



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **School Supplies 2021**

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### **Lead and Cadmium in School Supplies**

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<sup>1</sup> <https://apps.ecology.wa.gov/ptdbreporting/>

# **School Supplies 2021**

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## **Lead and Cadmium in School Supplies**

by

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The following document is a technical memorandum originally sent to the Washington State Attorney General's Office on August 31, 2022. The technical memo is a non-standard report, and includes additional information and appendices not included in a standard report format. Data provided and summarized in this technical memo is publicly available from Ecology's Product Testing Database. The federal Consumer Product Safety Commission (CPSC) sets limits on lead and cadmium. Data and product information for those products identified in this study to contain levels of lead and/or cadmium exceeding federal limits were submitted to the CPSC.

# Table of Contents

<b>Background</b> .....	<b>4</b>
<b>Methods</b> .....	<b>4</b>
Methods for Selecting Products.....	5
Online Purchases – Amazon.com.....	5
Retail Store Purchases – Dollar Tree.....	6
Sample Processing.....	6
Data Entry Review by Project Manager.....	7
Laboratory Analysis.....	8
Data Quality.....	8
Data Usability.....	8
<b>Results and Discussion</b> .....	<b>9</b>
Summary of Results for 2021 Study.....	9
Online Purchases - Amazon Products.....	10
Retail Store Purchases - Dollar Tree Products.....	10
Study Files (sent separately).....	11
Product Testing Database data files.....	11
Web screen recordings.....	11
Product photos.....	12
<b>References</b> .....	<b>12</b>
<b>Appendix A. Data Summary for 2021 Study</b> .....	<b>13</b>

## Acronyms/abbreviations used frequently in this document:

ASIN	Amazon Standardized Identification Number
CSPA	Children’s Safe Products Act
Ecology	Washington State Department of Ecology
MEL	Manchester Environmental Laboratory
PTDB	Product Testing Database
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
UPC	Universal Product Code

# Background

The Washington State Department of Ecology (Ecology) frequently performs studies to support the Children's Safe Products Act (CSPA, RCW 70A.430). Studies are designed to select, purchase, and analyze children's products for the presence of toxic chemicals, including chemicals of high concern to children (CHCCs, WAC-173-334). The CSPA sets limits on the use of lead, cadmium, and six phthalates in children's products sold in Washington or to residents of Washington.<sup>2,3</sup>

In 2015, Ecology's Product Testing Program conducted a study to support the CSPA. Lead levels in three pencil pouches and two book covers were found to be higher than the CSPA limit of 90 parts per million (ppm) for lead in the 2015 Back to School seasonal study<sup>4</sup> (Trumbull et al., 2017).

In 2017, 2018, and 2019, the Attorney General's Office and Ecology partnered to conduct additional studies to assess the levels of lead and cadmium in school supply products (Sekerak, 2017; Sekerak, 2019; Trumbull, 2019).

The Attorney General's Office and Ecology partnered again in 2021 to continue investigating lead and cadmium in school supply products. This technical memorandum describes the purchasing process, discusses data quality, and summarizes the data for the 2021 lead and cadmium in school supplies study. Along with delivery of this technical memorandum, Ecology will transfer product information, photos, web screen recordings, and test data to the Attorney General's Office.

## Methods

Ecology's project manager wrote a Quality Assurance Project Plan (QAPP) that was approved by Ecology's Quality Assurance (QA) Officer prior to conducting the 2021 product purchasing, sample preparation, lab analysis, and data reporting (Trumbull, 2022). The QAPP outlines the purchasing strategy, methods of sample processing and analysis, quality objectives, quality control, study timeline, budget, and method of data reporting. Ecology personnel followed standard operating procedures (SOPs) and QAPP-specified methods for the final data discussed in this technical memorandum.

Minor deviations from the QAPP are noted in the following discussion. Deviations occurred around product availability, the product purchasing process, and laboratory sample preparation. These deviations did not adversely affect the study data quality.

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<sup>2</sup> Under CSPA, manufacturers are also required to report to Ecology if any of their children's products contain CHCCs. In 2017, CSPA was amended to include limits on five flame retardants in children's products and residential upholstered furniture.

<sup>3</sup> When federal law violations are suspected, data and product information from Ecology-tested products are forwarded to the United States Consumer Product Safety Commission (CPSC) for review under the Consumer Product Safety Improvement Act (CPSIA).

<sup>4</sup> The 2015 study also tested for cadmium, but levels were not found higher than the 40 ppm CSPA limit in children's products.

## Methods for Selecting Products

Data from previous school supplies studies were used to prioritize product selection for this 2021 study (Trumbull, 2022). School supply products that were detected to contain lead and/or cadmium<sup>5</sup> in previous studies were prioritized for purchasing, if available. Product branding, Universal Product Codes (UPCs), unique product item numbers, unique naming, and/or design schemes and color patterns from previously tested products were used to determine products for the 2021 testing. After a reasonable effort was made to purchase the priority products, similar products by brand, manufacturer, or style, and some new school supplies, not previously tested, were purchased.

