

TEST REPORT

Mar. 17, 2025

LAB LOCATION: **REPORT NUMBER:** **VIET NAM**

EFFN25020823-CG-01

1 of 16

ISSUE DATE:

PAGE:

	OVERALL RATING	
PASS		X
FAIL		-
DATA		-

Applicant:	GIGACLOUD TECHNOLOGY (USA) INC				
Address:	4388 SHIRLEY AVE, EL MOI	NTE, CA	91731		
Contact:	LUNJIA LI				
TEL:	(626)912-8886 FAX: -				
E-mail:	ds@gigacloudtech.com sophiehuynh@husteel.vn				
Copy To:	-				

Retest		Previous Report No.: -	
Pre-Shipment Lead Test		Test for Protocol	FN-016; SP-014
Testing Status			
Date of Submission	Feb. 21, 2025	Test Performance Dates	Feb. 21, 2025
Reference item/ style number	-	Color	BLACK (AAB); WHITE (AAK); SILVER (AAN)
Code Number	-	Date of production	2025.02
Country of Origin	VIETNAM	Country of Destination	America
Buyer's Name	GIGACLOUD TECHNOLOGY(USA) INC	Manufacturer	H-U VIET NAM STEEL CO., LTD
Quantity	-	PO Number	Sample
Vendor style number	-		
Vendor Name	-	<u> </u>	
SKU	MF290425/ MF290426		
Style Number	Item 309T		
Sample Description	HOUSE BED		
Sample Information			



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 2 of 16

Sample Photo



EFFN25020823-CG-01

For and on behalf of

Eurofins MTS Consumer Product Testing Vietnam Ltd.

HARRY VU

HARDLINES LAB. ASSISTANT MANAGER





LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 3 of 16

EXECUTIVE SUMMARY:

TESTING RESULT SUMMARY							
Test Property	PASS	FAIL	DATA	COMMENTS			
FN-016-US_CN Bed (For Trundle and Regular Beds)	Х	-	-	-			
SP-014-US CPSIA Requirement	X	-	-	-			
Total Lead Content in Paint or Similar Surface Coating	Х	-	-	-			
Total Lead Content in Accessible Substrate	Х	-	-	-			

COMPONENT BREAKDOWN LIST:

Test Item	Component Description
01	Silvery metal with black plating (Big - Allen head bolt)
02	Silvery metal with black plating (Long - Allen head bolt) (Same item 01)
03	Silvery metal with black plating (Medium - Allen head bolt) (Same item 01)
04	Silvery metal with black plating (Short - Allen head bolt) (Same item 01)
05	Black plastic (Big Cap)
06	Black coating on metal (Bunk bed)
07	Silvery metal (Bunk bed)
08	Brown melamine with particle board backing
09	Particle board
10	White coating on metal (Bunk bed)
11	Silver coating on metal (Bunk bed)

Remark:

- (1) Test result was transferred from report# 76124-070088.
- (2) Test result was transferred from report# 76124-060934.
- (3) Test result was transferred from report# 76124-110119.
- (4) Test result was transferred from report# EFFN25020463-CG-01.

Eurofins MTS Consumer Product Testing Vietnam Ltd.

GR-HL-V1/15.12.2024





LAB LOCATION: **REPORT NUMBER:** **VIET NAM**

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 4 of 16

EXHIBIT BREAKDOWN:



TEST RESULT(S):

1. Total Lead Content in Paint or Similar Surface Coating - U.S. CPSC 16 CFR 1303 and U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101

Test Method: CPSC-CH-E1003-09.1. Analysis was performed by ICP-OES/ ICP-MS.

Test Item	Total Lead	Conclusion	
rest item	Result	Limit	Conclusion
06(4)	ND	90	PASS
10 ⁽¹⁾	ND	90	PASS
11 ⁽¹⁾	ND	90	PASS

Note:

ND = Not Detected (Lab reporting limit: 10 ppm)

ppm = part per million = mg/kg = milligram per kilogram





LAB LOCATION: VIET NAM ISSUE DATE: Mar. 17, 2025

REPORT NUMBER: EFFN25020823-CG-01 PAGE: 5 of 16

2. <u>Total Lead Content in Accessible Substrate – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101</u>

Test Method:

1) Metal components: CPSC-CH-E1001-08.3. Analysis was performed by ICP-OES/ ICP-MS.

2) Non-metal materials including plastics, glass and leather material: CPSC-CH-E1002-08.3. Analysis was performed by ICP-OES/ ICP-MS.

Toot Itom	Total Lea	Total Lead (Pb) (ppm)				
Test Item	Result	Limit	Conclusion			
01 ⁽⁴⁾	ND	100	PASS			
05 ⁽⁴⁾	ND	100	PASS			
07 ⁽⁴⁾	ND	100	PASS			
08 ⁽³⁾	ND	100	PASS			
09 ⁽³⁾	ND	100	PASS			

Note: ND = Not Detected (Lab reporting limit: 10 ppm)

ppm = part per million = mg/kg = milligram per kilogram



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 6 of 16

EXHIBIT(S):





Exhibit. 3



Exhibit. 4



Exhibit. 5



Exhibit. 6



Eurofins MTS Consumer Product Testing Vietnam Ltd.

