

Test Report

Number: GZHH00591442

Applicant: FLASHBAY ELECTRONICS
BUILDING2, JIXUN INDUSTRIAL PARK, XINJIAO,
DONG'AO VILLAGE, SHATIAN TOWN, HUIYANG
DISTRICT, HUIZHOU CITY, GUANGDONG PROVINCE,
P. R. CHINA

Date: May 15, 2025

Sample Description:

Three (3) pieces of submitted sample said to be :
Item Name : **Pen Series**
Item No. : **Xylo (XY)**
Country of Origin : China
Date Sample Received : Apr 17, 2025 & May 08, 2025
Testing Period : Apr 17, 2025 ~ May 14, 2025

Test sample



Tests conducted:

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

To be continued



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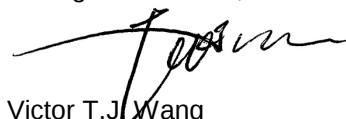
Conclusion:

Tested sample
Tested component(s) of
submitted sample(s)

Standard/Testing Item
EU REACH Regulation (EC) No 1907/2006 Article 33(1)
Obligation to provide information of safe use related to
substances of very high concern (SVHC) on the Candidate List
for Authorisation (see REACH and WFD requirement in report
for details)

Result
Meet
Requirement

Authorized by:
For Intertek Testing Services Shenzhen Ltd.
Guangzhou Branch, Hardlines



Victor T.J. Wang
General Manager



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1 (A) EU REACH Regulation (EC) No 1907/2006 on Substance of Very High Concern (SVHC) Content

By Inductively Coupled Plasma Optical Emission Spectrometry, Ion Chromatography, UV-Visible Spectrophotometry, Gas Chromatographic - Mass Spectrometry, Liquid Chromatographic / Tandem Mass Spectrometer and High Performance Liquid Chromatography analysis.

Table (A1)

Chemical Substance	Results % (w/w)
	Tested components
	(Group 2)
187. Lead	See Table (A2)
All other SVHCs in the Chemical list	ND

Table (P2)

Chemical Substance	Results % (w/w)
	Tested components
	(Group 1), (Group 3) , (Group 4)
Tested SVHCs in Chemical list	ND

SVHC = Substance of very high concern

ND = Not detected (less than reporting limit)

Reporting limit = 0.1%

The test result is based on assumption of worst-case and calculated by minimum sample weight.

Confirmation testing is recommended as to verify the exact content of SVHC in each individual component.

Group1: 2

Group2: 4+6+7+8+9+10+11+12+15+16

Group3: 13+14+17

Group 4:19

Test components: See component list in the last section of this report



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Table (A2)

Chemical Substance	Results % (w/w)
	Tested components
	(4), (6)to(11), (15), (16)
187. Lead	ND

ND = Not detected (less than reporting limit)

Reporting limit = 0.05%

Test components: See component list in the last section of this report

(B) Tested SVHC Chemicals list (Substance(s) in the list of 247 entries of chemicals published by European Chemicals Agency (ECHA) on 21 January 2025):

No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
1	Cobalt dichloride Δ	7646-79-9	2	Diarsenic pentaoxide Δ	1303-28-2
3	Diarsenic trioxide Δ	1327-53-3	4	Lead hydrogen arsenate Δ	7784-40-9
5	Triethyl arsenate Δ	15606-95-8	6	Sodium dichromate Δ	7789-12-0 10588-01-9
7	Bis(tributyltin) oxide (TBTO) Δ	56-35-9	8	Anthracene	120-12-7
9	4,4'-Diaminodiphenylmethane (MDA)	101-77-9	10	Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α-HBCDD, β-HBCDD, γ-HBCDD)	25637-99-4 3194-55-6 (134237-50-6, 134237-51-7, 134237-52-8)
11	5-Tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	12	Bis(2-ethylhexyl) phthalate (DEHP)	117-81-7
13	Dibutyl phthalate (DBP)	84-74-2	14	Benzyl butyl phthalate (BBP)	85-68-7
15	Short chain chlorinated paraffins (C ₁₀₋₁₃)	85535-84-8	16	Lead chromate Δ	7758-97-6
17	Lead chromate molybdate sulphate red (C.I. Pigment Red 104) Δ	12656-85-8	18	Lead sulfochromate yellow (C.I. Pigment Yellow 34) Δ	1344-37-2
19	Tris (2-chloroethyl) phosphate	115-96-8	20	2,4-dinitrotoluene	121-14-2
21	Diisobutyl phthalate (DIBP)	84-69-5	22	Coal tar pitch, high temperature	65996-93-2
23	Anthracene oil	90640-80-5	24	Anthracene oil, anthracene paste, distn. lights	91995-17-4
25	Anthracene oil,	91995-15-2	26	Anthracene oil,	90640-82-7



