Test Report No.: 68.431.19.02731.01
Dated: 2019-05-27

Applicant	**:**	Spector & Co
Address	:	/
Sample Description	:	plastic push-action ballpoint
Item No.	:	G1285
Style No.	:	PAMELA
Supplier	:	USX009
Country of Origin	:	China
Exported to	:	Canada & U.S.A
Test Sample Receipt Date, Location	:	2019-05-17, Shenzhen
Test Period, Location	:	From 2019-05-17 to 2019-05-24, Shenzhen
Test Result(s)	:	Refer to Section 3

Purpose Of Examination / Conclusion:

No.	Test Item(s)	Conclusion
1.	US California Proposition 65 - Total Cadmium Content Test - Substrate Materials	Pass*
2.	US California Proposition 65 - Total Cadmium Content Test - Paint and Similar Surface-Coating Materials	Pass*
3.	US California Proposition 65 - Total Lead Content Test - Substrate Materials	Pass*
4.	US California Proposition 65 - Total Lead Content Test - Paint and Similar Surface-Coating Materials	Pass*
5.	Canadian Consumer Products Containing Lead Regulations SOR/2018-83 - Total Lead Content Test	Pass
6.	Canadian Surface Coating Materials Regulations SOR/2016-193 - Total Lead Content Test	Pass
7.	Phthalates Content	Pass*
8.	US California Proposition 65 - Phthalates Content	Pass*
9.	U.S. CFR Title 16 Part 1307 - Phthalates Content	Pass
10.	Tungsten Content Test	Report as is

Remarks:
(1) The results relate only to the items tested.
(2) Samples are tested as received.
(3) "*" denotes the conclusion was drawn according to the client's specification.
(4) The test item and samples were specified by the client

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

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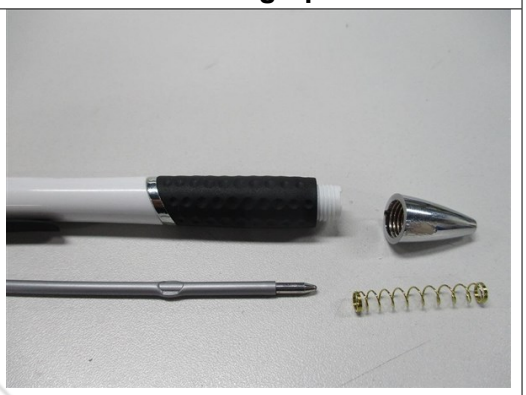
17025 requirements. By taking measurement uncertainties into account it might happen that measured values can neither be assessed as PASS nor as FAIL.

1. Description of the Test Sample:

Sample Description	plastic push-action ballpoint
	

2. List of Materials as identified by the Laboratory:

T. No.	Sample No.	Colour and Description	Photograph
T1	001	Shiny silver coating (Button, ring & collar of pen)	
T2	002	Beige plastic (Button, ring & collar of pen)	
T3	003	Black plastic (Clip of pen)	
T4	004	White plastic (Barrel of pen)	
T5	005	Black soft plastic (On barrel of pen)	
T6	006	Off white plastic (Inner barrel of pen)	
T7	007	Grey plastic (Core of pen)	

T. No.	Sample No.	Colour and Description	Photograph
T8	008	Blue ink (Pen ink)	
T9	009	Golden metal (Spring inner pen)	
T10	010	Silvery metal (Tip of core)	
T11	011	Silvery metal (Ball of tip)	
T12	012	Dull grey plastic (Under button inner pen)	
T13	013	Light grey plastic (Clip)	
T14	014	Light grey soft plastic (On barrel of pen)	

T. No.	Sample No.	Colour and Description	Photograph
T15	015	Flat white plastic (Inner pen)	
T16	016	Orange plastic (Clip)	
T17	017	Orange soft plastic (On barrel of pen)	
T18	018	Red plastic (Clip)	
T19	019	Red soft plastic (On barrel of pen)	
T20	020	Green plastic (Clip)	
T21	021	Green soft plastic (On barrel of clip)	
T22	022	Blue plastic (Clip)	
T23	023	Blue soft plastic (On barrel of pen)	

3. Test Result

3.1 US California Proposition 65 - Total Cadmium Content Test - Substrate Materials

Test method: Acid digestion/Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Test item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 002+003+004	Sample 005+014+017	Sample 006+007+012	
Cadmium	N.D.	N.D.	N.D.	<75
Conclusion	Pass	Pass	Pass	-

Test item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 009	Sample 010	Sample 011	
Cadmium	N.D.	N.D.	N.D.	<75
Conclusion	Pass	Pass	Pass	-

Test item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 013+015+016	Sample 018+020+022	Sample 019+021+023	
Cadmium	N.D.	N.D.	N.D.	<75
Conclusion	Pass	Pass	Pass	-

Note:
- "mg/kg" denotes milligram per kilogram
- "<" denotes less than
- "N.D." denotes Not Detected with Detection Limit 10.0mg/kg

