

Labelling of Hazardous Art Materials Act LHAMA Assessment

Product Name: Drawing pigment
Region of Destination: US
Target consumers: Age above 3 years old
Applicant Name: Da Guan Trading Co., Limited
Applicant Address: 29-31 Cheung Lee Street, Chai Wan, Hong Kong Island, Hong Kong
Receiving Date: Mar 27, 2026

Summary of Ingredient Review:

Based on the information provided by the client and when used under intended use of reasonably foreseeable misuse, the product conforms the following requirements:

Items	Result
US Labeling of Hazardous Art Materials Act LHAMA (Public Law 100- 695), Standard Practice for Labeling Art Materials for Chronic Health Hazards ASTM D-4236	This product conforms the safety requirements outlined in ASTM D-4236-94.

Mandatory warning statement

Conforms to ASTM D-4236.

Avoid contact with eyes. If the product gets into eyes, rinse well with water immediately.

Reviewer

Signed on behalf of STANDARDS COMPLIANCE AND TECHNOLOGY(INTERNATIONAL) CO LIMITED



LAKSHMINARAYANA M.
B. Pharm, M. Pharm, DABT, ERT, UKRT
Registered Toxicologists



Date: 01-04-2026

Background

This product was evaluated by a toxicologist according to the above requirements.

No impurities or contaminants from the product or ingredients were provided for assessment. Potential physical hazard and physical injury (e.g. flammability, choking hazard or mechanical irritation), environmental hazard and detailed labelling requirements (i.e., label content, prominence, placement, and conspicuousness, and any relevant exemptions) beyond any necessary hazard warning guidance on the product were not evaluated.

This TRA is based on information disclosure by the client at the time of this assessment. It should be updated upon any change in the formulation, change in use pattern or upon knowledge of additional toxicological information. SCTC will not be held reliable for any injury or damage resulting from the use of this product.

Composition of the product

This product contains 28 variants (RED GRAY-1, RED GRAY-2, RED GRAY-3, YELLOW GRAY-1, YELLOW GRAY-2, YELLOW GRAY-3, BROWN GRAY-1, BROWN GRAY-2, BROWN GRAY-3, WARM GRAY-1, WARM GRAY-2, WARM GRAY-3, GREEN GRAY-1, GREEN GRAY-2, GREEN GRAY-3, BLUE GRAY-1, BLUE GRAY-2, BLUE GRAY-3, PURPLE GRAY-1, PURPLE GRAY-2, PURPLE GRAY-3, COOL GRAY-1, COOL GRAY-2, COOL GRAY-3, Vermilion, Cad.Red, cobalt blue, Cad.Yellow). The composition is not disclosed as per client's request considering protection of business confidentiality. For any queries concerning the formulation of the product, please contact the client. In case of medical events, it is the client's responsibility to provide the formulation details to a patient's physician in order to diagnose or treat cases of exposure without prior written authorization.

Detailed information on the safety, and toxicology of the ingredients has been reviewed.

Exposure assessment

The following assumptions have been made for assessment of exposure based on EU Scientific Committee on Consumer Safety (SCCS) opinion notes of guidance 12th revision, EPA exposure handbook 2011 and A.S. Ficheux et al. 2016:

- Target consumers: Age above 3 years old
- Intended use and reasonably foreseeable use: This is toy product and intended to be played by children.
- Exposure Route(S): Dermal, primarily by hands
- Physical state: Liquid
- Net quantity: 3 ml
- Product use per day: As per net quantity
- Exposure area: 460 cm²
- Exposure duration: To be removed after played
- Body weight: 18.6 kg
- Retention factor: 0.01
- Calculated relative daily exposure: 1.61 mg/kg bw/day

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Toxicological risk assessment

Available data from the U.S. National Toxicology Program, the World Health Organization's International Agency for Research on Cancer IARC, the U.S. National Cancer Institute, U.S. National Library of Medicine's toxicology databases, EU Scientific Committee on Consumer Safety (SCCS) opinions, Cosmetic Ingredients Review (CIR), ECHA registration dossier and widely accepted scientific literatures were compiled for assessment. Apart from that, the physical & chemical form of the product, chemical composition of the product, concentration in the product, bioavailability and potential exposure to users under the intended and foreseeable conditions of use were also considered for the assessment.

All significant toxicological routes of absorption have been considered as well as the systemic effects. Where applicable, Margin of Safety (MoS) has been calculated for all ingredients except those which No Observed Adverse Effect Levels (NOAELs), or other suitable Points of Departure (PoD) were not available for review. The MoS values for these ingredients were well above 100 to indicate they are systemically safe for use in the product. For those materials where a Margin of Safety (MoS) was not derived, they are all common cosmetic & food ingredients with extensive history of safe usage and considered to be Generally Recognized as Safe (GRAS) in either direct food use or indirect food uses. Furthermore, a number of ingredients are present at or below the recommended safe levels as established by bodies such as the Scientific Committee on Consumer Safety (SCCS) or Cosmetic Ingredients Review (CIR) expert panel, or maximum legal limits from the relevant regulations.

