL OR MAN-MADE MATERIALS, ARE DETERMINED NOT TO EXCEED THE CPSIA LEAD LIMITS

The proposed CPSC rule that outlines the Commission's determinations of materials that have not been found to exceed the CPSIA lead limits should be expanded to include not only the dyed and undyed textile products described in the CPSC's February 6, 2009 Enforcement Policy, but should also include certain apparel products that are wholly composed of such textile materials. Under the proposed rule, while it is implicit that products containing only materials determined not to exceed the CPSIA's lead limits themselves do not exceed the limits, there remains ambiguity concerning whether the CPSC determinations include certain apparel products. The CPSC should clarify that certain apparel products, whether having undergone finishing processes, including but not limited to tie-dyeing, screen printing, and embroidering or other processes, which are entirely composed of materials determined not to exceed the lead limits, are themselves determined not to exceed the limits. Adding this language would make clear to companies such as ours that we will be in compliance with the CPSIA for all products containing

⁶ Donald Brushwood and Henry Perkins, *Determining the Metal Content of Cotton*, 26 *Textile Chemist and Colorist* 32 (May 1994).

⁷ Evidence provided to CPSC by the Textiles Coalition (January 30, 2009).

⁸ Evidence provided to CPSC by the Textiles Coalition, (January 30, 2009).

⁹ Consumer Product Safety Commission, *CPSC Spells out Enforcement Policy for New Lead Limits in Children's Products Effective February 10, 2009* (press release - February 6, 2009).

¹⁰ 74 Fed. Reg. 2435 (January 15, 2009).

only those materials already determined by the CPSC not to exceed the lead limits. This includes materials composed of man-made fibers such as acrylic, nylon, polyester, and spandex.

Gildan has undertaken to perform tests on its products at various manufacturing stages to determine whether this process introduces lead to its products. All of the tests conclusively show that Gildan products fall well below even the strictest standard (90 ppm). For example, both our undyed and dyed products were shown to have lead levels less than 10 ppm by using a wet chemistry spectrometry test.¹¹ Consistent with these findings, Gildan had numerous tests performed throughout its manufacturing process and failed to find lead at levels close to approaching the lowest 90 ppm level. Gildan maintains records of its testing data in addition to the data enclosed in this submission, which are available to the CPSC upon request.

III. PROPOSED LANGUAGE FOR THE FINAL RULE

A comprehensive suggestion of language for the final rule, which would address our comments and concerns described in Sections I and II of this document, is proposed below. Specifically, we urge that, because of the above findings, §1500.91(c)(5) be removed and placed in a new subsection, §1500.91(e), which specifically addresses textiles under the CPSIA. §1500.91(e) could read:

§1500.91(e): The following textile materials and products, whether dyed or undyed, do not exceed the 600 ppm or 300 ppm lead content limits under section 101(a) of the CPSIA provided that these materials do not contain components containing lead. This includes any textile materials or products that are manufactured, processed, or altered with the following materials:

- (1) Natural fibers, not limited to, cotton, silk, wool, hemp, flax, linen;
- (2) Man-made and synthetic fibers not limited to acrylic, nylon, polyester, and spandex;
- (3) Any unfinished or finished products wholly formed of the natural fibers listed in (1), and/or man-made and synthetic fibers in (2), and/or any other fibers, natural or man-made that although not listed, fit either category, in any blended forms. This includes unfinished or finished textile materials;
- (4) Any unfinished or finished apparel articles wholly formed of the materials listed in (3). This includes apparel articles such as socks, t-shirts, underwear, pants, or other sportswear composed of materials fitting these categories.

¹¹ See enclosed testing data with this submission.

CONCLUSION

As a major supplier of socks, t-shirts, underwear, and other simple garments, Gildan urges that the above changes are made to prevent unnecessary and wasteful steps from being taken to ensure compliance with the CPSIA testing and certification requirements. The above additions and clarifications would eliminate needless confusion for suppliers and manufacturers of textiles without adding any risk that clothing sold in the United States exceed the new lead standard. We believe the changes will also help the CPSC focus its resources on the areas posing the greatest threat to consumers and also help supply chains focus their compliance efforts on areas where the new lead standard requires substantive changes. This will in turn prevent increased costs from being passed to consumers at a time of extreme economic hardship.

Testing and empirical evidence demonstrate that CPSC can safely determine that textiles and the basic apparel goods (t-shirts, socks, underwear, etc.) manufactured by Gildan and others, do not exceed the CPSIA's statutory lead limits and therefore requiring testing and certification of such materials would be duplicative and wasteful for both industry and CPSC.

As we understand it, the changes we have proposed are in accord with both CPSC policy and the likely intent of the CPSC in the proposed rule. However, we feel that our proposed changes would prevent unnecessary confusion for industry attempting to discern what final products will require testing and certification as well as eliminating costs imposed in adjusting business operations to these requirements.

We look forward to working with the CPSC in a constructive manner toward effectively and efficiently implementing the new lead standard. The proposals outlined above we believe will help all interested parties towards these ends. Thank you for your time and consideration in this matter. If you have any questions regarding these proposals or our operations, please do not hesitate to contact us.

Sincerely,


Keith A. Jenkins
Director of Government Affairs
Sorini, Samet & Associates, LLC, on behalf of Gildan Activewear

2/17/09
Date

CC: Serge Zagury -Director, Customs and Trade Compliance, Gildan Activewear

ENCLOSURES (2)

1. Testing data – Products of 100% Natural Fibers
2. Testing data – Products of Blended Fiber Composition, Natural and Man-made Fibers

Enclosure 1:
Testing Data – Products of 100% Natural Fibers



ANALYSIS REPORT
SCC Accreditation No.: 40

Mrs Isabelle Tremblay
 Gildan Activewear

Date: January 23, 2009
 Report: 104-248-32726A

IDENTIFICATION:	1 piece of fabric; Style 2000 yarn 18's open end Can am 100% cotton; Color Greige; Ref. 2390480 Received: January 16, 2009	
STANDARD:	CHAPTER II - CONSUMER PRODUCT SAFETY COMMISSION PART 1303 - Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint	16 CFR PART 1303 (1-1-07)
TEST:	Lead in Paint — Atomic Absorption Spectrophotometric Method	AOAC Official Method 974.02 (1976)
TEST CONDITIONS:	As described in the test method; Detection limit: 0.001% (w/w) lead. Product tested: Knit Test method for lead content determination: AOAC Official Method 974.02 Date tested: January 20, 2009	
RESULTS:	Individual Data	
Total lead content, ppm:	< 10	

Total lead content, % (w/w):	< 0.001	
REQUIREMENTS:	0.06 percent.	
REMARKS:	The product tested is not painted nor printed. The above result refers to the fabric itself.	

Prepared by:


 Peggy Marcotte,
 Technician

Approved by:


 For: Martin Filteau, b. eng.
 First Vice-President

Date: January 23, 2009

****For any information concerning this report, please contact Martin Filteau.****

The reports are identified by an alphanumeric code, the last character refers to the number of revision(s), this is emitted in ascending order. The samples in relation to this test are retained for a period of 30 days following the expedition day of the written report, unless other instructions are received. The fees for all services after the tests are 125.00 \$ per hour and for appraisal in Court, 195.00\$ per hour. The above reported results refer exclusively to the samples submitted for evaluation. This analysis report cannot be partly used or reproduced, unless in whole, without CTT Group prior written consent.



Groupe CTT Group

Textiles Division

ANALYSIS REPORT SCC Accreditation No.: 40

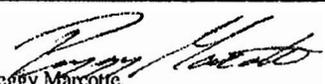
Mrs Isabelle Tremblay
Gildan Activewear

Date: January 23, 2009
Report: 104-248-32727A

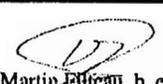
IDENTIFICATION:	1 yarn cone 18's open end 100% cotton Can am Yarn: Ref. 2394275 Received: January 16, 2009	
STANDARD:	CHAPTER II - CONSUMER PRODUCT SAFETY COMMISSION PART 1303 - Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint	16 CFR PART 1303 (1-1-07)
TEST:	Lead in Paint — Atomic Absorption Spectrophotometric Method	AOAC Official Method 974.02 (1976)
TEST CONDITIONS:	As described in the test method; Detection limit: 0.001% (w/w) lead. Product tested: Yarn Test method for lead content determination: AOAC Official Method 974.02 Date tested: January 20, 2009	
RESULTS:	Individual Data	
Total lead content, ppm:	< 10	

Total lead content, % (w/w):	< 0.001	
REQUIREMENTS:	0.06 percent.	
REMARKS:	The product tested is not painted nor printed. The above result refers to the yarn itself.	

Prepared by:


Peggy Marcotte,
Technician

Approved by:


For: Martin Filteau, b. eng.
First Vice-President

Date: January 23, 2009

****For any information concerning this report, please contact Martin Filteau.****

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Groupe CTT Group

Textiles Division

ANALYSIS REPORT SCC Accreditation No.: 40

Mrs Isabelle Tremblay
Gildan Activewear

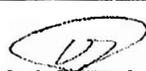
Date: January 23, 2009
Report: 104-248-32728A

IDENTIFICATION:	1 yarn cone 18's open end 100% cotton Can am Yarn: Ref. 2390480 Received: January 16, 2009	
STANDARD:	CHAPTER II - CONSUMER PRODUCT SAFETY COMMISSION PART 1303 - Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint	16 CFR PART 1303 (1-1-07)
TEST:	Lead in Paint — Atomic Absorption Spectrophotometric Method	AOAC Official Method 974.02 (1976)
TEST CONDITIONS:	As described in the test method; Detection limit: 0.001% (w/w) lead. Product tested: Yarn Test method for lead content determination: AOAC Official Method 974.02 Date tested: January 20, 2009	
RESULTS:	Individual Data	
Total lead content, ppm:	< 10	
Total lead content, % (w/w):	< 0.001	
REQUIREMENTS:	0.06 percent.	
REMARKS:	The product tested is not painted nor printed. The above result refers to the yarn itself.	

Prepared by:


Peggy Marcotte,
Technician

Approved by:


For: Martin Filleau, b. eng.
First Vice-President

Date: January 23, 2009

****For any information concerning this report, please contact Martin Filleau.****

The reports are identified by an alphanumeric code, the last character refers to the number of revision(s), this is emitted in ascending order. The samples in relation to this test are retained for a period of 30 days following the expedition day of the written report, unless other instructions are received. The fees for all services after the tests are 125.00 \$ per hour and for appraisal in Court, 195.00\$ per hour. The above reported results refer exclusively to the samples submitted for evaluation. This analysis report cannot be partly used or reproduced, unless in whole, without CTT Group prior written consent.



Groupe CTT Group

Textiles

ANALYSIS REPORT SCC Accreditation No.: 40

Mrs Isabelle Tremblay
Gildan Activewear

Date: January 23, 2009
Report: 104-248-32723A

IDENTIFICATION:	1 piece of fabric; Style 2000 yarn 18's open end Can am 100% cotton; Color Black; Ref. 2394275 Received: January 16, 2009	
STANDARD:	CHAPTER II - CONSUMER PRODUCT SAFETY COMMISSION PART 1303 - Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint	16 CFR PART 1303 (1-1-07)
TEST:	Lead in Paint — Atomic Absorption Spectrophotometric Method	AOAC Official Method 974.02 (1976)
TEST CONDITIONS:	As described in the test method; Detection limit: 0.001% (w/w) lead. Product tested: Knit Test method for lead content determination: AOAC Official Method 974.02 Date tested: January 20, 2009	

RESULTS: Individual Data

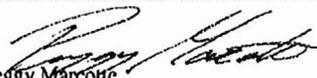
Total lead content, ppm: < 10

Total lead content, % (w/w): < 0.001

REQUIREMENTS: 0.06 percent.

REMARKS The product tested is not painted nor printed. The above result refers to the fabric itself.

Prepared by:


Peggy Marcotte,
Technician

Approved by:


For: Martin Filteau, b. eng.
First Vice-President

Date: January 23, 2009

****For any information concerning this report, please contact Martin Filteau.****

The reports are identified by an alphanumeric code, the last character refers to the number of revision(s), this is emitted in ascending order. The samples in relation to this test are retained for a period of 30 days following the expedition day of the written report, unless other instructions are received. The fees for all services after the tests are 125.00 \$ per hour and for appraisal in Court, 195.00\$ per hour. The above reported results refer exclusively to the samples submitted for evaluation. This analysis report cannot be partly used or reproduced, unless in whole, without CTT Group prior written consent.

Enclosure 2:
**Testing Data – Products of Blended Fiber Composition,
Natural and Man-made Fibers**



CONSUMER TESTING LABORATORIES, INC.

SOFTLINES TESTING LABORATORY • 2601 SE OTIS CORLEY DRIVE • BENTONVILLE, AR 72712
PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71369 BUYER: [REDACTED] DEPT: 24 DATE: 12/24/2008
ITEM DESCRIPTION: 6PR CREW SOCKS 1 SIZE/ 1 COLOR
TEST TYPE: INSTORE ITEM #: 002464900
STORE / REGION NO.: 0004
CTL MASTER STYLE NO.:
LABEL STYLE NO.: AW451/6BGH
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: SHOE: 6-9.5
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: NOT PROVIDED FAX NO.: NOT PROVIDED
REASON FOR TESTING: OVERALL QUALITY EVALUATION

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: WHITE/GREY

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
AW451/6BGH (4599BG)

UPC#: 032271250860

Specialists in the Evaluation of Consumer Products Since 1952

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Florida • Arkansas • Hong Kong • India • Canada • China



CONSUMER TESTING LABORATORIES, INC.

SOFTLINES TESTING LABORATORY • 2601 SE OTIS CORLEY DRIVE • BENTONVILLE, AR 72712

PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

Lab Report No.: WSP71369

Page 2 of 2

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
CMD

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

Specialists in the Evaluation of Consumer Products Since 1952

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71369

Date: 12/24/2008

Item Description: 6pr Crew Socks

SAMPLE INFORMATION

Size

Shoe 6-9 1/2

Color

White/Grey

LABELING		
	RATING	COMMENTS
<u>Includes the following labeling:</u>		
Country of origin (required by FTC)	P	
Manufacturer's Identification (required by FTC)	P	
Fiber content (required by FTC)	P	
Care instructions: (required by FTC) Written / Symbols (as defined in ASTM 3136 / ASTM D 5489)	P	

SOCK		RATING														
<p><u>CONSTRUCTION / DESIGN</u></p> <p><u>Size</u></p> <p>Shoe Size <u>6-9.5</u></p> <p>Sock Size <u>---</u></p> <p>Age <u>---</u></p> <p><u>Construction</u></p> <p>Toe <u>Reciprocated</u></p> <p>Cuff <u>welt</u></p> <p>Heel <u>Reciprocated</u></p>																
<p><u>FIT PROPERTIES</u></p> <p>Color: <u>White/Grey</u></p> <p><u>Cuff Support Stay-Up Properties</u></p> <p>Force to Support <u>0.70 lbs</u> @ <u>7.000 in</u></p> <p>Force to Support <u>1.00 lbs</u> @ <u>7.500 in</u></p> <p>Cuff Length <u>--- in</u></p> <p>Comments: <u>Satisfactory</u></p> <p><u>Cuff Stretchability</u> <u>--- in</u></p> <p>Comments: <u>Good</u></p>		P														
<p><u>NAHM FOOT FORM</u></p> <p>Color: <u>White/Grey</u></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"><u>NAHM Board</u></td> <td>Fit Comments:</td> </tr> <tr> <td><u>6</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>6.5</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>7</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> </table>	<u>NAHM Board</u>	Fit Comments:	<u>6</u>	<u>Good</u>	<u>6.5</u>	<u>Good</u>	<u>7</u>	<u>Good</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>		P
<u>NAHM Board</u>	Fit Comments:															
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<p><u>SOCK WEIGHT</u></p> <p>Color: <u>White/Grey</u></p> <p>actual: <u>28.200 grams / pair</u> specified: <u>--- grams / pair</u></p> <p> <u>11.934 oz/doz / pair</u> <u>--- oz/doz / pair</u></p>																

FIBER CONTENT					
Color Evaluated	%	Labeled Fiber Content	%	Actual Fiber Content	RATING
<i>Fiber Content - AATCC 20 & 20A</i> White/ grey	83%	Cotton	83%	Cotton	P
	13%	Polyester	13%	Polyester	
	2%	Stretch nylon	2%	Nylon	
	1%	Spandex	1%	Spandex	
	1%	elastic	1%	Elastic (Spandex)	

GENERAL APPEARANCE, WORKMANSHIP / CONSTRUCTION (SOCKS / HOSIERY)		
	RATING	COMMENTS
<u>Construction / Workmanship</u> No loose threads, needle damage, open seams, puckering, etc.	P	
<u>Color Appearance</u> Exhibits good overall color quality	P	
<u>Fabric Defects</u> No major defects, such as holes, runs, snags, stains, slub yarns, etc., or any other irregularities as defined in ASTM D3990	P	

APPEARANCE / DURABILITY AFTER LAUNDERING OR DRYCLEANING		
	RATING	COMMENTS
<u>General Appearance after Laundering</u> No open seams, holes, snags, runs, loose threads, excessive pilling, puckering, etc.	P	

DIMENSIONAL STABILITY (SOCK)					
TEST CONDUCTED	Original Size	Size After Washing	Shrinkage / Growth	Requirement	RATING
<i>DIMENSIONAL STABILITY (WASHING) - AATCC 135 / 150</i> (-) denotes shrinkage White/Grey					
Foot Length (in.)	5.625	5.500	-2.22%	≤ 10.0%	P
Foot Width (in.)	2.875	2.875	0.00%	≤ 10.0%	P
Sock Length (in.)	5.375	5.125	-4.65%	≤ 10.0%	P
Cuff Length (in.)	0.750				

COLORFASTNESS			
TEST CONDUCTED	RESULT	REQUIREMENT	RATING
<i>LAUNDERING - AATCC 135/150</i> <i>Gray Scales for Color Change / Staining</i> White/Grey			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P





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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71305 BUYER: [REDACTED] DEPT: 24 DATE: 12/22/2008
ITEM DESCRIPTION: 6PR CREW SOCK 1 SIZE/ 1 COLOR
TEST TYPE: PRODUCTION ITEM #: 2464963
CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: _____ AW652/6BBK
FACTORY: _____ NOT PROVIDED FACTORY NO: _____ NOT PROVIDED
COUNTRY OF ORIGIN: _____ [REDACTED] SIZES: _____ SHOE SIZE 3-9
SUPPLIER NAME: _____ GILDAN USA INC SUPPLIER NO.: _____ 272112
ATTENTION: _____ [REDACTED] FAX NO.: _____ NOT PROVIDED
REASON FOR TESTING: _____ ANALYSIS OF LEAD AND FLAMMABILITY TESTING ONLY

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NO PREV. LABS.