All online products were purchased through Amazon.com. These included (1) products from third-party sellers and fulfilled directly by the third party, (2) products from third-party sellers and fulfilled by Amazon.com, and (3) products from Amazon and fulfilled by Amazon.com.

All retail store products were purchased at Dollar Tree stores. In 2019, an assessment was conducted to select four Dollar Tree stores in vulnerable communities in Washington for purchasing school supply products (see Appendix B in Trumbull, 2020). For this 2021 study, two Dollar Tree stores were selected from the 2019 assessment. The project manager selected the second highest Environmental Justice (EJ) Index result from cities in two Ecology regions: Kent (northwest) and Tacoma (southwest). Products purchased from the Dollar Tree stores consisted of those prioritized for follow-up testing, if available, as well as several new products not previously tested.

When purchasing new products, Ecology personnel followed the children's product selection process used in previous studies.<sup>6</sup> New products purchased had designs, themes, or bright colors appealing to children or were packaged or marketed in a manner indicating they were designed for a child 12 years of age or younger.

### Online Purchases — Amazon.com

A total of 24 products were purchased through Amazon.com during three purchasing events on August 12 and 13, 2021 (designated Group A, Group B, and Group C). Details of the online purchases are available in the Appendix, Table A-1. Screen-recording videos were taken for all three online purchasing events.

During the three online purchasing events from Amazon.com, 25 products were initially selected, but only 24 products were received and payment finalized. One product (a cute white panda pencil case) was automatically canceled by Amazon because the seller did not confirm shipment of the order within 30 days.

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<sup>5</sup> Detections above the CSPA limits of 90 ppm for lead and 40 ppm for cadmium are used to characterize a product as a priority target product.

<sup>6</sup> Both the CSPA and CPSIA guidance were employed. We deferred to the broadest definition when the criteria differed. For example, when applying age determination, we used the CPSIA "12 years of age or younger" (16 CFR § 1200.2) criteria versus CSPA's "under the age of 12."

Product orders arrived at Ecology Headquarters (HQ) in Lacey, Washington via the United States Postal Service (USPS), United Parcel Service (UPS), FedEx, or JCEX shipping in intact packages during August 17 to 31, 2021. Images of the intact packages, along with packaging labels, were captured before opening the package. These images document that all packages received by Ecology's product testing personnel were intact upon arrival to Ecology HQ. Some minor damage to some packages was observed: small rips or tears in plastic packaging, cardboard box dented or torn, and/or packaging tape slightly ripped. All products were inspected, and many were received in additional plastic packaging. All products were deemed usable as received.

Online products were reconciled with order records upon delivery to confirm receipt and approve payables. The outermost packaging information was copied or cut from the shipping box or bag and stored with the product. Some products received were not identical, but were similar, to the picture of the product online. The discrepancy was documented in the notes for two products (AM-45-4 and AM-46-5).

- Spiderman Team Up Pencil Case, AM-45-4: The Spiderman graphic and style of pencil case received was different from the product picture when purchased online.
- Disney Princess Pencil Cases (2 Pieces), AM-46-5: The Disney princess graphic for the two pencil cases was different from the product picture when purchased online.

The products and all accompanying product-specific information were placed in clean, labeled sample bags and stored in plastic totes. Totes were labeled according to purchase event and stored in restricted-access, locked cabinets in Ecology's product testing room.

### **Retail Store Purchases — Dollar Tree**

A total of 25 products were purchased at two Dollar Tree retail stores in Washington, on August 10, 2021 (see Appendix, Table A-1). Thirteen school supply products were purchased at the Dollar Tree store in Kent and 12 products were purchased at the Dollar Tree store in Tacoma.

During retail store purchasing events, photos were taken to document store marketing. The two Dollar Tree stores had sections or aisles dedicated to school supplies and displayed signage reading "Back to School."

Upon return to Ecology, Ecology personnel closed the chain-of-custody log and copied receipts for attachment to Ecology's Product Testing Database (PTDB). Individual products were separated into clean, labeled sample bags and stored in labeled totes in restricted-access, locked cabinets in Ecology's product testing room.

### **Sample Processing**

Ecology personnel followed procedures for sample processing as referenced in the QAPP (Trumbull, 2022). All study products were stored in locked, restricted-access cabinets when not being processed. Products and accompanying product information were documented in Ecology's internal PTDB. Unique product IDs, generated by the PTDB, were used to label the sample bags containing the product or products (for sets or packs). When available, product packaging, packing slips, and online order records were stored with the products. Photos were



taken of the product, product packaging, and some individual product components. Scanned copies of packaging, packing slips, receipts, and product photos were cataloged in the PTDB.

Before screening or sample processing began, individual product components were identified and recorded in the PTDB. X-Ray Fluorescence (XRF) screening was performed on all products purchased to identify components for potential lab analysis. XRF screening was conducted following the standard operating procedure (SOP) cited in the QAPP (Trumbull, 2022).