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam Tel: (+84) 862896363 Fax: (+84) 862896262 Email: vncs@cpt.eurofinsasia.com Website: www.mts-global.com

GR-HL-V1/15.12.2024



TEST REPORT

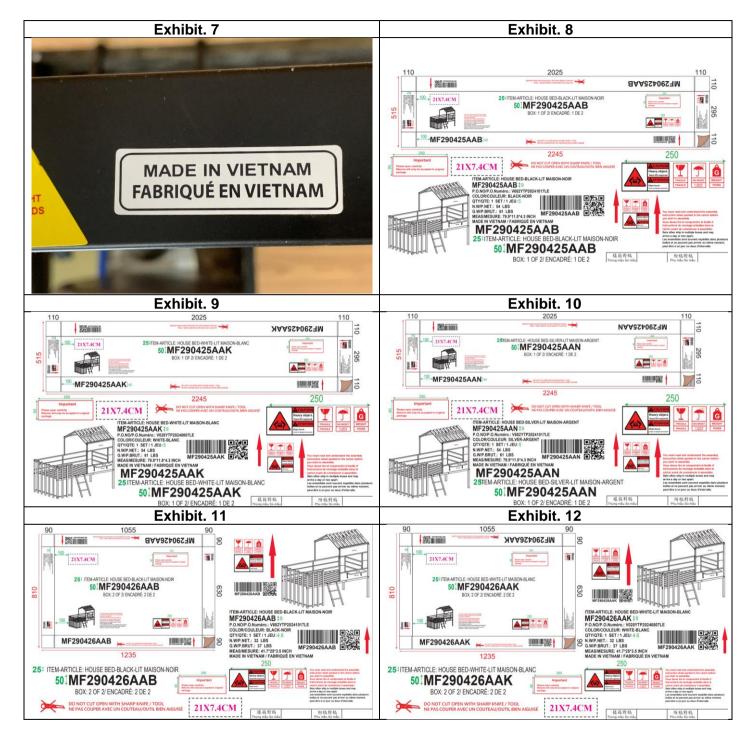
LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 7 of 16





TEST REPORT

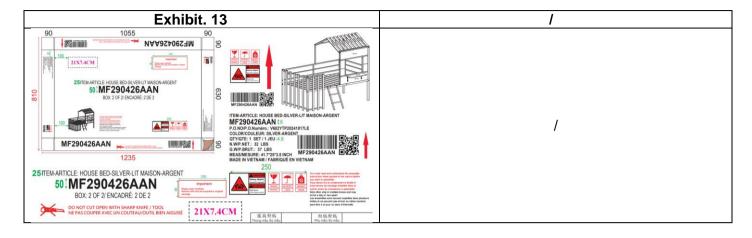
LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 8 of 16





TEST REPORT

LAB LOCATION: REPORT NUMBER:

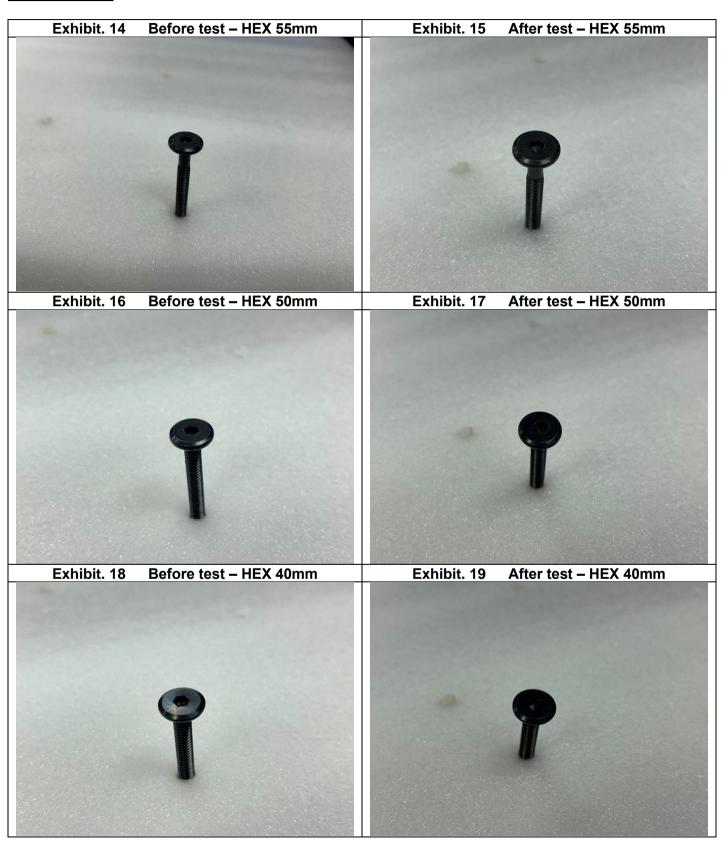
VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 9 of 16

Corrosion test:



Eurofins MTS Consumer Product Testing Vietnam Ltd.

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam Tel: (+84) 862896363 Fax: (+84) 862896262 Email: vncs@cpt.eurofinsasia.com Website: www.mts-global.com

GR-HL-V1/15.12.2024



TEST REPORT

LAB LOCATION: **REPORT NUMBER:** **VIET NAM**

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 10 of 16 Exhibit, 20 Before test - HEX 35mm Exhibit. 21 After test - HEX 35mm Before test - HEX 28mm Exhibit. 23 Exhibit. 22 After test - HEX 28mm Exhibit. 24 Before test - HEX 20mm Exhibit. 25 After test - HEX 20mm

Eurofins MTS Consumer Product Testing Vietnam Ltd.