The Responsible Person/manufacturer must ensure that all ingredients are of suitably grade and manufactured to ensure that any residues and impurities are not exposed at level that would cause local and/or chronic toxicity on humans.

The product contains 3-Iodo-2-propynyl-butylcarbamate IPBC which is a skin sensitizer based on humans and/or laboratory animal studies. US CIR Expert Panel considered that the available irritation and sensitization data do not suggest that IPBC is unsafe for use in cosmetic products at concentrations up to 0.05%. The concentration is below the threshold sensitization limit not to present a risk of inducing allergy, but extremely rare event of causing adverse reaction on people already sensitized could not be ruled out. The identity of these ingredients is recommended to be shown on the label, enabling those potentially affected to avoid contact.

Carbon black is classified as possible carcinogenic to human (Group 2B) in the powder form via inhalation by the IARC. However, this product is in the format of solid. As such, the likelihood of the product being inhaled is negligible thus the inhalation toxicity potential is low.

Titanium dioxide is classified as carcinogenic cat. 2 in the powder form containing 1 % or more of particles with aerodynamic diameter $\leq 10 \mu m$ via inhalation according to ECHA C&L inventory. It is also classified as possible carcinogenic to human (Group 2B) via inhalation by the IARC. So, the manufacturer/Responsible person must ensure to avoid the use of titanium dioxide of respirable particle size as per EU requirement. Since the product is in the format of liquid, the likelihood of the

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product being inhaled is negligible thus the inhalation toxicity potential is low.

This product contains Pigment Violet 3 and Pigment Blue 1 which are eye irritation substance. As this product is not intended to apply on eyes, so it is not expected to cause eye irritation. However, accidental exposure to eyes could not be ruled out, so warning is necessary to alert the user.

To sum up, it is unlikely to cause chronic effect through skin under normal and reasonably foreseeable conditions of use.

Labelling

This product must carry the following statement on the product label conspicuously and legibly.

- Conforms to ASTM D-4236.
- Avoid contact with eyes. If the product gets into eyes, rinse well with water immediately.

Conclusion

According to the Labeling of Hazardous Art Material Act (LHAMA), this product is unlikely to pose a chronic health effect on majority of consumers under normal and reasonably foreseeable condition of use. It conforms with applicable criteria outlined in ASTM D-4236.

***** End of Report *****

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(SDS)

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Applicant: Da Guan Trading Co., Limited

Address: 29-31 Cheung Lee Street, Chai Wan, Hong Kong Island, Hong Kong

Sample name: drawing pigment

Issue date: Jan. 15, 2026

Test Requested: As specified by the client, This Material safety data sheet was prepared in accordance with UN GHS Rev.8, The EU CLP REGULATION (EC) No 1272/2008. Please refer to the attached report for details.

Dongguan City Tianrun Testing Technology Co.,Ltd.



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Safety Data Sheet

Section 1 - Chemical Product and Company Identification

Product Name: drawing pigment

Manufacture: Da Guan Trading Co., Limited

Address: 29-31 Cheung Lee Street, Chai Wan, Hong Kong Island, Hong Kong

Section 2 - Hazards Identification

GHS/CLP Hazard Categories:The product is not classified according to the GHS/CLP regulation.

Pictograms:None

Hazard information:None

Invasion route: None

Health hazards:Under the normal condition of application,contact do not cause absorption hazard and irritate.

Storage:

Store in a well-ventilated place.

Disposal:

Dispose of contents / containers in accordance with local / regional / national / international regulations.

Section 3 - Composition/Information on Ingredient

Pure Admixture

Composition:

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Blue	OZOKERITE	12198-93-5	20	Not classified
	Cellulose CM	9000-11-7	5	Not classified
	Magnesium stearate	557-04-0	5	Not classified
	Talc	14807-96-6	5	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Raw Ocher 191	Gum arabic	9000-01-5	72.15	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Pigment Yellow 43	64294-91-3	13.12	Not classified
	Pigment Yellow 42	51274-00-1	8.75	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Yellow Green 115	Gum arabic	9000-01-5	76.34	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Pigment Orange 13	3520-72-7	10.47	Not classified
	Pigment Yellow 3	6486-23-3	6.98	Not classified
	Pigment Green 7	1328-53-6	0.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Ocher 193	Gum arabic	9000-01-5	73.6	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Umber	12713-03-0	13.62	Not classified
	Ferric oxide	1309-37-1	6.8	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Burnt Umber 194	Gum arabic	9000-01-5	74.85	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Umber	12713-03-0	14.49	Not classified
	Iron(III) oxide	1309-37-1	1.56	Not classified
	Pigment Yellow 42	51274-00-1	3.12	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Vandyke Brown 196	Gum arabic	9000-01-5	73.77	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Umber	12713-03-0	16.68	Not classified
	Ferric oxide	1309-37-1	3.57	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Dark Brown 195	Gum arabic	9000-01-5	71.71	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Umber	12713-03-0	22.31	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Permanent Rose 032	Pigment Violet 19	1047-16-1	12.47	Not classified
	Pigment Violet 1	1326-03-0	2.5	Not classified
	Gum arabic	9000-01-5	79.05	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Vermilion 014	Gum arabic	9000-01-5	76.4	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	BBN	7585-41-3	7.9	Not classified
	Pigment Yellow 1	2512-29-0	7.9	Not classified
	Pigment Yellow 3	6486-23-3	1.82	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Orange 076	Pigment Yellow 168	71832-85-4	1.19	Not classified
	Pigment Orange 13	3520-72-7	14.89	Not classified
	Gum arabic	9000-01-5	77.94	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Orange Red 025	Gum arabic	9000-01-5	74.86	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Pigment Orange 13	3520-72-7	15.33	Not classified
	C.I.Pigment Red 4	2814-77-9	3.83	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Pale Red 197	Gum arabic	9000-01-5	76.1	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Iron(III) oxide	1309-37-1	17.92	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Cad.Red Light 017	Pigment Red 48:1	7585-41-3	7.31	Not classified
	Pigment Yellow 168	71832-85-4	8.36	Not classified
	Gum arabic	9000-01-5	78.35	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Indigo152	Gum arabic	9000-01-5	72.62	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Vat Blue 4B	2475-31-2	17.98	Not classified
	Pigment Green 7	1328-53-6	3.42	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Prussian blue 149	Gum arabic	9000-01-5	78.81	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Pigment Blue 27	12240-15-2	15.21	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Permanent Yellow 063	Pigment Yellow 65	6528-34-3	19.63	Not classified
	Gum arabic	9000-01-5	74.39	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Yellow Orange 024	Pigment Yellow 1	2512-29-0	13.55	Not classified
	Pigment Yellow 3	6486-23-3	2.71	Not classified
	Pigment Orange 13	3520-72-7	1.36	Not classified
	Gum arabic	9000-01-5	76.4	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Light Yellow 053	Gum arabic	9000-01-5	79.18	Not classified
	Cutamol NNO	36290-04-7	3.7	Not classified
	Glycerol	56-81-5	2.31	Not classified
	Pigment Yellow 1	2512-29-0	6.17	Not classified
	Pigment Yellow 17	4531-49-1	6.17	Not classified
	Pigment Yellow 3	6486-23-3	2.47	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Gamboge 061	Pigment Yellow 65	6528-34-3	9.67	Not classified
	Pigment Yellow 17	3520-72-7	9.67	Not classified
	Gum arabic	9000/1/5	74.86	Not classified
	Cutamol NNO	36290-04-7	3.57	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Yellow Ochre 071	Gum arabic	9000-01-5	76.23	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Pigment Yellow 42	51274-00-1	6.67	Not classified
	Pigment Yellow 42	51274-00-1	11.12	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Chrome Green 092	Pigment Green 7	1328-53-6	15.97	Not classified
	Pigment Yellow 17	4531-49-1	5.32	Not classified
	Gum arabic	9000-01-5	72.73	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Ultramarine 146	Gum arabic	9000-01-5	79.08	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified
	Umber	71798-70-4	0.29	Not classified
	Pigment Blue 29	57455-37-5	14.65	Not classified

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Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
Crimson lake 018	BBC	7023-61-2	14.38	Not classified
	Gum arabic	9000-01-5	79.64	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Chemical Name		CAS No.	In % By Weight	Classification and hazard labeling
	Pigment Green 7	1328-53-6	5.95	Not classified
	Gum arabic	9000-01-5	88.07	Not classified
	Cutamol NNO	36290-04-7	3.75	Not classified
	Glycerol	56-81-5	2.23	Not classified

Section 4 - First Aid Measures

Skin contact: Remove contaminated clothes and rinse the skin with plenty of water and soap, clean clothes before wearing.

Eyes contact: Lifting the upper and lower eyelids, flush the eyes with plenty of water or saline water.

Inhalation: Under normal circumstances will not inhalation.

Ingestion: Ingestion discomfort, get medical aid.