The following color(s) have been tested: **BLACK SOOT**

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
AW652/6BBK

UPC#: 032271251461

See page two (2) for test results

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71305

Page 2 of 2

1. The sample conforms to the flammability requirements of 16 CFR 1610 Standard for the Flammability of Clothing Textiles.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
srk

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71305

Date: 12/22/2008

Item Description: Boys Crew Sock

SAMPLE INFORMATION

Color

Shoe 3-9

Black Soot

FLAMMABILITY - 16 CFR Part 1610					
Fabric Direction: LENGTH <i>Note: not applicable to hats, gloves, footwear or interfacing fabrics</i>					
Sample Type: <u>Boys Crew Sock</u>			Fiber Content: <u>87% Cotton, 11% Stretch Nylon, 1% Spandex, 1% Elastic</u>		
Type of fabric used in construction: Plain _____ Raised Fiber <u>X</u>					
<u>ORIGINAL STATE</u>					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 BLACK	SEC	21.10	6 ---	---	---
2 BLACK	SEC	21.60	7 ---	---	---
3 BLACK	SEC	20.20	8 ---	---	---
4 BLACK	SEC	19.70	9 ---	---	---
5 BLACK	SEC	19.80	# ---	---	---
Flame Spread (average if more than 1 burned) <u>20.48</u> sec					
No. of burned cords: <u>5.0</u>					
No. of base burns: <u>5.0</u>					
<u>AFTER REFURBISHING</u>					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 BLACK	SEC	20.10	6 ---	---	---
2 BLACK	SEC	21.50	7 ---	---	---
3 BLACK	SEC	24.30	8 ---	---	---
4 BLACK	SEC	22.00	9 ---	---	---
5 BLACK	SEC	21.20	# ---	---	---
Flame Spread (average if more than 1 burned) <u>21.82</u> sec					
No. of burned cords: <u>5.0</u>					
No. of base burns: <u>5.0</u>					
SAMPLE IS CLASS <u>1</u>					
<i>Requirement - ONLY Class 1 is Acceptable</i>					

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION <i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS <i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS <i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u> Product meets one of the following: <i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material _____ y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm) _____ --- Y/N</p>	
N/A	No surface coating
P	

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to all plastic/rubber components in child care articles for children <4 years of age that are intended for sleeping, feeding, teething, or sucking.</i></p> <p><i>Note: Applies to soft plastic/rubber components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children <4 yrs. of age which includes newborn, infant, & toddler sizes 5T and under.</i></p> <p><i>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p>		
<p>Is the product a Child Care Article/Children's Apparel intended for sleeping, feeding, teething, or sucking that provides a plastic/rubber component? (children's sleepwear, baby bibs, bedding, blankets with teething corners, etc.)</p> <p style="text-align: right;">_____ n _____ Y/N</p>		N/A - Not a Child Care Article
<p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (socks with grippers, screen prints, light-up patches, trim or other embellishments)</p> <p style="text-align: right;">_____ n _____ Y/N</p>		N/A - Does not include a plastic component that is accessible to the mouth when worn
<p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p>		
<p>Test report date _____ N/A</p>		N/A
DINP diisononyl phthalate		N/A
DIDP diisodecyl phthalate		N/A
DnOP di-n-octyl phthalate		N/A
DEHP di-(2-ethylhexyl) phthalate		N/A
BBP benzyl butyl phthalate		N/A
DBP dibutyl phthalate		N/A

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS								
	RATING	COMMENTS						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>	N/A	No liquids,putties,pastes,powders,gels						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table>	Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids,putties,pastes,powders,gels
Tested Age	Total Viable Count Limit							
18 months or less	500 cfu/ml(g)							
over 18 months	5000 cfu/ml(g)							
<p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) ---</p>	N/A	No liquids,putties,pastes,powders,gels						
<p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) ---</p>	N/A	No liquids,putties,pastes,powders,gels						
<p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) ---</p>	N/A	No liquids,putties,pastes,powders,gels						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
FOOT	BLACK	FABRIC	ND	
ANKLE	BLACK	FABRIC	ND	
CUFF	BLACK	FABRIC	ND	





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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71317 BUYER: [REDACTED] DEPT: 24 DATE: 12/22/2008
ITEM DESCRIPTION: BOYS CREW SOCK 1 SIZE/ 1 COLOR
TEST TYPE: PRODUCTION ITEM #: 2463031
CTL MASTER STYLE NO.:
LABEL STYLE NO.: AW551/6BGH
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: MEDIUM (SHOE 10-2.5)
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: ANALYSIS OF LEAD AND FLAMMABILITY TESTING ONLY

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: ARCTIC WHITE/ GREY

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
AW551/6BGH

UPC#: 032271250877

See page two (2) for test results:

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71317
Page 2 of 2

1. The sample conforms to the flammability requirements of 16 CFR 1610 Standard for the Flammability of Clothing Textiles.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (A) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
srk

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71317

Date: 12/22/2008

Item Description: Boys Crew Socks

SAMPLE INFORMATION

Size

Shoe 10-2 1/2

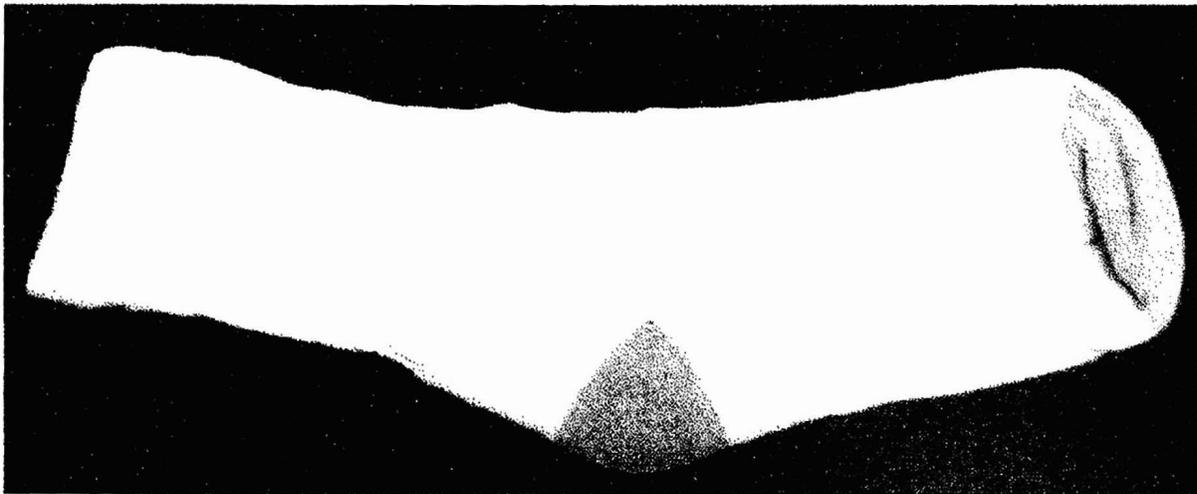
Color

Arctic White w/ Grey Heel & Toe

FLAMMABILITY - 16 CFR Part 1610					
Fabric Direction: LENGTH <i>Note: not applicable to hats, gloves, footwear or interfacing fabrics</i>					
Sample Type: <u>Boys Crew Sock</u>			Fiber Content: <u>84% Cotton / 12% Polyester / 2% Nylon / 1% Spandex / 1% Elastic</u>		
Type of fabric used in construction: Plain _____ Raised Fiber <u>X</u>					
ORIGINAL STATE					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 WHITE-GREY	SEC	39.90	6 ---	---	---
2 WHITE-GREY	SEC	29.40	7 ---	---	---
3 WHITE-GREY	SEC	27.90	8 ---	---	---
4 WHITE-GREY	SEC	46.30	9 ---	---	---
5 WHITE-GREY	SFPOI		# ---	---	---
Flame Spread (average if more than 1 burned) <u>35.88</u> sec					
No. of burned cords: <u>4.0</u>					
No. of base burns: <u>4.0</u>					
AFTER REFURBISHING					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 WHITE-GREY	SEC	23.20	6 ---	---	---
2 WHITE-GREY	SEC	20.40	7 ---	---	---
3 WHITE-GREY	SFPOI		8 ---	---	---
4 WHITE-GREY	SEC	23.50	9 ---	---	---
5 WHITE-GREY	SEC	22.30	# ---	---	---
Flame Spread (average if more than 1 burned) <u>22.35</u> sec					
No. of burned cords: <u>4.0</u>					
No. of base burns: <u>4.0</u>					
SAMPLE IS CLASS <u>1</u>					
<i>Requirement - ONLY Class 1 is Acceptable</i>					

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTS FOR CHILDREN'S PRODUCTS							
ELVRS	COMMENTS						
<p><i>Note: This worksheet is a requirement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION <i>Note: State name, lot code, or other traceability information (if provided)</i> On Package <i>not provided</i> On Product <i>not provided</i></p> <p>SURFACE COATINGS <i>Note: Prior to July 1, 2009 a surface coating had level of 0.05% (500ppm) is acceptable for in-use and season 04-08 (winter) products</i> TOTAL LEAD IN SURFACE COATING Lead content of the products surface coating(s) scraped from the product does not exceed 0.005% (50 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS <i>Note: Prior to July 1, 2009 accessible substrate / base material requirement of 0.04% (400ppm) is acceptable for in-use and season 04-08 (winter) products</i> TOTAL LEAD IN SUBSTRATES / BASE MATERIALS Product meets one of the following: (Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing) X-Ray Fluorescence (XRF) pre-screening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material <input checked="" type="checkbox"/> Y/N OR Lead content of all accessible substrate / base materials, sampled from the finished product do not exceed 0.03% (300 ppm) <input checked="" type="checkbox"/> Y/N</p>	<p>N/A</p> <p>No surface coatings</p> <p>Y</p> <p>Y/N</p> <p>Y/N</p>						
<p>PHTHALATES - For Child Care Articles and Apparel Only <i>Note: Applies to all phthalate components in child care articles for children 4 years of age that are intended for sleeping, feeding, feeding, or sucking.</i> <i>Note: Applies to all phthalate components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children 4 yrs. of age which includes bibs, shirts, & hoodies 4 yrs. and older.</i> <i>Note: Production requirements for Child Care Articles are effective for products manufactured after February 18, 2009. Phthalate requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p> <p>Is this product a Child Care Article/Children's Apparel intended for sleeping, feeding, feeding, or sucking that provides a phthalate component? (includes: bibs, shirts, hoodies, etc.) <input checked="" type="checkbox"/> Y/N</p> <p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when used? (includes: straps, seams, ties, up-pieces, etc or other attachments) <input checked="" type="checkbox"/> Y/N</p> <p>Test report provided that states that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method BPA 82707, 82814</p> <p>Test report date <input checked="" type="checkbox"/> Y/N</p> <p>DIBP dibenyl phthalate <input checked="" type="checkbox"/> Y/N DEHP dibenyl phthalate <input checked="" type="checkbox"/> Y/N DEHP di-nonyl phthalate <input checked="" type="checkbox"/> Y/N DEHP di-ethylhexyl phthalate <input checked="" type="checkbox"/> Y/N BBP benzyl butyl phthalate <input checked="" type="checkbox"/> Y/N DEP dibutyl phthalate <input checked="" type="checkbox"/> Y/N</p>	<p>N/A</p> <p>No Child Care Article</p> <p>N/A Does not include a plastic component that is accessible to the mouth when worn</p> <p>N/A</p> <p>Y/N</p> <p>Y/N</p> <p>Y/N</p> <p>Y/N</p> <p>Y/N</p> <p>Y/N</p>						
<p>HAZARDOUS LIQUID CHEMICALS Test report is provided indicating no hazardous chemicals are present in liquid food products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable) <input checked="" type="checkbox"/> Y/N</p> <p>LIQUIDS, PUTTERS, PASTES, POWDERS, GELS <i>Note: the following requirements are for products marketed in the US only</i> USFDA Microbial Limits Test Test report is provided which indicates that liquids, putters, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 81 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Yielded Any</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/100g</td> </tr> <tr> <td>over 18 months</td> <td>1000 cfu/100g</td> </tr> </tbody> </table> <p>Test report provided indicating the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli Report Date (dated within 1 year) <input checked="" type="checkbox"/> Y/N</p> <p>USFDA Preservative Effectiveness Test Test report is provided which indicates that liquids, putters, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 51 Preservative Effectiveness Test Report Date (dated within 2 years) <input checked="" type="checkbox"/> Y/N</p> <p>Conductibility Limits <i>Note: the following requirement is for products marketed in the US only</i> Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 160°F (65.6°C) when tested in accordance with 16 CFR 1500.43 Report Date (dated within 1 year) <input checked="" type="checkbox"/> Y/N</p>	Yielded Any	Total Viable Count Limit	18 months or less	500 cfu/100g	over 18 months	1000 cfu/100g	<p>N/A</p> <p>No liquid food products</p> <p>N/A</p>
Yielded Any	Total Viable Count Limit						
18 months or less	500 cfu/100g						
over 18 months	1000 cfu/100g						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
<i>FOOT</i>	<i>WHITE</i>	<i>FABRIC</i>	<i>ND</i>	
<i>ANKLE</i>	<i>WHITE</i>	<i>FABRIC</i>	<i>ND</i>	
<i>CUFF</i>	<i>WHITE</i>	<i>FABRIC</i>	<i>ND</i>	
<i>HEAL</i>	<i>GREY</i>	<i>FABRIC</i>	<i>ND</i>	





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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71301 BUYER: [REDACTED] DEPT: 24 DATE: 12/22/2008
ITEM DESCRIPTION: 6PR NO SHOW BOYS SOCK 1 SIZE/ 1 COLOR
TEST TYPE: PRODUCTION ITEM #: 2464935
CTL MASTER STYLE NO.:
LABEL STYLE NO.: AW512/6BBK
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: SHOE SIZE 10-2.5
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: ANALYSIS FOR LEAD & FLAMMABILITY TESTING

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: WSP62103, 64846, 69181

The following color(s) have been tested: BLACK SOOT

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
AW512/6BBK

UPC#: 032271251423

See page two for test results:

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71301
Page 2 of 2

1. The sample conforms to the flammability requirements of 16 CFR 1610 Standard for the Flammability of Clothing Textiles.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (A) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
srk

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

Specialists in the Evaluation of Consumer Products Since 1952

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71301

Date: 12/23/2008

Item Description: No Show Boys Sock

SAMPLE INFORMATION

Size

Shoe 10-2 1/2

Color

Black Soot

FLAMMABILITY - 16 CFR Part 1610

Fabric Direction: **LENGTH** *Note: not applicable to hats, gloves, footwear or interfacing fabrics*

Sample Type: No Show Boys Sock Fiber Content: 81% Cotton / 17% Stretch Nylon / 1% Spandex / 1% Elastic

Type of fabric used in construction: Plain _____ Raised Fiber X

ORIGINAL STATE

Side tested: Face _____ Back X

Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 BLACK	SEC	27.90	6 ---	---	---
2 BLACK	SEC	24.50	7 ---	---	---
3 BLACK	SEC	23.50	8 ---	---	---
4 BLACK	SEC	23.40	9 ---	---	---
5 BLACK	SEC	18.40	# ---	---	---

Flame Spread (average if more than 1 burned) 23.54 sec

No. of burned cords: 5.0

No. of base burns: 5.0

AFTER REFURBISHING

Side tested: Face _____ Back X

Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 BLACK	SFPOI		6 ---	---	---
2 BLACK	SEC	22.00	7 ---	---	---
3 BLACK	SEC	21.80	8 ---	---	---
4 BLACK	SEC	23.60	9 ---	---	---
5 BLACK	SFPOI		# ---	---	---

Flame Spread (average if more than 1 burned) 22.47 sec

No. of burned cords: 3.0

No. of base burns: 3.0

SAMPLE IS CLASS 1

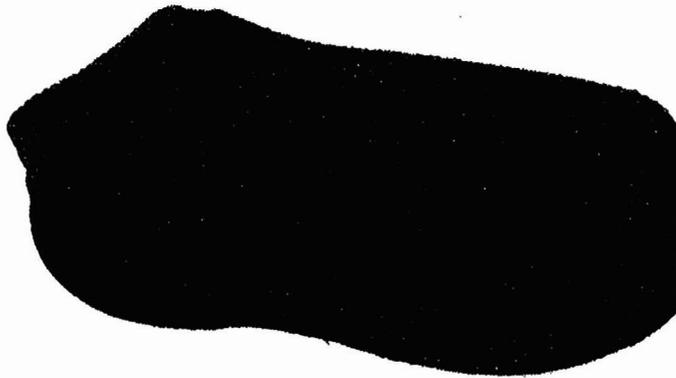
Requirement - ONLY Class 1 is Acceptable

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION <i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS <i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS <i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u> Product meets one of the following: <i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material _____ y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm) _____ Y/N</p>	
N/A	No surface coatings
P	

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to all plastic/rubber components in child care articles for children <4 years of age that are intended for sleeping, feeding, teething, or sucking.</i></p> <p><i>Note: Applies to soft plastic/rubber components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children <4 yrs. of age which includes newborn, infant, & toddler sizes 5T and under.</i></p> <p><i>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p> <p>Is the product a Child Care Article/Children's Apparel intended for sleeping, feeding, teething, or sucking that provides a plastic/rubber component? (children's sleepwear, baby bibs, bedding, blankets with teething corners, etc.) <u> n </u> Y/N</p> <p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (socks with grippers, screen prints, light-up patches, trim or other embellishments) <u> n </u> Y/N</p> <p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p> <p>Test report date <u> N/A </u></p> <p>DINP diisononyl phthalate <u> --- </u></p> <p>DIDP diisodecyl phthalate <u> --- </u></p> <p>DnOP di-n-octyl phthalate <u> --- </u></p> <p>DEHP di-(2-ethylhexyl) phthalate <u> --- </u></p> <p>BBP benzyl butyl phthalate <u> --- </u></p> <p>DBP dibutyl phthalate <u> --- </u></p>		<p>N/A - Not a Child Care Article</p> <p>N/A - Does not include a plastic component that is accessible to the mouth when worn</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS								
	RATING	COMMENTS						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>	N/A	No liquids						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table>	Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids, putties, pastes, powders, or gels
Tested Age	Total Viable Count Limit							
18 months or less	500 cfu/ml(g)							
over 18 months	5000 cfu/ml(g)							
<p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) ---</p>	N/A	No liquids, putties, pastes, powders, or gels						
<p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) ---</p>	N/A	No liquids, putties, pastes, powders, or gels						
<p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) ---</p>	N/A	No liquids						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
<i>FABRIC</i>	<i>BLACK</i>	<i>FABRIC</i>	<i>ND</i>	
<i>FABRIC</i>	<i>BLACK</i>	<i>FABRIC</i>	<i>ND</i>	





CONSUMER TESTING LABORATORIES, INC.

