

# Test Report

No.: 68.431.23.3565.01

Date: 2023-09-12



Greater China

**Applicant:** Spector & Co  
**Address:** /  
**Product Name:** Push action ballpoint pen made with 40% wheat husk + 60% Polypropylene plastic.  
**Product Type / End use:** Writing instrument  
**Item No.:** EC152  
**Style No.:** CHARLOTTE  
**Supplier:** USX009  
**Country of Origin:** China  
**Country of Destination:** CANADA & U.S.A.  
**Receipt Date of Sample:** 2023-09-06  
**Date of Testing:** From 2023-09-07 to 2023-09-12  
**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. US California Proposition 65 - Total Cadmium Content Test - Paint and Similar Surface-Coating Materials	Pass*
2. US California Proposition 65 - Total Cadmium Content Test - Substrate Materials	Pass*
3. US California Proposition 65 - Total lead Content Test - Paint and Similar Surface-Coating Materials	Pass*
4. US California Proposition 65 - Total Lead Content Test - Substrate Materials	Pass*
5. Phthalates Content (11P)	Pass*
6. Tungsten Content Test	Report As Is
7. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Surface Coating Materials Regulations SOR/2016-193 and SOR/2022-122 - Total Mercury	Pass
8. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Surface Coating Materials Regulations SOR/2016-193 and SOR/2022-122 - Total Lead	Pass
9. Canadian Consumer Products Containing Lead Regulations SOR/2018-83 - Total Lead Content Test	Pass
10. Total Nickel Content Test	Report As Is
11. U.S. CFR Title 16 Part 1307 - Toys and Childcare Articles - Phthalates Content (8P)	Pass
12. US California Proposition 65 - Phthalates Content (6P)	Pass*

Remarks: 1. MDL = Method Detection Limit  
2. N.D. = Not Detected (<MDL)  
3. ≤ Less than  
4. 1 mg/kg = 1 ppm = 0.0001%  
5. NA=Not Applicable

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Lab 2 - Physical & Mechanical Test: Building A2, Jin'ao Industrial Park, No. 150, Jingfang Road, Fuhai, Baoan District, Shenzhen, Guangdong, China

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

Prepared by:

Authorized by:



**Gianna Gao**  
Project Manager

**Eva Liang**  
Project Manager

## Note:

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For further details, please see "Testing and certification regulation", chapter A-3.4  
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- (4) If relevant standards do not specify decision rule(s), follow decision rule as below:  
- "Pass" means that the measured result is within the limits, even when extended by expanded uncertainty at a level of confidence of 95%.  
- "Fail" means that the measured result is beyond the limit, even when extended by expanded uncertainty at a level of confidence of 95%.
- (5) The test item and sample were specified by the client.
- (6) "\*" denotes the conclusion was drawn according to the client's specification.

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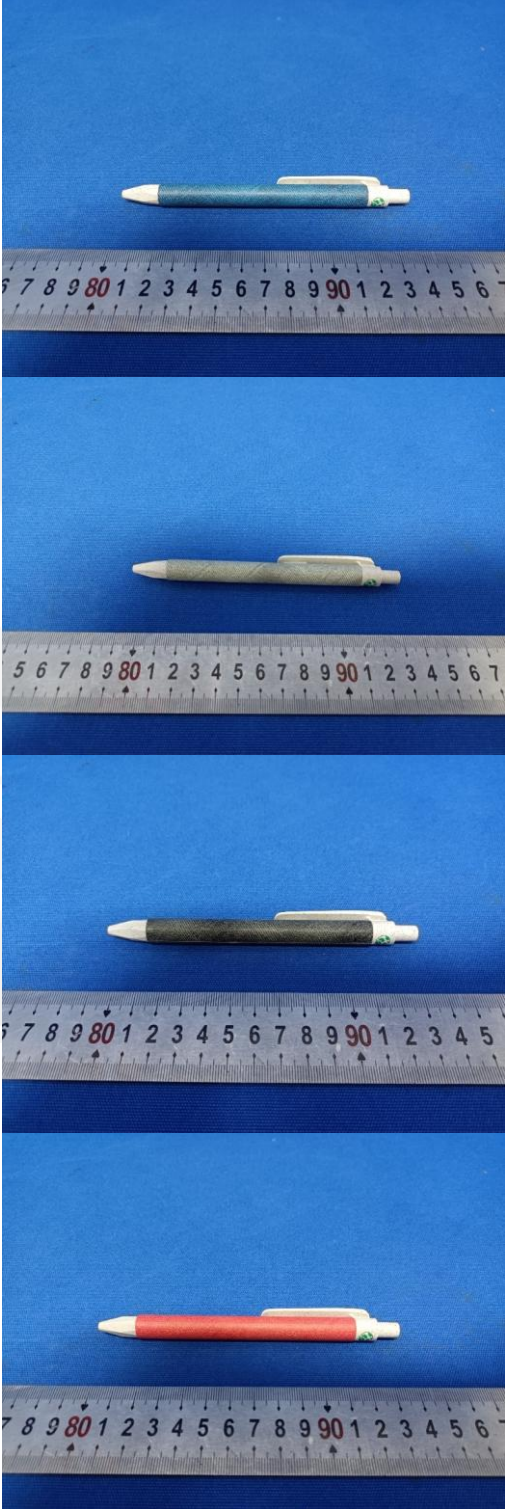
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Description of Tested Subject:

Sample	Description	Photo
A	Whole product	

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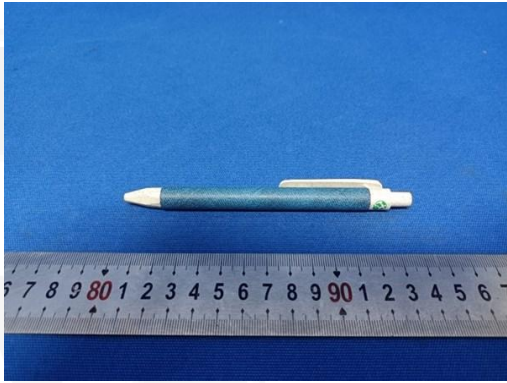

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Sample	Description	Photo
001	Black/ grey printed brown paper board (Barrel)	
002	Blue/ black printed brown paper board (Barrel)	
003	Red/ light red printed brown paper board (Barrel)	

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Sample	Description	Photo
004	Light grey/ black printed brown paper board (Barrel)	
005	Cream/ multi-color dot pattern plastic (Push-button, barrel, nib holder)	
006	Black plastic (Barrel)	
007	Off-white plastic (Insert part)	
008	White plastic (Insert part)	
009	Green coating (Pattern)	
010	Grey plastic (Refill)	
011	Silvery metal (Nib)	
012	Silvery metal (Ball on nib)	
013	Silvery metal (Spring)	
014	Blue ink (Pen)	

T. No	Sample	Description
T1	001	Black/ grey printed brown paper board (Barrel)
T2	002	Blue/ black printed brown paper board (Barrel)
T3	003	Red/ light red printed brown paper board (Barrel)
T4	004	Light grey/ black printed brown paper board (Barrel)
T5	005	Cream/ multi-color dot pattern plastic (Push-button, barrel, nib holder)
T6	006	Black plastic (Barrel)
T7	007	Off-white plastic (Insert part)

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T. No	Sample	Description
T8	008	White plastic (Insert part)
T9	009	Green coating (Pattern)
T10	010	Grey plastic (Refill)
T11	011	Silvery metal (Nib)
T12	012	Silvery metal (Ball on nib)
T13	013	Silvery metal (Spring)
T14	014	Blue ink (Pen)



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**Test Result(s):**

**1. US California Proposition 65 - Total Cadmium Content Test - Paint and Similar Surface-Coating Materials**

Test with reference to microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Client's Limit	Result(s)	Conclusion
009	mg/kg	10	75	N.D.	Pass
014	mg/kg	10	75	N.D.	Pass

**2. US California Proposition 65 - Total Cadmium Content Test - Substrate Materials**

Test with reference to acid digestion or microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Client's Limit	Result(s)	Conclusion
001+002	mg/kg	10	75	N.D.	Pass
003+004	mg/kg	10	75	N.D.	Pass
005+006+007	mg/kg	10	75	N.D.	Pass
008+010	mg/kg	10	75	N.D.	Pass
011	mg/kg	10	75	N.D.	Pass
012	mg/kg	10	75	N.D.	Pass
013	mg/kg	10	75	N.D.	Pass

**3. US California Proposition 65 - Total Lead Content Test - Paint and Similar Surface-Coating Materials**

Test with reference to microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Client's Limit	Result(s)	Conclusion
009	mg/kg	10	90	N.D.	Pass
014	mg/kg	10	90	N.D.	Pass

**4. US California Proposition 65 - Total Lead Content Test - Substrate Materials**

Test with reference to acid digestion or microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Client's Limit	Result(s)	Conclusion
001+002	mg/kg	10	100	N.D.	Pass
003+004	mg/kg	10	100	N.D.	Pass
005+006+007	mg/kg	10	100	N.D.	Pass
008+010	mg/kg	10	100	N.D.	Pass
011	mg/kg	10	100	28.4	Pass
012	mg/kg	10	100	N.D.	Pass
013	mg/kg	10	100	N.D.	Pass

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## 5. Phthalates Content (11P)

Test with reference to in-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS).