Product components from products were identified for potential sample selection by XRF screening if they contained levels of lead, cadmium, or both metals, near or higher than the CSPA restriction limit.

A total of 50 product components (or composite of components) were selected as samples for laboratory analysis:

- 26 samples from Amazon.com products.
- 24 samples from Dollar Tree products.

The 50 product component samples (13 fabric<sup>7</sup>, 8 plastic, and 29 metal) were size-reduced and placed in pre-cleaned certified glass jars for transport to the lab. Six of the 50 samples consisted of composited material of similar matrix. Composite samples were prepared to replicate processing done in the previous lead and cadmium in school supplies studies or were necessary to meet minimum weight requirements for lab preparation and analysis.

Samples were delivered via courier to Ecology's Manchester Environmental Laboratory (MEL) on March 31, 2022. Delivery of samples met all chain-of-custody requirements for the study.

All study products and accompanying product information remain in locked restricted-access cabinets at Ecology HQ for the duration of the 2021 study.<sup>8</sup>

## **Data Entry Review by Project Manager**

The project manager conducted the final review on all data entries and lab data in the PTDB for the 2021 school supplies study. When additional product information was identified and available, it was added to the PTDB. These included:

- Additional product photos.
- Copies of packing slips and packing receipts that displayed the source of information entered into the database.
- Product-specific Amazon Standardized Identification Numbers (ASINs).

ASINs were pulled from the screen recordings collected during the purchasing events from Amazon.com. ASINs were listed in the web address, or Uniform Resource Locator (URL), for each product purchased from Amazon.

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<sup>7</sup> Components cataloged as fabric mostly appear to be made of woven synthetic polymers rather than natural-fiber fabrics.

<sup>8</sup> Products will remain in this condition until approval is given by the AGO for transfer or disposal.

## Laboratory Analysis

Ecology's MEL prepared samples in one work order (WO) and four lab batches by microwave acid-assisted (less hydrofluoric acid) digestion following U.S. Environmental Protection Agency (EPA) Method 3052. Analyses were performed on the inductively coupled plasma mass spectrometer (ICP-MS) following EPA Method 6020B. Instruments were calibrated with National Institute of Standards and Technology (NIST) traceable standards and were verified with a second-source NIST traceable standard. All standard residuals and instrument calibration (initial and continuing) verification checks were within acceptance limits.

## Data Quality

The project manager received a laboratory case narrative, data verification report, and laboratory data analysis report from MEL by email on April 28, 2022; this was identified as WO 2203076. The electronic data deliverable was received through Ecology's internal PTDB on April 29, 2022. A final revised laboratory case narrative and the QA Coordinator's data verification report was received on May 16, 2022. Table A-2 (Appendix) summarizes the final data. MEL's final case narrative, data verification report, and lab data analysis report are provided as a separate study file.

MEL's case narrative and data verification report provide a discussion and assessment of the data quality, methods of analysis, instrument calibration, and quality control. All analyses were in accordance with the technical specifications, methods, and quality assurance/quality control requirements of MEL methods and the study's QAPP (Trumbull, 2022).

## Data Usability

The project manager performed the final assessment of lab data after receiving MEL's case narrative, data verification report, and lab data analysis report.

At the request of the project manager, the case narrative for WO 2203076 and data verification report were revised on May 16, 2022, to include a discussion on the loss of two sample during the sample preparation method.

During lab sample preparation (the acid digestion before lab analysis), sample 2203076-25 (DT-30-11-4) and sample 2203076-26 (DT-30-13-7) were spilled; therefore, none remained for lab analysis. Additional sample material was available to perform another acid digestion for sample 2203076-25 (DT-30-11-4), and the results were reported. There was no additional sample material available to perform another acid digestion for sample 2203076-26 (DT-30-13-7), and no results were reported. Lead and cadmium results are reported for 49 of the 50 product samples submitted to the lab.

All results without qualifiers are valid and useable as reported. Results with qualifiers and measurement quality objectives not met are discussed below.

Sample results with “U” qualifier indicate that concentrations were not quantified above the adjacent numeric reported concentration. The “U” sample results occurred when concentrations were not found above the reporting limit. The reporting limit of 1.00 mg/kg was met with the following exceptions:

- The processed product component sample weight was below the minimum quantity needed to achieve the target reporting limit for analysis.
- The sample was analyzed at a dilution, and the reporting limit was adjusted for the dilution level.

Matrix spike (MS) and matrix spike duplicate (MSD) recoveries did not meet the acceptance limit for lead in two samples: sample 2203076-10 (AM-46-1-1) contained 1,720 mg/kg lead, and sample 2203076-31 (AM-45-3-8) contained 663 mg/kg lead. The standard matrix spiking level was insufficient for the elevated concentration of lead in the component samples; therefore, results were not qualified on this basis. Lead was positively identified at a concentration well above the 90 mg/kg CSPA lead limit in both samples, and the results are useable.

