



Children's Jewelry Online Addendum 1 to Quality Assurance Project Plan: --- Assessment of Lead and Cadmium in Children's Jewelry 2025

By

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For the

Environmental Assessment Program

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Ecology's Activity Tracker code for this addendum is 26-012.

Original Quality Assurance Project Plan:

Smith, L. 2025. Quality Assurance Project Plan: Assessment of Lead and Cadmium in Children's Jewelry 2025. Publication 25-03-102. Washington State Department of Ecology, Olympia.

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¹ <https://apps.ecology.wa.gov/consumerproducts/>

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April 2026

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EAP: Environmental Assessment Program

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Signatures are not available on the Internet version.

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Note: The numbered headings in this document correspond to the headings in the original QAPP. Only relevant sections are included here; therefore, some numbered headings may be missing.

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3.0 Background

The Washington State Department of Ecology (Ecology) regularly conducts studies to support Washington's Children's Safe Products Act (CSPA). Ecology's researchers design product testing studies to find, purchase, and test products for the presence of restricted chemicals. Ecology has conducted multiple studies to assess children's jewelry for chemicals of high concern to children (CHCC), such as lead, cadmium, and other metals. In 2025, we purchased jewelry from local area retail stores (Smith 2025). This study will focus on online products not tested in the 2025 study due to time constraints.

3.2 Study area and surroundings

This study will continue to assess inexpensive children's jewelry designed for children 12 years and younger. We will focus on children's jewelry available online to Washington consumers. Children's jewelry is defined by RCW 70A.430.010 as jewelry that is made for, marketed for use by, or marketed to children under the age of 12.

Jewelry that meets the following conditions shall be considered children's jewelry and may be included in this study:

- Represented by packaging, display, or advertising as appropriate for use by children under the age of 12.
- Sold online and in conjunction with, attached to, or packaged with other products that are packaged, displayed, categorized, or advertised as appropriate for use by children.
- Sized for children and not intended for use by adults.
- Sold in online stores where products are packaged, displayed, categorized, or advertised as appropriate for use by children.

As in the original QAPP, inexpensive jewelry is defined as individual jewelry pieces costing \$5 or less and multipacks with multiple jewelry pieces costing \$15 or less (Smith 2025).

4.0 Project Description

Products are limited to those available from online stores to Washington state residents.

4.4 Tasks required

- Conduct online searches for the availability of children's jewelry and prioritize jewelry products for purchase.
- Purchase up to 50 inexpensive children's jewelry products through online retail outlets.

5.0 Organization and Schedule

5.1 Key individuals and their responsibilities

Table 1 shows only the new responsibilities and changes to the responsibilities of those involved in this project.

Table 1. Organization of project staff and responsibilities.

Staff ^a	Title	Responsibilities
Michael Zahn Statewide Coordination Section (SCS), EAP Phone: 564-669-4394	Project Manager/ Principal Investigator	Oversees product sampling, processing, screening, and submission of samples to the laboratory. Leads QA review of product and lab data, analyzes and interprets data, and enters data into the database. Leads the draft and final report if available.
Sara Sekerak Product Studies Unit SCS, EAP Phone: 360-480-9501	Unit Supervisor for Project Manager	Clarifies scope and design of project and finalizes the QAPP Addendum. Approves final QAPP Addendum. Assists with sample login, prep, as needed. Oversees project progress and prepares the draft and final report, as needed.
Jessica Archer SCS, EAP Phone: 360-407-6698	Section Manager for Project Manager	Reviews project scope and budget. Reviews draft QAPP and approves final QAPP Addendum.

^a All staff are from the Washington State Department of Ecology.

EAP = Environmental Assessment Program

QAPP = Quality Assurance Project Plan.

5.4 Proposed project schedule

Tables 2 – 5 list key activities, due dates, and lead staff for this project.

Table 2. Schedule for completing product collection and data entry.

Task	Due Date	Lead Staff
Product Purchasing	September 19, 2025	Michael Zahn/Jenna Rushing
Product data entry complete	October 10, 2025	Jenna Rushing
Product data entry QA	October 17, 2025	Michael Zahn/Jenna Rushing

Table 3. Schedule for screening and sending samples to the laboratory.

Task	Due Date	Lead Staff
Screening and sample prep complete	October 17, 2025	Jenna Rushing/Michael Zahn
Samples sent to the lab	October 20, 2025	Jenna Rushing/Michael Zahn
Lab analysis complete	December 29, 2025	Heidi Chuhran
Lab testing data validation ¹ complete	February 17, 2026	John Weakland

¹ Data Validation Stage is the same as in the parent QAPP

Table 4. Schedule for data and study reviews

Task	Due Date	Lead Staff
Study data analysis complete	March 13, 2026	Michael Zahn
Lab testing data entry complete	March 13, 2026	Michael Zahn
Database QA complete	Prior to report publication	Jenna Rushing

Table 5. Schedule for final report.

Task	Due Date	Lead Staff
Draft to supervisor	March 20, 2026	Michael Zahn
Draft to peer reviewer	April 3, 2026	Michael Zahn
Draft to policy partner	April 24, 2026	Michael Zahn
Final draft to publications team	May 15, 2026	Michael Zahn
Final report due on web	July 7, 2026	Devon Nemire-Pepe

5.5 Budget and funding

Total estimated costs for this study are presented in Tables 6 and 7. Estimates include costs for product purchasing, laboratory testing, and data validation. Quality control (QC) samples (duplicates, matrix spikes, and matrix spike duplicates) are included in the cost of analysis. This project is funded through the Environmental Assessment Program's Product Testing Budget.

Table 6. Project budget and funding.

Item	Cost (\$)
Product Purchasing (up to 50 products)	750
Laboratory analysis	7,920
Budget Total	8,670

Table 7. Laboratory budget details.

Lab analysis	Number of Samples	Lab QC samples ^b	Total samples	Cost Per Sample (\$)	Lab Subtotal (\$)
Metals: Lead and Cadmium	60	12	72	110	7,920

^b Quality control samples for a maximum of four batches (three per batch) are estimated.

7.0 Study Design

7.1 Study boundaries

The study will focus on purchasing children's jewelry products from the following categories based on findings from previous studies, HPCDS reporting, and recall information (Smith 2025):

- Chains or necklaces with or without pendants or decorative elements
- Bracelets with or without pendants or decorative elements
- Hair accessories² including tiaras or crowns

The table below illustrates the targeted procurement plan.

Table 8. Anticipated purchasing categories of children's jewelry.

Jewelry Category	Number of products
Chains/Necklaces	20
Bracelets	10
Hair accessories	20

Jewelry items sold with or attached to clothing or shoes can be included as long as 1) the jewelry item can be worn independently by a child, and 2) it fits one of the categories above.

² Bobby pins, barrettes, headbands, etc. without a significant decorative element are not hair accessories but are grooming aids. Combs, brushes, and similar items not intended to be worn as an item of personal ornamentation are not hair accessories. Novelty products such as beely boppers are not hair accessories.

We will try to purchase the number of items in each jewelry category listed in Table 7, subject to availability.

15.0 References

Smith, L. 2025. Quality Assurance Project Plan: Assessment of Lead and Cadmium in Children's Jewelry 2025. Publication 25-03-102. Washington State Department of Ecology, Olympia.
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