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam Tel: (+84) 862896363 Fax: (+84) 862896262 Email: vncs@cpt.eurofinsasia.com Website: www.mts-global.com

GR-HL-V1/15.12.2024



TEST REPORT

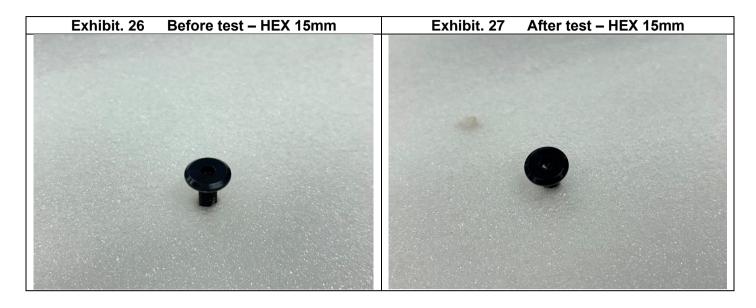
LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025

PAGE: 11 of 16





TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE:

PAGE:

Mar. 17, 2025

12 of 16

TSCA Title VI and CARB and SOR/2021-148 Declaration of Conformity

	on A – Samp tion must be com	le Information:
Sample	Description:	HOUSE BED
Item/SK	U Number:	MF290425 / MF290426
☐ Pa ☑ Fin	if the sample is a nel nished Good	SCA Title VI Applicability:
		pleted. The regulation can be viewed at: http://www.epa.gov/formaldehyde
		s not present in the sample. directly to Section C.
		s present in the sample and: if regulated and/or exempt. Then proceed to Section C.
		coording to 40 CFR 770 swer the following three questions and complete the chart in Section D.
	☐ Hardw ☐ Hardw ☐ Mediu ☐ Thin m	e type(s) of regulated composite wood (check all that apply): rood plywood – veneer core (HWPW-VC) rood plywood – composite core (HWPW-CC) m-density fiberboard (MDF) nedium-density fiberboard (Thin MDF) neboard (PB)
	Sampl	ninated product status under §770.4 (effective after March 22, 2024 for laminated portion): e is not a laminated product e is a laminated product and: Laminated portion is not exempt from the definition of hardwood plywood per §770.4 Laminated portion is exempt from the definition of hardwood plywood per §770.4(a)(1) Laminated portion is exempt from the definition of hardwood plywood per §770.4(a)(2)
	Sampl	d goods, indicate if labeling is present according to §770.45(c): e is not a finished good e is a finished good and: Labeling is not present Labeling is not present and not required per §770.45(e) Labeling is present
	Indicate the type	ed strand board d plywood (d) (e)(1)

Page 1 of 3



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE:

Mar. 17, 2025

PAGE:

13 of 16

TSCA Title VI and CARB and SOR/2021-148 Declaration of Conformity

	section to a CARB §93120 ATCM for Formaldenyde Applicability: section must be completed. The regulation can be viewed at: http://www.arb.ca.gov/toxics/compwood/compwood.htm
	cate if the sample will be sold in California. If "No" is checked, complete Section D if necessary from Section B, then seed to Section E. If "Yes" is checked, complete the remainder of this section. No Yes
	Composite wood is not present in the sample. If checked, proceed directly to Section E.
	Composite wood is present in the sample and: If checked, indicate if regulated and/or exempt. Then proceed to Section E.
	Regulated according to the ATCM. If checked, answer the following two questions and complete the chart in Section D.
	1. Indicate the type(s) of regulated composite wood (check all that apply): Hardwood plywood – veneer core (HWPW-VC) Hardwood plywood – composite core (HWPW-CC) Medium-density fiberboard (MDF) Thin medium-density fiberboard (Thin MDF) Particleboard (PB)
	For finished goods, indicate if labeling is present according to §93120.7(d):
	Exempt according to the ATCM. Indicate the type(s) of exempt composite wood (check all that apply): Hardboard Oriented strand board Curved plywood §93120.7(b)(1) §93120.7(b)(2)(A) §93120.7(b)(2)(B) Other List other type(s) of exempt composite wood and explain exemption:
All fie	etion D –Regulated Composite Wood Details: elds in this section must be completed if regulated composite wood is present in the sample as declared in Section B or Section C. Upon completion of this section, proceed to Section E.
Hard Med Thin	al Types and Emission Limits Reference: dwood plywood (HWPW) ≤ 0.05 ppm ium-density fibreboard (MDF) ≤ 0.11 ppm medium-density fibreboard (Thin MDF) ≤ 0.13 ppm icleboard (PB) ≤ 0.09 ppm Examples of resin type include but are not limited to: No-added formaldehyde-based (NAF) resin Ultra low-emitting formaldehyde (ULEF) resin Phenol-formaldehyde resin

Page 2 of 3



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE:

PAGE:

Mar. 17, 2025

14 of 16

TSCA Title VI and CARB and SOR/2021-148 Declaration of Conformity

Component of sample where composite wood is round:	Panel Type:	Emission Limit Met (ppm):	Resin Type:	Mill Name:	TPC Name:	TPC #:
Panel wall of the house	PB	≤ 0.09 ppm	NAF	VINA ECO BOARD CO., LTD	SGS Hong Kong Ltd	TPC -14

Section E - Declaration Signature:

This section must be completed. Print name and provide a signature/ company chop.

19 CFR 12.121 TSCA compliance statement

Supplier to check the box if they agree with the statement

 \boxtimes I CERTIFY THAT ALL CHEMICAL SUBSTANCES IN THIS SHIPMENT COMPLY WITH ALL APPLICABLE RULES OR ORDERS UNDER TSCA AND THAT I AM NOT OFFERING A CHEMICAL SUBSTANCE FOR ENTRY IN VIOLATION OF TSCA OR ANY APPLICABLE RULE OR ORDER THEREUNDER.

- EPA TSCA Title VI / 40 CFR 770 is understood and if applicable, portions relevant to this sample have been met.
- CARB §93120 ATCM for Formaldehyde is understood and if applicable, portions relevant to this sample have been met.
- If a Third Party Certifier (TPC) is identified, it has been recognized by EPA and/or CARB.
- The required sections of this form have been completed accurately and truthfully.