SOFTLINES TESTING LABORATORY • 2601 SE OTIS CORLEY DRIVE • BENTONVILLE, AR 72712

PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71361 BUYER: [REDACTED] DEPT: 26 DATE: 12/19/2008
ITEM DESCRIPTION: 8 PAIR CUFF SOCKS 1 SIZE/ 6 COLORS
TEST TYPE: PRODUCTION ITEM #: 002681611
CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: _____ FG405/8A
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: 3-5 YEARS
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: ANALYSIS OF LEAD AND FLAMMABILITY TESTING ONLY

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: **WHITE (RIB), WHITE (BASKET WEAVE), SUEDE, IRIS, PINK MIST, BRIGHT ROSE**

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
FG405/8A

UPC#: 032271234631

See page two (2) for test results.

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71361
Page 2 of 2

1. The sample is exempt from the flammability requirements of 16 CFR 1610.1 Standard for the Flammability of Clothing Textiles because it is a plain surface fabric weighing more than 2.6 ounces per square yard.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
CMD

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71361

Date: 12/19/2008

Item Description: 8 Pair Cuff Socks

SAMPLE INFORMATION

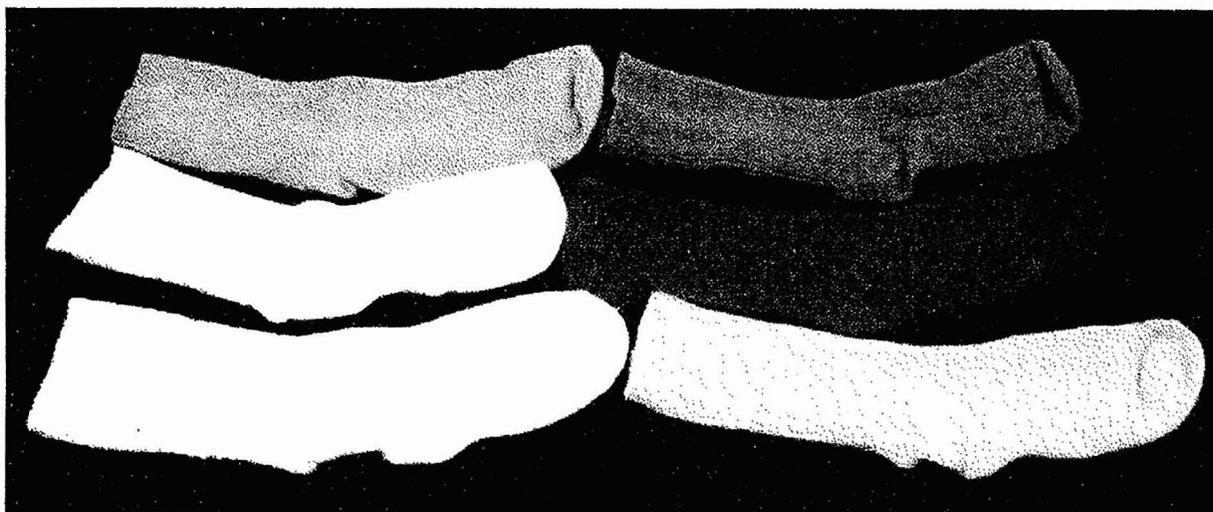
Size

3-5 Years

Color

White
Suede
Iris
Pink Mist
Bright Rose
White Pattern

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
BODY	WHITE	FABRIC	ND	
BODY	RED	FABRIC	ND	
BODY	PURPLE	FABRIC	ND	
BODY	YELLOW	FABRIC	ND	
BODY	PINK	FABRIC	ND	
ANKLE	WHITE	FABRIC	ND	
ANKLE	RED	FABRIC	ND	
ANKLE	PURPLE	FABRIC	ND	
ANKLE	YELLOW	FABRIC	ND	
ANKLE	WHITE	FABRIC	ND	
ANKLE	PINK	FABRIC	ND	
CUFF	WHITE	FABRIC	ND	
CUFF	PINK	FABRIC	ND	





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PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71353 BUYER: [REDACTED] DEPT: 26 DATE: 12/19/2008
ITEM DESCRIPTION: 8 PAIR CUFF SOCKS 1 SIZE/ 7 COLORS
TEST TYPE: PRODUCTION ITEM #: 002627861
CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: _____ FG439/8G
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: 3-5 YEARS
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: ANALYSIS OF LEAD AND FLAMMABILITY TESTING ONLY

SAMPLE RATING:



GOOD: THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.



MARGINAL PASS: THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.



UNSATISFACTORY: THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: WHITE, MAGENTA FIRE, PINK CANDY, LAVENDER WHISPER, DARK NAVY, WHITE W/BUTTERFLY, WHITE W/FLOWER

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
FG439/8G

UPC#: 032271221648

See page two (2) for test results.

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71353

Page 2 of 2

1. The sample is exempt from the flammability requirements of 16 CFR 1610.1 Standard for the Flammability of Clothing Textiles because it is a plain surface fabric weighing more than 2.6 ounces per square yard.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
CMD

Tammie Rollins

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71353

Date: 12/19/2008

Item Description: 8 Pair Cuff Socks

SAMPLE INFORMATION

Size

3-5 Years

Color

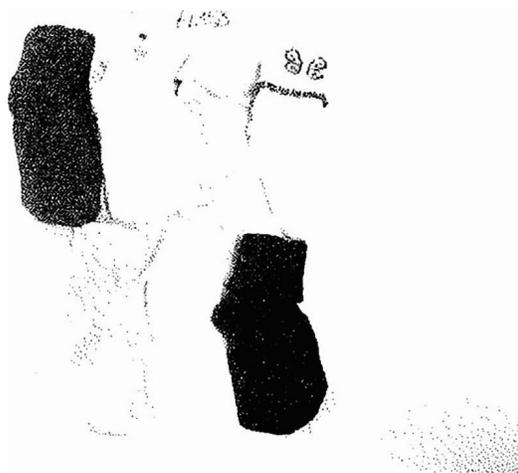
White
Magenta Fire
Pink Candy
Lavender Whisper
Dark Navy
White w/ Butterfly
White w/ Flower

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION</p> <p><i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS</p> <p><i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS</p> <p><i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following:</p> <p><i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material _____ y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm) _____ Y/N</p>	
N/A	No surface coating
P	

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to all plastic/rubber components in child care articles for children <4 years of age that are intended for sleeping, feeding, teething, or sucking.</i></p> <p><i>Note: Applies to soft plastic/rubber components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children <4 yrs. of age which includes newborn, infant, & toddler sizes 5T and under.</i></p> <p><i>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p>		
<p>Is the product a Child Care Article/Children's Apparel intended for sleeping, feeding, teething, or sucking that provides a plastic/rubber component? (children's sleepwear, baby bibs, bedding, blankets with teething corners, etc.)</p> <p style="text-align: right;">_____ n _____ Y/N</p>		N/A - Not a Child Care Article
<p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (socks with grippers, screen prints, light-up patches, trim or other embellishments)</p> <p style="text-align: right;">_____ n _____ Y/N</p>		N/A - Does not include a plastic component that is accessible to the mouth when worn
<p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p> <p>Test report date _____ N/A</p>		N/A
DINP diisononyl phthalate		N/A
DIDP diisodecyl phthalate		N/A
DnOP di-n-octyl phthalate		N/A
DEHP di-(2-ethylhexyl) phthalate		N/A
BBP benzyl butyl phthalate		N/A
DBP dibutyl phthalate		N/A

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		RATING	COMMENTS						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>		N/A	No liquids,putties,pastes,powders,gels						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p>Note: the following requirements are for products marketed in the US only</p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopela (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table>		Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids,putties,pastes,powders,gels
Tested Age	Total Viable Count Limit								
18 months or less	500 cfu/ml(g)								
over 18 months	5000 cfu/ml(g)								
<p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) ---</p>		N/A	No liquids,putties,pastes,powders,gels						
<p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopela (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) ---</p>		N/A	No liquids,putties,pastes,powders,gels						
<p><u>Combustible Liquids</u></p> <p>Note: the following requirement is for products marketed in the US only</p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) ---</p>		N/A	No liquids,putties,pastes,powders,gels						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
BODY	WHITE	FABRIC	ND	
BODY	PINK	FABRIC	ND	
BODY	DK PINK	FABRIC	ND	
BODY	PURPLE	FABRIC	ND	
BODY	NAVY	FABRIC	ND	
ANKLE	WHITE	FABRIC	ND	
ANKLE		FABRIC	ND	
ANKLE	DKPINK	FABRIC	ND	
ANKLE	PURPLE	FABRIC	ND	
ANKLE	NAVY	FABRIC	ND	
ANKLE	DK PINK	FABRIC	ND	
ANKLE	PURPLE	FABRIC	ND	
ANKLE	PINK	EMBROIDERY	ND	
ANKLE	DK PINK	EMBROIDERY	ND	
ANKLE	GREY	EMBROIDERY	ND	
ANKLE	PURPLE	EMBROIDERY	ND	





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PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: SWM806857 BUYER: [REDACTED] DEPT: 24 DATE: 12/15/2008
ITEM DESC: BOYS SS CREWNECK 5 PACK SMALL 1 SIZE / 1 COLOR
TEST TYPE: PRODUCTION COUNTRY OF ORIGIN: [REDACTED]

CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: G1000B FG/SMALL
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
PREV. LAB NO: SWM722589 ITEM #: 002472527

SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NUMBER: NOT PROVIDED
REASON FOR TESTING: EVALUATION OF RESTRICTED CHEMICAL TESTING

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

The following color(s) have been tested: WHITE

PO NO.: NOT PROVIDED

STYLE / MODEL NO.: G1000B FG (G1000B FG/SMALL)

UPC#: 883096030157

The accessible substrates on the submitted sample comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

CHERYL SPENCER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
REW

SAMINA KHAN
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: swm806857

Date: 12/15/2008

Item Description: BOY'S CREW NECK 5 PACK - SMALL

SAMPLE INFORMATION

Size

SMALL (6/8)

Color

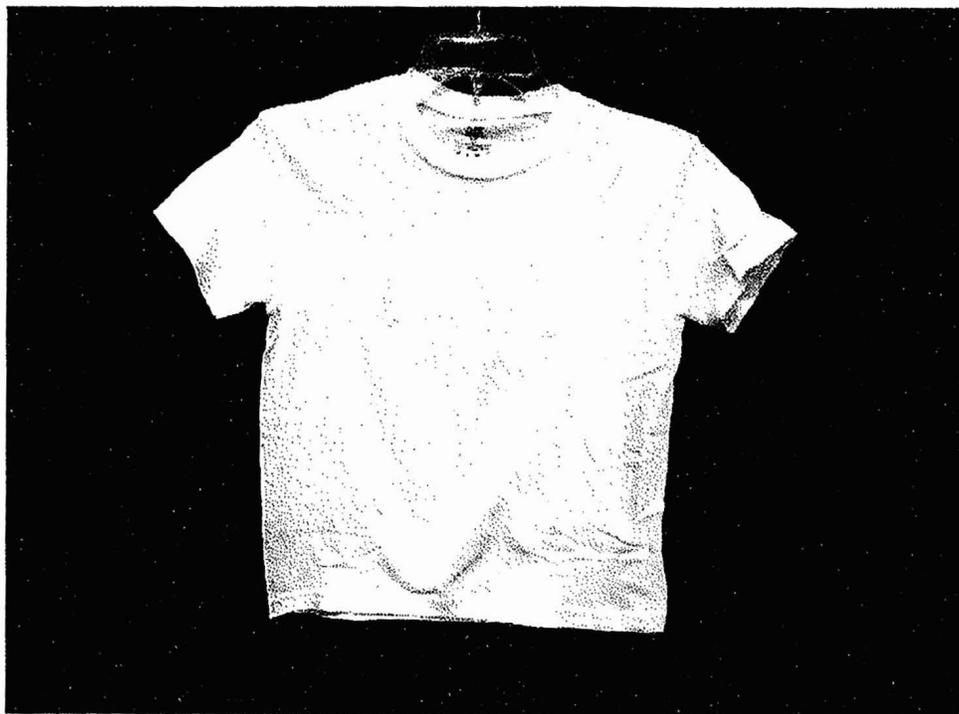
WHITE

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION</p> <p><i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS</p> <p><i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS</p> <p><i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following:</p> <p><i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p style="text-align: right;">Y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm)</p> <p style="text-align: right;">--- Y/N</p>	
N/A	No surface coatings.
P	See RSHC data sheet

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to all plastic/rubber components in child care articles for children <4 years of age that are intended for sleeping, feeding, teething, or sucking.</i></p> <p><i>Note: Applies to soft plastic/rubber components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children <4 yrs. of age which includes newborn, infant, & toddler sizes 5T and under.</i></p> <p><i>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p>		
<p>Is the product a Child Care Article/Children's Apparel intended for sleeping, feeding, teething, or sucking that provides a plastic/rubber component? (children's sleepwear, baby bibs, bedding, blankets with teething corners, etc.)</p> <p style="text-align: right;">N Y/N</p>		N/A - Not a Child Care Article
<p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (socks with grippers, screen prints, light-up patches, trim or other embellishments)</p> <p style="text-align: right;">_____ N Y/N</p>		N/A - Does not include a plastic component that is accessible to the mouth when worn
<p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p>		
<p>Test report date _____ N/A</p>		N/A
DINP diisononyl phthalate		N/A
DIDP diisodecyl phthalate		N/A
DnOP di-n-octyl phthalate		N/A
DEHP di-(2-ethylhexyl) phthalate		N/A
BBP benzyl butyl phthalate		N/A
DBP dibutyl phthalate		N/A

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS								
	RATING	COMMENTS						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>	N/A	No liquid components.						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table>	Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids, putties, pastes, powders, or gels.
Tested Age	Total Viable Count Limit							
18 months or less	500 cfu/ml(g)							
over 18 months	5000 cfu/ml(g)							
<p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) _____</p>	N/A	No liquids, putties, pastes, powders, or gels.						
<p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) _____</p>	N/A	No liquids, putties, pastes, powders, or gels.						
<p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) _____</p>	N/A	No liquids, putties, pastes, powders, or gels.						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
<i>cbn tagless</i>	<i>navy</i>	<i>fabric</i>	<i>nd</i>	
<i>neck trim</i>	<i>white</i>	<i>fabric</i>	<i>nd</i>	
<i>body</i>	<i>white</i>	<i>fabric</i>	<i>nd</i>	





CONSUMER TESTING LABORATORIES, INC.

SOFTLINES TESTING LABORATORY • 2601 SE OTIS CORLEY DRIVE • BENTONVILLE, AR 72712
PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71193 BUYER: [REDACTED] DEPT: 26 DATE: 12/15/2008
ITEM DESCRIPTION: BABY CREW SOCKS 18-36 MONTHS 1 SIZE/ 7 COLORS
TEST TYPE: PRODUCTION ITEM #: 2623907
CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: _____ GE350/8BA
FACTORY: _____ NOT PROVIDED FACTORY NO: _____ NOT PROVIDED
COUNTRY OF ORIGIN: _____ SIZES: HOE: 4-8.5 / 18-36 MONTHS
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: _____ FAX NO.: _____ NOT PROVIDED
REASON FOR TESTING: ANALYSIS OF LEAD AND FLAMMABILITY TESTING

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: BLACK SOOT, NAVY WATER, PALE CAMEL, SLATE BLUE, WHITE, UNIFORM GREEN, STORMY SKY

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
GE350/8BA

UPC#: 032271251638

See page 2 for test results:

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PHONE: (479) 286-2300 • FAX: (479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

Lab Report No.: WSP71193

Page 2 of 2

1. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.
2. The sample is exempt from the flammability requirements of 16 CFR 1610.1 Standard for the Flammability of Clothing Textiles because it is a plain surface fabric weighing more than 2.6 ounces per square yard.

CONSUMER TESTING LABORATORIES, INC.