## Results and Discussion

### Summary of Results for 2021 Study

Table A-2 (Appendix) summarizes the results for the product component samples tested. A total of 50 samples were submitted for laboratory analysis. The laboratory reported lead and cadmium results for 49 of the 50 samples. In all, 49 product component samples from 37 products were tested. A total of 31 of these products were pencil pouches/cases (25 purchased as the pouch/case alone and six as part of a set), four were backpacks (three purchased individually and one as part of a set), and two were lunch bags (one purchased individually and one as part of a backpack set).

A total of 41 of 49 product component samples contained lead, cadmium, or both metals, at concentrations higher than the reporting limit (1.0 mg/kg) or adjusted reporting limit. Detected concentrations of lead ranged from 1.01 to 4,710 mg/kg, and cadmium concentrations ranged from 1.30 to 958 mg/kg. Of 49 product component samples, 24 (49%) from 18 products contained lead, cadmium, or both metals, higher than the respective CSPA limits<sup>9</sup> of 90 mg/kg for lead and 40 mg/kg for cadmium.

The study’s highest detection of lead (4,710 mg/kg) was in the *Monster High Backpack and Lunch Bag Set — Lunch Bag — Internal Black Seam Tape* (AM-45-11-39). The study’s highest detection of cadmium (958 mg/kg) was in the *Monster High Pink Pencil Case — Internal Black Seam Tape* (AM-45-1-9).

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<sup>9</sup> The lower CSPA limits of 90 ppm for lead and 40 ppm for cadmium are used in the discussion, instead of the CPSIA limits of 100 ppm and 75 ppm for lead and cadmium, respectively.

## Online Purchases — Amazon Products

A total of 26 product component samples from 18 products purchased through Amazon.com were tested. Of the 26 product component samples, 16 samples from 11 products contained lead, cadmium, or both metals, above the respective CSPA limits of 90 mg/kg for lead and 40 mg/kg for cadmium.

Most of these 11 school supply products appear to be the same or very similar to products tested in Ecology's previous school supplies studies (Sekerak, 2017; Sekerak, 2019; Trumbull, 2019).

- The Mattel *Monster High Pink Pencil Case* contained lead and cadmium above the CSPA limits in the internal black seam tape (AM-45-1-9). Also, the internal black seam tape (AM-45-11-39) and internal black plastic liner (AM-45-11-40) from the lunch bag as part of the Mattel *Monster High Backpack and Lunch Bag Set* had lead and cadmium above the CSPA limits.
- The metal zipper slider and pull on both the EatFishinSea *Sad Cat Pencil Pouch* (AM-45-2-8) and X-dolls *Cute Cat Pencil Pouch* (AM-45-3-8) were above the CSPA limit for lead.
- The metal zipper pull (AM-45-7-55) on a yellow heart pouch from the Inkology *Assorted Pink and Yellow with Dots and Hearts 3-Ring Pencil Pouches (8 Pieces)* set contained lead above the CSPA limit.
- The Dreamworks *Trolls Family Lunch Bag* contained lead and cadmium above the CSPA limits in the internal white seam tape (AM-45-9-12).
- The black backpack material (AM-45-10-1) and external black USB outlet holder (AM-45-10-27) on the UPSTORE *Black Shark Backpack with USB Outlet* were above the CSPA limit for lead. Also, the upper white zipper pull strap 1 (AM-45-10-8) on this backpack contained lead and cadmium above the CSPA limit.
- The Boonafit *Purple 3-Ring Pencil Pouch* contained lead above the CSPA limit in the purple pouch material (AM-46-1-1).
- The black metal zipper slider (AM-46-3-43) on a purple pouch from the Bazic *Assorted Bright Colors 3-Ring Pencil Pouches (24 Pieces)* contained lead above the CSPA limit.
- The Nickelodeon *SpongeBob Squarepants Yellow Pencil Case* contained lead above the CSPA limit in the yellow case material (AM-46-4-2). Also, the internal white seam tape (AM-46-4-8) from this pencil case had lead and cadmium above the CSPA limits.
- The pink case material (AM-46-7-1) and metal zipper slider and pull (AM-46-7-16) on the Aobopar *Pink Bunny Pencil Case* contained lead above the CSPA limit.

## Retail Store Purchases — Dollar Tree Products

A total of 23 product component samples from 19 products purchased at two Dollar Tree stores were tested in this study. Of the 23 product component samples, eight samples from seven products contained lead, cadmium, or both metals, above the respective CSPA limits of 90 mg/kg for lead and 40 mg/kg for cadmium.

Two styles of pencil pouches, one in a variety of colors, accounted for the seven pencil pouches with at least one component containing lead and/or cadmium above the CSPA limit.

