

# Test Report

No.: 70.452.26.14489.01

Date: 2026-06-17



**Applicant:** PF CONCEPT INTERNATIONAL COÖPERATIEF U.A.  
**Address:** SCHIPHOLWEG 59 2316 ZL LEIDEN THE NETHERLANDS  
**Item No:** 10733101-WH/ 10733114-GOLD/ 10733121-RD/ 10733155-OBL/ 10733181-SL/  
10733190-BK  
**Description:** Verton rAL twist bp pen  
**PO No.:** PO#676564  
**Vendor No.:** #10349  
**Factory No.:** #3417  
**Country of Origin:** CHINA  
**Country of Destination:** EU  
**Receipt Date of Sample:** 2026-06-03  
**Date of Testing:** 2026-06-03 ~ 2026-06-17  
**Sample Submitted:** The sample(s) was (were) submitted by applicant and identified.  
**Test Result:** Refer to the data listed in following pages

| Test Item                                                                                                                                           | Conclusion |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 1. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 63 - Lead Content                                                                          | Pass       |
| 2. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 23 - Cadmium Content                                                                       | Pass       |
| 3. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 27 - Nickel Release                                                                        | Pass       |
| 4. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) - Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) | <0.1%(W/W) |
| 5. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) - Dibutylbis(pentane-2,4dionato-O,O')tin Content            | <0.1%(W/W) |
| 6. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) -2-methylimidazole Content                                  | <0.1%(W/W) |

Remarks: 1. MDL = Method Detection Limit  
2. ND = Not Detected (<MDL)  
3. <= Less than  
4. 1 mg/kg = 1 ppm = 0.0001%

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TÜV SÜD Certification and Testing (China) Co., Ltd. Shanghai Branch  
Testing Center

Prepared by:

Authorized by:



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## Description of Tested Subject:

| Sample | Description                           | Photo |
|--------|---------------------------------------|-------|
| 001    | Verton rAL twist bp pen 10733101-WH   |       |
| 002    | Verton rAL twist bp pen 10733114-GOLD |       |
| 003    | Verton rAL twist bp pen 10733121-RD   |       |
| 004    | Verton rAL twist bp pen 10733155-OBL  |       |

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| Sample | Description                         | Photo |
|--------|-------------------------------------|-------|
| 005    | Verton rAL twist bp pen 10733181-SL |       |
| 006    | Verton rAL twist bp pen 10733190-BK |       |

| T. No | Sample | Description                                   |
|-------|--------|-----------------------------------------------|
| T1    | 007    | White coated metal (barrel, 001)              |
| T2    | 008    | Gold coated metal (barrel, 002)               |
| T3    | 009    | Red coated metal (barrel, 003)                |
| T4    | 010    | Blue coated metal (barrel, 004)               |
| T5    | 011    | Silvery coated metal (barrel, 005)            |
| T6    | 012    | Black coated metal (barrel, 006)              |
| T7    | 013    | Black coated metal (ring on barrel, 001~006)  |
| T8    | 014    | Black coated metal (clip, 001~006)            |
| T9    | 015    | Black plastic (nib/end/inner barrel, 001~006) |
| T10   | 016    | White plastic (upper tooth column, 001~006)   |
| T11   | 017    | White plastic (lower tooth column, 001~006)   |
| T12   | 018    | White plastic (refill, 001~006)               |
| T13   | 019    | Silvery metal (spring inner, 001~006)         |
| T14   | 020    | Silvery metal (end of stopper, 001~006)       |
| T15   | 021    | Blue ink (001~006)                            |

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## Test Result(s):

### 1. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 63 - Lead Content

Test with reference to in-house method, determination by ICP-OES.

| Sample      | Unit  | MDL  | Limit | Result(s) | Conclusion |
|-------------|-------|------|-------|-----------|------------|
| 007+008+009 | mg/kg | 10.0 | 500   | ND        | Pass       |
| 010+011+012 | mg/kg | 10.0 | 500   | ND        | Pass       |
| 013+014     | mg/kg | 10.0 | 500   | ND        | Pass       |
| 015+016+017 | mg/kg | 10.0 | 500   | ND        | Pass       |
| 018         | mg/kg | 10.0 | 500   | ND        | Pass       |
| 019         | mg/kg | 10.0 | 500   | ND        | Pass       |
| 020         | mg/kg | 10.0 | 500   | ND        | Pass       |
| 021         | mg/kg | 10.0 | 500   | ND        | Pass       |

### 2. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 23 - Cadmium Content

Test with reference to EN 1122:2001 Method B, determination by ICP-OES.

| Sample      | Unit  | MDL  | Limit | Result(s) | Conclusion |
|-------------|-------|------|-------|-----------|------------|
| 007+008+009 | mg/kg | 10.0 | 100   | ND        | Pass       |
| 010+011+012 | mg/kg | 10.0 | 100   | ND        | Pass       |
| 013+014     | mg/kg | 10.0 | 100   | ND        | Pass       |
| 015+016+017 | mg/kg | 10.0 | 100   | ND        | Pass       |
| 018         | mg/kg | 10.0 | 100   | ND        | Pass       |
| 021         | mg/kg | 10.0 | 100   | ND        | Pass       |

### 3. Regulation (EC) No.1907/2006 (REACH) Annex XVII, Item 27 - Nickel Release

Test with reference to EN 12472:2020+EN 1811:2023, determination by ICP-OES.

| Sample | Size of Tested Sample Area (cm <sup>2</sup> ) | Volume of Test Solution Used (mL) | Experimental result(s) (ug/cm <sup>2</sup> /week) | Limit (ug/cm <sup>2</sup> /week) | Conclusion |
|--------|-----------------------------------------------|-----------------------------------|---------------------------------------------------|----------------------------------|------------|
| 007    | 19.90                                         | 19.9                              | <0.1                                              | 0.5                              | Pass       |
|        | 19.90                                         | 19.9                              | <0.1                                              | 0.5                              |            |
|        | 19.90                                         | 19.9                              | <0.1                                              | 0.5                              |            |

**4. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) - Tris(4-nonylphenyl, branched and linear) phosphite (TNPP)**

Test with reference to in house method and determination by GC-MS.

| Parameter                                                 | CAS No. | Unit  | MDL  | Limit | Result(s)       |
|-----------------------------------------------------------|---------|-------|------|-------|-----------------|
|                                                           |         |       |      |       | 015+016+017+018 |
| Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) | -       | % w/w | 0.01 | 0.1   | ND              |

**5. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) - Dibutylbis(pentane-2,4dionato-O,O')tin Content**

Test with reference to in house method and determination by GC-MS.

| Parameter                              | CAS No.                   | Unit  | MDL  | Limit | Result(s)       |
|----------------------------------------|---------------------------|-------|------|-------|-----------------|
|                                        |                           |       |      |       | 015+016+017+018 |
| Dibutylbis(pentane-2,4dionato-O,O')tin | 22673-19-4<br>(245-152-0) | % w/w | 0.01 | 0.1   | ND              |

**6. Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) -2-methylimidazole Content**

Test with reference to in house method and determination by GC-MS,HPLC-DAD..

| Parameter         | CAS No.  | Unit  | MDL  | Limit | Result(s)       |
|-------------------|----------|-------|------|-------|-----------------|
|                   |          |       |      |       | 015+016+017+018 |
| 2-methylimidazole | 693-98-1 | % w/w | 0.01 | 0.1   | ND              |

-End of Test Report-