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
CMD

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71193

Date: 12/15/2008

Item Description: George Baby Crew Socks 18-36 Months

SAMPLE INFORMATION

Size

18-36 Months

Color

Black Soot
Navy Water
Pale Camel
Slate Blue
White
Uniform Green
Stormy Sky

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION</p> <p><i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS</p> <p><i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS</p> <p><i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following:</p> <p><i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm)</p>	<p>---</p> <p>---</p> <p>---</p> <p>---</p> <p>N/A</p> <p>P</p> <p>---</p>	<p>---</p> <p>---</p> <p>---</p> <p>---</p> <p>N/A - No surface coatings</p> <p>See substrate / base material list</p> <p>---</p>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to all plastic/rubber components in child care articles for children <4 years of age that are intended for sleeping, feeding, teething, or sucking.</i></p> <p><i>Note: Applies to soft plastic/rubber components in apparel that are accessible to the mouth when worn. This applies to apparel that is designed, marketed or intended for children <4 yrs. of age which includes newborn, infant, & toddler sizes 5T and under.</i></p> <p><i>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</i></p> <p>Is the product a Child Care Article/Children's Apparel intended for sleeping, feeding, teething, or sucking that provides a plastic/rubber component? (children's sleepwear, baby bibs, bedding, blankets with teething corners, etc.) <u> N </u> Y/N</p> <p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (socks with grippers, screen prints, light-up patches, trim or other embellishments) <u> N </u> Y/N</p> <p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p> <p>Test report date <u> N/A </u></p> <p>DINP diisononyl phthalate</p> <p>DIDP diisodecyl phthalate</p> <p>DnOP di-n-octyl phthalate</p> <p>DEHP di-(2-ethylhexyl) phthalate</p> <p>BBP benzyl butyl phthalate</p> <p>DBP dibutyl phthalate</p>		<p><i>N/A - Not a Child Care Article</i></p> <hr/> <p><i>N/A - Does not include a plastic component that is accessible to the mouth when worn</i></p> <hr/> <p><i>N/A</i></p> <hr/>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS								
	RATING	COMMENTS						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>	N/A	N/A - No hazardous liquids						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table>	Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	N/A - No liquids, putties, pastes, powders, or gels
Tested Age	Total Viable Count Limit							
18 months or less	500 cfu/ml(g)							
over 18 months	5000 cfu/ml(g)							
<p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) ---</p>	N/A	N/A - No liquids, putties, pastes, powders, or gels						
<p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) ---</p>	N/A	N/A - No liquids, putties, pastes, powders, or gels						
<p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) ---</p>	N/A	N/A - No liquids, putties, pastes, powders, or gels						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
FOOT	WHITE	FABRIC	ND	
LEG	WHITE	FABRIC	ND	
CUFF	WHITE	FABRIC	ND	
FOOT	LT BLUE	FABRIC	ND	
LEG	LT BLUE	FABRIC	ND	
CUFF	LT BLUE	FABRIC	ND	
FOOT	SLATE	FABRIC	ND	
LEG	SLATE	FABRIC	ND	
CUFF	SLATE	FABRIC	ND	
FOOT	NAVY	FABRIC	ND	
LEG	NAVY	FABRIC	ND	
CUFF	NAVY	FABRIC	ND	
FOOT	GREEN	FABRIC	ND	
LEG	GREEN	FABRIC	ND	
CUFF	GREEN	FABRIC	ND	
FOOT	KHAKI	FABRIC	ND	
LEG	KHAKI	FABRIC	ND	
CUFF	KHAKI	FABRIC	ND	
FOOT	BLACK	FABRIC	ND	
LEG	BLACK	FABRIC	ND	
CUFF	BLACK	FABRIC	ND	





Groupe CTT Group

Textiles Division

ANALYSIS REPORT SCC Accreditation No.: 40

Mr Serge Zagury
Gildan Activewear

Date: December 10, 2008
Report: 104-245-32013A

IDENTIFICATION: Pack 1; GE 8PR crew 3-ST; UPC#1: 0003227125164: Black, Khaki, White, Tan, Navy, Blue, Light blue
Received: December 9, 2008

STANDARD:

TEST: Determination of total lead in paints and applied coatings Health Canada-Part B: C-02
(94-12-12)*1

TEST CONDITIONS: *1Amendment number 4;
As described in the test method;
Detection limit: 0.001% (w/w) lead.
Product tested: knit
Date tested: December 10, 2008

RESULTS: Individual Data

Black

Total lead content, ppm: 13

Total lead content, % (w/w): 0.001

Khaki

Total lead content, ppm: 10

Total lead content, % (w/w): 0.001

White

Total lead content, ppm: <10.0

Total lead content, % (w/w): <0.001

Tan

Total lead content, ppm: <10.0

Total lead content, % (w/w): <0.001

Prepared by:


Peggy Marcotte,
Technician

Approved by:


For: Martin Pilleau, b. eng.
First Vice-President

Date: December 10, 2008

****For any information concerning this report, please contact Martin Pilleau.****

The reports are identified by an alphanumeric code, the last character refers to the number of revision(s), this is emitted in ascending order. The samples in relation to this test are retained for a period of 30 days following the expedition day of the written report, unless other instructions are received. The fees for all services after the tests are 125.00 \$ per hour and for appraisal in Court, 195.00\$ per hour. The above reported results refer exclusively to the samples submitted for evaluation. This analysis report cannot be partly used or reproduced, unless in whole, without CTT Group prior written consent.



ANALYSIS REPORT
SCC Accreditation No.: 40

Mr Serge Zagury
 Gildan Activewear

Date: December 10, 2008
 Report: 104-245-32013A

IDENTIFICATION: Pack 1; GE 8PR crew 3-5T; UPC#1: 0003227125164: Black, Khaki, White, Tan, Navy, Blue, Light blue
 Received: December 9, 2008

STANDARD:

TEST: Determination of total lead in paints and applied coatings
 Health Canada-Part B: C-02
 (94-12-12)*1

RESULTS (CONT): Individual Data

Navy

Total lead content, ppm: <10.0

Total lead content, % (w/w): <0.001

Blue

Total lead content, ppm: <10.0

Total lead content, % (w/w): <0.001

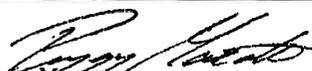
Light blue

Total lead content, ppm: <10.0

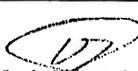
Total lead content, % (w/w): <0.001

REQUIREMENTS: Hazardous Products Act current to September 15, 2006 - Schedule I, Part I, Item 9:
 Maximum total lead content: 600 ppm or 0.06% (w/w).

Prepared by:


 Peggy Marcotte,
 Technician

Approved by:


 For: Martin Filteau, b. eng.
 First Vice-President

Date: December 10, 2008

****For any information concerning this report, please contact Martin Filteau.****

The reports are identified by an alphanumeric code, the last character refers to the number of revision(s), this is emitted in ascending order. The samples in relation to this test are retained for a period of 30 days following the expedition day of the written report, unless other instructions are received. The fees for all services after the tests are 125.00 \$ per hour and for appraisal in Court, 195.00\$ per hour. The above reported results refer exclusively to the samples submitted for evaluation. This analysis report cannot be partly used or reproduced, unless in whole, without CTT Group prior written consent.



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PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

LAB REPORT NO: TS34052 BUYER: [REDACTED] DEPT: 00 DATE: 12/05/2008
ITEM DESCRIPTION: BOBBY SOCK 10 SAMPLES / 1 COLOR
PRODUCT DEVELOPMENT: GLOBAL SOURCING: VENDOR TEST: BUYER'S REQUEST
ITEM#: NOT PROVIDED
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
SUPPLIER NAME: PREWETT MILLS DIST CENTER SUPPLIER NO.: 319251
ATTENTION: [REDACTED] FAX NUMBER: 256-845-5750
REASON FOR TESTING: EVALUATION OF LEAD, FORMALDEHYDE, AND FLAMMABILITY

- THE SAMPLE IS RATED AS **GOOD** AND PASSED THE BASIC PERFORMANCE AND SERVICEABILITY TESTS.
- THE SAMPLE IS RATED AS **UNSATISFACTORY** BECAUSE OF DEFICIENCIES LISTED BELOW.
- ALTHOUGH THE SUBMITTED SAMPLE IS RATED AS **GOOD**, THE ALLOCATION OF THE ORDER WILL NOT BE ALLOWED UNTIL THE SIZES AND COLORS LISTED BELOW ARE SUBMITTED FOR TESTING.

Rating: GOOD

FAIL REASON:

PREV. LAB NO:

The following color(s) have been tested: WHITE

PO NO: N/A

STYLE / MODEL NO:

4322

UPC# NOT PROVIDED

The results begin on page 2.

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EVALUATION OF TEST RESULTS

Lab Report No.: TS34052
Page 2 of 2

1. **RESTRICTED CHEMICALS**

The accessible substrate on the submitted sample complies with the lead content requirements of Section 101 (a)(2)(B) of the CPSIA 2008.

2. **FLAMMABILITY:**

The sample is exempt from the flammability requirements of 16 CFR 1610.1 Standard for the Flammability of Clothing Textiles because it is a plain surface fabric weighing more than 2.6 ounces per square yard.

CONSUMER TESTING LABORATORIES, INC.

TAMMIE ROLLINS
DIRECTOR, SPECIALTY TESTING
srk

ROBERT MANSFIELD
VICE PRESIDENT WORLDWIDE TEXTILE TESTING SERVICES

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: TS34052

Date: 12/5/2008

Item Description: BOBBY SOCK

SAMPLE INFORMATION

Size

18-36 MO

Color

ARCTIC WHITE

LABELING

	RATING	COMMENTS
<u>Includes the following labeling:</u>		
Country of origin (required by FTC)	---	LEAD ONLY
Fiber content (required by FTC)	---	LEAD ONLY
Care instructions: (required by FTC) Written / Symbols (as defined in ASTM 3136 / ASTM D 5489)	---	LEAD ONLY

FORMALDEHYDE

TEST CONDUCTED	SPOT TEST	FREE FORMALDEHYDE IN SAMPLE (ppm)	RATING
Formaldehyde (Spot Test) - AATCC 94 ARCTIC WHITE	Negative	---	P

CHILDREN'S SAFETY (Sizes 0-5T)	
	RATING
<p>FLOAT THREADS (other than footed garments, socks, booties, & mittens)</p> <p>Garment intended for 6 months and under exhibits no float threads in the non-foot area which exceed 3/8 in (+/- 1/4 inch)</p>	<p>---</p> <p>LEAD ONLY</p>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
	RATING
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION</p> <p><i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package --- _____</p> <p>On Product --- _____</p> <p>SURFACE COATINGS</p> <p><i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS</p> <p><i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store and season 04-08 (winter) products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following:</p> <p><i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing)</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p style="text-align: right;">_____ Y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm)</p> <p style="text-align: right;">_____ --- Y/N</p>	<p>---</p> <p>NOT PROVIDED</p> <p>---</p> <p>NOT PROVIDED</p> <p>---</p> <p>NO SURFACE COATINGS</p> <p>P</p>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to child care articles for children <4 years of age.</i></p> <p><i>Note: Applies to soft plastic components in apparel that are accessible to the mouth when worn. This applies to apparel that are designed, marketed or intended for children <4 years of age which includes newborn, infant, and toddler sizes 5T and under.</i></p> <p>E</p> <p><i>Note: After January 1, 2009 in-store products in all departments will be required to meet the following requirement</i></p> <p>Is the product a Child Care Article? <u> N </u> Y/N</p> <p>OR</p> <p>Does the product include a soft plastic component that is accessible to the mouth when worn? <u> N </u> Y/N</p> <p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C or EN</p> <p>Test report date <u> N/A </u></p> <p>DINP</p> <p>DIDP</p> <p>DnOP</p> <p>DEHP</p> <p>BBP</p> <p>DBP</p> <p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>		<p>N/A - Not a Child Care Article</p> <hr/> <p>N/A - Does not include a plastic component that is accessible to the mouth when worn</p> <hr/> <p>N/A</p> <hr/> <p>---</p> <p>NO LIQUIDS</p>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS								
	RATING	COMMENTS						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table> <p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) _____</p> <p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) _____</p> <p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 years) _____</p>	Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	---	NO LIQUIDS, PUTTIES, PASTES, POWDERS, GELS
Tested Age	Total Viable Count Limit							
18 months or less	500 cfu/ml(g)							
over 18 months	5000 cfu/ml(g)							
	---	NO LIQUIDS, PUTTIES, PASTES, POWDERS, GELS						
	---	NO LIQUIDS, PUTTIES, PASTES, POWDERS, GELS						
	---	NO LIQUIDS, PUTTIES, PASTES, POWDERS, GELS						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
BODY	WHITE	FABRIC	ND	
TRIM	WHITE	FABRIC	ND	





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EVALUATION OF TEST RESULTS

LAB REPORT NO: TSN5620 BUYER: OPEN DEPT: 26 DATE: 11/20/2008

ITEM DESCRIPTION: FG 10PR ASSORTED BOBBY SOCKS

PRODUCT DEVELOPMENT: _____ GLOBAL SOURCING: _____ VENDOR TEST: BUYER'S REQUEST
ITEM#: 3343913

FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED

SUPPLIER NAME: PREWETT MILLS DIST CENTER SUPPLIER NO.: 319251

ATTENTION: _____ FAX NUMBER: _____

REASON FOR TESTING: ANALYSIS OF LEAD CONTENT PER REQUEST OF [REDACTED]

STYLE / MODEL NO.: 3321

UPC#: 077039120764 Country of Origin: [REDACTED]

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for [REDACTED]

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Assorted Bobby Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
Grey - Body	Not Detected	Data Only
Brown - Body	Not Detected	Data Only
Hot Pink - Body	Not Detected	Data Only
Aqua - Body	Not Detected	Data Only
Lt Pink - Body	Not Detected	Data Only
White - Body	Not Detected	Data Only

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

SK

Samina Khan

SAMINA KHAN
SOFTLINES LABORATORY DIRECTOR

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EVALUATION OF TEST RESULTS

LAB REPORT NO: TSN5616 BUYER: _____ OPEN _____ DEPT: 26 DATE: 11/20/2008

ITEM DESCRIPTION: _____ FG 2PR LACE SOCKS

PRODUCT DEVELOPMENT: _____ GLOBAL SOURCING: _____ VENDOR TEST: BUYER'S REQUEST

ITEM#: 2634309

FACTORY: _____ NOT PROVIDED _____ FACTORY NO: _____ NOT PROVIDED

SUPPLIER NAME: _____ GILDAN USA INC _____ SUPPLIER NO.: 272112

ATTENTION: _____ FAX NUMBER: _____

REASON FOR TESTING: _____ ANALYSIS OF LEAD CONTENT PER REQUEST OF _____

STYLE / MODEL NO.: 3120

UPC#: 077039173760 Country of Origin: _____

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for _____

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Lace Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
White - Elastic and Body	Not Detected	Data Only
White - Bow	Not Detected	Data Only
White - Lace	Not Detected	Data Only

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

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Samina Khan

SAMINA KHAN
SOFTLINES LABORATORY DIRECTOR

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EVALUATION OF TEST RESULTS

LAB REPORT NO: TSN5615 BUYER: _____ OPEN _____ DEPT: 26 DATE: 11/20/2008

ITEM DESCRIPTION: _____ FG 2PR LACE SOCKS

PRODUCT DEVELOPMENT: _____ GLOBAL SOURCING: _____ VENDOR TEST: BUYER'S REQUEST

ITEM#: 2634323

FACTORY: _____ NOT PROVIDED _____ FACTORY NO: _____ NOT PROVIDED

SUPPLIER NAME: _____ GILDAN USA INC _____ SUPPLIER NO.: 272112

ATTENTION: _____ FAX NUMBER: _____

REASON FOR TESTING: _____ ANALYSIS OF LEAD CONTENT PER REQUEST OF _____

STYLE / MODEL NO.: 5120

UPC#: 077039173968 Country of Origin: _____

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for _____

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Lace Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
White - Elastic and Body	Not Detected	Data Only
White - Bow	Not Detected	Data Only

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP71318 BUYER: [REDACTED] DEPT: 24 DATE: 12/22/2008
ITEM DESCRIPTION: BOYS ANKLE SOCKS 1 SIZE/ 1 COLOR
TEST TYPE: PRODUCTION ITEM #: 2463017
CTL MASTER STYLE NO.:
LABEL STYLE NO.: AW531/6BGH
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: MEDIUM (SHOE 10-2.5)
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: ANALYSIS OF LEAD AND FLAMMABILITY TESTING ONLY

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NOT PROVIDED

The following color(s) have been tested: ARCTIC WHITE/ GREY

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
AW531/6BGH

UPC#: 032271250846

See page two (2) for test results.