- The Jot *Double Zipper 3-Ring Pencil Pouch* product contained six pouches with material colors: red (DT-30-1-2), orange (DT-30-2-2), blue (DT-31-1-2), green (DT-31-2-2), black (DT-31-3-2), and pink (DT-31-4-2).
  - The gray trim material component on all six of the double zipper 3-ring pencil pouches contained lead above the CSPA limit of 90 mg/kg. The UPC number was the same for these 2021 pencil pouches as the 2019 pencil pouches with the same style.
  - In the 2019 study, the pouch material in the orange, red, blue, and green pencil pouches exceeded the lead and cadmium limits, while the zipper composite in the black pouch exceeded the lead limit (Trumbull, 2020).
- The Jot *Pink and Clear Plastic 3-Ring Pencil Pouch* product tested in 2021 was the same style with the same UPC number as a 2019 pencil pouch.
  - The clear plastic material component (DT-30-3-2) on the pink pouch was above the CSPA limit of 40 mg/kg for cadmium. Also, the metal zipper slider and pull composite component (DT-30-3-10) was above the CSPA limit of 90 mg/kg for lead.
  - Four additional colors of this style pencil pouch did not contain lead or cadmium above the CSPA limit in the product component sample tested: the orange (DT-30-4-8), gray (DT-31-5-6), yellow (DT-31-6-8), or blue (DT-31-7-8) pouches.
  - These four 2021 pencil pouches appeared similar in style, with the same UPC number, but the color plastic material was thinner and some colors different than in the 2019 pencil pouches. The product label displayed an image of a different color scheme in this style of pencil pouch for these four pouches. The pink and clear plastic 3-ring pencil pouch had the identical product label with the same color scheme on the label as did the 2019 pencil pouch.

## **Study Files (sent separately)**

### **Product Testing Database data files**

School Supplies 2021 — Preliminary Data 06302022.csv

School Supplies 2021 — Final Data 08152022.csv

School Supplies 2021 — Study Details 08152022.csv

### **Web screen recordings**

2021August12Amazon0418 edited.mp4

*The last 40 seconds of the recording at the purchasing phase were cut from the edited version.*

2021August13Amazon1140.mp4

2021August13Amazon1214.mp4

## Product photos

### Purchases — In-Store

Receipts

In-Store Photos

### Purchases — Online

Receipts

Package Received Photos

## References

Sekerak, S. 2017. School Supplies 2017, Addendum 2 to Quality Assurance Project Plan: Phthalates and Metals in Children’s Products. Publication 17-03-114. Washington State Department of Ecology, Olympia.

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<https://apps.ecology.wa.gov./publications/SummaryPages/2203108.html>

## Appendix A. Data Summary for 2021 Study

**Table A-1. Summary of items purchased, including locations, dates, costs, and quantity.**

Retail name (purchase event ID)	Physical address or web address	Purchase date	Total cost of purchase (\$)	Number of products purchased
Dollar Tree (DT-30)	10432 SE Kent Kangley Rd, Store # 2921 Kent, WA 98030-7624	8/10/2021	14.31	13
Dollar Tree (DT-31)	9830 Pacific Ave, Store # 2344 Tacoma, WA 98444-6539	8/10/2021	13.23	12
Amazon (AM-45)	Amazon.com	8/12/2021	334.71	14
Amazon (AM-46)	Amazon.com	8/13/2021	134.04	8
Amazon (AM-47)	Amazon.com	8/13/2021	60.15	2
Dollar Tree combined—Subtotal			27.54	25
Amazon combined—Subtotal			528.90	24
<b>Totals</b>			<b>556.44</b>	<b>49</b>

**Table A-2. Summary Results for School Supplies Study 2021.**

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
AM-45-1-9	Monster High Pink Pencil Case—Internal Black Seam Tape	Mattel	4714670059058	Amazon, The Free Shipping Store, Shinn Jee Enterprise Co., Ltd.	3,420	958	ASIN: B00LNJ04JY; Attached tag with UPC; Code below UPC: BVMH-9A-41
AM-45-2-8	Sad Cat Pencil Pouch—Metal Zipper Slider & Pull	EatFishinSea	---	Amazon, EatFishinSea, Amazon Fulfillment Services	636	3.09	ASIN: B076H869SB; No attached tag with UPC; Label on packaging: X002D1MBZ7; Brand information from website
AM-45-3-8	Cute Cat Pencil Pouch—Metal Zipper Slider & Pull	X-dolls	---	Amazon, Senriseus, IMGLOBAL	663	1.77	ASIN: B08GXCCSDR; No attached tag with UPC; Label on packaging: HA7404D, P107DEC34DE
AM-45-5-7	Bug Eye Orange Cat Pencil Pouch—Orange Metal Zipper Pull	Inkology	838157004257	Amazon, Exquisite Buys, Inkology, Inc.	19.4	4.75	ASIN: B008LR0V4E; Attached tag with UPC; Code on tag: 081141371, F11221994, 04/12; Choking hazard warning on tag
AM-45-7-28	Assorted Pink and Yellow with Dots and Hearts 3-Ring Pencil Pouches (8 Pieces)—Pink Heart Pouch #2—Metal Grommet	Inkology	838157004295	Amazon, Dollar Item Direct, Inkology, Inc.	1.01	1.00 U	ASIN: B08FRPTDNW; Attached tag with UPC and internal label are identical for all eight 3-ring pencil pouches; Item No. 429-5; Code below UPC on tag and on internal label: F12311869 04302017
AM-45-7-42	Assorted Pink and Yellow with Dots and Hearts 3-Ring Pencil Pouches (8 Pieces)—Yellow Dot Pouch #2—Metal Grommet	Inkology	838157004295	Amazon, Dollar Item Direct, Inkology, Inc.	1.00 U	1.00 U	ASIN: B08FRPTDNW; Attached tag with UPC and internal label are identical for all eight 3-ring pencil pouches; Item No. 429-5; Code below UPC on tag and on internal label: F12311869 04302017
AM-45-7-55	Assorted Pink and Yellow with Dots and Hearts 3-Ring Pencil Pouches (8 Pieces)—Yellow Heart Pouch #2—Metal Zipper Pull	Inkology	838157004295	Amazon, Dollar Item Direct, Inkology, Inc.	90.9	23.9	ASIN: B08FRPTDNW; Attached tag with UPC and internal label are identical for all eight 3-ring pencil pouches; Item No. 429-5; Code below UPC on tag and on internal label: F12311869 04302017



Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
AM-45-8-14	Assorted Pink Dots and Yellow Hearts Pencil Cases (6 Pieces)—Pink Dot Case #2—Metal Zipper Pull	Inkology	838157004288	Amazon, Dollar Item Direct, Inkology, Inc.	81.8	26.6	ASIN: B08FRR887W; Attached tag with UPC and internal label are identical for all six pencil cases; Item No. 428-8; Code below UPC on tag and on internal label: F12311869 04302017
AM-45-8-23	Assorted Pink Dots and Yellow Hearts Pencil Cases (6 Pieces)—Yellow Heart Case #1—Yellow Material	Inkology	838157004288	Amazon, Dollar Item Direct, Inkology, Inc.	1.58	1.00 U	ASIN: B08FRR887W; Attached tag with UPC and internal label are identical for all six pencil cases; Item No. 428-8; Code below UPC on tag and on internal label: F12311869 04302017
AM-45-9-12	Trolls Family Lunch Bag—Internal White Seam Tape	Dreamworks	4714127515106	Amazon, Toyz Distributor, DreamWorks Animation LLC	383	77.1	ASIN: B07TDRC8CV; Attached tag with UPC; Code above UPC: 8A-TRO; Label on packaging: X002QP3U73; Licensed by Pustaka Sri Dunia Sdn. Bhd.
AM-45-10-1	Black Shark Backpack with USB Outlet—Black Backpack Material	UPSTORE	---	Amazon, Uprive Online, Parcel Select	556	5.14	ASIN: B07J4Y7HFT; No attached tag with UPC; Label on packaging: @168473@08-161, ALA10576/AA008; Brand information from website
AM-45-10-8	Black Shark Backpack with USB Outlet—Upper White Zipper Pull Strap 1	UPSTORE	---	Amazon, Uprive Online, Parcel Select	169	193	ASIN: B07J4Y7HFT; No attached tag with UPC; Label on packaging: @168473@08-161, ALA10576/AA008; Brand information from website
AM-45-10-27	Black Shark Backpack with USB Outlet—External Black USB Outlet Holder	UPSTORE	---	Amazon, Uprive Online, Parcel Select	250	6.79	ASIN: B07J4Y7HFT; No attached tag with UPC; Label on packaging: @168473@08-161, ALA10576/AA008; Brand information from website
AM-45-11-39	Monster High Backpack and Lunch Bag Set—Lunch Bag—Internal Black Seam Tape	Mattel	4714670059041	Amazon, FOUR-SEASONS-STORE, Shinn Jee Enterprise Co., Ltd.	4,710	757	ASIN: B00EA17X46; Product contained: 1 backpack, 1 lunch bag; Attached tags with different UPCs for each item; UPC for backpack: 4714670059096; Code below UPC for backpack: BVMH-136A-41; UPC for lunch bag: 4714670059041; Code below UPC for lunch bag: BVMH-8A-41

