SDS Report No. 1002 Date: Mar. 20. 2019

Fengcheng Sanyou Pen Making Science and Technology limited company

Yuandu Town Fengcheng City Jiangxi Province

Trade Name : Ball pen ink (blue)

End Uses : Writing

Composition/Ingredient : See Section 3 Composition/information on ingredients on the SDS

report

Summary : As per request, the contents and formats of the SDS are prepared

in accordance with European Commission Directives, Regulation (EC) No 1907/2006, Regulation (EC) No 1272/2008, and is

provided per attached.

1: Identification of the substance/mixture and of the company/undertaking

Product identifier

Trade name: Ball pen ink (blue)

Relevant identified uses of the substance or mixture and uses advised against

Application of the substance / the mixture: Writing Details of the supplier of the safety data sheet Manufacturer/Supplier:

Fengcheng Sanyou Pen Making Science and Technology limited company

Yuandu Town Fengcheng City Jiangxi Province

Tel: 13979199077

E-mail: littlesan@163.com

Further information obtainable from:

Fengcheng Sanyou Pen Making Science and Technology limited company

Emergency telephone number:

Hu Yonghui Tel: 13979199077

2 :Hazards identification

Classification of the substance or mixture

Classification according to Regulation (EC) No 1272/2008



GHS07

Acute Tox. 4, H302; Harmful if swallowed.

Skin Sens.1 H317 May cause an allergic skin reaction.

Eye Irrit. 2. H319 Causes serious eye irritation.

Aquatic Chronic 3. H412 harmful to aquatic life with long lasting effects.

Label elements

Labelling according to Regulation (EC) No 1272/2008

The product is classified and labelled according to Regulation (EC) No 1272/2008.

Hazard pictograms GHS07

Signal word warning

Hazard statements

H302 Harmful if swallowed.

H317 May cause an allergic skin reaction.

H319 Causes serious eye irritation.

H412 Harmful to aquatic life with long lasting effects.

ullet Precautionary statements

P101 If medical advice is needed, have product container or label at hand.

P102 Keep out of reach of children.

P103 Read label before use.

P261 Avoid breathing dust/fume/gas/mist/vapours/spray.

P280 Wear protective gloves/protective clothing/eye protection/face protection.

P305+P351+P338 IF IN EYES: Rinse cautiously with water for several minutes.

Remove contact lenses, if present and easy to do. Continue rinsing.

P321 Specific treatment (see on this label).

P405 Store locked up.

P501 Dispose of contents/container in accordance with local/regional/national/international

regulations.

- Additional information:
- Other hazards Not applicable.
- Results of PBT and vPvB assessment

PBT: Not applicable.vPvB: Not applicable.

3: Composition/information on ingredients

· Chemical characterization: Mixtures

• Description:

Mixture: consisting of the following components.

For the wording of the listed risk phrases refer to section 16.

Components:		
CAS: 100-51-6 EC: 202-859-9	Benzyl alcohol Acute Tox. 4, H302; Acute Tox. 4, H332	15, 0%
CAS: 122-99-6 EC: 204-589-7	2-Phenoxyethanol Acute Tox. 4, H302; Eye Irrit. 2, H319;	15, 0%
CAS: 57-55-6 EC: 200-338-0	propane-1, 2-diol no hazards have been classified.	9, 0%
CAS: 25054-06-2 EC: 607-515-5	Formaldehyde, polymer with cyclohexanone no hazards have been classified.	26, 0%
CAS:61788-97-4 EC: 612-377-4	Epoxy resin Skin Irrit. 2. H. Skin Sens. 1 H3 H319; Aquatic Chronic 2 . H411	11, 0%
CAS:9003-39-8 EC: 618-363-4	Polyvinylpyrrolidone (PVP) no hazards have been classified.	1,0%
CAS: 112–80–1 EC: 204–007–1	oleic acid Elainic acid cis-9-Octadecenoic acid Skin Irrit. 2. H3 Eye Irrit. 2, H319;	1, 0%
CAS: 102-71-6 EC: 203-049-8	2, 2', 2' '-nitrilotriethanol tris(Hydroxyethyl)amine Skin Irrit. 2. H3 Eye Irrit. 2, H319;	3%
CAS:1328-51-4 EC: 215-523-4	Solvent blue 38 Acute Tox. 4. H302; Eye Irrit. 2. H315 Acute Tox. 4. H332; STOT SE 3. H335; Aquatic Chronic 4. H413	6%
CAS: 52080-58-7 EC: 610-776-8	[4-[4,4'-Bis(dimethylamino)benzhydrylidene]cyclohexa-2,5-dien-1-ylidene]methylimine C. I. 42535:1Solvent Violet 8 Acute Tox. 4. H302; Eye Irrit. 2. H319;	10%
CAS: 2390-60-5 EC: 219-232-0	Basic blue 7	3, 0%