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP71318
Page 2 of 2

1. The sample conforms to the flammability requirements of 16 CFR 1610 Standard for the Flammability of Clothing Textiles.
2. The accessible substrate(s) on the submitted sample comply with the lead content requirements of Section 101(a) (2) (A) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
srk

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp71318

Date: 12/22/2008

Item Description: Boys Ankle Socks

SAMPLE INFORMATION

Size

Shoe 10-2 1/2

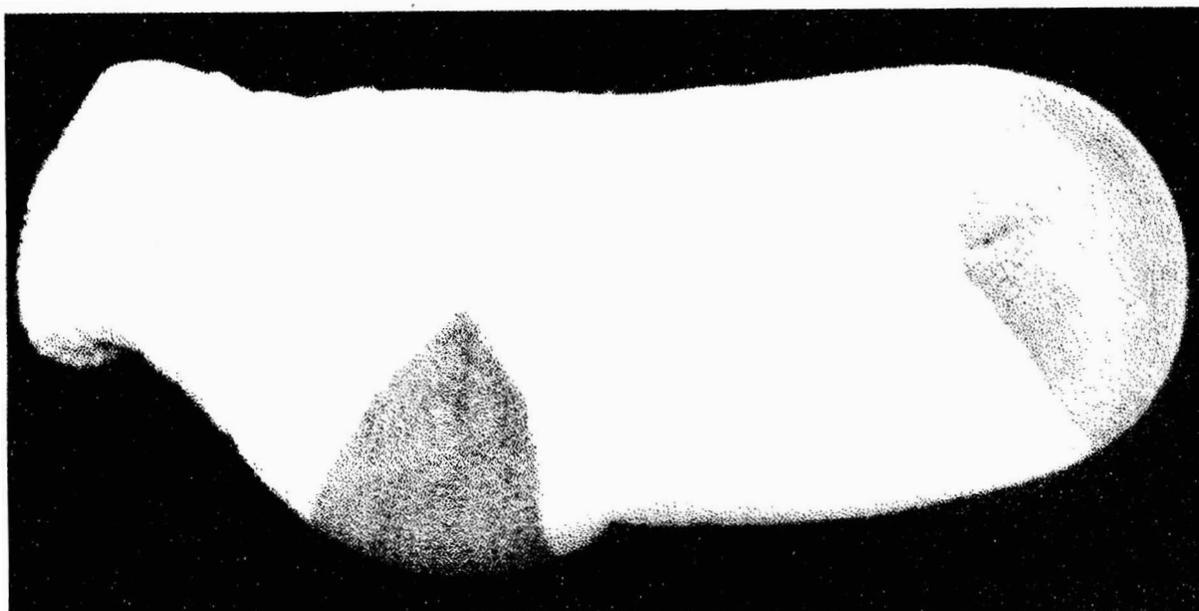
Color

Arctic White w/Grey Heel & Toe

FLAMMABILITY - 16 CFR Part 1610					
Fabric Direction: LENGTH <i>Note: not applicable to hats, gloves, footwear or interfacing fabrics</i>					
Sample Type: <u>Boys ankle socks</u>			Fiber Content: <u>82% Cotton / 15% Polyester / 1% Stretch Nylon / 1% Spandex / 1% Elastic</u>		
Type of fabric used in construction: Plain _____ Raised Fiber <u>X</u>					
ORIGINAL STATE					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 WHITE/GREY	SEC	21.70	6 ---	---	---
2 WHITE/GREY	SEC	25.50	7 ---	---	---
3 WHITE/GREY	SEC	26.10	8 ---	---	---
4 WHITE/GREY	SEC	23.50	9 ---	---	---
5 WHITE/GREY	SEC	25.60	# ---	---	---
Flame Spread (average if more than 1 burned) <u>24.48</u> sec					
No. of burned cords: <u>5.0</u>					
No. of base burns: <u>5.0</u>					
AFTER REFURBISHING					
Side tested: Face _____ Back <u>X</u>					
Color	Burning Characteristics	Flame Spread Seconds	Color	Burning Characteristics	Flame Spread Seconds
1 WHITE/GREY	SEC	23.40	6 ---	---	---
2 WHITE/GREY	SEC	22.80	7 ---	---	---
3 WHITE/GREY	SEC	24.30	8 ---	---	---
4 WHITE/GREY	SEC	25.00	9 ---	---	---
5 WHITE/GREY	SFPOI		# ---	---	---
Flame Spread (average if more than 1 burned) <u>23.88</u> sec					
No. of burned cords: <u>4.0</u>					
No. of base burns: <u>4.0</u>					
SAMPLE IS CLASS <u>1</u>					
<i>Requirement - ONLY Class 1 is Acceptable</i>					

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		STATUS	COMMENTS						
<p>TRACEABILITY INFORMATION</p> <p>Note: EUM trace, for each, or other traceability information (if provided)</p> <p>On Package <i>not required</i></p> <p>On Product <i>not required</i></p>									
<p>SURFACE COATINGS</p> <p>Note: From July 1, 2009 a surface coating that level of 0.05% (500ppm) is acceptable for all items and 0.01% (100ppm) for all items (0-36m) products</p> <p>TOTAL LEAD IN SURFACE COATINGS</p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.005% (50 ppm)</p>		N/A	See surface coating						
<p>ACCESSIBLE SUBSTRATE / BASE MATERIALS</p> <p>Note: Prior to July 1, 2009 accessible substrate / base material requirement of 0.05% (500ppm) is acceptable for all items and 0.01% (100ppm) for all items (0-36m) products</p> <p>TOTAL LEAD IN SUBSTRATE / BASE MATERIALS</p> <p>Product meets one of the following:</p> <p>(1) XRF testing is performed on metal substrate / base materials. For metal substrate / base materials only perform wet chemistry testing.</p> <p>X-Ray Fluorescence (XRF) screening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p>OR</p> <p>Lead content of all accessible substrate / base materials, sampled from the finished product do not exceed 0.01% (100 ppm)</p>		Y/N	See test data						
<p>PHthalATES - For Child Care Articles and Apparel Only</p> <p>Note: Applies to all plastic-based components in child care articles for children 4 years of age that are intended for sleeping, feeding, learning, or sucking</p> <p>Note: Applies to all plastic-based components in apparel that are accessible to the mouth when worn. It is expected to be worn that is designed, marketed or intended for children 4 yrs. of age which requires washing, rinsing, or machine wash 57 and under.</p> <p>Note: Phthalates requirements for Child Care Articles are effective for products manufactured after February 10, 2009. Phthalates requirements for Apparel are effective for products manufactured after July 1, 2009.</p> <p>Is this product a Child Care Article/Children's Apparel intended for sleeping, feeding, learning, or sucking that provides a plastic-based component? (includes sleepwear, underclothing, swimwear, underwear, etc.)</p> <p>OR</p> <p>Does the apparel include a soft plastic component that is accessible to the mouth when worn? (includes pajamas, swim trunks, turtleneck sweaters, etc.)</p> <p>Test report provided that states that 12 months from current date indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C, EN14</p> <p>Test report date</p> <p>DEHP (di-n-octyl phthalate)</p> <p>DEHP (di-n-butyl phthalate)</p> <p>DEHP di-(2-ethylhexyl) phthalate</p> <p>DEHP benzyl butyl phthalate</p> <p>DEHP dibutyl phthalate</p>		Y/N	N/A - Not a Child Care Article						
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid fluid products in accordance with 16 CFR 1500.25 or Consumer Product Safety Act (if applicable)</p> <p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p>Note: The following requirements are for products marketed in the US only</p> <p>USP 61 Microbial Limits Test</p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Treated Area</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 CFU/gm</td> </tr> <tr> <td>over 18 months</td> <td>5000 CFU/gm</td> </tr> </tbody> </table> <p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year)</p> <p>USP 51 Preservative Effectiveness Test</p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopoeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years)</p> <p>CONSUMER LIMITS</p> <p>Note: The following requirements are for products marketed in the US only</p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.5°C) when tested in accordance with 16 CFR 1500.48</p> <p>Report Date (dated within 1 year)</p>		Treated Area	Total Viable Count Limit	18 months or less	500 CFU/gm	over 18 months	5000 CFU/gm	N/A	See report of test results
Treated Area	Total Viable Count Limit								
18 months or less	500 CFU/gm								
over 18 months	5000 CFU/gm								

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
Location / Position on Product	Color	Material	XRF Pre-Screen Lead Content	Wet Chemistry Lead Content
			(Measurement in PPM, unless otherwise specified)	
FOOT	WHITE	FABRIC	ND	
ANKLE	WHITE	FABRIC	ND	
HEEL	GREY	FABRIC	ND	
CUFF	WHITE	FABRIC	ND	





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EVALUATION OF TEST RESULTS

LAB REPORT NO: TSN5187 BUYER: OPEN DEPT: 26 DATE: 11/13/2008

ITEM DESCRIPTION: FG 10PK BOYS LOW CUT SOCKS

PRODUCT DEVELOPMENT: _____ GLOBAL SOURCING: _____ VENDOR TEST: BUYER'S REQUEST

ITEM#: 2660797

FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED

SUPPLIER NAME: PREWETT MILLS DIST CENTER SUPPLIER NO.: 319251

ATTENTION: _____ FAX NUMBER: _____

REASON FOR TESTING: ANALYSIS OF LEAD CONTENT PER REQUEST OF [REDACTED]

STYLE / MODEL NO.: 3393

UPC#: 077039152666

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for [REDACTED]

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Boys Lowcut Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
White, Black - Elastic and Body	Not Detected	Data Only
Blue, White - Elastic and Body	Not Detected	Data Only
Green, White - Elastic and Body	Not Detected	Data Only
Red, White - Elastic and Body	Not Detected	Data Only
Navy, White - Elastic and Body	Not Detected	Data Only
White - Elastic and Body	Not Detected	Data Only

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

srt

Samina Khan

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EVALUATION OF TEST RESULTS

[REDACTED]

LAB REPORT NO: TSN5180 BUYER: OPEN DEPT: 26 DATE: 11/12/2008

ITEM DESCRIPTION: FG 10PK WARD CREW SOCKS

PRODUCT DEVELOPMENT: _____ GLOBAL SOURCING: _____ VENDOR TEST: BUYER'S REQUEST

ITEM#: 2660296

FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED

SUPPLIER NAME: PREWETT MILLS DIST CENTER SUPPLIER NO.: 319251

ATTENTION: _____ FAX NUMBER: _____

REASON FOR TESTING: ANALYSIS OF LEAD CONTENT PER REQUEST OF [REDACTED]

STYLE / MODEL NO.: 2151

UPC#: 077039043766

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for [REDACTED]

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Ward Crew Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
Tan - Body	Not Detected	Data Only
White - Sock	Not Detected	Data Only
Red, Blue - Sock	Not Detected	Data Only
Grey - Sock	Not Detected	Data Only
Black - Sock	Not Detected	Data Only
Navy - Sock	Not Detected	Data ONLY
Light Blue - Sock	Not Detected	Data Only
Red - Sock	Not Detected	Data Only
Navy, White - Sock	Not Detected	Data Only
Lt Blue, White - Sock	Not Detected	Data Only

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PHONE:(479) 286-2300 • FAX:(479) 286-2301, 286-2401

EVALUATION OF TEST RESULTS

Lab Report No.: TSN5180

Page 2 of 2

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

srt

Samina Khan

SAMINA KHAN
SOFTLINES LABORATORY DIRECTOR

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EVALUATION OF TEST RESULTS

LAB REPORT NO: TSN5129 BUYER: OPEN DEPT: 26 DATE: 11/11/2008

ITEM DESCRIPTION: FG 10PK BOBBY SOCKS

PRODUCT DEVELOPMENT: GLOBAL SOURCING: VENDOR TEST: BUYER'S REQUEST

ITEM#: 2660247

FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED

SUPPLIER NAME: PREWETT MILLS DIST CENTER SUPPLIER NO.: 319251

ATTENTION: FAX NUMBER:

REASON FOR TESTING: ANALYSIS OF LEAD CONTENT PER REQUEST OF

STYLE / MODEL NO.: 5366

UPC#: 077039043063

REASON FOR ANALYSIS: Evaluation of the sample to determine lead content of the accessible surface coating and substrate using X-Ray Fluorescence (XRF) screening as requested by the client for

EXECUTIVE SUMMARY: The accessible substrates on the Faded Glory Bobby Socks were tested using the XRF screening process. The lead (Pb) content of the respective components is outlined below. It should be noted this result, by the XRF method, is provided for data purposes only and is not to show compliance to the Consumer Product Safety Improvement Act (CPSIA) 2008.

Location/Substrate	Results	Conclusion
Pink - Sock	Not Detected	Data Only
Purple - Sock	Not Detected	Data Only
Green - Sock	Not Detected	Data Only
Yellow - Sock	Not Detected	Data Only
White - Sock	Not Detected	Data Only
Yellow, Green - Flower	Not Detected	Data Only
White - Lace	Not Detected	Data Only
Pink - Bow	Not Detected	Data Only
Pink, Blue - Trim	Not Detected	Data Only
Yellow, Green - Trim	Not Detected	Data Only

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EVALUATION OF TEST RESULTS

Lab Report No.: TSN5129

Page 2 of 2

CONSUMER TESTING LABORATORIES, INC.

Larisa Garrison

LARISA GARRISON
TEXTILE LABORATORY MANAGER

srt

Samina Khan

SAMINA KHAN
SOFTLINES LABORATORY DIRECTOR

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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP70110 BUYER: [REDACTED] DEPT: 24 DATE: 10/29/2008
ITEM DESCRIPTION: SOLID CREW SOCKS 1 SIZE/ 4 COLORS
TEST TYPE: PRODUCTION ITEM #: 002464621
CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: _____ GE650/6BA
FACTORY: _____ NOT PROVIDED FACTORY NO: _____ NOT PROVIDED
COUNTRY OF ORIGIN: _____ SIZES: _____ SHOE SIZE 3-9
SUPPLIER NAME: _____ GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: _____ FAX NO.: _____ NOT PROVIDED
REASON FOR TESTING: _____ OVERALL QUALITY EVALUATION

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
 MARGINAL PASS: THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
 UNSATISFACTORY: THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: WSP67168, 67500, 67165, 69302, 69792, 68650, 68649, 67164

The following color(s) have been tested: DRESS NAVY, BLACK SOOT, UNIFORM GREEN, SANDSTORM

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
GE650/6BA

UPC#: 032271252628

See page two (2) for test results:

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP70110
Page 2 of 2

Based on XRF screening technology the accessible substrate / base materials from the finished product comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

Shelly Kelsheimer

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
srk

Tammie Rollins

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp70110

Date: 10/29/2008

Item Description: Boys Solid Crew Shoe Size 3-9

SAMPLE INFORMATION

Size

Shoe 3-9

Color

Dress Navy
Black Soot
Uniform Green
Sandstorm

LABELING		
	RATING	COMMENTS
<u>Includes the following labeling:</u>		
Country of origin (required by FTC)	P	
Manufacturer's Identification (required by FTC)	P	
Fiber content (required by FTC)	P	
Care instructions: (required by FTC) Written / Symbols (as defined in ASTM 3136 / ASTM D 5489)	P	

FIBER CONTENT					
Color Evaluated	%	Labeled Fiber Content	%	Actual Fiber Content	RATING
Fiber Content - AATCC 20 & 20A Beige Crew	70%	Cotton	71%	Cotton	P
	29%	Nylon	27%	Nylon	
	1%	Spandex	2%	Spandex	

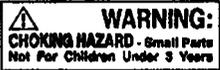
GENERAL APPEARANCE, WORKMANSHIP / CONSTRUCTION (SOCKS / HOSIERY)		
	RATING	COMMENTS
<u>Construction / Workmanship</u> No loose threads, needle damage, open seams, puckering, etc.	P	
<u>Color Appearance</u> Exhibits good overall color quality	P	
<u>Fabric Defects</u> No major defects, such as holes, runs, snags, stains, slub yarns, etc., or any other irregularities as defined in ASTM D3990	P	
APPEARANCE / DURABILITY AFTER LAUNDERING OR DRYCLEANING		
	RATING	COMMENTS
<u>General Appearance after Laundering</u> No open seams, holes, snags, runs, loose threads, excessive pilling, puckering, etc.	P	

DIMENSIONAL STABILITY (SOCK)					
TEST CONDUCTED	Original Size	Size After Washing	Shrinkage / Growth	Requirement	RATING
DIMENSIONAL STABILITY (WASHING) - AATCC 135 / 150					
<i>(-) denotes shrinkage</i>					
Dress Navy					
Foot Length (in.)	8.000	8.000	0.00%	≤ 10.0%	P
Foot Width (in.)	2.750	2.750	0.00%	≤ 10.0%	P
Sock Length (in.)	7.500	7.500	0.00%	≤ 10.0%	P
Cuff Length (in.)	0.750				
Black Soot					
Foot Length (in.)	8.000	8.000	0.00%	≤ 10.0%	P
Foot Width (in.)	2.750	2.750	0.00%	≤ 10.0%	P
Sock Length (in.)	7.000	7.000	0.00%	≤ 10.0%	P
Cuff Length (in.)	1.000				
Uniform Green					
Foot Length (in.)	8.000	7.875	-1.56%	≤ 10.0%	P
Foot Width (in.)	2.625	2.625	0.00%	≤ 10.0%	P
Sock Length (in.)	6.875	6.875	0.00%	≤ 10.0%	P
Cuff Length (in.)	0.750				
Sandstorm					
Foot Length (in.)	8.000	8.000	0.00%	≤ 10.0%	P
Foot Width (in.)	2.625	2.625	0.00%	≤ 10.0%	P
Sock Length (in.)	6.875	6.875	0.00%	≤ 10.0%	P
Cuff Length (in.)	0.875				

COLORFASTNESS			
TEST CONDUCTED	RESULT	REQUIREMENT	RATING
LAUNDERING - AATCC 135/150			
<i>Gray Scales for Color Change / Staining</i>			
Dress Navy			
SHADE CHANGE GRADE:	4.5	≥ 3.0	P
Black Soot			
SHADE CHANGE GRADE:	4.5	≥ 3.0	P
Uniform Green			
SHADE CHANGE GRADE:	4.5	≥ 3.0	P
Sandstorm			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
COLORFASTNESS TO CROCKING - AATCC 8			
Dress Navy			
DRY CROCKING GRADE:	5.0	≥ 3.0	P
WET CROCKING GRADE:	4.5	≥ 2.5	P
Black Soot			
DRY CROCKING GRADE:	4.5	≥ 3.0	P
WET CROCKING GRADE:	3.5	≥ 2.5	P
Uniform Green			
DRY CROCKING GRADE:	5.0	≥ 3.0	P
WET CROCKING GRADE:	5.0	≥ 2.5	P

COLORFASTNESS (PERFORMANCE)			
TEST CONDUCTED	RESULT	REQUIREMENT	RATING
PERSPIRATION - AATCC 15 Dress Navy			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	4.5	≥ 3.5	P
NYLON:	4.5	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P
Black Soot			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	5.0	≥ 3.5	P
NYLON:	5.0	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P
Uniform Green			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	5.0	≥ 3.5	P
NYLON:	5.0	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P

COLOR APPROVAL			
TEST CONDUCTED			RATING
COLOR APPROVAL / CTL Test Method			
Color:	Dress Navy		
Actual Color:	DRESS NAVY		
Lab Dip No.:	---	Previous lab no.: ---	P
Color:	Black Soot		
Actual Color:	BLACK SOOT		
Lab Dip No.:	---	Previous lab no.: ---	P
Color:	Uniform Green		
Actual Color:	UNIFORM GREEN		
Lab Dip No.:	---	Previous lab no.: ---	P
Color:	Sandstorm		
Actual Color:	SANDSTORM		
Lab Dip No.:	---	Previous lab no.: ---	P

