

June 21, 2012

**LHAMA CERTIFICATION PROCEDURE AND APPLICABLE REGULATIONS
FOR ARTS & CRAFT MATERIALS (16 CFR 1500.135)*****Boku-Undo Co., Ltd SAIEKI - INNOVATION MARBLING PIGMENT DYE - RECERTIFICATION
404***

The Federal Hazardous Substances Act (FHSA), as amended by Public Law 100-695 (15USC 1227), names the American Society for Testing and Materials (ASTM) Standard Practice for Labeling Art Materials for Chronic Health Hazards, Designation 4236, as applicable under federal law, to art materials. This US Federal requirement applies in addition to the labeling and certification requirements of various states. The referenced ASTM standard previously established certain procedures which are to be used by qualified persons to use in health labeling review and compliance certification for art materials. The statement of compliance with the standard can only be performed by a Toxicologist or a Physician who is certified by a nationally recognized certification board. For ASTM, the Toxicologist shall use the current ASTM standard practice, while FHSA requires ASTM D-4236-88. This certification is conducted in accord with the Consumer Product Safety Commission procedure detailed at 16 CFR 1500.135 as applicable and as data are available.

For the Toxicologist to assure labeling compliance as required by ASTM and to conclude that a material is suitable for use, i.e., to certify a material as being free of chronic health hazard of that it is adequately labeled to warn of such hazards under conditions of use, the Toxicologist shall conduct those investigations which, the the Toxicologist's professional opinion, are sufficient to develop the information required for such a judgment. These investigations include manufacturing formula review, biologic testing (as warranted), and review of the toxicologic literature. Biologic availability and anticipated exposures, as well as acceptable levels of intake, are considerations used by the Toxicologist in his or her evaluation. Incorporated by reference are the determination of the presence of substances which may be carcinogenic, neurotoxic or otherwise toxic to the reproductive systems of men, women and children. Proper Labeling considers the assessment of exposure by ingestion, inhalation and dermal contact. As data are available, direct monitoring, modeling or surrogate data may be used. Assessment of bioavailability and the application of suitable margins of safety are an integral part of this evaluation.

In the present case, the general formula for your product was reviewed by Dr. Rudolph J. Jaeger, Consulting Toxicologist. Dr. Jaeger is a Diplomate of the American Board of Toxicology. As defined by ASTM, a Toxicologist is qualified by training and experience to evaluate the toxicity of art materials. The product in question has been evaluated for its intended use as an art or craft material. To fill a gap in information or to confirm the data provided, the Toxicologist may arrange for the performance of toxicity testing. Test results from similar products, certification for equivalent product and information provided by the supplier of the components used, will also be judged to be applicable. Exposures which are foreseeable and reasonable form the basis for the certification. For, reasonable and foreseeable uses of the product, that is, its intended and likely use as an art material, the Toxicologist will rely on the label as well as the statements of the manufacturer, formulator, or the packager.

Your representative(s), employees, and others assigned by you have described the product(s), the intended distribution, and expected uses. The description of the art material, as of this date, suggests that the material is generally available for sale to a variety of customers. It is understood that similar products or formulations have been sold by your firm. To the present date and for the product that is named below, the Toxicologist is given to understand that no significant chronic harm or contents-attributable injury has been reported to your by customers or by other responsible authorities. As the manufacturer, such reports must be provided to the Toxicologist for review if and when they are received. The product labels will be registered with a Poison Information System so that reports of adverse effects can be documented.

Based on professional judgment, scientific and regulatory literature, and the reasonable foreseeable use of the products, it is judged that this product meets the current ASTM D-4236 requirements and, thus, it may be certified for compliance.

This product, SAIEKI - INNOVATION MARBLING PIGMENT DYE - RECERTIFICATION, 404, may be labeled as follows: "CONFORMS TO ASTM D-4236".

ENVIRONMENTAL MEDICINE INC.


Rudolph J. Jaeger, Ph.D., DABT
Certifying Toxicologist

ENVIRONMENTAL MEDICINE INC., 263 CENTER AVENUE, WESTWOOD, NJ 07675



Environmental Medicine
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Project Code: BOK816

July 30, 2012

Nobuyoshi Matsui
Boku-Undo Co., Ltd
5-35 ROKUJYO 1-CHOME
Nara-Shi, 630-8043
JAPAN

Re: ASTM D-4236 ART MATERIAL CERTIFICATION (LHAMA)

Dear Nobuyoshi Matsui,

This letter constitutes my certification that your product(s),

**BOKU-EKI CALLIGRAPHY & DRAWING INK - REVISION AND FIVE YEAR
RECERTIFICATION
0115-02-N series**

complies with the standard cited above. As a qualified Toxicologist as defined by ASTM D-4236. I confirm compliance of this product with the American Society for Testing and Materials (ASTM) Standard of Practice for Labeling Art Materials for Chronic Health Hazards. I conducted this review in a manner consistent with the Consumer Product Safety Commission Guidelines as found in 16 CFR 1500.135. The procedures and regulations that I followed are described separately and have been filed with the CPSC.

This certification is based on the product(s) with changes to your current label, as required. To comply with LHAMA and to complete my review, I considered the product as a whole. I reviewed the components, their formulas, the MSDS's for the ingredients and such other information provided to me by you.