4 First aid measures

General information:

Symptoms of poisoning may even occur after several hours; therefore medical observation for at least 48 hours after the accident.

After inhalation: Supply fresh air; consult doctor in case of complaints.

After skin contact:

Immediately wash with water and soap and rinse thoroughly.

If skin irritation continues, consult a doctor.

 $\textbf{After eye contact:} \ \ \text{Rinse opened eye for several minutes under running water.} \ \ \text{Then consult a doctor.}$

After swallowing:

Rinse out mouth with water.

Never give anything by mouth to an unconscious person.

Call for a doctor immediately.

Information for doctor:

Most important symptoms and effects, both acute and delayed No further relevant information available.

Indication of any immediate medical attention and special treatment needed No further relevant information available.

5 Firefighting measures

Extinguishing media

Suitable extinguishing agents: Use fire extinguishing methods suitable to surrounding conditions.

Special hazards arising from the substance or mixture No further relevant information available. Advice for firefighters

Protective equipment:

Wear fully protective suit.

Mouth respiratory protective device.

6 Accidental release measures

Personal precautions, protective equipment and emergency procedures

Wear protective equipment. Keep unprotected persons away.

Ensure adequate ventilation.

Use respiratory protective device against the effects of fumes/dust/aerosol.

Avoid contact with eyes.

Avoid contact with skin.

Environmental precautions: Do not allow to enter sewers/ surface or ground water.

Methods and material for containment and cleaning up:

Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).

Dispose contaminated material as waste according to item 13.

Ensure adequate ventilation.

Reference to other sections

See Section 7 for information on safe handling.

See Section 8 for information on personal protection equipment.

See Section 13 for disposal information.

7 Handling and storage

Handling

Precautions for safe handling

Keep receptacles tightly sealed.

Ensure good ventilation/exhaustion at the workplace.

Keep away from heat and direct sunlight.

Prevent formation of aerosols.

Avoid contact with eyes and skin.

Information about fire - and explosion protection: Normal measures for preventive fire protection.

Conditions for safe storage, including any incompatibilities

Requirements to be met by storerooms and receptacles:

Store in a cool location.

Store only in the original receptacle.

Information about storage in one common storage facility:

Store a way from foodstuff's.

Store away from oxidizing agents.

Further information about storage conditions: Store in cool, dry conditions in well sealed receptacles.

Specific end use(s) No further relevant information available.

8 Exposure controls/personal protection

Additional information about design of technical facilities: No further data; see item 7.

Control parameters

Ingredients with lin	nit values that require monitoring at the workplace:				
100-51-6 Benzyl alcohol					
MAK (Germany)	nicht festgelegt				
122-99-6 2-Phenoxyethan	ol				
MAK (Germany)	20 ml/m³, ppm				
57-55-6 propane-1,2-	diol				
MAK (Germany)	nicht festgelegt				
102-71-6 2, 2 , 2	102-71-6 2, 2 '.2 "-nitrilotriethanol				
MAK (Germany)	5E mg/m³				

DNELs: Data not available.
PNECs: Data not available.

Additional information: The lists valid during the making were used as basis.

Exposure controls

Based on the composition shown in Section 3, the following measures are suggested for occupational safety measure

Personal protective equipment

General protective and hygienic measures:

Keep away from foodstuffs, beverages and feed.

Wash hands before breaks and at the end of work.

Respiratory protection:

In case of brief exposure or low pollution use respiratory filter device. In case of intensive or longer exposure use self-contained respiratory protective device.

Protection of hands:



Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation.

Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.

Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation.

Material of gloves:

The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.

Penetration time of glove material:

The exact break trough time has to be found out by the manufacturer of the protective gloves and has to be observed.

Eye protection:



Tightly sealed goggles

				perties

• Information on basic physical and chemical properties

• General Information

• Appearance:

 Form:
 Ge1

 Colour:
 Blue

 • Odour:
 Odourless

Odour threshold: Data not available.
 pH-value: Data not available.

• Change in condition: Data not available. Data not available.

Melting point/Melting range: Boiling point/Boiling range:

pH- value	6 10
• Flash point:	100. 6°C.
• Flammability (solid, gaseous):	Not applicable.
• ignition temperature:	436.1°C. (Benzoyl alcohol)
• Decomposition temperature:	Data not available.
• Self-igniting:	Product is not selfigniting.
• Danger of explosion:	Product does not present an explosion hazard.
• Explosion limits	
Lower:	Data not available.
<i>Upper:</i>	Data not available.
 Oxidizing properties: 	Data not available.
• Vapour pressure:	13.3 mm Hg (100 °C) (Benzoyl alcohol)
• Density:	1.1 g/cm³ (lit.)
• Relative density:	Data not available.
• Vapour density:	Data not available.
• Evaporation rate:	Data not available.
 Solubility in / Miscibility with 	
water:	Data not available.
• Partition coefficient (n-octano)	l/water): Data not available.
• Viscosity:	
Dynamic:	5000mpa.s \pm 1000(25 °C) by NDJ-79 viscometer
Kinematic:	Data not available.
• Other information	Data not available.

10 Stability and reactivity

Reactivity No decomposition if used according to specifications.

 $\label{lem:chemical_stability} Chemical\ stability\ {\tt Stable}\ under\ recommended\ storage\ conditions.$

Possibility of hazardous reactions No dangerous reactions known.

Conditions to avoid No further relevant information available.

Incompatible materials: Strong oxidizing agents

 ${f Hazardous}$ decomposition products: Nitrogen oxides, carbon monoxide, carbon dioxide, nitrogen ,acid smoke and fumes.

11 Toxicological information

• Information on toxicological effects

· Acute toxicity

	· Acute toxicity				
• LD/L	• LD/LC50 values relevant for classification:				
100-51	-6 Benz	yl alcohol			
0ra1	LD50	1230 mg/kg (rat)			
Derma1	LD50	2000 mg/kg (rabbit)			
122-99	6 2-Ph	enoxyethanol			
0ra1	LD50	1260 mg/kg (rat)			
Derma1	LD50	5000 mg/kg (rabbit)			
57-55-	6 prop	nane-1, 2-diol			
0ra1	LD50	20000 mg/kg (rat)			
Derma1	LD50	20800 mg/kg (rabbit)			
9003-3	9-8 Po1	yvinylpyrrolidone (PVP)			
Oral	LD50	>40000 mg/kg (mouse)			
		100000 mg/kg (rat)			
112-80-1	oleic	acid , pure			
0ra1	LD50	28000 mg/kg (mouse)			
		74000 mg/kg (rabbit)			
102-71	62,2"	-nitrilotriethanol			
0ra1	LD50	5846 mg/kg (mouse)			
		2200 mg/kg (rabbit)			
Derma1	LD50	>22500 mg/kg (rabbit)			
		γ 22000 mg/ ng (1 αυστο)			

Primary irritant effect

on the skin: Irritating effect.
on the eye: Irritating effect.

Sensitization: Sensitization possible.

Toxicokinetics, metabolism and distribution: No further relevant information available.

Acute effects (acute toxicity irritation and corrosivity): No further relevant information available.

Repeated dose toxicity: No further relevant information available. CMR effects (carcinogenity, mutagenicity and toxicity for reproduction):

No further relevant information available.

12 Ecological information

Toxicity

Aquatic toxicity: No further relevant information available.

Persistence and degradability No further relevant information available.

Behaviour in environmental systems

Bioacc umulative potential No further relevant information available.

Mobility in soil No further relevant information available.

Additional ecological information:

General notes:

Water hazard class 1 (German Regulation) (Self-assessment): slightly hazardous for water. Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.