Company Name: CÔNG TY TNHH THÉP H-U VIỆT NAM

Company Address: Lô F17, đường N4, KCN Nam Tân Uyên mở rộng, phường Hội Nghĩa, thành phố Tân

Uyên, Bình Dương

Date: Mar 06, 2025

Name: SHE CHUN TAI

Title: GIÁM ĐỐC

CÔNG TY TNHƯ THÉP THU VIỆT NMI She Chun Tai

Signature:

Page 3 of 3





LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN25020823-CG-01

ISSUE DATE:

Mar. 17, 2025

PAGE: 15 of 16



Eurofins MTS Consumer Product Testing Vietnam Ltd.

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam Tel: (+84) 862896363 Fax: (+84) 862896262 Email: vncs@cpt.eurofinsasia.com Website: www.mts-global.com

GR-HL-V1/15.12.2024



REPORT NUMBER:

Modern Testing Services



LAB LOCATION: VIET NAM

EFFN25020823-CG-01

ISSUE DATE: Mar. 17, 2025
PAGE: 16 of 16

NOTE:

The test results are considered as conform to specification based on the general consideration simple acceptance as stated in ISO/IEC GUIDE 98-4:2012.

If there is question or concern regarding the above results, please contact the appropriate lab person below:

Technical questions:

Primary Contact: Allen Hsu

Tel: +84-28-6289-6363 Ext: 127

Back-up Contact: Harry Vu

Tel: +84-28-6289-6363 Ext: 175

Email: Allen.Hsu@cpt.eurofinsasia.com

Tel: +84-28-6289-6363 Ext: 175

Email: Harry.Vu@cpt.eurofinsasia.com

Concerns About Billing and General Inquiries:

Primary Contact: Vincent Pham

Tel: +84-28-6289-6363 Ext: 114

Email: Vincent.Pham@cpt.eurofinsasia.com

Tel: +84-28-6289-6363 Ext: 123

Email: Wendy.Do@cpt.eurofinsasia.com

This test report is governed by the Terms and Conditions, available on request or attached to the end of this test report. Attention is especially drawn to the limitations of liability, indemnification and jurisdictional provisions defined therein. This report is issued strictly based on the testing of the samples submitted by you. The test results in this report refer only to the sample(s) actually tested and do not refer or be deemed to refer to any bulk production from which such sample(s) may be said to have been obtained. In the event that Eurofins MTS Consumer Product Testing (Vietnam) Co. Ltd ("ERF") was requested to survey and test any bulk production quantity of samples, ERF, in the absence of any contrary written instructions, performed random sampling of bulk production for testing purposes. Variations in the conditions under which samples are stored, transported, etc., may lead to variations in the test results. ERF cannot anticipate and shall not be held responsible for variations in test results that may be due to factors beyond ERF' control, such as, sample cross-contamination, evaporation of volatile substances due to storage temperature, humidity, etc. This report does not constitute a recommendation, actual or implied, for any specific course of action. Other than the expressed warranties made in the Terms and Conditions of the ERF Test Request Form, ERF makes no warranties or representations either express or implied with respect to this report. In no circumstances whatsoever shall ERF be liable for any consequential, special or incidental damages arising out of, or in connection with, this report.



SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 2025	Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	REQUIREMENT RESULT		COMMENTS
			Pass	Fail	
SUPPLEMEN	ITAL PROTOCOLS				
SP-572-US	* California Proposition 65	Shall be reviewed against the requirements of California proposition 65 to determined if additional testing or labeling is required.	-	-	NA
SP-014-US	* CPSIA Requirements	Shall meet the applicable requirement as specified.	Х		See protocol SP-014-US
TX-990-US	* Law Label	All samples shall be reviewed against the requirements of Law Label Tag supplemental protocol to determine if additional testing or labeling is required.	-	-	NA
SP-301-US	* Flammability for Upholstered Furniture (CPSC / California Bureau Of Household Goods And Services) (For all states of US)	Shall comply with applicable requirements in supplemental protocol.	-	-	NA
SP-300- US/CN	Upholstery Fabrics, Leather, Vinyl (Indoor/Outdoor)	Shall comply with applicable requirements in supplemental protocol.	-	1	NA
	· · · · · · · · · · · · · · · · · · ·	may be required if testing to 1 or more			ntal protocol is necessary.
LABELING					
16 CFR 500 and Uniform Laws and Regular	** Labeling - Packaging F.P.&L. Act (16 CFR 500) OR All other Products: NIST Uniform Laws	[US] Distributor's Name & Address (City, State & Zip) (See Minimum Labeling Requirements)	Х		
handbook 130	and Regular Handbook 130	[US] Product Identification	Х		
		[US] Net Quantity of Contents Shall Be Expressed In Terms Of Weight Or Mass, Measure, Numeric Count or combination so as to give accurate information to Facilitate consumer comparison (US & Metric).	Х		
19 CFR 134	** Country of Origin	[US] Shall indicate country of origin legibly, permanently, and in comparable size and close proximity to any mention of country other than country in which the article was manufactured or produced. Must be visible at point of purchase.	х		

Latest revision: 15 Mar 2023 Page 1 of 12



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT		JLTS	COMMENTS
			Pass	Fail	
Consumer packaging and labeling act R.S., 1985, c. C- 38	** Product Identity	[CN] English and French, PDP, Bold, 1.6mm minimum type size	-	-	NA
Consumer packaging and labeling act R.S., 1985, c. C- 38	** Product Net Quantity	[CN] Declaration must be in English and French, metric units, on PDP, bold, type size based on PDP size Principal Display Panel Minimum Type <32cm² (5in.²) 1.6mm (1/16in.) >32 but < 258cm² 3.2mm (1/8in.) (40in.²) >258 but < 645cm² 6.4mm (1/4in.) (100in.²) >645 but < 25.8dm² 9.5mm (3/8in.) (400in.²) >25.8dm² (400in.²) 12.7mm (1/2in.)	,	-	NA
Consumer packaging and labelling act R.S., 1985, c. C- 38	** Manufacturer or distributor's name and place of business - city and zip	l` '_		-	NA