If the formula or intended uses change, it will be necessary for me to evaluate the new data in order for my certification to remain applicable. In any case, under ASTM requirements, this certification must be reviewed every five (5) years. This certification is not transferrable. The re-certification date for this product is May 18, 2017.

Be advised that the Consumer Product Safety Commission may choose a different determination about this product line than I made. Since the Commission is mandated by Congress to enforce LHAMA, their opinion, not mine, is final.

Sincerely,

ENVIRONMENTAL MEDICINE INC.

Rudolph J. Jaeger, Ph.D. DABT. REA (California), ERT (Europe)
Certifying Toxicologist



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July 30, 2012

Project Code: BOK847

Nobuyoshi Matsui
Boku-Undo Co., Ltd
5-35 ROKUJYO 1-CHOME
Nara-Shi, 630-8043
JAPAN

Re: ASTM D-4236 ART MATERIAL CERTIFICATION (LHAMA)

Dear Nobuyoshi Matsui,

This letter constitutes my certification that your product(s),

**SAIEKI - INNOVATION MARBLING PIGMENT DYE - RECERTIFICATION
404**

complies with the standard cited above. As a qualified Toxicologist as defined by ASTM D-4236. I confirm compliance of this product with the American Society for Testing and Materials (ASTM) Standard of Practice for Labeling Art Materials for Chronic Health Hazards. I conducted this review in a manner consistent with the Consumer Product Safety Commission Guidelines as found in 16 CFR 1500.135. The procedures and regulations that I followed are described separately and have been filed with the CPSC.

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If the formula or intended uses change, it will be necessary for me to evaluate the new data in order for my certification to remain applicable. In any case, under ASTM requirements, this certification must be reviewed every five (5) years. This certification is not transferrable. The re-certification date for this product is June 22, 2017.

Be advised that the Consumer Product Safety Commission may choose a different determination about this product line than I made. Since the Commission is mandated by Congress to enforce LHAMA, their opinion, not mine, is final.

Sincerely,

ENVIRONMENTAL MEDICINE INC.

Rudolph J. Jaeger, Ph.D. DABT. REA (California), ERT (Europe)
Certifying Toxicologist



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Project Code: BOK848

July 30, 2012

Nobuyoshi Matsui
Boku-Undo Co., Ltd
5-35 ROKUJYO 1-CHOME
Nara-Shi, 630-8043
JAPAN

Re: ASTM D-4236 ART MATERIAL CERTIFICATION (LHAMA)

Dear Nobuyoshi Matsui,

This letter constitutes my certification that your product(s),

**SAIBOKU (ARTIST'S INK) STICK 401 - RECERTIFICATION
SERIES 401**

complies with the standard cited above. As a qualified Toxicologist as defined by ASTM D-4236. I confirm compliance of this product with the American Society for Testing and Materials (ASTM) Standard of Practice for Labeling Art Materials for Chronic Health Hazards. I conducted this review in a manner consistent with the Consumer Product Safety Commission Guidelines as found in 16 CFR 1500.135. The procedures and regulations that I followed are described separately and have been filed with the CPSC.

This certification is based on the product(s) with changes to your current label, as required. To comply with LHAMA and to complete my review, I considered the product as a whole. I reviewed the components, their formulas, the MSDS's for the ingredients and such other information provided to me by you.

If the formula or intended uses change, it will be necessary for me to evaluate the new data in order for my certification to remain applicable. In any case, under ASTM requirements, this certification must be reviewed every five (5) years. This certification is not transferrable. The recertification date for this product is June 27, 2017.

Be advised that the Consumer Product Safety Commission may choose a different determination about this product line than I made. Since the Commission is mandated by Congress to enforce LHAMA, their opinion, not mine, is final.

Sincerely,

ENVIRONMENTAL-MEDICINE-INC.

Rudolph J. Jaeger, Ph.D. DABT. REA (California), ERT (Europe)
Certifying Toxicologist



Environmental Medicine
I N C O R P O R A T E D

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June 21, 2012

Nobuyoshi Matsui
Boku-Undo Co., Ltd
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Re: ASTM D-4236 ART MATERIAL CERTIFICATION (LHAMA)

Dear Nobuyoshi Matsui,

This letter constitutes my certification that your product(s),

**SAIEKI - INNOVATION MARBLING PIGMENT DYE - RECERTIFICATION
404**

complies with the standard cited above. As a qualified Toxicologist as defined by ASTM D-4236. I confirm compliance of this product with the American Society for Testing and Materials (ASTM) Standard of Practice for Labeling Art Materials for Chronic Health Hazards. I conducted this review in a manner consistent with the Consumer Product Safety Commission Guidelines as found in 16 CFR 1500.135. The procedures and regulations that I followed are described separately and have been filed with the CPSC.

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If the formula or intended uses change, it will be necessary for me to evaluate the new data in order for my certification to remain applicable. In any case, under ASTM requirements, this certification must be reviewed every five (5) years. This certification is not transferrable. The re-certification date for this product is June 22, 2017.

Be advised that the Consumer Product Safety Commission may choose a different determination about this product line than I made. Since the Commission is mandated by Congress to enforce LHAMA, their opinion, not mine, is final.

Sincerely,

ENVIRONMENTAL MEDICINE INC.

Rudolph J. Jaeger, Ph.D. DABT. REA (California), ERT (Europe)
Certifying Toxicologist