3.2 US California Proposition 65 - Total Cadmium Content Test - Paint and Similar Surface-Coating Materials

Test method: Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Test Item	Results [mg/kg]		Client's Specification [mg/kg]
	Sample 001	Sample 008	
Cadmium	N.D.	N.D.	<75
Conclusion	Pass	Pass	-

Note:
- "mg/kg" denotes milligram per kilogram
- "<" denotes less than
- "N.D." denotes Not Detected with Detection Limit 10.0mg/kg

3.3 US California Proposition 65 - Total Lead Content Test - Substrate Materials

Test method: Acid digestion or Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Test Item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 002+003+004	Sample 005+014+017	Sample 006+007+012	
Lead	N.D.	19.8	16.3	<100
Conclusion	Pass	Pass	Pass	-

Test Item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 009	Sample 010	Sample 011	
Lead	N.D.	42.6	N.D.	<100
Conclusion	Pass	Pass	Pass	-

Test Item	Results [mg/kg]			Client's Specification [mg/kg]
	Sample 013+015+016	Sample 018+020+022	Sample 019+021+023	
Lead	22.2	N.D.	18.1	<100
Conclusion	Pass	Pass	Pass	-

Note:
- "mg/kg" denotes milligram per kilogram
- "<" denotes less than
- "N.D." denotes Not Detected with Detection Limit 10.0mg/kg

3.4 US California Proposition 65 - Total Lead Content Test - Paint and Similar Surface-Coating Materials

Test method: Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Test Item	Results [mg/kg]		Client's Specification [mg/kg]
	Sample 001	Sample 008	
Lead	N.D.	N.D.	<90
Conclusion	Pass	Pass	-

Note:
- "mg/kg" denotes milligram per kilogram
- "<" denotes less than
- "N.D." denotes Not Detected with Detection Limit 10.0mg/kg

3.5 Total Lead

Consumer Products Containing Lead Regulations SOR/2018-83
Acid digestion / Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).
[Reporting Limit: 10.0mg/kg]

Analyte	Result [mg/kg]		
	Sample 001	**Sample 002+003+004**	**Sample 005+014+017**
Lead	N.D.	N.D.	19.8
Limit	<90		
Conclusion	Pass	Pass	Pass

Analyte	Result [mg/kg]		
	Sample 006+007+012	**Sample 008**	**Sample 009**
Lead	16.3	N.D.	N.D.
Limit	<90		
Conclusion	Pass	Pass	Pass

Analyte	Result [mg/kg]		
	Sample 010	**Sample 011**	**Sample 013+015+016**
Lead	42.6	N.D.	22.2
Limit	<90		
Conclusion	Pass	Pass	Pass

Analyte	Result [mg/kg]	
	Sample 018+020+022	**Sample 019+021+023**
Lead	N.D.	18.1
Limit	<90	
Conclusion	Pass	Pass

Note 1. “mg/kg” denotes milligram per kilogram
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 10.0mg/kg

3.6 Total Lead

Surface Coating Materials Regulations SOR/2016-193
Microwave Digestion, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Analyte	**Result [mg/kg]**	
	Sample 001	**Sample 008**
Lead	N.D.	N.D.
Limit	<90	
Conclusion	Pass	Pass

Note 1. “mg/kg” denotes milligram per kilogram
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 10.0mg/kg

3.7 Phthalates Content

Test method: In-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS). [Reporting limit: 0.005%]

Test Items	CAS No.	Results [%]			Client's Specification [%]
		Sample 001	Sample 002+003 +004	Sample 005+014 +017	
Di-(2-ethylhexyl)-phthalat (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Dibutylbenzylphthalat (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Diethyl phthalate (DEP)	84-66-2	N.D.	N.D.	N.D.	<0.1
Butylbenzylphthalat (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Di-iso-butylphthalat (DIBP)	84-69-5	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Di-isodecylphthalat (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	N.D.	<0.1
Di-n-octylphthalat (DNOP)	117-84-0	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DnHP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	N.D.	<0.1
Di-n-pentyphthalat (DNPP)	131-18-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.7 Phthalates Content

Test method: In-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS). [Reporting limit: 0.005%]

Test Items	CAS No.	Results [%]			Client's Specification [%]
		Sample 006+007 +012	Sample 008	Sample 013+015 +016	
Di-(2-ethylhexyl)-phthalat (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Dibutylbenzylphthalat (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Diethyl phthalate (DEP)	84-66-2	N.D.	N.D.	N.D.	<0.1
Butylbenzylphthalat (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Di-iso-butylphthalat (DIBP)	84-69-5	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Di-isodecylphthalat (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	N.D.	<0.1
Di-n-octylphthalat (DNOP)	117-84-0	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DnHP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	N.D.	<0.1
Di-n-pentyphthalat (DNPP)	131-18-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.7 Phthalates Content

Test method: In-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS). [Reporting limit: 0.005%]