Results of PBT and vPvB assessment

PBT: Not applicable. vPvB: Not applicable.

Other adverse effects No further relevant information available.

13 Disposal considerations

Waste treatment methods

Recommendation:

Must not be disposed together with household garbage. Do not allow product to reach sewage system.

Uncleaned packaging

Recommendation: Disposal must be made according to official regulations

14 Transport information

• UN-Number ADR, IMDG, IATA	Not applicable.
• UN proper shipping name	Not applicable.
ADR, IMDG, IATA	
• Transport hazard class(es)	,
• ADR, IMDG, IATA • Class	Not applicable.
• Packing group	Not applicable.
• ADR, IMDG, IATA	
•Marine pollutant:	
• Special precautions for user	Not applicable.
• Transport in bulk according to Anna	ex II of MARPOL73/78 and the IBC Code Not applicable.
• UN "ModelRegulation":	-

15 Regulatory information

Safety, health and environmental regulations/legislation specific for the substance or mixture MAK(German Maximum Workplace Concentration)

Ingredients with li	mit values that require monitoring at the workplace:
100-51-6 Benzyl alcohol	
MAK (Germany)	nicht festgelegt
122-99-6 2-Phenoxyethan	ol
MAK (Germany)	20 ml/m³, ppm
57-55-6 propane-1,2-6	diol
MAK (Germany)	nicht festgelegt
102-71-6 2, 2, 2, 2	"-nitrilotriethanol
MAK (Germany)	$5E \text{ mg/m}^3$

•National regulations:

•Waterhazard class: Water hazard class 3 (Self-assessment): extremely hazardous for water.

- Other regulations, limitations and prohibitive regulations
- SVHC Candidate List of REACH Regulation Annex XIV Authorisation (30/3/2017)
 None of the ingredients is listed.
- REACH Regulation Annex XVII Restriction (30/3/2017)
 None of the ingredients is listed.
- REACH Regulation Annex XIV Authorization List (30/3/2017)
 None of the ingredients is listed.

Chemical safety assessment: A Chemical Safety Assessment has not been carried out.

16 Other information

Relevant phrases

H301 Toxic if swallowed.

H302 Harmful if swallowed.

H315 Causes skin irritation.

H317 May cause an allergic skin reaction.

H318 Causes serious eye damage.

H319 Causes serious eye irritation.

H332 Harmful if inhaled.

H335 May cause respiratory irritation.

H400 Very toxic to aquatic life.

H411 Toxic to aquatic life with long lasting effects.

H413 May cause long lasting harmful effects to aquatic life

Abbreviations and acronyms:

ADR: Accord europeen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)

RID: Reglement international concernant le transport des marchandises dangereuses par chemin de fer (Regulations Concerning the International Transport of Dangerous Goods by Rail)

IMDG: International Maritime Code for Dangerous Goods

IATA: International Air Transport Association ICAO:

International Civil Aviation Organization

GHS: Globally Harmonized System of Classification and Labelling of Chemicals

ACGIH: American Conference of Governmental Industrial Hygienists DNEL: Derived

No-Effect Level (REACH)

PNEC: Predicted No-Effect Concentration (REACH)

LC50: Lethal concentration, 50 percent

LD50: Lethal dose, 50 percent

Acute Tox. 3: Acute toxicity, Hazard Category $\boldsymbol{3}$

Acute Tox. 4: Acute toxicity, Hazard Category 4

Skin Irrit. 2: Skin corrosion/irritation, Hazard Category 2

Eye Irrit. 2: Serious eye damage/eye irritation, Hazard Category 2

Skin Sens. 1: Sensitisation - Skin, Hazard Category $\mathbf{1}$

Aquatic Acute 1: Hazardous to the aquatic environment — Acute Hazard, Category $\boldsymbol{1}$

 $\label{eq:Aquatic Chronic 2: Hazardous to the aquatic environment - Chronic Hazard, Category\ 2$

End of document



Report No.: AGC02372181201-002 Date: Dec.12, 2018 Page: 1 of 6

Applicant:

Address:

Report on the submitted samples said to be:

Sample Name

:

Model No.