CHILDREN'S SAFETY (Sizes Girls / Boys 4-20)		
	RATING	COMMENTS
<p><u>SMALL PARTS LABELING (Girls size 4 - 6x / Boys size 4 - 7)</u></p> <p>Exhibits the following choking hazard warning hangtag for products sized 4-6X girls or 4-7 boys, which exhibit sequins or other small part embellishments that are not allowed for sizes 0-5T (i.e. jewels, rhinestones, certain sequins)</p> <div style="text-align: center;">  </div>	---	<i>N/A-Does not apply to this product</i>
<p>Exhibits the following choking hazard warning hangtag for products sized 4-6X girls or 4-7 boys, which exhibit cords, ties, or belts constructed of metal chain</p> <div style="text-align: center;">  </div>	---	<i>N/A-Does not apply to this product</i>
<p><u>SHARP EDGES / POINTS</u></p> <p>Exhibits no non-functional sharp points and/or edges (e.g., broken needles, exposed sharp prongs, etc.)</p> <p>Products sized 4-6X do not exhibit any functional sharp points and/or edges</p>	P	
	P	
<p><u>CONSTRUCTION</u></p> <p>Monofilament thread (if used) is properly covered with a backing</p>	---	<i>N/A-No monofilament thread</i>
<p>Components (i.e. fasteners, toggles etc.) are not positioned in the knee area, or any other area that would cause injury or discomfort during wear</p>	P	

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION</p> <p><i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>Not provided</u></p> <p>On Product <u>Not provided</u></p> <p>SURFACE COATINGS</p> <p><i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p>	
N/A	No surface coating
<p>ACCESSIBLE SUBSTRATES / BASE MATERIALS</p> <p><i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following:</p> <p><i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p style="text-align: right;">_____ y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm)</p> <p style="text-align: right;">_____ -- Y/N</p>	
P	See RSHC for color tested

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
<p>PHTHALATES - For Child Care Articles and Apparel Only</p> <p><i>Note: Applies to child care articles for children <4 years of age.</i></p> <p><i>Note: Applies to plastic components in apparel that are accessible to the mouth when worn. This applies to apparel that are designed, marketed or intended for children <4 years of age which includes newborn, infant, and toddler sizes 5T and under.</i></p> <p><i>Note: After January 1, 2009 in-store products in all departments will be required to meet the following requirement</i></p> <p>Is the product a Child Care Article? <u>no</u> Y/N</p> <p>OR</p> <p>Does the product include a plastic component that is accessible to the mouth when worn? <u>no</u> Y/N</p> <p>Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C or EN</p> <p>Test report date <u>N/A</u></p> <p>DINP</p> <p>DIDP</p> <p>DnOP</p> <p>DEHP</p> <p>BBP</p> <p>DBP</p>		<p><i>N/A - Not a Child Care Article</i></p> <p><i>N/A - Does not include a plastic component that is accessible to the mouth when worn</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p> <p><i>N/A</i></p>
<p>HAZARDOUS LIQUID CHEMICALS</p> <p>Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)</p>	N/A	<i>No liquids, putties, pastes, powders, gels</i>

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		RATING	COMMENTS						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table> <p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) _____</p> <p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) _____</p> <p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) _____</p>		Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids, putties, pastes, powders, gels
Tested Age	Total Viable Count Limit								
18 months or less	500 cfu/ml(g)								
over 18 months	5000 cfu/ml(g)								
		N/A	No liquids, putties, pastes, powders, gels						
		N/A	No liquids, putties, pastes, powders, gels						
		N/A	No liquids, putties, pastes, powders, gels						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
XRF Pre-Screen Lead Content	Wet Chemistry Lead Content	Material	Color	Location / Position on Product
nd		fabric	navy	body
nd		fabric	black	body
nd		fabric	green	body
nd		fabric	tan	body





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EVALUATION OF TEST RESULTS

LAB REPORT NO: WSP70002 BUYER: [REDACTED] DEPT: 24 DATE: 10/22/2008
ITEM DESCRIPTION: SOLID CREW SOCKS 1 SIZE/ 4 COLORS
TEST TYPE: PRODUCTION ITEM #: 002464607

CTL MASTER STYLE NO.: _____
LABEL STYLE NO.: GE450/6BA
FACTORY: NOT PROVIDED FACTORY NO: NOT PROVIDED
COUNTRY OF ORIGIN: [REDACTED] SIZES: SHOE 6-9.5
SUPPLIER NAME: GILDAN USA INC SUPPLIER NO.: 272112
ATTENTION: [REDACTED] FAX NO.: NOT PROVIDED
REASON FOR TESTING: OVERALL QUALITY EVALUATION

SAMPLE RATING:

- GOOD:** THE SAMPLE HAS PASSED THE BASIC PERFORMANCE AND SERVICABILITY TESTS.
- MARGINAL PASS:** THE SAMPLE HAS MINOR FAILURE(S) LISTED BELOW.
- UNSATISFACTORY:** THE SAMPLE HAS DEFICIENCIES LISTED BELOW.

PREV. LAB NO: NONE

The following color(s) have been tested: DRESS NAVY, BLACK SOOT, UNIFORM GREEN, SANDSTORM

PO NO.:
NOT PROVIDED

STYLE / MODEL NO:
GE450/6BA

UPC#: 032271252604

See page two for test results:

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EVALUATION OF TEST RESULTS

Lab Report No.: WSP70002
Page 2 of 2

1. It should be noted that the package of the sample does not provide bilingual information. [REDACTED] expects suppliers to provide bilingual information on the package.
2. Based on XRF screening technology the accessible substrate / base materials from the finished product comply with the lead content requirements of Section 101(a) (2) (B) of the CPSIA 2008.

CONSUMER TESTING LABORATORIES, INC.

SHELLY KELSHEIMER
TEXTILE LABORATORY MANAGER
BENTONVILLE BRANCH
CMD

TAMMIE ROLLINS
SOFTLINES LABORATORY DIRECTOR

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CONSUMER TESTING LABORATORIES, INC

SOFTLINES APPAREL WORKSHEET

Lab Report No.: Wsp70002

Date: 10/22/2008

Item Description: Boys Solid Crew Shoe Size 6-9 1/2

SAMPLE INFORMATION

Size

Shoe 6-9 1/2

Color

Dress Navy
 Black Soot
 Uniform Green
 Sandstorm

LABELING

	RATING	COMMENTS
<u>Includes the following labeling:</u>		
Country of origin (required by FTC)	P	
Manufacturer's Identification (required by FTC)	P	
Fiber content (required by FTC)	P	
Care instructions: (required by FTC) Written / Symbols (as defined in ASTM 3136 / ASTM D 5489)	P	

SOCK		RATING														
<p><u>CONSTRUCTION / DESIGN</u></p> <p><u>Size</u></p> <p>Shoe Size <u>6-9.5</u></p> <p>Sock Size <u>---</u></p> <p>Age <u>---</u></p> <p><u>Construction</u></p> <p>Toe <u>Reciprocated</u></p> <p>Cuff <u>welt</u></p> <p>Heel <u>Reciprocated</u></p>																
<p><u>FIT PROPERTIES</u></p> <p>Color: <u>Uniform Green</u></p> <p><u>Cuff Support Stay-Up Properties</u></p> <p>Force to Support <u>1.10 lbs</u> @ <u>7.000 in</u></p> <p>Force to Support <u>1.40 lbs</u> @ <u>7.500 in</u></p> <p>Cuff Length <u>0.625 in</u></p> <p>Comments: <u>Good</u></p> <p><u>Cuff Stretchability</u> <u>12.0 in</u></p> <p>Comments: <u>Good</u></p>		P														
<p><u>NAHM FOOT FORM</u></p> <p>Color: <u>Uniform Green</u></p> <table border="0"> <tr> <td style="vertical-align: top;"><u>NAHM Board</u></td> <td style="vertical-align: top;">Fit Comments:</td> </tr> <tr> <td><u>6</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>6.5</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>7</u></td> <td><u>Good</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> <tr> <td><u>---</u></td> <td><u>---</u></td> </tr> </table>		<u>NAHM Board</u>	Fit Comments:	<u>6</u>	<u>Good</u>	<u>6.5</u>	<u>Good</u>	<u>7</u>	<u>Good</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>---</u>	P
<u>NAHM Board</u>	Fit Comments:															
<u>6</u>	<u>Good</u>															
<u>6.5</u>	<u>Good</u>															
<u>7</u>	<u>Good</u>															
<u>---</u>	<u>---</u>															
<u>---</u>	<u>---</u>															
<u>---</u>	<u>---</u>															
<p><u>SOCK WEIGHT</u></p> <p>Color: <u>Dress Navy</u></p> <p>actual: <u>24.200 grams / pair</u> specified: <u>24.560 grams / pair</u></p> <p> <u>10.241 oz/doz / pair</u> <u>10.394 oz/doz / pair</u></p>		P														

FIBER CONTENT					
Color Evaluated	%	Labeled Fiber Content	%	Actual Fiber Content	RATING
<i>Fiber Content - AATCC 20 & 20A</i> Khaki	70%	Cotton	72%	<i>Cotton</i>	P
	29%	Nylon	26%	<i>Nylon</i>	
	1%	Lycra Spandex	2%	<i>Spandex</i>	

GENERAL APPEARANCE, WORKMANSHIP / CONSTRUCTION (SOCKS / HOSIERY)

	RATING	COMMENTS
<u>Construction / Workmanship</u> No loose threads, needle damage, open seams, puckering, etc.	P	
<u>Color Appearance</u> Exhibits good overall color quality	P	
<u>Fabric Defects</u> No major defects, such as holes, runs, snags, stains, slub yarns, etc., or any other irregularities as defined in ASTM D3990	P	

APPEARANCE / DURABILITY AFTER LAUNDERING OR DRYCLEANING

	RATING	COMMENTS
<u>General Appearance after Laundering</u> No open seams, holes, snags, runs, loose threads, excessive pilling, puckering, etc.	P	

DIMENSIONAL STABILITY (SOCK)					
TEST CONDUCTED	Original Size	Size After Washing	Shrinkage / Growth	Requirement	RATING
DIMENSIONAL STABILITY (WASHING) - AATCC 135 / 150 (-) denotes shrinkage					
Dress Navy					
Foot Length (in.)	6.000	5.750	-4.17%	≤ 10.0%	P
Foot Width (in.)	2.375	2.375	0.00%	≤ 10.0%	P
Sock Length (in.)	5.875	5.500	-6.38%	≤ 10.0%	P
Cuff Length (in.)	0.500				
Black Soot					
Foot Length (in.)	6.000	5.750	-4.17%	≤ 10.0%	P
Foot Width (in.)	2.375	2.250	-5.26%	≤ 10.0%	P
Sock Length (in.)	5.750	5.625	-2.17%	≤ 10.0%	P
Cuff Length (in.)	0.500				
Uniform Green					
Foot Length (in.)	5.750	5.500	-4.35%	≤ 10.0%	P
Foot Width (in.)	2.375	2.250	-5.26%	≤ 10.0%	P
Sock Length (in.)	5.750	5.625	-2.17%	≤ 10.0%	P
Cuff Length (in.)	0.625				
Sandstorm					
Foot Length (in.)	6.250	6.000	-4.00%	≤ 10.0%	P
Foot Width (in.)	2.375	2.250	-5.26%	≤ 10.0%	P
Sock Length (in.)	6.000	6.000	0.00%	≤ 10.0%	P
Cuff Length (in.)	0.500				

COLORFASTNESS			
TEST CONDUCTED	RESULT	REQUIREMENT	RATING
LAUNDERING - AATCC 135/150 Gray Scales for Color Change / Staining			
Dress Navy			
SHADE CHANGE GRADE:	4.5	≥ 3.0	P
Black Soot			
SHADE CHANGE GRADE:	4.5	≥ 3.0	P
Uniform Green			
SHADE CHANGE GRADE:	4.0	≥ 3.0	P
Sandstorm			
SHADE CHANGE GRADE:	4.0	≥ 4.0	P
COLORFASTNESS TO CROCKING - AATCC 8			
Dress Navy			
DRY CROCKING GRADE:	4.0	≥ 3.0	P
WET CROCKING GRADE:	4.0	≥ 2.5	P
Black Soot			
DRY CROCKING GRADE:	4.5	≥ 3.0	P
WET CROCKING GRADE:	4.0	≥ 2.5	P
Uniform Green			
DRY CROCKING GRADE:	4.5	≥ 3.0	P
WET CROCKING GRADE:	4.5	≥ 2.5	P

COLORFASTNESS (PERFORMANCE)			
TEST CONDUCTED	RESULT	REQUIREMENT	RATING
PERSPIRATION - AATCC 15			
Dress Navy			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	4.5	≥ 3.5	P
NYLON:	4.5	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P
Black Soot			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	5.0	≥ 3.5	P
NYLON:	5.0	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P
Uniform Green			
SHADE CHANGE GRADE:	4.5	≥ 4.0	P
MULTI-FIBER STAINING GRADES: ACETATE:	5.0	≥ 3.5	P
COTTON:	5.0	≥ 3.5	P
NYLON:	5.0	≥ 3.5	P
POLYESTER:	5.0	≥ 3.5	P
ACRYLIC:	5.0	≥ 3.5	P
WOOL:	5.0	≥ 3.5	P

COLOR APPROVAL		RATING
TEST CONDUCTED		
COLOR APPROVAL / CTL Test Method		
Color:	Dress Navy	
Actual Color:	<i>Dress Navy</i>	
Lab Dip No.:	--- Previous lab no.: ---	P
Color:	Black Soot	
Actual Color:	<i>Black Soot</i>	
Lab Dip No.:	--- Previous lab no.: ---	P
Color:	Uniform Green	
Actual Color:	<i>Uniform Green</i>	
Lab Dip No.:	--- Previous lab no.: ---	P
Color:	Sandstorm	
Actual Color:	<i>Sandstorm</i>	
Lab Dip No.:	--- Previous lab no.: ---	P

CHILDREN'S SAFETY (Sizes Girls 4-16 / Boys 4-18)		
	RATING	COMMENTS
<p><u>SMALL PARTS LABELING (Girls size 4 - 6x / Boys size 4 - 7)</u></p> <p>Exhibits the following choking hazard warning hangtag for products sized 4-6X girls or 4-7 boys, which exhibit sequins or other small part embellishments that are not allowed for sizes 0-5T (i.e. jewels, rhinestones, certain sequins)</p>  <p>Exhibits the following choking hazard warning hangtag for products sized 4-6X girls or 4-7 boys, which exhibit cords, ties, or belts constructed of metal chain</p> 	---	N/A- does not apply to this product
<p><u>SHARP EDGES / POINTS</u></p> <p>Exhibits no non-functional sharp points and/or edges (e.g., broken needles, exposed sharp prongs, etc.)</p> <p>Products sized 4-6X do not exhibit any functional sharp points and/or edges</p>	P	
<p><u>CONSTRUCTION</u></p> <p>Monofilament thread (if used) is properly covered with a backing</p> <p>Components (i.e. fasteners, toggles etc.) are not positioned in the knee area, or any other area that would cause injury or discomfort during wear</p>	---	N/A- does not apply to this product
	---	N/A- does not apply to this product
	---	N/A- does not apply to this product

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS	
RATING	COMMENTS
<p><i>Note: This worksheet is a supplement and must accompany the applicable product specific worksheet</i></p> <p>TRACEABILITY INFORMATION <i>Note: Date code, lot code, or other traceability information (if provided)</i></p> <p>On Package <u>NOT PROVIDED</u></p> <p>On Product <u>NOT PROVIDED</u></p> <p>SURFACE COATINGS <i>Note: Prior to July 1, 2009 a surface coating lead level of 0.06% (600ppm) is acceptable for in-store products</i></p> <p><u>TOTAL LEAD IN SURFACE COATINGS</u></p> <p>Lead content of the products surface coating(s) scraped from the product does not exceed 0.009% (90 ppm)</p> <p>ACCESSIBLE SUBSTRATES / BASE MATERIALS <i>Note: Prior to July 1, 2009 accessible substrates / base material requirement of 0.06% (600ppm) is acceptable for in-store products</i></p> <p><u>TOTAL LEAD IN SUBSTRATES / BASE MATERIALS</u></p> <p>Product meets one of the following: <i>(Note: XRF testing is not performed on metal substrates / base materials. For metal substrates / base materials only perform wet chemistry testing</i></p> <p>X-Ray Fluorescence (XRF) prescreening indicates a lead level less than 0.01% (100ppm) for any accessible substrate / base material</p> <p style="text-align: right;">Y Y/N</p> <p>OR</p> <p>Lead content of all accessible substrates / base materials, sampled from the finished product do not exceed 0.03% (300 ppm)</p> <p style="text-align: right;">-- Y/N</p>	
N/A	No surface coatings
P	

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		
	RATING	COMMENTS
PHTHALATES - For Child Care Articles and Apparel Only <i>Note: Applies to child care articles for children <4 years of age.</i> <i>Note: Applies to plastic components in apparel that are accessible to the mouth when worn. This applies to apparel that are designed, marketed or intended for children <4 years of age which includes newborn, infant, and toddler sizes 5T and under.</i> <i>Note: After January 1, 2009 in-store products in all departments will be required to meet the following requirement</i>		
Is the product a Child Care Article? <u> N </u> Y/N OR Does the product include a plastic component that is accessible to the mouth when worn? <u> N </u> Y/N		N/A-Not for child care article
Test report provided (not older than 12 months from current date) indicates that the finished product contains no more than 0.1% (1000 ppm) of each of the following phthalates. Test report must indicate testing was performed as per method EPA 8270C or EP		
Test report date <u> </u> N/A		N/A
DINP	---	N/A
DIDP	---	N/A
DnOP	---	N/A
DEHP	---	N/A
BBP	---	N/A
DBP	---	N/A
HAZARDOUS LIQUID CHEMICALS Test report is provided indicating no hazardous chemicals are present in liquid filled products in accordance with 16 CFR 1500.231 or Canada Hazardous Products Act (if applicable)		
	N/A	No liquid filled products

RESTRICTED SUBSTANCES AND HAZARDOUS COMPONENTS TESTING FOR CHILDREN'S PRODUCTS		RATING	COMMENTS						
<p>LIQUIDS, PUTTIES, PASTES, POWDERS, GELS</p> <p><i>Note: the following requirements are for products marketed in the US only</i></p> <p><u>USP 61 Microbial Limits Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 61 Microbial Limits Test and are within the following limits:</p> <table border="1"> <thead> <tr> <th>Tested Age</th> <th>Total Viable Count Limit</th> </tr> </thead> <tbody> <tr> <td>18 months or less</td> <td>500 cfu/ml(g)</td> </tr> <tr> <td>over 18 months</td> <td>5000 cfu/ml(g)</td> </tr> </tbody> </table> <p>Test report provided indicates the absence of Staphylococcus aureus, Pseudomonas aeruginosa, Salmonella, and Escherichia coli</p> <p>Report Date (dated within 1 year) _____</p> <p><u>USP 51 Preservative Effectiveness Test</u></p> <p>Test report is provided which indicates that liquids, putties, pastes, powders, or gels sampled from the finished goods have been tested in accordance to United States Pharmacopeia (USP) 51 Preservative Effectiveness Test</p> <p>Report Date (dated within 2 years) _____</p> <p><u>Combustible Liquids</u></p> <p><i>Note: the following requirement is for products marketed in the US only</i></p> <p>Test report is provided which indicates that all liquids sampled from the finished goods have a flash point higher than 150°F (65.6°C) when tested in accordance with 16 CFR 1500.43</p> <p>Report Date (dated within 1 year) _____</p>		Tested Age	Total Viable Count Limit	18 months or less	500 cfu/ml(g)	over 18 months	5000 cfu/ml(g)	N/A	No liquids, putties, pastes, powders, gels
Tested Age	Total Viable Count Limit								
18 months or less	500 cfu/ml(g)								
over 18 months	5000 cfu/ml(g)								
		N/A	No liquids, putties, pastes, powders, gels						
		N/A	No liquids, putties, pastes, powders, gels						
		N/A	No liquids, putties, pastes, powders, gels						

SUBSTRATE / BASE MATERIAL LIST				
Record all accessible substrate - base materials below:				
XRF Pre-Screen Lead Content	Wet Chemistry Lead Content	Material	Color	Location / Position on Product
nd		fabric	black	trim/body
nd		fabric	tan	trim/body
nd		fabric	green	trim/body
nd		fabric	blue	trim/body





INTERNATIONAL
SLEEP
PRODUCTS
ASSOCIATION

February 17, 2009

Consumer Product Safety Commission
Office of the Secretary
Room 502
4330 East West Highway
Bethesda, Maryland, 20814

Re: Section 101 Determinations of Certain Materials or Products NPR

The International Sleep Products Association (ISPA) submits the following comments on behalf of the mattress manufacturing industry in response to the Consumer Product Safety Commission’s (CPSC) Notice of Proposed Rulemaking on “Proposed Determinations Regarding Lead Content Limits on Certain Materials or Products” (74 FR 2433). ISPA supports the Commission’s efforts to use its authority under the Consumer Product Safety Improvement Act (CPSIA) to grant exemptions from the section 101 lead testing requirements for products and materials that contain no or a de minimus amount of lead.