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
AM-45-11-40	Monster High Backpack and Lunch Bag Set—Lunch Bag—Internal Black Plastic Liner	Mattel	4714670059041	Amazon, FOUR-SEASONS-STORE, Shinn Jee Enterprise Co., Ltd.	265	57.3	ASIN: B00EA17X46; Product contained: 1 backpack, 1 lunch bag; Attached tags with different UPCs for each item; UPC for backpack: 4714670059096; Code below UPC for backpack: BVMH-136A-41; UPC for lunch bag: 4714670059041; Code below UPC for lunch bag: BVMH-8A-41
AM-45-12-10	Trolls World Tour Backpack and Lunch Bag Set—Backpack—Metal Zipper Pull 1	Dreamworks	843340211459	Amazon, Decade West, Amazon Fulfillment Services, Accessory Innovations, DreamWorks Animation LLC	24.6	1.63	ASIN: B0851T3S7K; Product contained: 1 backpack, 1 lunch bag; Attached tag with UPC for set; Code above UPC: B20TL46555, Code below UPC: 12/19-17341-C024; Label on packaging: X002JGTTH9, B0851T3S7K; Choking hazard warning on tag
AM-45-13-32	Trolls Pink Backpack Set (5 Pieces)—Pencil Pouch—Metal Zipper Pull	Dreamworks	678634509970	Amazon, Crenstone, Amazon Fulfillment Services, Fast Forward New York, DreamWorks Animation LLC	25.0	1.63	ASIN: B07HHHF3Z4; Product contained: 1 backpack, 1 lunch bag, 1 pencil pouch, 1 water bottle, 1 carabiner; Attached tag with UPC for set; Code above UPC: Item# TRIE; Code below UPC: PR001/11-2019/Batch#S20-48; Label on packaging: Cren-SP, X00216IULN, B07HHHF3Z4; Choking hazard warning on tag
AM-45-14-16	Cars Lightning McQueen Mater Backpack — Internal Black Seam Tape	Disney Pixar	---	Amazon, Yankee Toy Box LLC, Amazon Fulfillment Services, Accessory Innovations	3.33	1.00 U	ASIN: B086C99RRJ; Attached tag with no UPC; Code on tag: 09/20-18451-C024; Label on packaging: X002HZULYR, Style # B20CR46765-YT; Choking hazard warning on tag
AM-46-1-1	Purple 3-Ring Pencil Pouch (2 Pieces)—Pouch #1—Purple Pouch Material	Boonafit	---	Amazon, Boonafit	1,720	18.1	ASIN: B07KZLS4S9; No label on packaging or attached tag with UPC or code; Brand information from website
AM-46-2-7	Blue and Orange 3-Ring Pencil Pouches (2 Pieces)—Blue Pouch—Metal Grommet	Mr. Pen	853126008517	Amazon, Mr. Pen	82.4	1.76	ASIN: B07HM7WHVQ; Attached tag with UPC on each pouch; Product tag and UPC identical on both pouches (2 pouches of 2 colors); Batch # 345

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
AM-46-3-43	Assorted Bright Colors 3-Ring Pencil Pouches (24 Pieces)—Purple Pouch—Black Metal Zipper Slider	Bazic	764608008041	Amazon, ShippedFast, Bazic Products	108	1.30	ASIN: B004MTP43S; Attached tag with UPC on each pencil pouch; Product tag and UPC identical on all 24 pencil pouches (four pouches of six colors); Code above UPC: 804; Code on tag: V01222-012021-70002171
AM-46-4-2	SpongeBob Squarepants Yellow Pencil Case—Yellow Case Material	Nickelodeon	4714670042890	Amazon, All Accessory Central, AAC_WHSE1	2,280	3.69	ASIN: B00FAV2VTW; Attached tag with UPC; Code above UPC: BVSP-9A-28
AM-46-4-8	SpongeBob Squarepants Yellow Pencil Case—Internal White Seam Tape	Nickelodeon	4714670042890	Amazon, All Accessory Central, AAC_WHSE1	409	85.1	ASIN: B00FAV2VTW; Attached tag with UPC; Code above UPC: BVSP-9A-28
AM-46-7-1	Pink Bunny Pencil Case—Pink Case Material	Aobopar	---	Amazon, MK&MH, Amazon Fulfillment Services	499	21.8	ASIN: B08TGRGFDT; No attached tag with UPC; Label on product packaging: X002S4GTP7; Two pencil grips included with pencil case; Brand information from website
AM-46-7-16	Pink Bunny Pencil Case—Metal Zipper Slider & Pull	Aobopar	---	Amazon, MK&MH, Amazon Fulfillment Services	583	4.44	ASIN: B08TGRGFDT; No attached tag with UPC; Label on product packaging: X002S4GTP7; Two pencil grips included with pencil case; Brand information from website
AM-47-2-35	Zoo Pack Unicorn Backpack—Side Pocket Metal Grommet	Skip Hop	879674020092	Amazon, Amazon.com Services LLC, Amazon Fulfillment Services, Skip Hop, Inc.	19.7	1.00 U	ASIN: B00SIM40MG; Attached tag with UPC; Style #: 210227; Code on label: GT 032019, Reg. No. 02T-0859706
DT-30-1-2	Red Double Zipper 3-Ring Pencil Pouch—Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	101	1.00 U	Code on label: 164338-12702-001-093020