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	anthracene paste, anthracene fraction			anthracene-low	
27	Anthracene oil, anthracene paste	90640-81-6	28	Acrylamide	79-06-1
29	Boric acid Δ	10043-35-3 11113-50-1	30	Disodium tetraborate, anhydrous Δ	1330-43-4 12179-04-3 1303-96-4
31	Tetraboron disodium heptaoxide, hydrate Δ	12267-73-1	32	Sodium chromate Δ	7775-11-3
33	Potassium chromate Δ	7789-00-6	34	Ammonium dichromate Δ	7789-09-5
35	Potassium dichromate Δ	7778-50-9	36	Trichloroethylene	79-01-6
37	2-Methoxyethanol	109-86-4	38	2-Ethoxyethanol	110-80-5
39	Cobalt sulphate Δ	10124-43-3	40	Cobalt dinitrate Δ	10141-05-6
41	Cobalt carbonate Δ	513-79-1	42	Cobalt diacetate Δ	71-48-7
43	Chromium trioxide Δ	1333-82-0	44	Chromic acid Δ Dichromic acid Δ Oligomers of chromic acid and dichromic Acid Δ	7738-94-5 13530-68-2 --
45	Strontium chromate Δ	7789-06-2	46	2-Ethoxyethyl acetate (2-EEA)	111-15-9
47	1,2-Benzenedicarboxylic acid, di-C ₇₋₁₁ -branched and linear alkyl esters (DHNUP)	68515-42-4	48	Hydrazine	7803-57-8 302-01-2
49	1-Methyl-2-pyrrolidone	872-50-4	50	1,2,3-Trichloropropane	96-18-4
51	1,2-Benzenedicarboxylic acid, di-C ₆₋₈ -branched alkyl esters, C ₇ -rich (DIHP)	71888-89-6	52	Lead dipicrate Δ	6477-64-1
53	Lead styphnate Δ	15245-44-0	54	Lead azide; Lead diazide Δ	13424-46-9
55	Phenolphthalein	77-09-8	56	2,2'-dichloro-4,4'-methylenedianiline (MOCA)	101-14-4
57	N,N-dimethylacetamide (DMAC)	127-19-5	58	Trilead diarsenate Δ	3687-31-8
59	Calcium arsenate Δ	7778-44-1	60	Arsenic acid Δ	7778-39-4
61	Bis(2-methoxyethyl) ether	111-96-6	62	1,2-Dichloroethane	107-06-2
63	4-(1,1,3,3-tetramethylbutyl)phenol, (4-tert-Octylphenol)	140-66-9	64	2-Methoxyaniline; o-Anisidine	90-04-0
65	Bis(2-	117-82-8	66	Formaldehyde,	25214-70-4