GT50910

Item No

5410

Country of Origin

CHINA

Country of Destination

Sample Receiving Date

EUROPE

Sumple Reserving

Dec.07, 2018

Testing Period

Dec.07, 2018 to Dec.12, 2018

Test site

.

Test Requested:

Please refer to next page(s).

Test Method

Please refer to next page(s).

Test Result

Please refer to next page(s).

Approved by Liulinwen, Lewis



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Compliance Std. & Tech.

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Report No.: AGC02372181201-002

Date: Dec.12, 2018

Page: 2 of 6

Test Requested:

Conclusion

For compliance with the European Standard on Safety of Toys:

EN71-3:2013+A3:2018 - Migration of Certain Elements

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Report No.: AGC02372181201-002

Date: Dec.12, 2018

Page: 3 of 6

Test Result(s):

EN 71-3:2013+A3:2018 - Migration of Certain Elements.

Category II: In liquid or sticky toy material

Test method: With reference to EN 71-3:2013+A3:2018, Analysis was performed by ICP-OES, GC-MS,

Unit: mg/kg

Tostad Itam(s)	Result(s) MDL		Limit	
Tested Item(s)				
Aluminum (Al) (M)	N.D.	50		
Antimony (Sb) (M)	N.D.	2.0		
Arsenic (As) (M)	N.D.	0.5	5 8	
Barium (Ba) (M)	N.D.	50	P-	
Boron (B) (M)	N.D.	50		
Cadmium (Cd) (M)	N.D.	0.3	100	
Chromium III (Cr(III)) (M)	N.D.	0.2	100	
Chromium VI (Cr(VI)) (M)	N.D.	0.005	300	
Cobalt (Co) (M)	N.D.	2.5		
Copper (Cu) (M)	N.D.	50		
Lead (Pb) (M)	N.D.	0.25	See Remark	
Manganese (Mn) (M)	N.D.	50	D.	
Mercury (Hg) (M)	N.D.	1.0		
Nickel (Ni) (M)	N.D.	10		
Selenium (Se) (M)	N.D.	5	60	
Strontium (Sr) (M)	N.D.	50		
Tin (Sn) (M)	N.D.	50	42	
Organic Tin* (M)	N.D.	0.15		
Zinc (Zn) (M)	N.D.	50	- 694	
Conclusion	Pass	1	1	

Note: 1. N.D.= Not Detected (lower than method detection limit)

2.MDL = Method detection limit

3.mg/kg = milligram per kilogram

4.M = Migration

5.* = Migration of organic tin is expressed as tributyl tin cation content in mg/kg.

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Report No.: AGC02372181201-002

Date: Dec.12, 201

6. As specified by client, only test the designated sample.

7. The result of wet sample

Permissible Limit for Different Materials

Item	Category III In scraped-off toy material	Category II In liquid or sticky toy material	Category I In dry, brittle, powder-like of pliable toy material	
Aluminum (Al) (M)	70000	1406	5625	
Antimony (Sb) (M)	560	11.3	45	
Arsenic (As) (M)	47	0.9	3.8	
Barium (Ba) (M)	18750	375	1500	
Boron (B) (M)	15000	300	1200	
Cadmium (Cd) (M)	17	0.3	1.3	
Chromium III(Cr(III)) (M)	460	9.4	37.5	
Chromium VI (Cr(VI)) (M)	0.2	0.005	0.02	
Cobalt (Co) (M)	130	2.6	10.5	
Copper (Cu) (M)	7700	156	622.5	
Lead (Pb) (M)	23	0.5	2.0	
Manganese (Mn) (M)	15000	300	1200	
Mercury (Hg) (M)	94	1.9	7.5	
Nickel (Ni) (M)	930	18.8	75	
Selenium (Se) (M)	460	9.4	37.5	
Strontium (Sr) (M)	56000	1125	4500	
Tin (Sn) (M)	180000	3750	15000	
Organic Tin (M)	12	0.2	0.9	
Zinc (Zn) (M)	46000	938	3750	

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Report No.: AGC02372181201-002