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					001+002	003+004
Diethyl phthalate(DEP)	84-66-2	%	0.005	0.1	N.D.	N.D.
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Di-n-octyl phthalate, (DNOP)	117-84-0	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					005+006+007	008+010
Diethyl phthalate(DEP)	84-66-2	%	0.005	0.1	N.D.	N.D.
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	0.013	0.006
Di-n-octyl phthalate, (DNOP)	117-84-0	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	0.014	0.007

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Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					009	014
Diethyl phthalate(DEP)	84-66-2	%	0.005	0.1	0.026	N.D.
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Di-n-octyl phthalate, (DNOP)	117-84-0	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

## 6. Tungsten Content Test

Test with reference to acid digestion and determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

Test items	Unit	MDL	Maximum Permissible Limit	Result(s)
				013
Tungsten(W)	mg/kg	10.0	-	N.D.
<b>Conclusion</b>				<b>Report As Is</b>

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**7. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Surface Coating Materials Regulations SOR/2016-193 and SOR/2022-122 - Total Mercury**

Test with reference to microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Limit	Result(s)	Conclusion
009	mg/kg	10	10.0	N.D.	Pass

**8. Canada Consumer Product Safety Act (S.C. 2010, c. 21), Surface Coating Materials Regulations SOR/2016-193 and SOR/2022-122 - Total Lead**

Test with reference to microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Limit	Result(s)	Conclusion
009	mg/kg	10	90	N.D.	Pass

**9. Canadian Consumer Products Containing Lead Regulations SOR/2018-83 - Total Lead Content Test**

Test with reference to acid digestion or microwave digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Limit	Result(s)	Conclusion
001+002	mg/kg	10	90	N.D.	Pass
003+004	mg/kg	10	90	N.D.	Pass
005+006+007	mg/kg	10	90	N.D.	Pass
008+010	mg/kg	10	90	N.D.	Pass
009	mg/kg	10	90	N.D.	Pass
011	mg/kg	10	90	28.4	Pass
012	mg/kg	10	90	N.D.	Pass
013	mg/kg	10	90	N.D.	Pass
014	mg/kg	10	90	N.D.	Pass

**10. Total Nickel Content Test**

Test with reference to acid digestion, determination by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

Sample	Unit	MDL	Client's Limit	Result(s)	Conclusion
011	mg/kg	5	-	85.087	Report As Is
012	mg/kg	5	-	71529.175	Report As Is
013	mg/kg	5	-	387.321	Report As Is

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## 11. U.S. CFR Title 16 Part 1307 - Toys and Childcare Articles - Phthalates Content (8P)

Test with reference to in-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS).

Parameter	CAS No.	Unit	MDL	Limit	Result(s)	
					001+002	003+004
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

Parameter	CAS No.	Unit	MDL	Limit	Result(s)	
					005+006+007	008+010
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	0.013	0.006
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	0.014	0.007
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

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Parameter	CAS No.	Unit	MDL	Limit	Result(s)	
					009	014
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Diisobutylphthalate, (DIBP)	84-69-5	%	0.005	0.1	N.D.	N.D.
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DnHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Dicyclohexyl phthalate (DCHP)	84-61-7	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
Di-n-pentyl phthalates (DnPP)	131-18-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

12. US California Proposition 65 - Phthalates Content (6P)

Test with reference to in-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS).

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					001+002	003+004
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DNHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					005+006+007	008+010
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	0.013	0.006
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.

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# Test Report

No.: 68.431.23.3565.01

Date: 2023-09-12



Greater China

Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DNHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	0.014	0.007
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

Parameter	CAS No.	Unit	MDL	Client's Limit	Result(s)	
					009	014
Dibutyl phthalate, (DBP)	84-74-2	%	0.005	0.1	N.D.	N.D.
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	%	0.005	0.1	N.D.	N.D.
Benzyl butyl phthalate, (BBP)	85-68-7	%	0.005	0.1	N.D.	N.D.
Di-isodecyl phthalate, (DIDP)	26761-40-0	%	0.005	0.1	N.D.	N.D.
Di-n-hexyl phthalate (DNHP)	84-75-3	%	0.005	0.1	N.D.	N.D.
Di-isononyl phthalate, (DINP)	28553-12-0	%	0.005	0.1	N.D.	N.D.
<b>Conclusion</b>					<b>Pass</b>	<b>Pass</b>

-End of Test Report-

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