Latest revision: 15 Mar 2023 Page 2 of 12



SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	25 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RES	JLTS	COMMENTS
			Pass	Fail	
Canada Customs Tariff, Marking of Imported Goods Regulations, SOR-94-10 / Marking of Imported Goods Memorandu m D11-3-1	** Country of origin marking	[CN] a) Imported goods shall indicate country of origin. b) Must be legible and sufficiently permanent to remain on the goods until it reaches the purchaser. c) For goods from NAFTA countries, the language may be English, French or Spanish. d) For goods from non-NAFTA countries, language may be English or French and marking should appear on individual articles. e) If the packaging conceals the Country of Origin mark, then the packaging must also be marked. f) There is a provision to mark only the container providing that certain conditions are met, such that the ultimate purchaser will see the marked container.	-	-	NA
Consumer Packaging and Labeling Regulations, C.R.C., c. 417 section 6	** Labeling - Packaging	[CN] All mandatory labeling information must be shown in both French and English languages. The type of mandatory labeling that is required includes, but is not limited to, any written statement or warning, product identity, net content and ingredient declarations. The names and address of the manufacturer and country of origin labeling requirements may be presented in either French or English. Other supplemental label information that is considered to be nonmandatory (e.g. directions for use) also does not have to appear in a bilingual manner. However, manufacturers are encouraged to include such information in a bilingual format if plausible.	-	-	NA
Quebec, R.S.Q., c. C- 11	** Labeling - Charter of French Language	[CN] Every inscription on a product, on its container or on its wrapping, or on a document or object supplied with it, including the directions for use and the warranty certificates, must be drafted in French. The French inscription may be accompanied with a translation or translations, but no inscription in another language may be given greater prominence than that in French.	-	-	NA



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT		JLTS	COMMENTS
			Pass	Fail	
H-10004	Use Labeling	Use / care instructions that are clear and understandable shall be provided in language appropriate to destination countries.	Х		
Visual	Verify Label Claims	Must Comply with All Claims	Х		
40 CFR 770	** EPA TSCA title VI-Composite wood-Declaration form and mill certification	[US] If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, B, and E of the Sample Declaration Form must always be completed. If regulated composite wood is not present in the sample, result is N/A. If regulated composite wood is present in the sample: Section D of the Sample Declaration Form must also be completed Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased All information on the certificate shall be consistent with the Sample Declaration Form Notes: Include a copy of the Sample Declaration Form in the report Regulated composite wood includes: Hardwood plywood (HWPW) Medium-density fiberboard (MDF) Thin medium-density fiberboard (Thin MDF) Particleboard (PB) Mill certificate that denotes compliance with CARB's ATCM for formaldehyde will be accepted in lieu of a certificate denoting compliance with TSCA Title VI until March 22, 2019	X		Document is provided
	** EPA TSCA title VI-Composite wood-Declaration form and mill certification (Continued)	Rating Schedule: On or before May 31, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as data On or after June 1, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail	×		Document is provided



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RES	JLTS	COMMENTS
			Pass	Fail	
40 CFR 770.45(c) & (e)	** EPA TSCA Title VI–Composite wood-Finished good labeling	[US] Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c) unless the finished good qualifies for the de minimis exception found in 40 CFR 770.45(e). • A finished good does not require labeling per 40 CFR 770.45(c) if the finished good does qualify for the de minimis exception in 40 CFR 770.45(e). If the finished good does qualify for the de minimis exception, result is N/A. • A finished good does require labeling per 40 CFR 770.45(c) if the finished good does not qualify for the de minimis exception in 40 CFR 770.45(e). - At a minimum, the label must be on the product OR the packaging - The label may be applied as a stamp, tag, or sticker - The label shall include, at a minimum, in legible English text: 1. Fabricator's name 2. Date the finished good was produced (in month/year format) 3. A statement of compliance to denote that the finished good complies with TSCA Title VI Example: XXX Company MMYYYYY EPA TSCA Title VI compliant for formaldehyde	X		

Latest revision: 15 Mar 2023 Page 5 of 12



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 2025	Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESULTS		COMMENTS
			Pass	Fail	
	** EPA TSCA Title VI–Composite wood-Finished good labeling (Continued)	Notes: A de minimis amount of regulated composite wood is defined as regulated composite wood content not exceeding 144 square inches, based on the surface area of the largest face of the finished good. The de minimis exception is not available to finished goods or component parts that are designed to be used in combination or in multiples to create larger surfaces, finished goods, or component parts. When a statement of compliance is necessary, a statement of compliance that denotes the finished good complies with CARB's ATCM for formaldehyde will be accepted in lieu of a TSCA Title VI compliance statement until March 22, 2019. Rating Schedule: On or before May 31, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as data On or after June 1, 2018: Compliant submission shall be rated as pass Non-compliant submission shall be rated as fail	X		

Latest revision: 15 Mar 2023 Page 6 of 12



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESULTS		COMMENTS
			Pass	Fail	
Title 17, CA Code of Regulations §93120	** CARB–Composite wood- Declaration form and mill certificate	[US] If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, C, and E of the Sample Declaration Form must always be completed. If regulated composite wood is not present in the sample, result is N/A. If regulated composite wood is present in the sample: Section D of the Sample Declaration Form must also be completed. Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased. All information on the certificate shall be consistent with the Sample Declaration Form. Notes: Include a copy of the Sample Declaration Form. Notes: Regulated composite wood includes: Hardwood plywood (HWPW) Medium-density fiberboard (MDF) Thin medium-density fiberboard (Thin MDF) Particleboard (PB)	X		Document is provided
Title 17, CA Code of Regulations §93120.7(d)	** CARB–Composite wood- Finished good labeling	[US] Finished goods containing regulated composite wood shall comply with the labeling requirements for fabricators found in §93120.7(d). • A finished good containing regulated composite wood requires the following: - At a minimum, the label must be on the product OR the packaging - The label shall be applied as a stamp, tag, sticker, or bar code - The label shall include, at a minimum: 1. Fabricator's name 2. Date the finished good was produced (in month/year format) 3. A statement of compliance to denote that the finished good complies with the ATCM Example: XXX Company MM/YYYY California 93120 phase 2 compliant for formaldehyde	X		