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
DT-30-2-2	Orange Double Zipper 3-Ring Pencil Pouch - Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	102	1.00 U	Code on label: 164338-12702-001-093020
DT-30-3-2	Pink and Clear Plastic 3-Ring Pencil Pouch—Clear Plastic Material	Jot	639277721433	Greenbrier International Inc.	1.00 U	194	Code on label: 182374-12702-004-011519
DT-30-3-8	Pink and Clear Plastic 3-Ring Pencil Pouch—Metal Grommet	Jot	639277721433	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 182374-12702-004-011519
DT-30-3-10	Pink and Clear Plastic 3-Ring Pencil Pouch—Metal Zipper Slider & Pull	Jot	639277721433	Greenbrier International Inc.	454	1.32	Code on label: 182374-12702-004-011519
DT-30-4-8	Orange and Clear Plastic 3-Ring Pencil Pouch—Metal Grommet	Jot	639277721433	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 182374-12702-001-011521
DT-30-5-7	Pink Flowers 3-Ring Pencil Pouch—Metal Grommet	Jot	195464013304	Greenbrier International Inc.	1.04 U	1.04 U	Code on label: 331638-10959-009-030121
DT-30-6-5	Green Easy View 3-Ring Pencil Pouch—Metal Zipper Slider	Unison	747219101455	Fibro Source USA Inc.	29.6	1.32	Code on label: 089-1812-15065; Item No. 10145
DT-30-8-8	Green Soccer Graphic 3-Ring Pencil Pouch—Metal Zipper Slider & Pull	Jot	639277765253	Greenbrier International Inc.	26.8	1.33	Code on label: 317035-12702-009-101520
DT-30-9-7	Pink Crayola 2-Ring Pencil Pouch—Metal Grommets	Crayola	639277994257	Greenbrier International Inc., Dreamtivity	1.22	1.17 U	Code on label: 280959-18449-002-061520; Code above UPC: RCM-10310

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cad-mium (mg/kg)	Product Notes
DT-30-11-4	Transformers Graphic 3-Ring Pencil Pouch—Crimson Metal Zipper Slider	Hasbro	639277309693	Greenbrier International Inc., Peachtree Playthings	29.7	4.88	Code on label: 331645-16247-043-030821
DT-30-13-7	Pink Whale Pencil Pouch—Metal Ring on Zipper Pull	Jot	195464013328	Greenbrier International Inc.	no result	no result	Code on internal label: 327598-10959-006-040121; Code on label below UPC: 331641-10959-006-030121
DT-31-1-2	Blue Double Zipper 3-Ring Pencil Pouch—Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	<b>124</b>	1.00 U	Code on label: 164338-12702-001-011521
DT-31-1-12	Blue Double Zipper 3-Ring Pencil Pouch—Metal Grommet	Jot	639277407979	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 164338-12702-001-011521
DT-31-2-2	Green Double Zipper 3-Ring Pencil Pouch—Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	<b>112</b>	1.00 U	Code on label: 164338-12702-001-011521
DT-31-3-2	Black Double Zipper 3-Ring Pencil Pouch—Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	<b>126</b>	1.00 U	Code on label: 164338-12702-001-011521
DT-31-4-1	Pink Double Zipper 3-Ring Pencil Pouch—Pink Pouch Material	Jot	639277407979	Greenbrier International Inc.	9.75	28.8	Code on label: 164338-12702-001-011521
DT-31-4-2	Pink Double Zipper 3-Ring Pencil Pouch—Gray Trim Material	Jot	639277407979	Greenbrier International Inc.	<b>124</b>	1.00 U	Code on label: 164338-12702-001-011521
DT-31-5-6	Gray and Clear Plastic 3-Ring Pencil Pouch—Metal Zipper Slider	Jot	639277721433	Greenbrier International Inc.	22.0	1.00 U	Code on label: 182374-12702-001-011521
DT-31-6-8	Yellow and Clear Plastic 3-Ring Pencil Pouch—Metal Grommet	Jot	639277721433	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 182374-12702-001-011521

Component ID	Product Component Description	Brand	UPC Number	Companies Associated (distributors, importers, manuf., etc.)	Lead (mg/kg)	Cadmium (mg/kg)	Product Notes
DT-31-7-8	Blue and Clear Plastic 3-Ring Pencil Pouch—Metal Grommet	Jot	639277721433	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 182374-12702-001-011521
DT-31-8-6	Orange Stripes 3-Ring Pencil Pouch—Metal Zipper Slider & Pull	Jot	639277175038	Greenbrier International Inc.	24.7	2.91	Code on label: 331662-07919-001-012021
DT-31-10-6	Pink Shimmer 3-Ring Pencil Pouch—Metal Grommet	Jot	195464013267	Greenbrier International Inc.	12.4	12.8	Code on label: 331633-07919-001-010521
DT-31-11-7	Rainbow 3-Ring Pencil Pouch—Metal Ring on Zipper Pull	Jot	639277765239	Greenbrier International Inc.	1.00 U	1.00 U	Code on label: 317033-07919-001-092520

**Bold**=Detections above CSPA limits (90 mg/kg lead, 40 mg/kg cadmium).

UPC=Universal Product Code; SIN=Amazon Standardized Identification Number; U=Analyte was not detected at or above the reported result.