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	methoxyethyl) phthalate (DMEP)			oligomeric reaction products with aniline (technical MDA)	
67	Pentazinc chromate octahydroxide Δ	49663-84-5	68	Potassium hydroxyoctaoxodizincate di-chromate Δ	11103-86-9
69	Dichromium tris(chromate) Δ	24613-89-6	70	Aluminosilicate Refractory Ceramic Fibres Δ	(Index No. 650-017-00-8)
71	Zirconia Aluminosilicate Refractory Ceramic Fibres Δ	(Index No. 650-017-00-8)	72	1,2-Bis(2-methoxyethoxy)ethane (TEGDME; triglyme)	112-49-2
73	1,2-Dimethoxyethane; ethylene glycol dimethyl ether (EGDME)	110-71-4	74	Diboron trioxide Δ	1303-86-2
75	Formamide	75-12-7	76	Lead(II) bis(methanesulfonate) Δ	17570-76-2
77	1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione (TGIC)	2451-62-9	78	1,3,5-tris[(2S and 2R)-2,3-epoxypropyl]-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione (β-TGIC)	59653-74-6
79	4,4'-bis(dimethylamino) benzophenone (Michler's ketone)	90-94-8	80	N,N,N',N'-tetramethyl-4,4'-methylenedianiline (Michler's base)	101-61-1
81	[4-[4,4'-bis(dimethylamino) benzhydrylidene]cyclohexa-2,5-dien-1-ylidene]dimethylammonium chloride (C.I. Basic Violet 3) [with ≥ 0.1% of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)] +	548-62-9	82	[4-[[4-anilino-1-naphthyl][4-(dimethylamino)phenyl]methylene]cyclohexa-2,5-dien-1-ylidene]dimethylammonium chloride (C.I. Basic Blue 26) [with ≥ 0.1% of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)] +	2580-56-5
83	α,α-Bis[4-(dimethylamino)phenyl]-4-(phenylamino)naphthalene-1-methanol (C.I. Solvent Blue 4) [with ≥ 0.1% of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)] +	6786-83-0	84	4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol [with ≥ 0.1% of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)] +	561-41-1



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
85	Bis(pentabromophenyl) ether (decabromodiphenyl ether; DecaBDE)	1163-19-5	86	Pentacosafuorotridecanoic acid	72629-94-8
87	Tricosafuorododecanoic acid	307-55-1	88	Henicosafuoroundecanoic acid	2058-94-8
89	Heptacosafuorotetradecanoic acid	376-06-7	90	Diazene-1,2-dicarboxamide (C,C'-azodi(formamide))	123-77-3
91	Cyclohexane-1,2-dicarboxylic anhydride [1] cis-cyclohexane-1,2-dicarboxylic anhydride [2] trans-cyclohexane-1,2-dicarboxylic anhydride [3] [The individual cis- [2] and trans- [3] isomer substances and all possible combinations of the cis- and trans-isomers [1] are covered by this entry]	85-42-7 13149-00-3 14166-21-3	92	Hexahydromethylphthalic anhydride [1], Hexahydro-4-methylphthalic anhydride [2], Hexahydro-1-methylphthalic anhydride [3], Hexahydro-3-methylphthalic anhydride [4] [The individual isomers [2], [3] and [4] (including their cis- and trans-stereo isomeric forms) and all possible combinations of the isomers [1] are covered by this entry]	25550-51-0 19438-60-9 48122-14-1 57110-29-9
93	4-Nonylphenol, branched and linear [substances with a linear and/or branched alkyl chain with a carbon number of 9 covalently bound in position 4 to phenol, covering also UVCB- and well-defined substances which include any of the individual isomers or a combination thereof]	--	94	4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated [covering well-defined substances and UVCB substances, polymers and homologues]	--
95	Methoxyacetic acid	625-45-6	96	N,N-dimethylformamide	68-12-2
97	Dibutyltin dichloride (DBTC) Δ	683-18-1	98	Lead monoxide (Lead oxide) Δ	1317-36-8
99	Orange lead (Lead tetroxide) Δ	1314-41-6	100	Lead bis(tetrafluoroborate) Δ	13814-96-5
101	Trilead bis(carbonate)dihydroxide Δ	1319-46-6	102	Lead titanium trioxide Δ	12060-00-3
103	Lead titanium	12626-81-2	104	Silicic acid, lead salt Δ	11120-22-2



