

**Test Report**

Number: SHAH01573381

Applicant: POLYCONCEPT GBS  
4/F., HONGQIAO RONGGUANG BLDG.,  
11 CHANGSHUN ROAD SHANGHAI,  
200051, PR CHINA  
Attn: JASMINE GU/SONIA HE

Date: 30 May, 2023

Sample Description:

Item Name : Ocean Plastic Pen / Recycled Ocean Plastic Pen  
Item No. : 10786101-WHWH 10786121-WHRD 10786131-WHOR 10786152-WHBL  
10786161-WHGR 10786190-WHBK 10783501-WT 10783521-RD  
10783531-OG 10783552-BL 10783561-GN 10783590-BK  
Vendor : #10349/ #3127  
Goods Exported To : Europe  
Country Of Origin : China  
P.O. No. : # 658702/658698  
Date Sample Received : 22 May, 2023  
Testing Period : 22 May, 2023 To 30 May, 2023

Tests Conducted:

As requested by the applicant, for details refer to attached page(s).

Conclusion:

Tested Samples	Standard	Result
Tested components of submitted samples	Lead content requirement in Commission Regulation (EU) 2015/628 of 22 April 2015 Amending Annex XVII item 63 of the REACH Regulation (EC) No. 1907/2006	Pass
	Cadmium content requirement in Commission Regulation (EU) No. 494/2011 of 20 May 2011, (EU) No. 835/2012 of 18 September 2012 and (EU) No. 2016/217 of 16 February 2016 Amending Annex XVII Items 23 of the Reach Regulation (EC) No. 1907/2006	Pass
	Dibutylbis(pentane-2,4-dionato-O,O')tin content (SVHC substance)	Pass
	2-methylimidazole content (SVHC substance)	Pass
	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) content (SVHC substance)	Pass

To be continued

Authorized By:  
For Intertek Testing Services Ltd., Shanghai



Bill Zhang  
General Manager



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Tests Conducted

1 Lead (Pb) Content

With reference to method IEC 62321-5:2013, microwave digestion method was used and total Lead content was determined by Inductively Coupled Argon Plasma Spectrometry.

<u>Tested Component</u>	<u>Result (%)</u>	<u>Limit (%)</u>
(1)	ND	0.05
(2+3+4)	ND	0.05
(5+6)	ND	0.05
(7+8+9)	ND	0.05
(10)	ND	0.05

Remark: ND = Not Detected (Less than detection limit)  
Detection Limit = 0.001%

Tested Components: See component list in the last section of this report.

Date Sample Received: May 22, 2023  
Testing Period: May 22, 2023 To May 29, 2023

2 Cadmium (Cd) Content

With reference to methods EN 1122 (Method B)/ IEC 62321:2008/ ISO 11885:2007, acid digestion method was used and total Cadmium content was determined by Inductively Coupled Argon Plasma Spectrometry.

<u>Tested Component</u>	<u>Result in %</u>
(1)	ND
(2+3+4)	ND
(5+6)	ND
(7+8+9)	ND

<u>Requirement:</u>	
<u>Category</u>	<u>Limit (%)</u>
Painted article	0.1
Plastic	0.01
Metal parts of jewellery & hair accessories	0.01

Remark: ND = Not Detected (<0.0005%)

Tested Components: See component list in the last section of this report.

Date Sample Received: May 22, 2023  
Testing Period: May 22, 2023 To May 29, 2023

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Tests Conducted

3 Dibutylbis(pentane-2,4-dionato-O,O')tin Content

By acid digestion and followed by Inductively Coupled Plasma- Optical Emission Spectrometer (ICP-OES) analysis.

Test Item	Cas No.	Result (%. w/w)	
		(1+2+3+4+5)	(6+7+8+9)
Dibutylbis(pentane-2,4-dionato-O,O')tin Δ	22673-19-4	ND	ND

Remark: ND = Not Detected (Less than reporting limit)

Reporting limit = 0.01%

Δ = Determination was based on elemental analysis. The content was calculated based on assumption of worst-case.

