



Test Report

No.T52310250628TC

Date: MAR 02, 2023

Page 1 of 10

DONGGUAN JIAN PLASTIC & METAL PRODUCTS LTD.
NO. 6, GAOBU BLVD,GAOBU TOWN, DONGGUAN CITY, GUANGDONG PROVINCE, CHINA 523278

The following samples were submitted and identified by/on behalf of the client as:

TPR RUBBER BUTTERFLY CLUTCH

Buyer : WORLD WIDE
Manufacturer : CHINA
Country of Origin : CHINA
Country of Destination : WORLD WIDE
Requested Age Grading : 3+

\*\*\*\*\*

Sample Receiving Date : FEB 15, 2023
Further Information Date : MAR 01, 2023
Testing Period : FEB 15, 2023 TO MAR 02, 2023

Table with 2 columns: Test Requested, Conclusion. Row 1: European Regulation (EC) No. 1907/2006 (REACH) Annex XVII and its amendment (EU) 2018/2005 - Phthalates content, PASS. Row 2: DBP, BBP, DEHP, DIBP, DHNUP, DIHP, DMEP, 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear, nPIPP, DIPP, DPP, DnHP and 1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear, 1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with >= 0.3% of dihexyl phthalate, DCHP, DIHxP in the Candidate List of Substances of Very High Concern (SVHC) for authorization published by European Chemicals Agency (ECHA) regarding Regulation (EC) No 1907/2006 concerning the REACH, PASS.



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Test Report

No. T52310250628TC

Date: MAR 02, 2023

Page 2 of 10

Test Requested		Conclusion
3.	CPSIA section 101 - Total Lead content	--
	CPSIA section 101(f) (1) – Lead in paint/similar surface coating material	NOT APPLICABLE (SEE REMARK)
	CPSIA section 101(a) (2) – Lead in accessible substrate materials (Including Children’s Metal Jewelry)	PASS
4.	US 16 CFR Part 1307 – Phthalates	PASS
5.	US California Proposition 65 – Cadmium Content	PASS
6.	Client’s Requirement – Cadmium Content	PASS

Remark: There were no surface coating found in the said submitted sample.

\*\*\*\*\* FOR FURTHER DETAILS, PLEASE REFER TO THE FOLLOWING PAGE(S) \*\*\*\*\*

Signed for and on behalf of  
SGS-CSTC Standards Technical  
Services Co., Ltd. Shenzhen Branch Testing Center



Qu Ping, Kiky  
Dept. Manager



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**Results:**

**European Regulation (EC) No. 1907/2006 (REACH) Annex XVII and its amendment (EU) 2018/2005 – Phthalate content**

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS) / High Performance Liquid Chromatography with Mass Spectrometer (HPLC-MS)

Materials can be placed in the mouth for toys & childcare articles

Test Item(s)	CAS No.	Result (s) (%)	MDL (%)	Permissible Limit (%)
Alias No.	--	2		
Tracing No.	--	1		
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisononyl Phthalate (DINP)	28553-12-0 68515-48-0	ND	0.010	--
Di-n-octyl Phthalate (DNOP)	117-84-0	ND	0.003	--
Diisodecyl Phthalate (DIDP)	26761-40-0 68515-49-1	ND	0.010	--
Diisobutyl phthalate (DIBP)	84-69-5	ND	0.003	0.1
Total (DBP+BBP+DEHP+DIBP)		ND	--	0.1
Total (DINP+DNOP+DIDP)		ND	--	0.1

Specimen Description:

- 1. Black soft plastic (Butterfly clutch)

- Note:
- ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - % = percentage by weight

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- + Composite test has been performed as per client's request and the results are calculated using the total specimen weight
- <sup>Δ</sup> Result is made based on the composite test which may have the probability of one or more components that can lead to a failure conclusion. Individual test is highly recommended for each component
- \* Exceeds Permissible Limit



**Phthalates in the Candidate List of Substances of Very High Concern (SVHC) for authorization published by European Chemicals Agency (ECHA) regarding Regulation (EC) No 1907/2006 concerning the REACH**