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	zirconium oxide Δ				
105	Silicic acid (H ₂ Si ₂ O ₅), barium salt (1:1), lead-doped Δ [with lead (Pb) content above the applicable generic concentration limit for 'toxicity for reproduction' Repr. 1A (CLP) or category 1 (DSD); the substance is a member of the group entry of lead compounds, with index number 082-001-00-6 in Regulation (EC) No 1272/2008]	68784-75-8	106	1-Bromopropane (n-propyl bromide)	106-94-5
107	Methyloxirane (Propylene oxide)	75-56-9	108	1,2-Benzenedicarboxylic acid, dipentylester, branched and linear	84777-06-0
109	Diisopentylphthalate (DIPP)	605-50-5	110	N-pentyl-isopentylphthalate	776297-69-9
111	1,2-Diethoxyethane	629-14-1	112	Acetic acid, lead salt, basic Δ	51404-69-4
113	Lead oxide sulfate Δ	12036-76-9	114	[Phthalato(2-)]dioxotrilead Δ	69011-06-9
115	Dioxobis(stearato)trilead Δ	12578-12-0	116	Fatty acids, C16-18, lead salts Δ	91031-62-8
117	Lead cyanamate Δ	20837-86-9	118	Lead dinitrate Δ	10099-74-8
119	Pentalead tetraoxide sulphate Δ	12065-90-6	120	Pyrochlore, antimony lead yellow Δ	8012-00-8
121	Sulfurous acid, lead salt, dibasic Δ	62229-08-7	122	Tetraethyllead Δ	78-00-2
123	Tetralead trioxide sulphate Δ	12202-17-4	124	Trilead dioxide phosphonate Δ	12141-20-7
125	Furan	110-00-9	126	Diethyl sulphate	64-67-5
127	Dimethyl sulphate	77-78-1	128	3-Ethyl-2-methyl-2-(3-methylbutyl)-1,3-oxazolidine	143860-04-2
129	Dinoseb (6-sec-butyl-2,4-dinitrophenol)	88-85-7	130	4,4'-Methylenedi-o-toluidine	838-88-0
131	4,4'-Oxydianiline and its salts	101-80-4	132	4-Aminoazobenzene	60-09-3
133	4-Methyl-m-phenylenediamine (toluene-2,4-diamine)	95-80-7	134	6-Methoxy-m-toluidine (p-cresidine)	120-71-8



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
135	Biphenyl-4-ylamine	92-67-1	136	o-Aminoazotoluene[(4-o-tolylazo-o-toluidine)]	97-56-3
137	o-Toluidine	95-53-4	138	N-Methylacetamide	79-16-3
139	Cadmium	7440-43-9	140	Cadmium oxide Δ	1306-19-0
141	Dipentyl phthalate (DPP)	131-18-0	142	4-Nonylphenol, branched and linear, ethoxylated [substances with a linear and/or branched alkyl chain with a carbon number of 9 covalently bound in position 4 to phenol, ethoxylated covering UVCB- and well-defined substances, polymers and homologues, which include any of the individual isomers and/or combinations thereof]	--
143	Ammonium pentadecafluorooctanoate (APFO)	3825-26-1	144	Pentadecafluorooctanoic acid (PFOA)	335-67-1
145	Cadmium sulphide Δ	1306-23-6	146	Disodium 3,3'-[[1,1'-biphenyl]-4,4'-diylbis(azo)]bis(4-aminonaphthalene-1-sulphonate) (C.I. Direct Red 28)	573-58-0
147	Disodium 4-amino-3-[[4'-[(2,4-diaminophenyl)azo][1,1'-biphenyl]-4-yl]azo]-5-hydroxy-6-(phenylazo)naphthalene-2,7-disulphonate (C.I. Direct Black 38)	1937-37-7	148	Dihexyl phthalate (DnHP)	84-75-3
149	Imidazolidine-2-thione (2-imidazoline-2-thiol)	96-45-7	150	Lead di(acetate) Δ	301-04-2
151	Trixylyl phosphate	25155-23-1	152	1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear (Diisohexyl phthalate)	68515-50-4