REACH requirement:

As per Article 7 of Regulation (EC) No 1907/2006 (REACH) as amended, if a substance of very high concern (SVHC) on the Candidate List for Authorisation is present in articles above a concentration of 0.1% weight by weight (w/w) and the substance is present in those articles in quantities totalling over 1 tonne per producer or per importer per year, then the producer or importer shall notify the European Chemicals Agency (ECHA). The notifications have to be submitted no later than 6 months after the inclusion in the Candidate List. The information to be notified shall include the following:

- (a) Identity and contact details of the producer or importer;
- (b) Registration number(s), if available;
- (c) Identity of the substance;
- (d) Classification of the substance(s);
- (e) Brief description of the use(s) of the substance(s) in the article and of the uses of the article(s);
- (f) Tonnage range of the substance(s).

As per Article 31 of Regulation (EC) No 1907/2006 (REACH) as amended, the supplier of mixture not classified as hazardous according to Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), shall provide the recipient at his request with a safety data sheet, where a mixture contains at least one substance on the SVHC list (Candidate List of substances of very high concern for Authorisation) and its individual concentration is of 0.1% or above by weight for non-gaseous mixtures.

As per Article 33(1) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the recipient of the article with information of safe use of the article. An article meets the requirement of Article 33(1) by default when no SVHC exceeds 0.1% weight by weight (w/w).

As per Article 33(2) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the consumer on request with information of safe use of the article, within 45 days of receipt of the request.

As per Court of Justice of the European Union Judgment in Case C-106/14, Press Release No 100/15 dated 10 September 2015, each of the articles incorporated as a component of a complex product is covered by the relevant duties to notify and provide information when they contain a substance of very high concern in a concentration above 0.1% of their mass.

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To be continued



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Tests Conducted

Tested Components: See component list in the last section of this report.

Date Sample Received: May 22, 2023

Testing Period: May 22, 2023 To May 25, 2023

4 2-methylimidazole Content

By solvent extraction and followed by Gas Chromatography-Mass Spectrometry (GC-MS) analysis.

Test Item	Cas No.	Result (%, w/w)	
		(1+2+3+4+5)	(6+7+8+9)
2-methylimidazole	693-98-1	ND	ND

Remark: ND = Not Detected (Less than reporting limit)

Reporting limit = 0.01%

REACH requirement:

As per Article 7 of Regulation (EC) No 1907/2006 (REACH) as amended, if a substance of very high concern (SVHC) on the Candidate List for Authorisation is present in articles above a concentration of 0.1% weight by weight (w/w) and the substance is present in those articles in quantities totalling over 1 tonne per producer or per importer per year, then the producer or importer shall notify the European Chemicals Agency (ECHA). The notifications have to be submitted no later than 6 months after the inclusion in the Candidate List. The information to be notified shall include the following:

- (g) Identity and contact details of the producer or importer;
- (h) Registration number(s), if available;
- (i) Identity of the substance;
- (j) Classification of the substance(s);
- (k) Brief description of the use(s) of the substance(s) in the article and of the uses of the article(s);
- (l) Tonnage range of the substance(s).

As per Article 31 of Regulation (EC) No 1907/2006 (REACH) as amended, the supplier of mixture not classified as hazardous according to Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), shall provide the recipient at his request with a safety data sheet, where a mixture contains at least one substance on the SVHC list (Candidate List of substances of very high concern for Authorisation) and its individual concentration is of 0.1% or above by weight for non-gaseous mixtures.

As per Article 33(1) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the recipient of the article with information of safe use of the article. An article meets the requirement of Article 33(1) by default when no SVHC exceeds 0.1% weight by weight (w/w).

As per Article 33(2) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the consumer on request with information of safe use of the article, within 45 days of receipt of the request.

As per Court of Justice of the European Union Judgment in Case C-106/14, Press Release No 100/15 dated 10 September 2015, each of the articles incorporated as a component of a complex product is covered by the relevant duties to notify and provide information when they contain a substance of very high concern in a concentration above 0.1% of their mass.

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To be continued



**Test Report**

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Tested Components: See component list in the last section of this report.

Date Sample Received: May 22, 2023

Testing Period: May 22, 2023 To May 25, 2023

5 Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with ≥ 0.1% w/w of 4-nonylphenol, branched and linear (4-NP) Content

By solvent extraction and followed by Gas Chromatography-Mass Spectrometry (GC-MS) / Liquid Chromatography with tandem mass spectrometry (LC-MS-MS) analysis.