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 2025	Finish Date:	Mar. 17, 2025	Result Reviewed by:	НА

TEST CODE	TESTED PROPERTY	REQUIREMENT	RES	ULTS	COMMENTS
			Pass	Fail	
	** CARB–Composite wood- Finished good labeling (Continued)	Notes: If a finished good is labeled with the EPA compliance statement, a separate statement of compliance to the CARB ATCM is not required. It is not required for the label to state the level of emissions (Phase 2, NAF, ULEF). Labels for finished goods should not include the number of the TPC associated with the composite wood products contained in the finished good.	X		
ANALYTICA	<u></u>				
CPSC-CH- E1003-09.1	* Total lead content in surface coatings	All accessible surface coatings in the as received state on items shall not contain lead or lead components in which the lead content is in excess of 0.009% (90ppm) of the weight of the total content. Report actual results or include data table within report. Component testing is allowed. Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed.	X		See Test Result

Latest revision: 15 Mar 2023 Page 8 of 12



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

Canada Surface Coating Materials Regulations (SOR/2016- 193) section 2 & 6 Applicable for: (1) Paint & similar material (varnish, lacquer, etc.) sold in containers and purchased at retail; (2) A sticker, film or other similar material that can be removed, or a surface coating material, that is applied to an accessible part of the following products: (a) Furniture (b) Children's Product (toys, playing/learning devices, furniture, and other articles, etc.) (c) Pencils (d) Art Brushes * Total mercury content in sticker, film or other similar material that can be removed, or a surface coating material, that is applied to an accessible part of the following products: (a) Furniture (b) Children's Product (toys, playing/learning devices, furniture, and other articles, etc.) (c) Pencils (d) Art Brushes * Total mercury content in surface Coating Materials	RES	ULTS	COMMENTS
Surface Coating Materials Regulations (SOR/2016- 193) section 2 & 6 Coating Materials Applicable for: (1) Paint & similar material (varnish, lacquer, etc.) sold in containers and purchased at retail; (2) A sticker, film or other similar material that can be removed, or a surface coating material, that is applied to an accessible part of the following products:	Pass	Fail	
Surface surface coating materials Surface coating materials Surface coating material shall not contain mercury in excess of 10 mg/kg when a dried sample of it is tested.	-	-	NA
Regulations (SOR/2016- 193) section 5 Report actual results or include data table within report. Composite up to 3 colors is allowed. If any color in the composite exceeds 80% of the limit based on the lowes weight component, individual colors will be analyzed. Note: - Applicable to a paint or other similar material that is in its own container and dries to a solid film when a layer of it is applied to a surface. Not applicable to materials that become part of the substrate.	-	-	NA



SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 2025	Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT		JLTS	COMMENTS
		•		Fail	
Visual	Design or features	Design and features of the product should not differ from color box pictures, enclosed instructions, or approval sample in a way that is misleading.			
H-20001	Dimensions (L x W x H) (cm)	Report overall dimensions; shall meet label claims (If applicable) (-0% / +5%).	-	-	No claim Record: 198 x 136 x 193.7 cm
H-20001	Dimensions of mattress support frame (L x W x H)	Report actual; shall meet label claims (If applicable) (-0% / +5%).	-	-	No claim Record: 194 x 99 x 53 cm
H-20001	Weight (kg)	Report overall weight; shall meet label claims (If applicable) (-0% / +5%).	-	-	Data Net Weight: 86 lbs
Visual	Accessories	Report all submitted accessories such as carrying bags, carrying straps, pouches, hole covers, end caps, casters, levelers, drawer glides, drawer stops, mounting hardware, hooks, pegs, hardware provided, anchors, screws, etc. Shall comply with any claims.	-	-	No claim Record: Hardware
CONSTRUCT	I TION QUALITIES & WORKM	ANSHIP			
16 CFR 1500.48 and 1500.49 (Mod.)	Sharp Points/Sharp Edges	Shall have no sharp edges or sharp points on any component other than those required for functional use (Mod. = Expanded scope to other products)	х		
Visual Check	Defects	Shall have no discernible surface degradation, including crazing, shivering, denting, bubbles, cracks, stains, deformations, chips, fractures, heavy lines, waves, shear marks, scratches, scuff marks, indentations, or blisters.	х		
Visual Check	Workmanship	Shall have no components missing, malformed, and/or fractured.	х		
PERFORMAN	NCF				
	Functionality	Shall function as intended as received.	Х		
H-41012	Effects of Extreme temperature	24 Hours at -32° F and 140° F - No failure or visual change (Report piece/section/ whole unit placed in Chamber) <i>Note: When pieces/Section were tested, to be sure the tested part should be properly cover/protected in cutting process.</i>	Х		