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
				(DIHP))	
153	Cadmium chloride Δ	10108-64-2	154	Sodium perborate; perboric acid, sodium salt Δ	--
155	Sodium peroxometaborate Δ	7632-04-4	156	2-(2H-benzotriazol-2-yl)- 4,6-ditertpentylphenol (UV-328)	25973-55-1
157	2-Benzotriazol-2-yl- 4,6-di-tert- butylphenol (UV-320)	3846-71-7	158	2-Ethylhexyl 10-ethyl- 4,4-dioctyl-7-oxo-8-oxa- 3,5-dithia-4- stannatetradecanoate (DOTE)	15571-58-1
159	Cadmium fluoride Δ	7790-79-6	160	Cadmium sulphate Δ	10124-36-4 31119-53-6
161	Reaction mass of 2-ethylhexyl 10- ethyl-4,4-dioctyl-7- oxo-8-oxa-3,5- dithia-4- stannatetradecano ate and 2- ethylhexyl 10-ethyl- 4-[[2-[(2- ethylhexyl)oxy]-2- oxoethyl]thio]-4- octyl-7-oxo-8-oxa- 3,5-dithia-4- stannatetradecano ate (reaction mass of DOTE and MOTE)	15571-58-1 27107-89-7	162	1,2- Benzenedicarboxylic acid, di-C ₆₋₁₀ -alkyl esters; 1,2- benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate (EC No. 201- 559-5)	68515-51-5 68648-93-1
163	5-Sec-butyl-2-(2,4- dimethylcyclohex- 3-en-1-yl)-5-methyl- 1,3-dioxane [1], 5- sec-butyl-2-(4,6- dimethylcyclohex- 3-en-1-yl)-5-methyl- 1,3-dioxane [2] [covering any of the individual isomers of [1] and [2] or any combination thereof]	117933-89-8	164	Nitrobenzene	98-95-3
165	2,4-Di-tert-butyl-6- (5- chlorobenzotriazol- 2-yl)phenol (UV-327)	3864-99-1	166	2-(2H-benzotriazol-2-yl)- 4-(tert-butyl)-6-(sec- butyl)phenol (UV-350)	36437-37-3
167	1,3-Propanesultone	1120-71-4	168	Perfluorononan-1-oi-	375-95-1



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
				acid and its sodium and ammonium salts	21049-39-8 4149-60-4
169	Benzo[def]chrysen e (Benzo[a]pyrene)	50-32-8	170	4,4'- Isopropylidenediphenol (bisphenol A; BPA)	80-05-7
171	Nonadecafluorodec anoic acid (PFDA) and its sodium and ammonium salts	335-76-2 3830-45-3 3108-42-7	172	4-Heptylphenol, branched and linear [substances with a linear and/or branched alkyl chain with a carbon number of 7 covalently bound predominantly in position 4 to phenol, covering also UVCB- and well-defined substances which include any of the individual isomers or a combination thereof]	--
173	p-(1,1 Dimethylpropyl)phe nol	80-46-6	174	Perfluorohexane-1- sulphonic acid and its salts (PFHxS)	355-46-4
175	1,6,7,8,9,14,15,16, 17,17,18,18- Dodecachloropenta cyclo[12.2.1.16,9.0 2,13.05,10]octadec a-7,15-diene ("Dechlorane Plus"™) [covering any of its individual anti- and syn- isomers or any combination thereof]	13560-89-9 135821-74-8 135821-03-3	176	Benz[a]anthracene	56-55-3
177	Cadmium nitrate Δ	10325-94-7	178	Cadmium carbonate Δ	513-78-0
179	Cadmium hydroxide Δ	21041-95-2	180	Chrysene	218-01-9
181	Reaction products of 1,3,4- thiadiazolidine-2,5- dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP) [with ≥0.1% w/w 4- heptylphenol,	--	182	Benzene-1,2,4- tricarboxylic acid 1,2 anhydride (trimellitic anhydride, TMA)	552-30-7