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS) / High Performance Liquid Chromatography with Mass Spectrometer (HPLC-MS)

Test Item(s)	CAS No.	Result(s) (%)	MDL (%)	Permissible Limit# (%)
<b>Specimen No.</b>	--	1		
<b>Alias No.</b>	--	1		
<b>Tracing No.</b>	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisobutyl phthalate (DIBP)	84-69-5	ND	0.003	0.1
Benzenedicarboxylic acid, di-(C7-11)-branched and linear alkyl esters (DHNUP)	68515-42-4	ND	0.01	0.1
1,2-benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP)	71888-89-6	ND	0.01	0.1
Bis(2-methoxyethyl) phthalate (DMEP)	117-82-8	ND	0.003	0.1
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear^	84777-06-0	ND	0.003	0.1
N-pentyl-isopentylphthalate (nPiPP)	776297-69-9	ND	0.003	0.1
Diisopentyl phthalate (DiPP)	605-50-5	ND	0.003	0.1
Di-n-pentyl phthalate (DPP/DPeNP)	131-18-0	ND	0.003	0.1
Di-n-Hexyl phthalate (DHP/DnHP)	84-75-3	ND	0.003	0.1
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	68515-50-4	ND	0.003	0.1
1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate	68515-51-5 68648-93-1	ND	0.025	0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	ND	0.003	0.1
Di-iso-hexyl phthalate (DIHxP)	71850-09-4	ND	0.003	0.1

**Specimen Description:**

1. Black soft plastic (Butterfly clutch)



- Note:
- ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - % = percentage by weight

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- # = According to Article 33 of REACH Regulation (EC) No. 1907/2006, fulfilling the requirement of communication in the supply chain is required when the SVHC on the candidate list is / are found to be > 0.1%.
- ^ = a mixture of i) Di-n-pentyl phthalate (DPP); ii) N-pentyl-isopentylphthalate (nPiPP) and iii) Diisopentyl phthalate (DiPP)
- \* Exceeds Limit
- + Composite test has been performed as per client's request and the results are calculated using the total specimen weight
- Δ Result is made based on the composite test which may have the probability of one or more components that can lead to a failure conclusion. Individual test is highly recommended for each component





# Test Report

No. T52310250628TC

Date: MAR 02, 2023

Page 6 of 10

## CPSIA - Lead in Accessible Substrate Materials

Method (non-metallic materials): With reference to CPSC-CH-E1002-08.3 - Standard Operation Procedure for Determining Total Lead (Pb) in Non-Metal Children Product

Method (metal materials): With reference to CPSC-CH-E1001-08.3 - Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)

Test Item(s)	Lead (Pb)		
Permissible Limit (ppm)	100		
Specimen Description	Alias No.	Tracing No.	Result(s) (ppm)
1. Black soft plastic (Butterfly clutch)	4	1	ND

- Note:
- ppm = parts per million
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit = 10 ppm
  - 1% = 10000 mg/kg = 10000 ppm

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- <sup>Δ</sup> Test result is over recommended action limit (80% of the regulatory limit). As the result is based on composite test and falls into an uncertain range, where "Pass" or "Fail" cannot be truly defined, "Interim-Fail" is given since the specimen may possibility fail according to the regulatory limit. Individual test is highly recommended to determine the exact Lead content in each component. The decision rule has prescribed in the regulation or standard, conformity reporting will base on the standard.
- + Composite test has been performed as per client's request and the results are calculated using the minimum specimen weight
- \* Exceeds Permissible Limit



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**US 16 CFR Part 1307 – Phthalates Content**

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS) / High Performance Liquid Chromatography with Mass Spectrometer (HPLC-MS)

Test Item(s)	CAS No.	Result (s) (%)	MDL (%)	Permissible Limit (%)
Alias No.	--	3		
Tracing No.	--	1		
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisononyl Phthalate (DINP)	28553-12-0 68515-48-0	ND	0.010	0.1
Di-n-Hexyl phthalate (DHP/DnHP/DHEXP)	84-75-3	ND	0.003	0.1
Diisobutyl phthalate (DIBP)	84-69-5	ND	0.003	0.1
Di-n-pentyl phthalate (DPP/DPEP/DPENP)	131-18-0	ND	0.003	0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	ND	0.003	0.1