Test Item	CAS No.	Result (%. w/w)	
		(1+2+3+4+5)	(6+7+8+9)
Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with ≥ 0.1% w/w of 4-nonylphenol, branched and linear (4-NP)	-	ND	ND

Remark: ND = Not Detected (Less than reporting limit)

Reporting limit = 0.01%

REACH Requirement:

As per Article 7 of Regulation (EC) No 1907/2006 (REACH) as amended, if a substance of very high concern (SVHC) on the Candidate List for Authorisation is present in articles above a concentration of 0.1% weight by weight (w/w) and the substance is present in those articles in quantities totalling over 1 tonne per producer or per importer per year, then the producer or importer shall notify the European Chemicals Agency (ECHA). The notifications have to be submitted no later than 6 months after the inclusion in the Candidate List. The information to be notified shall include the following:

- (m) Identity and contact details of the producer or importer;
- (n) Registration number(s), if available;
- (o) Identity of the substance;
- (p) Classification of the substance(s);
- (q) Brief description of the use(s) of the substance(s) in the article and of the uses of the article(s);
- (r) Tonnage range of the substance(s).

As per Article 31 of Regulation (EC) No 1907/2006 (REACH) as amended, the supplier of mixture not classified as hazardous according to Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), shall provide the recipient at his request with a safety data sheet, where a mixture contains at least one substance on the SVHC list (Candidate List of substances of very high concern for Authorisation) and its individual concentration is of 0.1% or above by weight for non-gaseous mixtures.

As per Article 33(1) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the recipient of the article with information of safe use of the article. An article meets the requirement of Article 33(1) by default when no SVHC exceeds 0.1% weight by weight (w/w).

As per Article 33(2) of Regulation (EC) No 1907/2006 (REACH) as amended, any supplier of an article containing a substance of very high concern (SVHC) on the Candidate List for Authorisation in a concentration above 0.1% weight by weight (w/w) shall provide the consumer on request with information of safe use of the article, within 45 days of receipt of the request.

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To be continued



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Tests Conducted

As per Court of Justice of the European Union Judgment in Case C-106/14, Press Release No 100/15 dated 10 September 2015, each of the articles incorporated as a component of a complex product is covered by the relevant duties to notify and provide information when they contain a substance of very high concern in a concentration above 0.1% of their mass.

Tested Components: See component list in the last section of this report.



Picture of sample

Date Sample Received: May 22, 2023

Testing Period: May 22, 2023 To May 25, 2023

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To be continued



**Test Report**

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Tests Conducted

Components List:

- (1) Transparent plastic with silver/gray coatings.(pen body)
- (2) Transparent red plastic with silver/gray coatings.(pen body)
- (3) Transparent orange plastic with silver/gray coatings.(pen body)
- (4) Transparent green plastic with silver/gray coatings.(pen body)
- (5) Transparent blue plastic with silver/gray coatings.(pen body)
- (6) Transparent black plastic with silver/gray coatings.(pen body)
- (7) White plastic.(pen body)
- (8) White plastic.(refill body& plug)
- (9) Off white plastic.(plug)
- (10) Silver color metal.(spring)

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End of report

*The statements of conformity reported have considered the decision rule agreed, namely that Intertek have taken account of measurement uncertainty as calculated by Intertek, and applied according to ILAC-G8/09:2019 (Non-binary acceptance based on guard band  $w = U$ ) except designation from the customer, regulation or test specification. This decision rule only applies to the numeric test results.*

*The sample(s) and sample information hereto are provided by the client who shall be solely responsible for the authenticity and integrity thereof. The results shown in this report relate only to the sample(s) received and tested. It is not intended to be a recommendation for any particular course of action. Intertek does not accept a duty of care or any other responsibility to any person other than the Client in respect of this report and only accepts liability to the Client insofar as is expressly contained in the terms and conditions governing Intertek's provision of services to you. Intertek makes no warranties or representations either express or implied with respect to this report save as provided for in those terms and conditions. We have aimed to conduct the review on a diligent and careful basis and we do not accept any liability to you for any loss arising out of or in connection with this report, in contract, tort, by statute or otherwise, except in the event of our gross negligence or wilful misconduct. This report shall not be reproduced unless with prior written approval from Intertek Testing Services Shanghai Ltd.*