Composition of a Mattress and Foundation

Mattresses and box-springs (also called foundations) are assembled from various components manufactured by separate third party suppliers. A mattress and foundation are made from several different component parts. These typically may include polyurethane and/or latex foams; air chambers made of vulcanized rubber and/or vinyl; steel innersprings and coils; various natural and synthetic fiber products, including outer covering fabrics (also called ticking), tape edge fabric, thread, internal upholstery material and other fiber products; foundations consisting of wood, metal and/or polyethylene; and fastening materials (including thread, metal and synthetic fasteners, and adhesives). All of these components are enclosed in the outer fabric ticking, and except for the ticking, tape edge (where used) and thread, are physically inaccessible to a child. For this reason, ISPA has requested that the Commission determine that these internal mattress components are “inaccessible component parts” for purposes of Section 101 of the CPSIA, and therefore exempt from the lead requirements.

Furthermore, since the outer fabric ticking, tape edge and thread do not contain lead, ISPA also requests that the Commission exempt such fabric, tape edge and thread from these requirements.

Proposed Determination on Certain Natural Materials

As detailed in the Commission’s notice of proposed rulemaking, CPSC staff has indentified certain materials that do not inherently contain lead, provided that they “are untreated and unadulterated with respect to the addition of materials or chemicals, including pigments, dyes, coatings, finishes or any other substance” (74 FR 2433). Included in this list are “[n]atural fibers such as cotton, silk, wool, hemp, flax, linen” (74 FR 2434). Although the proposed exclusion of certain natural fibers from the lead requirements provides a starting point in the analysis, it has very little practical application for the thousands of products made from fiber and fabric for several reasons.

First, unprocessed natural fibers have extremely limited uses in consumer products. Virtually all natural fiber must undergo numerous manufacturing processes to prepare it for use in a consumer product. These processes include cleaning, dying and otherwise preparing the fiber so that it will have the look, feel, color, smell and

performance characteristics (durability, washability, etc.) that consumers want. As the Commission has learned from voluminous scientific data submitted by the textile and apparel industry, the manufacturing operations that are routinely used to make the fiber materials suitable for use in consumer products do not impart lead to the natural fiber. Therefore, the Commission's fiber exemption should be broadened to include natural fibers that undergo certain types of acceptable processing.

Second, since natural fibers are often used to make fabrics, thread, tape edge, and other fiber-based materials (e.g., batting and other non-woven materials) or synthetic materials, the exemption should be broadened to include these materials. Furthermore, the spinning, weaving, knitting, garneting (and other processes used to make batting and other non-woven materials), and cutting operations that process the raw fiber into a material suitable for use in a consumer product do not impart lead to the resulting material.

Third, the exemption should apply to synthetic fibers as well as the fabrics, threads, tape edge and other fiber-based materials, including those products that are made from a blend of natural and synthetic fibers. Like natural fibers, synthetic fibers do not inherently contain lead. Therefore, we urge the Commission to recognize that materials made from synthetic fibers (including blends of synthetic and natural fibers) do not contain lead.

Fourth, the exemption should apply to fiber and fiber-based materials when used in a finished consumer product. In most cases, including the construction of a mattress or foundation, the finished product manufacturer will simply cut and assemble the fabric and other fiber-based materials into a finished product and/or secure the fiber to a natural and/or synthetic material. In doing so, the finished product manufacturer will not impart lead to the fabric or fiber-based product.

In the case of mattresses and foundations, the outer fabric ticking, tape edge and thread used to assemble a finished product are typically composed of a blend of several types of fibers, including cotton, rayon, polyester, polypropylene, and occasionally other natural fibers like flax, wool and other animal hair, and silk. None of these fibers inherently contain lead. Likewise, the dyes and finishes applied to these fibers (and resulting fabric, thread, tape edge and other fiber-based materials) do not inherently contain lead.

When considering this request, ISPA urges the Commission to:

1. Exempt certain products based on specific fiber categories and apply that exemption to fiber when used in any consumer product, provided that the processes used to make the finished product do not add lead to the fiber. In the case of mattresses and foundations, this would mean that an exemption for cotton fiber would apply to those components that use cotton fiber in the outer fabric ticking, the tape edge, thread, material secured to an air chamber, and other fiber-based products.
2. Determine which specific manufacturing operations do not impart lead to fibers and fiber-based products, and identify those operations to clarify for the manufacturing community which processes are acceptable for purposes of the exemption. In the case of mattresses and foundations, it would be useful for the Commission to specify that weaving, knitting, garneting, cutting, sewing and quilting, securing fiber to a component and other similar basic manufacturing operations are not considered as imparting lead to fiber and fiber-based products.

Summary

For these reasons, ISPA urges the Commission to expand the proposed fibers exemption to include both natural and synthetic fibers, as well as fibers that have been converted into fabrics and other fiber-based materials. The Commission should also exempt specific categories of fibers, fabrics, and other materials that have undergone specific basic manufacturing and assembly processes that do not impart lead to the material in excess of the limits set forth in the CPSIA. Exempting fiber and fiber-based materials in this manner would avoid the costly and unnecessary testing of products that pose no risk.

Manufacturers of fiber-based components used in the mattress industry are in the process of collecting lead content test data to reassure the Commission that these materials will not expose consumers to lead. We understand that this data will be submitted to the Commission in the near future.

Thank you for the opportunity to share our comments. If you have further questions you may contact me at (703) 683-8371.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Trainer". The signature is fluid and cursive, with the first name "Ryan" and last name "Trainer" clearly distinguishable.

Ryan Trainer
Executive Vice President & General Counsel



Via Electronic Mail

February 18, 2009

Mr. Todd Stevenson
Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Section 101 - Determinations of Certain Materials or Products – Notice of Proposed Rulemaking

Dear Mr. Stevenson:

We write on behalf of the Footwear Distributors and Retailers of America (“FDRA”)¹ and in response to the solicitation of comments by the Consumer Product Safety Commission (“CPSC”) regarding the identity of materials that should be considered to satisfy the lead content limits prescribed by Section 101(a) of the Consumer Product Safety Improvement Act of 2008 (“CPSIA”).

Footwear incorporates a number of natural and manufactured materials that contain little or no lead or, if present, lead is in a form that a child who might mouth or otherwise be exposed to the lead-containing material will not absorb it. These materials include; fabric (natural and man-made), leather, crystal, glass, rubber, and various types of plastic.

The Commission may exclude specific materials from the lead limits of Section 101 when it determines that any lead in the material will not result in the absorption of lead, taking into account normal and reasonably foreseeable use and abuse conditions, and will not have otherwise have an adverse impact on public health or safety. The CPSIA recognizes that eliminating lead is not achievable, and that children might be exposed to lead in handling or mouthing products that meet total lead limits but in amounts that would not pose a health risk.

The CPSIA clearly contemplates that the Commission will exercise its authority to exclude materials that would not expose children to accessible lead in amounts that would create a health hazard.

FDRA requests that the Commission consider exempting the materials described herein from lead testing requirements. FDRA’s justifications for this request are set out below.

¹ FDRA is the trade association representing an estimated three-quarters of all footwear sales in the United States through its retailer, importer, distributor and manufacturer members.

Fabric. The Commission held a hearing on January 22, 2009 on the incidence of lead in textile products (fabric, thread, trim and laces). The private sector participants in the hearing presented tests of 3,000 garments incorporating a wide range of natural and man-made fabrics, trim and thread. The tests included fabrics that were dyed as well as printed. The tests revealed that only some textile materials incorporate lead, and then at levels of 100 ppm or less. The majority of the tests detected no lead. These submissions provide a solid basis for a determination that fabric and other textile materials are free of lead.

Leather. Leather in various forms is commonly found in a wide variety of footwear. Generally, the risk of lead being present in unfinished (uncoated) leather such as aniline leather (*i.e.*, dyed in a vat process with no color coating added to the surface), suede or nubuck is extremely limited. It is the experience of FDRA members that when leather samples are tested, lead, when present is found in the finish layer, which is a coating applied to the surface of the leather. The finish is usually a combination of polymers and pigments and is applied by spraying or similar means to the surface of the leather. This layer provides protection and esthetic qualities to the leather.

The Commission has determined that “untreated leather” does not exceed the 600 ppm or 300 ppm lead content limits of Section 101(a) of the CPSIA.

FDRA requests that the Commission clarify that the term “untreated leather” refers to the aniline, nubuck and suede leathers described above. These leathers are not “finished” in the sense used here and FDRA believes they meet the definition of what the Commission refers to as “untreated leather”.

As noted above, a finishing operation typically involves some sort of a surface coating. Accordingly, FDRA believes that leather in general should be excluded from the testing requirements to Section 101(a). It is FDRA’s belief that the requirement to test surface coatings as set forth in 16 C.F.R. Part 1303 is sufficient to ensure that footwear with leather components does not exceed the lead limits of the CPSIA. It should not be necessary to test leather as a substrate. Only those leathers, which have been coated, should be subject to the testing requirement.

Crystal and Glass. FDRA is a signatory to the submission made by the Fashion Jewelry Trade Association (“FJTA”). The submission provides a detailed, documented analysis of why lead in glass and crystal does not pose a danger to children. FDRA adopts the position taken in FJTA’s submission.

Plastics and Rubber. Polyvinyl Chloride (“PVC”), Polyurethane (“PU”) and Thermal Plastic Rubber (“TPR”), among other plastics, are widely used in footwear. Generally, any lead contained in these materials will not be released and, therefore will not be absorbed.

Indeed, Commission Staff have determined that any lead in PVC is not a hazard to children. CPSC Staff Report on Lead and Cadmium in Children’s Polyvinyl Chloride (PVC)

Mr. Todd Stevenson
February 18, 2009
Page 3

Products (1997) (the "Report")². The nub of the Report is that any lead in PVC is not be released and, if released, the amount released would not be hazardous. Report at 4. The clear and unambiguous conclusion of the Report is strong support for a determination that PVC satisfies the lead content limits of the CPSIA.

* * *

The materials described herein sometimes contain lead. However, lead is present in relatively small quantities and is not likely to be released. The Commission may exempt these materials from the lead limit without endangering the health of children. Further support for the materials used in footwear is found in the fact that of the approximately 300 recalls based on a lead hazard since July 2001, none involved footwear.³

FDRA appreciates the opportunity to comment on this topic and urges that its views be adopted.

Please feel free to contact me if you have any questions on this submission.

Sincerely,

Peter T. Mangione

V7282467.1

² The Report did not test PVC in footwear.

³ Data from: www.CPSC.gov/cgi-bin/haz.aspx, February 4, 2009.

Stevenson, Todd

From: Peter Mangione [ptmangione@fdra.org]
Sent: Tuesday, February 17, 2009 1:09 PM
To: Lead Determinations
Cc: Pellegrini, John B.
Subject: Sec 101 Determinations of Certain Materials or Products NPR
Attachments: CPSC Submission Sec 101 Determinations of Certain Materials NPR Feb 17,2009.DOC

Dear Mr. Secretary – Enclosed pls find the comments of FDRA on the above captioned request for comment.

Pls contact us if you have any questions.

Best regards.

Peter T. Mangione
President
Footwear Distributors and Retailers of America
1319 F Street, NW, Ste 700
Washington, DC 20004
P: (202)737-5660 x15
F: (202) 638-2615
M: (703)328-0802
www.fdra.org

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ALA American Library Association

February 20, 2009

BY FIRST CLASS MAIL

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East West Highway
Bethesda, MD 20814

2009 FEB 21 P 1:36
OFFICE OF THE SECRETARY
CONSUMER PRODUCT SAFETY COMMISSION

**Re: Section 101 Determinations of Certain Materials or Products NPR:
Application to Ordinary Books**

To Whom It May Concern:

The American Library Association submits these supplemental comments in response to the Notice of Proposed Rulemaking issued by the Consumer Product Safety Commission (Commission) on January 15, 2009, *Children's Products Containing Lead; Proposed Determinations Regarding Lead Content Limits on Certain Materials or Products*, 74 Fed. Reg. 2433.

In our previous comments, we expressed our concern that the Commission's implementation of the Consumer Product Safety Improvement Act of 2008 (CPSIA) will prevent libraries from providing children with access to books and other print materials. We further explained why the CPSIA does not apply to libraries by its terms. We urged the Commission to: (1) Issue a rule or other guidance confirming that the new lead limits do not apply to libraries, even if they apply to suppliers of library books; and (2) Determine by rule that ordinary books do not inherently contain lead or contain lead below the CPSIA lead limits.

The supplemental comments provided below respond to specific inquiries that CPSC recently made to ALA relating to how long children's books typically remain on the shelves of public libraries and school libraries, and how long school textbooks remain in circulation.

Because each library's situation is different, there is not a single answer to how long a children's book will stay on a library shelf; even an "average" would be somewhat misleading. Although there is a wide range, it is our experience and understanding that school libraries recycle books on average every three years. Children's books in public libraries tend to withstand 18 circulations before needing to be replaced. How long a book ultimately remains on a library shelf depends on a number of factors, including the popularity and use of the book and the library's resources. For school libraries, additional factors include enrollment and school level. Furthermore, on balance, children's books tend to be replaced more frequently because of the nature and frequency of their use.

Below, we provide a description of some of the issues that are relevant to determining precisely how long books remain on library shelves, and we explain some of the applicable terminology. We do not have information relating to the longevity of textbooks in schools, in part because libraries do not typically keep textbooks in their collections (or at least not in significant numbers).

1. Copyright Date: The copyright date refers to the date a book was first published or set down in the form being presented; however, a copyright may be renewed. The copyright date is not a reliable indicator of the length of time a book itself has been in existence or on a shelf. Thus, the oldest *Winnie the Pooh* book is copyrighted in 1928, but the actual edition on a library shelf could be later, and the printing date even later than that. In other words, the "copyright date" is when the book was first written, but does not indicate when each copy of that book was actually printed. The date of "production" is not a statistic that is normally tracked, so the copyright date often provides the best tool to estimate the age of the collection even if it does not pinpoint the age of each copy of the book.

In some cases, a library will replace the book over and over again (e.g, classic children's books such as *Charlotte's Web*, which was first published in 1952 but is readily available in numerous editions today). As a result, the date of manufacture will not track with the copyright date. Books in this category usually comprise a small percentage of the overall collection.

2. Publication Date: The publication date refers to the date the particular manifestation of a work was published. A book copyrighted in 1995 might be published in hardcover in 1995 and in paperback in 1997—and republished by another publisher in 2005.

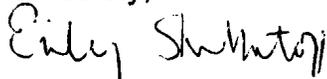
3. "In Print": "In print" refers to a book's availability through normal retail sales channels from the publisher. For many books, this period lasts about 18 months, thanks to the *Thor* ruling in the 1970s, which allows for taxing books in inventory. Classics and perennially popular books will remain "in print" (or available from the publisher) for much longer, as part of the backlist every publisher has. These would be later printings, but all holding the same copyright and publication dates

as the first printings. However, the fact that a book has been in print for 18 months does not indicate that each copy of the book is 18 months old; rather, each copy could have been printed at any point during that 18-month period.

4. Durability: Many libraries, particularly school libraries, buy reinforced bindings, or have soft cover books re-bound. The number of circulations a book can withstand varies by binding. In general, however, a book's longevity is tied to its number of circulations.

Please let us know if you need additional information.

Sincerely,



Emily Sheketoff

Cc: Hyun Kim, CPSC (by e-mail)

Stevenson, Todd

From: notify@yahogroups.com on behalf of adwidlakeherring [adwidlakeherring@yahoo.com]
Sent: Monday, January 12, 2009 1:37 AM
To: Lead Determinations
Subject: Section 101 Determinations of Certain Materials or Products NPR

Hi..