Latest revision: 15 Mar 2023 Page 10 of 12



SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESULTS		COMMENTS
			Pass Fail		
H-41007	Effect of Humidity	No Change after 24 Hours at 95% RH and 100 °F - Also. If pieces/sections were tested, list which piece/section, indicate pass or fail for each piece/section, and include before and after pictures of each piece/section. Note: When pieces/Section were tested, to be sure the tested part should be properly cover/protected in cutting process.	X		
ASTM B117- 19 modified	Resistance to corrosion	[Applicable to samples / sample components constructed of metal or samples with metallic coatings that can be exposed to the environment] Shall withstand 24 hours in 1% salt spray (fog) with no noticeable oxidation / corrosion changes. Modification = 1% salt spray (fog).	х		
Actual Use	Cycling Test	Shall function as intended after operation for 100 cycles	-	-	NA
Scratching	Surface scratching - wood panel	No scratching of surface (3 cycles of 6" back and forth)	х		
H-41063	Moisture Content (%) (Wood Only)	Shall be between 8%-12%. Report the actual moisture content.	-	-	NA
ASTM D5034	Cap removal strength - caps on end of tube or cap covers on screw ends	Shall not separate minimum holding force @ 5.0 lbs. Modification = Expanded scope to other products.	Х		
H-41030	Distributed load capacity test	No structural failure or greater than 1/4 inch permanent deformation after loading for 60 minutes Single - 500 lbs Full/Queen/King - 800 lbs Modification = Expanded scope to other products	х		Single 500 lbs

Latest revision: 15 Mar 2023 Page 11 of 12



SUMMARY OF TEST RESULTS FOR

FN - 016 - US / CN

Bed (For Trundle and Regular Beds)

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RES	JLTS	COMMENTS
			Pass	Fail	
H-43012	Distributed Load Test (For storage units, except magazine, shoe, coat or wine racks)	Apply distributed test loads to all units, elements, and top surface. There shall be no structural failure or permanent deformation greater than 1/4inch. < 8 in. Depth (3 lbs X Shelf / Top Width) 8 - 16 in. Depth (5 lbs X Shelf / Top Width) > 16 in. Depth (7 lbs X Shelf / Top Width) or 1.5 x Claimed Capacity Report load for each element and total load on unit for period of 60 minutes, 24 hours for pegs.	X		Load: 56.25 lbs
H-43012	Display Shelf Loading (For light weight or glass shelves intended only for display of small or light items)	Shall withstand distributed loading of 1.5 times claimed capacity or (if no claim made) 1.5 lb per inch of width, with no structural failure or permanent deformation greater than 1/4 inch. Report test load used.	-	-	NA
H-41033	End Drop Test	No breakage or separation; One end dropped from 10" (Unit fully assembled). Modification = Expanded scope to other products.	Х		

IMPORTANT NOTICE: Please review the Actual Products against the updated Requirements/Regulation. Prior to testing and communicate with clients if additional test required. This protocol is the basic guidelines to follow and does not replace the content of the standard.

Note: It is the Vendor's responsibility to ensure that the products comply with all local laws, regulations and ordinances of Countries and States where products will be sold. A Pass Lab test result does not constitute a certification that a vendor's products meet all legal requirements. It is the vendor's responsibility to manufacture their items to comply with all applicable laws and in conformance with the purchase order terms and conditions.

Key:

*Additional Charge For This Test

**Mandatory Requirement

Latest revision: 15 Mar 2023 Page 12 of 12

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 2025	Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESULTS		COMMENTS
			Pass	Fail	
SCOPE: This	protocol applies to toys, c	hildren products and child care articl	es as defi	ned by CP	SIA. all furniture.
	ult furniture, and household			,	, · · ,
	EQUIREMENTS				
Consumer	* Tracking labels for children's	A permanent and distinguishing mark or			
Product Safety Improvement Act of 2008	products	code on the product and its packaging, to the extent practicable, allows the manufacturer and purchaser to ascertain the name of the manufacturer or private labeler, location and date of production of the product. Verified the Presence and verified the format accuracy. If internal coding is used, de-code system shall also be submitted for verification. Note: Internal coding for manufacturer	X		
		or private labeler on the tracking label is not accepted.			
CPSIA section 104(d) / 16 CFR 1130	* Registration for durable nursery product	Consumer registration requirement: Required to provide consumers with a postage-paid consumer registration form with each such product and to permanently place the manufacturer name and contact information, model name and number, and the date of manufacture on each durable infant or toddler product. Requirements for registration form: The registration form shall (A) include spaces for a consumer to provide the consumer's name, address, telephone number, and e-mail address; (B) include space sufficiently large to permit easy, legible recording of all desired information; (C) Be attached to the surface of each durable infant or toddler product so that, as a practical matter, the consumer must notice and handle the form after purchasing the product; (D) include the manufacturer's name, model name and number for the product, and the date of manufacture; (E) include a message explaining the	-	-	NA
		and the date of manufacture;			



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

Client Code:	Local	_Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RES	ULTS	COMMENTS
			Pass	Fail	
CPSIA section 104(d) / 16 CFR 1130	* Registration for durable nursery product (Continued)	(F) include an option for consumers to register through the Internet; and (G) include a statement that information provided by the consumer shall not be used for any purpose other than to facilitate a recall of or safety alert regarding that product. "Durable infant or toddler product" means full-size cribs and nonfull-size cribs, toddler beds, high chairs, booster chairs, hook-on chairs, bath seats, gates and other enclosures for confining a child, play yards, stationary activity centers, infant carriers, strollers, walkers, swings, bassinets and cradles, children's folding chairs, changing tables, bouncers, infant bath tubs, bed rails and infant sling.	-	-	NA
ANALYTICAL	-				
Consumer Product Safety Improvement Act of 2008 / 16 CFR 1303 / AOAC 974.02(mod)	* Total lead content in surface coatings	All accessible surface coatings, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead or lead components in which the lead content is in exceed of 0.009%(90ppm) of the weight of the total content. In case of insufficient coating for testing found on number of samples specified in the protocol, vendor needs to provide additional samples for testing. Report actual results or include data table within report. Report actual results or include data table within report lssue a third party test report. Component testing is allowed. Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72ppm), based on the lowest weight component, individual colors will be analyzed.	×		See Test Result