**Specimen Description:**

- Black soft plastic (Butterfly clutch)

- Note:
- % = percentage by weight
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - 1% = 10000 mg/kg = 10000 ppm

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- + Composite test has been performed as per client's request and the results are calculated using the total specimen weight
- <sup>Δ</sup> Result is made based on the composite test which may have the probability of one or more components that can lead to a failure conclusion. Individual test is highly recommended for each component
- \* Exceeds Permissible Limit





# Test Report

No. T52310250628TC

Date: MAR 02, 2023

Page 8 of 10

## US California Proposition 65 – Cadmium Content

Method: With reference to CPSC-CH-E1003-09.1 / CPSC-CH-E1002-08.3 / CPSC-CH-E1001-08.3

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Inductively Coupled Plasma – Mass Spectrometry (ICP-MS)

Test Item(s)	Cadmium (Cd)		
Specimen Description	Alias No.	Tracing No.	Result(s) (ppm)
1. Black soft plastic (Butterfly clutch)	5	1	ND

- Note:
- ppm = parts per million
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit = 5 ppm

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- + Composite test has been performed as per client's request and the results are calculated using the minimum specimen weight
- \* Exceed Permissible Limit, Product improvement or Warning statement required

Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment. By requiring that this information be provided, Proposition 65 enables Californians to make informed decisions about their exposures to these chemicals.

**⚠️WARNING:** This product can expose you to chemicals including Cadmium, which is known to the State of California to cause cancer and birth defects or other reproductive harm. For more information, go to <https://www.p65warnings.ca.gov/>

### Summary of permissible limits of Cadmium requirement(s) otherwise warning label required.

Requirement(s)	Permissible Limit of Cadmium (ppm)	Effective Date
California Proposition 65 (County of Alameda Court Case No. RG-10-514803 [Consolidated with Case No. RG 10-545680 and RG 10-545687])	300	Current



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No. T52310250628TC

Date: MAR 02, 2023

Page 9 of 10

## Cadmium Content

Method: With reference to CPSC-CH-E1003-09.1 / CPSC-CH-E1002-08.3 / CPSC-CH-E1001-08.3

Test Item(s)	Unit	1	MDL	Client's Limit
Alias No.	--	6	--	--
Tracing No.	--	1	--	--
Cadmium (Cd)	mg/kg	ND	5	75

### Specimen Description:

1. Black soft plastic (Butterfly clutch)

- Note:
- mg/kg = milligram per kilogram
  - MDL = Method Detection Limit
  - ND = Not Detected (lower than MDL)

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- + Composite test has been performed as per client's request and the results are calculated using the minimum specimen weight
- \* Exceeds Client's Limit



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Remark 2: The statement of conformity has considered the decision rule based on the Guarded acceptance (8.3.2 of ISO/IEC GUIDE 98-4:2012)- When the measured value falls within the guard band, only the test data and measurement uncertainty will be reported. The guard band is equal to the expanded measurement uncertainty with a 95% coverage probability( $k=2$ ),  $w = U_{95}$ . The Probability of False Accept and the Probability of False Reject of the decision rule are 2.5%.

For Upper Tolerance Limit ( $T_U$ ):

Pass - when the measurement result is below  $T_U - U_{95}$

Fail - when the measurement result is above  $T_U + U_{95}$

Inconclusive - when the measurement result is falling in guard band  $[T_U - U_{95}, T_U + U_{95}]$

For Lower Tolerance Limit ( $T_L$ ):

Pass - when the measurement result is above  $T_L + U_{95}$

Fail - when the measurement result is below  $T_L - U_{95}$

Inconclusive - when the measurement result is falling in guard band  $[T_L - U_{95}, T_L + U_{95}]$

### Sample Picture (As received)

Pic.1



SGS authenticate the photo on original report only

\*\*\* End of Report \*\*\*