Test Items	CAS No.	Results [%]		Client's Specification [%]
		Sample 018+020+022	Sample 019+021+023	
Di-(2-ethylhexyl)-phthalat (DEHP)	117-81-7	N.D.	N.D.	<0.1
Dibutylbenzylphthalat (DBP)	84-74-2	N.D.	N.D.	<0.1
Diethyl phthalate (DEP)	84-66-2	N.D.	N.D.	<0.1
Butylbenzylphthalat (BBP)	85-68-7	N.D.	N.D.	<0.1
Di-iso-butylphthalat (DIBP)	84-69-5	N.D.	N.D.	<0.1
Di-isononyl phthalate (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	<0.1
Di-isodecylphthalat (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	<0.1
Di-n-octylphthalat (DNOP)	117-84-0	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DnHP)	84-75-3	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	<0.1
Di-n-pentyphthalat (DNPP)	131-18-0	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.8 US California Proposition 65 - Phthalates Content

Test method: In-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS). [Reporting limit: 0.005%]

Test Items	CAS No.	Results [%]			Client's Specification [%]
		Sample 001	Sample 002+003 +004	Sample 005+014 +017	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Di-isodecyl phthalate, (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DNHP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Test Items	CAS No.	Results [%]			Client's Specification [%]
		Sample 006+007 +012	Sample 008	Sample 013+015 +016	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Di-isodecyl phthalate, (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DNHP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.8 US California Proposition 65 - Phthalates Content

Test method: In-house method, solvent extracted and analyzed by Gas Chromatography and Mass Spectrometry (GC-MS). [Reporting limit: 0.005%]

Test Items	CAS No.	Results [%]		Client's Specification [%]
		Sample 018+020+022	Sample 019+021+023	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	<0.1
Di-isodecyl phthalate, (DIDP)	26761-40-0 , 68515-49-1	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DNHP)	84-75-3	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.9 U.S. CFR Title 16 Part 1307 - Phthalates Content

CPSC-CH-C1001-09.4 – Standard Operating Procedure for Determination of Phthalates
[Reporting Limit = 0.005%]

Phthalates	CAS No.	Results [%]			Limit [%]
		Sample 001	Sample 002+003 +004	Sample 005+014 +017	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Diisobutylphthalate, (DIBP)	84-69-5	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DHEXP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Di-n-pentyl phthalates (DPENP)	131-18-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.9 U.S. CFR Title 16 Part 1307 - Phthalates Content

CPSC-CH-C1001-09.4 – Standard Operating Procedure for Determination of Phthalates
[Reporting Limit = 0.005%]

Phthalates	CAS No.	Results [%]			Limit [%]
		Sample 006+007 +012	Sample 008	Sample 013+015 +016	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	N.D.	<0.1
Diisobutylphthalate, (DIBP)	84-69-5	N.D.	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DHEXP)	84-75-3	N.D.	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	N.D.	<0.1
Di-n-pentyl phthalates (DPENP)	131-18-0	N.D.	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	Pass	-

Note 1. “%” denotes percentage by weight
2. “<” denotes less than
3. “N.D.” denotes Not Detected with Detection Limit 0.005%

3.9 U.S. CFR Title 16 Part 1307 - Phthalates Content

CPSC-CH-C1001-09.4 – Standard Operating Procedure for Determination of Phthalates
[Reporting Limit = 0.005%]

Phthalates	CAS No.	Results [%]		Limit [%]
		Sample 018+020+022	Sample 019+021+023	
Dibutyl phthalate, (DBP)	84-74-2	N.D.	N.D.	<0.1
Benzyl butyl phthalate, (BBP)	85-68-7	N.D.	N.D.	<0.1
Bis (2-ethylhexyl) phthalate, (DEHP)	117-81-7	N.D.	N.D.	<0.1
Diisobutylphthalate, (DIBP)	84-69-5	N.D.	N.D.	<0.1
Di-n-hexyl phthalate (DHEXP)	84-75-3	N.D.	N.D.	<0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	N.D.	N.D.	<0.1
Di-isononyl phthalate, (DINP)	28553-12-0 , 68515-48-0	N.D.	N.D.	<0.1
Di-n-pentyl phthalates (DPENP)	131-18-0	N.D.	N.D.	<0.1
Conclusion		Pass	Pass	-

Note 1. "%" denotes percentage by weight
2. "<" denotes less than
3. "N.D." denotes Not Detected with Detection Limit 0.005%

3.10 Tungsten Content Test

Test method: EPA 3050B:1996, analyzed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES). [Reporting Limit: 10.0mg/kg]

Test Item	Results [mg/kg]	Client's Specification [mg/kg]
	Sample 009	
Tungsten	N.D.	-
Conclusion	Report as is	-

Note:
- "mg/kg" denotes milligram per kilogram
- "<" denotes less than
- "N.D." denotes Not Detected with Detection Limit 10.0mg/kg

-- END OF TEST REPORT--