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	25 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	ROPERTY REQUIREMENT RESU		ULTS	COMMENTS
			Pass	Fail	
Consumer Product Safety Improvement Act of 2008 / 16 CFR 1303 / AOAC 974.02(mod)	* Total lead content in surface coatings	All accessible surface coatings in the assembled state on adult furniture [exempt factory applied coatings on metal components/parts] and household paint shall not contain lead or lead components in which the lead content is in exceed of 0.009% (90ppm) of the weight of the total content. In case of insufficient coating for testing found on number of samples specified in the protocol, vendor needs to provide dipped parts or components/parts for testing. Report actual results or include data table within report Issue a program audit report Component testing is allowed Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72ppm), based on the lowest weight component, individual colors will be analyzed	-	-	NA
Consumer Product Safety Improvement Act of 2008	* Total lead content in substrates	All accessible substrates, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead in excess of 0.01% (100ppm) of the weight of the total content. In case of insufficent material for testing found on number of damples specified in the protocol, vendor needs to provide components/parts for testing. Report actual results or include data table within report. Issue a program audit reprot (until December 2011). Component testing is allowed. Compositing up to 3 like materials is allowed except metal.	×		See Test Result



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

CPSIA Requirement (Supplement)

Client Code: Local Technician: William Report Number: EFFN25020823-CG-01
Start Date: Feb. 21, 2025 Finish Date: Mar. 17, 2025 Result Reviewed by: HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESI	JLTS	COMMENTS
			Pass	Fail	
Consumer Product Safety Improvement Act of 2008	metal jewelry	Any accessible metal component of items intended for children ages 12 and under shall not contain lead in excess of 0.03% (300ppm) of the weight of the total content. Note: The lead limit will be reduced, if technologically feasible, to 0.01% (100ppm) on Aug. 14, 2011. Components composed of surgical steel, stainless steel within UNS \$13800 – \$66286, excluding 303Pb (UNS \$30360); gold (at least 10 karat), sterling silver (at least 925/1000), platinum, palladium, rhodium, osmium, iridium, ruthenium, and titanium are exempt. Any non-precious metal components such as solder, base metal in electroplate and fill are not included in these exemptions and must comply. Report actual results or include data table within report Issue a third party test report Compositing is not allowed Component testing is not allowed Documentation of component testing is not allowed		-	NA



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

Client Code:	Local	Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	25 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	TESTED PROPERTY REQUIREMENT		ULTS	COMMENTS
			Pass	Fail	
Consumer Product Safety Improvement Act of 2008 / 16 CFR 1307 / CPSC CH-C1001- 09.3 (Mod)		Children's toys and childcare articles, before and after use and abuse testing, shall not contain concentrations of more than 0.1% BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP or DCHP individually. Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber) (excluding materials listed below), plasticizer print, scrapable surface coatings, decals, polymeric coated materials (unscrapable), adhesives and sealants (exclude adhesive for stickers), toy nail polish, reusable packaging, electrical plug and cables. Polypropylene (PP), polyethylene (PE), acrylonitrile butadiene styrene (ABS), general purpose polystyrene (MIPS), highimpact polystyrene (SHIPS), and super highimpact polystyrene (SHIPS), and their additives as listed in 16 CFR 1308 are exempt from testing, however, they are not exempt from compliance or certification. If material identification is not provided, phthalate testing will be conducted on all plastic materials. Vendor shall be responsible for the compliance of all other accessible materials, including additives in the exempt plastic materials.	-	-	NA
	* Phthalates content (Continued)	In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing. Report actual results or include data table within report. Component testing is allowed. Compositing up to 3 like materials is allowed. Product manufactured and imported as of April 25, 2018 must comply.	-	-	NA



EUROFINS MTS TEST PROTOCOL

SUMMARY OF TEST RESULTS FOR

SP - 014 - US

CPSIA Requirement (Supplement)

Client Code:	Local	_Technician:	William	Report Number:	EFFN25020823-CG-01
Start Date:	Feb. 21, 202	5 Finish Date:	Mar. 17, 2025	Result Reviewed by:	HA

TEST CODE	TESTED PROPERTY	REQUIREMENT	RESULTS		COMMENTS
_	•		Pass	Fail	

Definitions of CPSC Terminologies for CPSIA Phthalate Test:

IMPORTANT NOTICE: Please review the Actual Products against the updated Requirements/Regulation. Prior to testing and communicate with clients if additional test required. This protocol is the basic guidelines to follow and does not replace the content of the standard. (For Silverware additional test should be included)

Note: It is the Vendor's responsibility to ensure that the products comply with all United States Federal, States, and local laws, regulations, and ordinances. A Pass Lab test result does not constitute a certification that a vendor's products meet all legal requirements. It is the vendor's responsibility to manufacture their items to comply with all applicable laws and in conformance with the purchase order terms and conditions. Key:

*Additional Charge For This Test

**Mandatory Requirement

^{1. &}quot;Children's Toy" means a consumer product designed or intended by the manufacturer for a child 12 years of age or younger for use by the child when the child plays per CPSC Draft Guidance of CPSIA section 108 refer to the use of ASTM F963.

^{2. &}quot;Child care article" means a consumer product designed or intended by the manufacturer to facilitate sleep, or the feeding of a child 3 years of age or younger or to help such children with sucking or teething. Products used directly in the mouth by the child are primary products and are subject to the regulation. Products that have direct contact with the child, but may or may not have direct mouth contact, would also be considered primary products. Products that are not necessarily in direct physical contact with the child, but are in close proximity to the child may or may not be subject to the regulation per CPSC Draft Guidance of CPSIA section 108. Products that are used by the parent, but have no contact with the child, are considered secondary products and would be not be subject to regulation per CPSC Draft Guidance of CPSIA section 108. Products that are used by the parent, but have no contact with the child, are considered secondary products and would not be subject to regulation per CPSC Draft Guidance of CPSIA section 108.