I have heard that if we let you know, which items we use for our homemade items, there is a chance for exeption...

I make homemade hairbows... I use Grosgrain polyester ribbon...
I also make tutus, that uses tulle and satin ribbon...

I also use metal single prong clippies, french clips, and hot glue...

Please try and help us out...

I realize this law isn't being put into effect to try and punish the "small business", but I'm afraid that if 3rd party testing is put into effect, it will run many of us into the ground...

The manufacturers of the ribbon and tulle, should have to pass certification, before items are ever purchased by us... Thus ready for us to craft and sale...

Thanks,
Amber Widlake-Herring

Stevenson, Todd

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From: Becky [mypewteriscewter@comcast.net]
Sent: Monday, January 12, 2009 6:13 AM
To: Lead Determinations
Subject: Exemption requests from new law

I use lead-free pewter. I already have a material data sheet which I feel I should be able to use since I don't alter my pewter. Having me retest it will be too costly. I buy my lead-free pewter from a USA manufacturer.

I also use agate slices and amethyst, clusters from Brazil, calcite, quartz clusters and other specimens found in the ground. My petrified wood all comes directly from the ground here in Texas...any child could pick it up themselves. And then there is jasper, aventurine, hematite...the list goes on. The only alterations to rock is polishing.

I'd like to know what rocks, if any, contain lead levels so high that sitting them on the shelf or wearing them as a necklace or bracelet would cause harm to anyone including children.

Becky McMullen
Small Businesswoman until Feb 10th
<http://www.mypewteriscewter.com>

Stevenson, Todd

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From: Amy Schulz [amythyst@cox.net] on behalf of Happy Magpie [orders@happymagpie.com]
Sent: Tuesday, March 17, 2009 9:46 PM
To: Lead Determinations
Subject: [Possibly Spam]: Section 101(a) Determinations
Importance: Low

I understand this to be the email address to ask for certain exemptions to HR 4040. I am a small business owner/artist. I would hope that all artists/crafters purchasing items in the USA would not be able to purchase items with lead in them. But, here are the items that concern me:

Glass
Gemstones
Stainless Steel
Sterling Silver
Gold
Printed Fabric

Amy Schulz
Happy Magpie LLC
<http://happymagpie.com/etching>

5 Form Letters

Natural, other textile and apparel materials

Stevenson, Todd

From: Lo Whipple [mslo50@yahoo.com]
Sent: Saturday, January 10, 2009 10:38 AM
To: Lead Determinations
Subject: Exemption from lead testing

Dear CPSC,

I am writing to ask that you exempt certain supplies from the current lead-testing rule that goes into effect on February 10th. These items have been known to be lead-free and many have already been certified through the manufacturer.

- organic cotton
- organic hemp
- 100% cotton fabric (solid & prints)
- 100% cotton flannel (solid & prints)
- bamboo/cotton blends
- 0A chenille
- 100% polyester fabrics (fleeces, knits & microfiber)
- polyresin snaps
- polyester thread
- polyfil
- dyed wool

Thank you for your time and for your consideration in helping keep small businesses in business!
Sincerely,

Lo Whipple

Lo Whipple Design
1602 Broadmoor Drive
Austin, Texas 78723
Phone 512-289-3108
Fax 512-524-1325
mslo50@yahoo.com

Stevenson, Todd

From: Juanita Harte [jcharte@sbcglobal.net]
Sent: Friday, January 09, 2009 11:45 PM
To: Lead Determinations
Subject: Fw: The Roods Need Help- Please read.

--- On Fri, 1/9/09, iciclechic@aol.com <iciclechic@aol.com> wrote:

> From: iciclechic@aol.com <iciclechic@aol.com>
> Subject: The Roods Need Help- Please read.
> To: srruhman@aol.com, Pennydolginer@aol.com, jcharte@sbcglobal.net,
> ljosburn@gmail.com, GiaShia@aol.com, marisasagehorn@comcast.net,
> Bret@Bretrood.com, cjrood@earthlink.net, t.ruhman@sbcglobal.net,
> b.ruhman@sbcglobal.net, Mytphyl@aol.com, eva.alice@gmail.com,
> lbmoran1@aol.com, mrs_elucero77@hotmail.com, heididreyfus@yahoo.com,
> dizsak@murad.com, coolbpl@yahoo.com, spacey323@ymail.com
> Date: Friday, January 9, 2009, 6:23 PM Hello Everyone,
> Our family needs your help. I wouldn't ask if I didn't think that
> we could make a difference. Some of you might know about the new
> CPSIA regulations. Basically it is a new regulation that will go into
> effect starting February 10th which will help regulate lead in kids
> clothing and toys. As you know we cloth diaper our babies and we want
> to continue to do so. The new regulations will prevent many of the
> people who make our diapers to continue to have a business. The CPSIA
> actually asked if anything should be revised- so I have typed up a
> letter below for you to send to them.
> If you have 2 minutes please cut and copy the information below and
> send it to the email address below. Thanks so much for doing this- it
> means so much more than cloth- it means keeping our kids healthier!
> THANK YOU!
> Ali, Bret, Sadie and Stella (in the bella)
>
>
> Send to:
>
> Sec101Determinations@cpsc.gov
>
>
> Dear CPSC,
>
> I am writing to ask that you exempt certain supplies from the current
> lead-testing rule that goes into effect on February 10th. These items
> have been known to be lead-free and many have already been certified
> through the manufacturer.
>
> • organic cotton
> • organic hemp
> • 100% cotton fabric (solid & prints)
> • 100% cotton flannel (solid & prints) • bamboo/cotton blends •
> chenille • 100% polyester fabrics (fleeces, knits &
> microfiber)
> • polyresin snaps

> • polyester thread
> • polyfil
> 2 dyed wool
>
> Thank you for your time and for your consideration in helping keep
> small businesses in business!
> Sincerly,
>
>
>
>
> Ali- Slinging Mama to Sadie Cakes-and baking her a little sister in my
> belly until (hopefully) April!

Stevenson, Todd

From: Clint Rood [cjrood@earthlink.net]
Sent: Saturday, January 10, 2009 6:18 PM
To: Lead Determinations
Subject: New regulations

Dear CPSC,

I am writing to ask that you exempt certain supplies from the current lead-testing rule that goes into effect on February 10th. These items have been known to be lead-free and many have already been certified through the manufacturer.

- organic cotton
- organic hemp
- 100% cotton fabric (solid & prints)
- 100% cotton flannel (solid & prints)
- bamboo/cotton blends
- chenille
- 100% polyester fabrics (fleeces, knits & microfiber)
- polyresin snaps
- polyester thread
- polyfil
- dyed wool

Thank you for your time and for your consideration in helping keep small businesses in business!
Sincerely,

Clint and Joan Rood

Stevenson, Todd

From: Heidi Dreyfus [heididreyfus@yahoo.com]
Sent: Sunday, January 11, 2009 4:17 PM
To: Lead Determinations
Subject: Lead testing rule exemptions.

Dear CPSC,

I am writing to ask that you exempt certain supplies from the current lead-testing rule that goes into effect on February 10th. These items have been known to be lead-free and many have already been certified through the manufacturer.

- organic cotton
- organic hemp
- 100% cotton fabric (solid & prints)
- 100% cotton flannel (solid & prints)
- bamboo/cotton blends
- chenille
- 100% polyester fabrics (fleeces, knits & microfiber)
- polyresin snaps
- polyester thread
- polyfil
- dyed wool

Thank you for your time and for your consideration in helping keep small businesses in business!

Sincerely,
Heidi Dreyfus

Stevenson, Todd

From: giashia@aol.com
Sent: Monday, January 12, 2009 12:20 PM
To: Lead Determinations
Subject: lead testing

Dear CPSC,

I am writing to ask that you exempt certain supplies from the current lead-testing rule that goes into effect on February 10th. These items have been known to be lead-free and many have already been certified through the manufacturer.

- organic cotton
- organic hemp
- 100% cotton fabric (solid & prints)
- 100% cotton flannel (solid & prints)
- bamboo/cotton blends
- chenille
- 100% polyester fabrics (fleeces, knits & microfiber)
- polyresin snaps
- polyester thread
- polyfil
- dyed wool

Thank you for your time and for your consideration in helping keep small businesses in business!
Sincerely,

Paige Bente

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!

7 Form Letters

Natural products

Stevenson, Todd

From: Clementine NW [brenna@clementinenw.com]
Sent: Tuesday, February 17, 2009 10:29 PM
To: Lead Determinations
Subject: CPSIA

Hello.

Thank you for the opportunity to comment on this matter. In addition to the materials exempted at present, I request that the Commission exempt the following:

- Any Natural Materials Regulated as Foodstuffs by the FDA. This includes vegetable and nut oils, grain flours, medicinal-grade mineral oil, table salt, flax seed, FDA-approved food coloring, cream of tartar, dried beans, dried corn, essential plant oils, herbs, witch hazel, millet, and FDA-approved food preservatives.
- Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
- Other Natural Materials which are not otherwise regulated but are known to not contain lead that are not currently exempted: paper, cardboard, bark, rattan, beeswax, natural rubber latex, lavender, 100% pure tung oil (in its cured form), milk paint (in its cured form), flower petals, dried plants, shellac (in its cured form), bamboo, bamboo fiber, plant-based dyes, nut shells, hide glue, Candelilla wax, Carnauba wax, loofa, jute, kapok, moss, straw, and jojoba oil.
- Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
- Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product and that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant

Sincerely,

Signature of Todd Stevenson
Clementine NW
1000 1st Street NW
Seattle, WA 98107
Phone: 206.461.1111
Fax: 206.461.1112

Stevenson, Todd

From: Tara Chatterton [shop@generationsboutique.com]
Sent: Tuesday, February 17, 2009 8:39 PM
To: Lead Determinations
Subject: A suggested comment on the CPSC's rule to exempt certain materials from testing.

Hi,

Thank you for the opportunity to comment on this matter. In addition to the materials exempted at present, I request that the Commission exempt the following:

- Any Natural Materials Regulated as Foodstuffs by the FDA. This includes vegetable and nut oils, grain flours, medicinal-grade mineral oil, table salt, flax seed, FDA-approved food coloring, cream of tartar, dried beans, dried corn, essential plant oils, herbs, witch hazel, millet, and FDA approved food preservatives.
- Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
- Other Natural Materials which are not otherwise regulated but are known to not contain lead that are not currently exempted: paper, cardboard, bark, rattan, beeswax, natural rubber latex, lavender, 100% pure tung oil (in its cured form), milk paint (in its cured form), flower petals, dried plants, shellac (in its cured form), bamboo, bamboo fiber, plant-based dyes, nut shells, hide glue, Candelilla wax, Carnauba wax, loofa, jute, kapok, moss, straw, and jojoba oil.
- Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
- All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
- Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product and that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant.

Thanks,

Tara

Tara Chatterton :: Owner

Mamababy
(GENERATIONS)

4029 SE Hawthorne Blvd.
Portland, OR 97214
503.233.8130 ph/fx
mamababyshop.com
shop@mamababyshop.com

Stevenson, Todd

From: Stephanie Stewart [stephanie@armbibs.com]
Sent: Tuesday, February 17, 2009 12:33 PM
To: Lead Determinations
Subject: exempt dyed textiles + EU and CE marked goods

I request that the CPSC adopt rules to exempt dyed textiles, that are understood to be lead and phthalate free, from the burdens of continuous testing, certification and permanently affixed labels. CPSIA desperately needs modifications to avoid causing catastrophic damage to untold numbers of small manufacturers operating in good faith, producing safe products.

My company manufactures a product that is just fibers and dye - not plastic, paint or metal fixtures. Yet, I have to test and third-party certify for both lead-content and for the presence of phthalates. Lead-content because it is a product marketed for children 12 and under; phthalates because it is a product marketed for the "care and feeding" of a person under 3. These two tests alone will make for a 50% increase in my cost of goods – and I haven't even begun to address the costs of meeting the new, permanently affixed labeling requirements (early estimates = an additional 50% increase in COG). I offer a product that common sense would tell us doesn't pose any lead or phthalate hazard. I've sacrificed profit margins to manufacture this product in the US, because I trust our safety standards more than I trust China's. But there is only so much the market will bear; will I have to cut costs by moving my production to China?

Exempting products like mine, that pose no known lead or phthalate contamination risk, will make all the difference in whether companies like mine remain viable concerns employing American labor, or *close* this year. In addition, exemptions for safe products will free up testing systems and enforcement efforts so that they may appropriately focus on more hazardous goods. The fastest path to the safest of goods is to focus on the known hazards.

In addition to dyed textiles, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product *as well as* rules that deem compliant those products manufactured under EU standards or bearing the CE mark.

Stephanie Stewart
Founder
www.armbibs.com

1121 SE 50th Ave
Portland, OR 97215
503-236-6190
stephanie@armbibs.com

Stevenson, Todd

From: Milagros [milagros@milagrosboutique.com]
Sent: Tuesday, February 17, 2009 11:32 AM
To: Lead Determinations
Subject: Section 101 Determinations of Certain Materials or Products NPR

Thank you for the opportunity to comment on this matter. In addition to the materials exempted at present, I request that the Commission exempt the following:

- Any Natural Materials Regulated as Foodstuffs by the FDA. This includes vegetable and nut oils, grain flours, medicinal-grade mineral oil, table salt, flax seed, FDA-approved food coloring, cream of tartar, dried beans, dried corn, essential plant oils, herbs, witch hazel, millet, and FDA-approved food preservatives.
- Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
- Other Natural Materials which are not otherwise regulated but are known to not contain lead that are not currently exempted: paper, cardboard, bark, rattan, beeswax, natural rubber latex, lavender, 100% pure tung oil (in its cured form), milk paint (in its cured form), flower petals, dried plants, shellac (in its cured form), bamboo, bamboo fiber, plant-based dyes, nut shells, hide glue, Candelilla wax, Carnauba wax, loofa, jute, kapok, moss, straw, and jojoba oil.
- Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
- All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
- Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product and that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant.

Thank you,

Tony Fuentes
Milagros, LLC
5433 NE 30th Avenue
Portland, OR 97211
503-493-4141

Stevenson, Todd

From: Jennifer Stickley [seasonsnaturaltoys@gmail.com]
Sent: Tuesday, February 17, 2009 12:36 PM
To: Lead Determinations
Subject: Comments

Thank you for the opportunity to comment on this matter. In addition to the materials exempted at present, I request that the Commission exempt the following:

- Any Natural Materials Regulated as Foodstuffs by the FDA. This includes vegetable and nut oils, grain flours, medicinal-grade mineral oil, table salt, flax seed, FDA-approved food coloring, cream of tartar, dried beans, dried corn, essential plant oils, herbs, witch hazel, millet, and FDA-approved food preservatives.
- Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
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- Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
- All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product and that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant.

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With Kind Regards,

Jennifer

Seasons Natural Toys

www.seasonsnaturaltoys.com

Stevenson, Todd

From: Lori [lori@misterjudy.com]
Sent: Tuesday, February 17, 2009 12:58 PM
To: Lead Determinations
Cc: Wendy Zerza
Subject: Section 101 Determinations of Certain Materials or Products NPR

Dear Sirs-

I am a small business owner and manufacturer of children's products in partnership with my sister. We feel that testing of materials which inherently do not contain lead is an expense that we cannot afford and will no longer be able to remain in business if such testing is required.

Here is a list of materials to add to your material exemption list:

1. Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
2. Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
3. All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
4. Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that clearly allow component testing for finished product in lieu of testing of the entire finished product. We also request that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant.

Best regards,

Lori

Lori Wahl
Mister Judy, LLC
Partner/Owner
phone- 503.236.2816
email- lori@misterjudy.com
Mister Judy

Stevenson, Todd

From: Jody Berry [dirtgirl@wildcarrotherbals.com]
Sent: Tuesday, February 17, 2009 1:39 PM
To: Lead Determinations
Subject: "Section 101 Determinations of Certain Materials or Products NPR."

Thank you for the opportunity to comment on this matter. In addition to the materials exempted at present, I request that the Commission exempt the following:

- Any Natural Materials Regulated as Foodstuffs by the FDA. This includes vegetable and nut oils, grain flours, medicinal-grade mineral oil, table salt, flax seed, FDA-approved food coloring, cream of tartar, dried beans, dried corn, essential plant oils, herbs, witch hazel, millet, and FDA-approved food preservatives.
- Any Materials Which are Regulated as Art Materials and Meet ASTM D-4236 Standards. These should not require additional testing.
- Other Natural Materials which are not otherwise regulated but are known to not contain lead that are not currently exempted: paper, cardboard, bark, rattan, beeswax, natural rubber latex, lavender, 100% pure tung oil (in its cured form), milk paint (in its cured form), flower petals, dried plants, shellac (in its cured form), bamboo, bamboo fiber, plant-based dyes, nut shells, hide glue, Candelilla wax, Carnauba wax, loofa, jute, kapok, moss, straw, and jojoba oil.
- Any and all Natural Materials which have been modified by the addition of other lead-free materials or lead-free chemicals. Even if the natural textiles are processed through the addition of chemicals, including pigments, dyes, bleaches, or other substances provided those chemicals either do not contain lead or do not introduce lead to the product above the CPSIA limits.
- All dyed or undyed textiles (cotton, wool, hemp, nylon, etc.), including children's fabric products, such as baby blankets, and non-metallic thread and trim.
- Reclaimed Textiles: These items would have met existing standards at the time of their original manufacture and because these remanufactured items are by definition one of a kind, testing of these reclaimed textiles should not be required.

In addition to these materials, I strongly encourage the Commission to adopt rules that allow component testing for finished product in lieu of testing of the finished product and that products that have been deemed compliant under EU standards and bear the CE mark as a result are deemed compliant.

Thank you very much,
Jody Berry

*Jody Berry
Wild Carrot Herbals, LLC
dirtgirl@wildcarrotherbals.com
phone: 800.988.4491
cell: 503.990.4342
fax: 503.835.2067
P.O. Box 494
Amity, OR 97101*

Life is not measured by the number of breaths we take, but by the moments that take our breath away.