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	branched and linear]				
183	Dicyclohexyl phthalate (DCHP)	84-61-7	184	Octamethylcyclotetrasiloxane (D4)	556-67-2
185	Decamethylcyclotetrasiloxane (D5)	541-02-6	186	Dodecamethylcyclotetrasiloxane (D6)	540-97-6
187	Lead	7439-92-1	188	Disodium octaborate Δ	12008-41-2
189	Benzo[ghi]perylene	191-24-2	190	Terphenyl hydrogenate	61788-32-7
191	Ethylenediamine (EDA)	107-15-3	192	1,7,7-Trimethyl-3-(phenylmethylene)bicyclo[2.2.1]heptan-2-one	15087-24-8
193	2,2-Bis(4'-hydroxyphenyl)-4-methylpentane	6807-17-6	194	Benzo[k]fluoranthene	207-08-9
195	Fluoranthene	206-44-0	196	Phenanthrene	85-01-8
197	Pyrene	129-00-0	198	2,3,3,3-Tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides (covering any of their individual isomers and combinations thereof)	--
199	4-Tert-Butylphenol (PTBP)	98-54-4	200	2-Methoxyethyl acetate	110-49-6
201	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP)	--	202	Diisohexyl phthalate	71850-09-4
203	2-Benzyl-2-dimethylamino-4'-morpholinobutyrophenone	119313-12-1	204	2-Methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one	71868-10-5
205	Perfluorobutane sulfonic acid (PFBS) and its salts	--	206	1-Vinylimidazole	1072-63-5
207	2-Methylimidazole	693-98-1	208	Dibutylbis(pentane-2,4-dionato-O,O')tin Δ	22673-19-4
209	Butyl 4-hydroxybenzoate (Butylparaben)	94-26-8	210	Bis(2-(2-methoxyethoxy)ethyl) ether	143-24-8
211	Dioctyltin dilaurate, stannane, dioctyl-, bis(coco acyloxy) derivs., and any other stannane, dioctyl-, bis(fatty acyloxy) derivs. wherein C ₁₂ is the predominant carbon number of the fatty acyloxy	--	212	1,4-Dioxane	123-91-1



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	moiety Δ				
213	2,2-Bis(bromomethyl)propane1,3-diol (BMP); 2,2-dimethylpropan-1-ol, tribromo derivative/3-bromo-2,2-bis(bromomethyl)-1-propanol (TBNPA); 2,3-dibromo-1-propanol (2,3-DBPA)	3296-90-0 36483-57-5 1522-92-5 96-13-9	214	2-(4-Tert-butylbenzyl)propionaldehyde and its individual stereoisomers	--
215	4,4'-(1-Methylpropylidene) bisphenol	77-40-7	216	Glutaral	111-30-8
217	Medium-chain chlorinated paraffins (MCCP) (UVCB substances consisting of more than or equal to 80% linear chloroalkanes with carbon chain lengths within the range from C ₁₄ to C ₁₇)	--	218	Orthoboric acid, sodium salt Δ	13840-56-7
219	Phenol, alkylation products (mainly in para position) with C ₁₂ -rich branched alkyl chains from oligomerisation, covering any individual isomers and/ or combinations thereof (PDDP)	--	220	6,6'-Di-tert-butyl-2,2'-methylenedi-p-cresol	119-47-1
221	Tris(2-methoxyethoxy)vinylsilane	1067-53-4	222	($\pm$)-1,7,7-Trimethyl-3-[(4-methylphenyl)methylene]bicyclo[2.2.1]heptan-2-one covering any of the individual isomers and/or combinations thereof (4-MBC)	--
223	S-(Tricyclo(5.2.1.0 ^{2,6})deca-3-en-8(or 9)-	255881-94-8	224	N-(Hydroxymethyl)acrylamide	924-42-5