Section 5 - Fire Fighting Measures

Danger characteristic: Non flammable and explosive dangerous goods.

Fire-fighting method: The staff must equip with isolated breathing apparatus, wear clothes which can defense fire and toxic gases. Put out the fire in the upwind direction. Remove the container to the open space as soon as possible.

Fire extinguishing agent: Foam, Powder, CO₂, Sandy clay.

Section 6 - Accidental Release Measures

Methods for cleaning up: Material is non-hazardous, can be collected. Dispose of this product according to all national, state, and local regulations where applicable. Small amount of divulgence: Clean off. Collecte in a dry, clean, covered container and transferred to safe place; Massive divulgence: Recycle or transport to waste treatment place for handling.

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Section 7 - Handling and Storage

Handling: Supply with sufficient partial air exhaust. The operating staff must have received special training and abide by the operating regulations. It is advised that the staff wear appropriate personal protective equipment. Keep away from the fire source, heat source, no smoking in the work place. Take care when lifting and handling in case of damaging the package. Equip with relevant types and quantities of extinguishment instruments and device for divulgence handling.

Storage: Keep in sealed container, place in a cool dry place.

Section 8 - Exposure Controls, Personal Protection

Occupational exposure limit:

MAC(mg/m3):No information

TWA(mg/m3):No information

STEL(mg/m3):No information

Engineering control: The production process space is closed, need to strengthen the ventilation. Make sure that there is a wash and shower in the vicinity of the workplace. Set emergency evacuation routes.

Respiratory Protection: No protection in normal situation. High concentration contact can wear on the filter type gas mask.

Eyes Protection: No protection in normal situation. Wear protective glasses if necessary.

Body Protection: Wear work clothes.

Hands Protection: Wear protective gloves.

Other Protections: No smoking, dining and drinking water in the workplace. Keep good habit of hygiene.

Section 9 - Physical and Chemical Properties

Appearance:Solid

Colour:Multicolor

PH:N/A

Melting point/range:N/A

Density:N/A

Oxidising properties:N/A

Solubility in water:N/A

Partition coefficient(n-octanol / water):N/A

Evaporation rate:N/A

Odour:Odourless

Boiling point/range:N/A

Flashpoint:N/A

Viscosity:N/A

Vapour pressure:N/A

Vapour density:N/A

Ignition temperature:N/A

UEL:N/A

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Section 10 - Stability and Reactivity

Stability: Stable under normal temperature and pressure

Distribution of Ban: Strong oxidizing agent, strong acid

Conditions to Avoid: None

Hazardous Polymerization: None

Decomposition products: In normal condition of storage and use, hazardous decomposition products should not be produced.

Section 11 - Toxicological Information

Acute Toxicity: No known significant effects or serious harm.

Sub-acute and Chronic Toxicity: No known significant effects or serious harm.

Irritation: No known significant effects or serious harm.

Sensitization: No known significant effects or serious harm.

Mutagenicity: No known significant effects or serious harm.

Carcinogenicity: No known significant effects or serious harm.

Section 12 - Ecological Information

Ecological toxicity: None

Persistence and degradation: No information

Potential bioaccumulation: No information

Migration in soil: No information

Other harmful effects: None

Section 13 - Disposal Considerations

Disposal method: Recycle or dispose of waste in compliance with current legislation, preferably via a certified collector.

Disposal considerations: Choose to have certified disposal contractor.

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Section 14 - Transport Information

The product as a non restricted goods transport.

UN number:None

Risk classification:Non-dangerous goods.

Land Transport ADR/RID:Not regulated for transport of dangerous goods.

Maritime Transport IMO/IMDG:Not regulated for transport of dangerous goods.

Air Transport IATA/ICAO:Not regulated for transport of dangerous goods.

Packaging Information: Packing according to customer requirements.

Transport Fashion:By sea、By air、By rail、By highway

Transport Attentions: No collapse or no damage during the course of transportation. Corresponding varieties and number of fire equipment and contingency processing equipment should be equipped during the course of transportation. Strictly prohibit put the goods together with oxidizer, acid, etc. for transport. During transport, the goods should prevent exposure, rain and high temperature. Keep away from fire.

Section 15 - Regulatory Information

Regulatory Information:

ISO 11014-2009 Safety data sheet for chemical products - Content and order of sections.

Regulation (EC) No. 1272/2008 Classification, Labeling and Packaging of Substances and Mixtures.

《Dangerous Goods Regulation》

《International Maritime Dangerous Goods》

Section 16 - Additional Information

The above information is based on the data of which we are aware and is believed to be correct as of the data hereof. Since this information may be applied under conditions beyond our control and with which may be unfamiliar and since data made available subsequent to the data hereof may suggest modifications of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

End of MSDS