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
	yl O-(isopropyl or isobutyl or 2-ethylhexyl) O-(isopropyl or isobutyl or 2-ethylhexyl) phosphorodithioate Δ				
225	1,1'-[Ethane-1,2-diylbisoxyl]bis[2,4,6-tribromobenzene]	37853-59-1	226	2,2',6,6'-Tetrabromo-4,4'-isopropylidenediphenol	79-94-7
227	4,4'-Sulphonyldiphenol	80-09-1	228	Barium diboron tetraoxide Δ	13701-59-2
229	Bis(2-ethylhexyl) tetrabromophthalate covering any of the individual isomers and/or combinations thereof	--	230	Isobutyl 4-hydroxybenzoate	4247-02-3
231	Melamine	108-78-1	232	Perfluoroheptanoic acid and its salts	--
233	Reaction mass of 2,2,3,3,5,5,6,6-octafluoro-4-(1,1,1,2,3,3,3-heptafluoropropan-2-yl)morpholine and 2,2,3,3,5,5,6,6-octafluoro-4-(heptafluoropropyl)morpholine	--	234	Bis(4-chlorophenyl) sulphone (BCPS)	80-07-9
235	Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide	75980-60-8	236	2,4,6-Tri-tert-butylphenol (2,4,6-TTBP)	732-26-3
237	2-(2H-Benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol (UV-329)	3147-75-9	238	2-(Dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one	119344-86-4
239	Bumetrizole (UV-326)	3896-11-5	240	Oligomerisation and alkylation reaction products of 2-phenylpropene and phenol (OAPP)	--
241	Bis(α,α -dimethylbenzyl) peroxide	80-43-3	242	Triphenyl phosphate (TPHP)	115-86-6
243	6-[(C ₁₀ -C ₁₃)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA)	2156592-54-8	244	O,O,O-Triphenyl phosphorothioate (TPPT)	597-82-0



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No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
245	Octamethyltrisiloxane	107-51-7	246	Perfluamine	338-83-0
247	Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives	192268-65-8			

(B2) Tested proposed SVHC Chemicals list (Substance in the list of 1 chemical in the draft Commission Implementing Decision proposed by European Commission, and published as Notification G/TBT/N/EU/803 on World Trade Organization (WTO) on 1 June 2021):

No.	Chemical Substance	CAS No.	No.	Chemical Substance	CAS No.
1	Resorcinol	108-46-3			

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

+ = The content was calculated based on assumption of worst-case.

(C) SVHC Requirements

Following substances may be identified as substance of very high concern (SVHC):

Substances classified as:

- Carcinogenicity category 1A or 1B;
- Germ cell mutagenicity category 1A or 1B;
- Reproductive toxicity category 1A or 1B, adverse effects on sexual function and fertility or on development;
- Persistent, bioaccumulative and toxic (PBT)
- Very persistent and very bioaccumulative (vPvB)
- Other substances for which there is scientific evidence of probable serious effects to human health or the environment which give rise to an equivalent level of concern, such as endocrine disrupters



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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 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.

Waste Framework Directive (WFD) Requirement:

As per Article 9(1)(i) of Directive 2008/98/EC on waste (WFD, Waste Framework Directive) as amended, Member States shall take measures to ensure that any supplier of an article as defined in point 33 of Article 3 of Regulation (EC) No 1907/2006 (REACH) provides the information pursuant to Article 33(1) of Regulation (EC) No 1907/2006 (REACH) to the European Chemicals Agency (ECHA) as from 5 January 2021. 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) on the EU market is required to submit a SCIP Notification on that article to ECHA, as from 5 January 2021.



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Component list:

Sequence No.	Test Component No.	Test Component Description(s)
SN1	2.	Black ink (ink of pen).
SN2	4.	Silver color metal (nib, ball point of pen).
SN3	6.	Gun color metal (joint of barrel of pen).
SN4	7.	Gun color metal (socket of pen).
SN5	8.	Gun color metal (joint of cap of pen).
SN6	9.	Gun color metal (cap of pen).
SN7	10.	Silver color metal (spring of nib of pen).
SN8	11.	Silver color metal (ink chamber of pen).
SN9	12.	Gold color metal (inner of barrel of pen).
SN10	13.	Natural color wood (barrel of pen).
SN11	14.	Gun color metal with white coating (barrel of pen).
SN12	15.	Gold color metal (washer of cap of pen) (internal).
SN13	16.	Silver color metal (inner of barrel of pen) (internal).
SN14	17.	Black/white plastic (end cap of ink chamber, stopper of inner barrel of pen).
SN15	19.	Gold color metal (inner of barrel of pen) (sample received date: May 08, 2025).



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Reference photo



Remark: The products in the reference photo are not tested in this report. It's declared by the applicant that they are the same series of products with the particular tested sample, just included in the report for reference.

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) 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 Shenzhen Limited, Guangzhou Branch.



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