Date: Dec.12, 2018

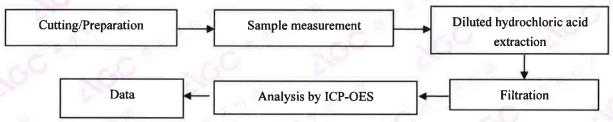
Page: 5 of 6

Sample Description

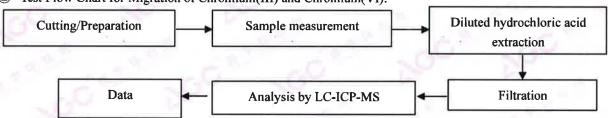
1-1 Black ink

Test Flow Chart

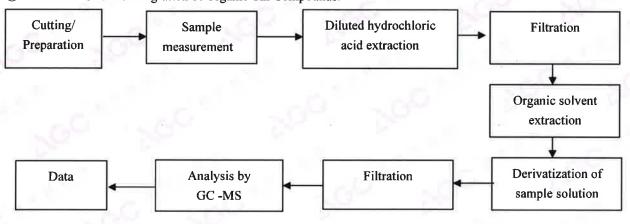
① Test Flow Chart for Migration of 17 Heavy Metals-Lead, Cadmium, Chromium, Mercury, Antimony, Barium, Arsenic, Selenium, Aluminum, Boron, Cobalt, Copper, Manganese, Nickel, Strontium, Zinc and Tin:



② Test Flow Chart for Migration of Chromium(III) and Chromium(VI):



3 Test Flow Chart for Migration of Organic Tin Compounds:



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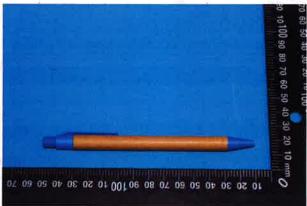
Report No.: AGC02372181201-002

Date: Dec.12, 2018

Page: 6 of 6

The photo of the sample





AGC02372181201-002

AGC authenticate the photo on original report only

*** End of Report***

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Producer:

DBID: and Audit Id: Audit Type: Full Audit

Audit Date: 25/10/2019



Auditee :	
Audit Date From :	25/10/2019
Audit Date To :	25/10/2019
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	QIMA Limited
Auditor's Name(s):	Simon Jia(Lead)
Auditing Branch (if applicable):	



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Audit Date: 25/10/2019

DBID: and Audit Id: Audit Type: Full Audit



Rating Definitions





Producer:

DBID: 3 and Audit Id: Audit Type: Full Audit

Audit Date : 25/10/2019



Main Auditee Information



Name of producer :			
DBID number :			
Audit ID :			
Address :			
Province :	Zhejiang	Country:	China
Management Representative :	Meijiao Fang		
Contact person:	Meijiao Fang	Sector :	Non-Food
Industry Type :	Accessories	Product group :	other accessories (please specify)
Product Type :	Notebook, ball pen, plastic items		



DBID: and Audit Id: Audit Type : Full Audit Audit Date: 25/10/2019



Audit Details			



Audit Range:	⊠ Full Audit	Follow-u	ıp Audit			
Audit Scope :	⊠ Main Auditee	☐ Main Au	ditee & Farms			
Audit Environment :		Agricult	ural	Sma	all Producer	
Audit Announcement :		☐ Fully-Ur	announced	Sen	ni-Announced	
Random Unannounced Check (RUC) :	No					
Audit extent (if applicable) :	none					
Audit interferences or contingencies (if applicable):	none					
Overall rating :	С					
Need of follow-up :	Yes		If YES, by:		25/10/2020	
<u> </u>	•	,	•			

Rating	oer Perfor	mance A	rea (PA)									
PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	С	Α	Α	Α	D	Α	Α	A	Α	Α	С	Α

Executive summary of audit report

The announced full audit for Ningbo Ritter Stationery Promotion Co., Ltd. (Business license number: 913302007685101395) /宁波锐特文具礼品有限公司, located at No.61-2, Building No.31, No. 777 Qingfeng Road, Cicheng, Jiangbei District, Ningbo City, Zhejiang Province, China. (浙江省宁波市江北区慈城镇 庆丰路777弄61号31幢) was conducted on October 25, 2019. The auditee was established on December 3, 2004. The factory occupied an area of approximately 1180 square meters.

[Structure of facility]: The auditee rents 1F and 2F of one 3-storey building as office area, workshops and warehouses. Neither dormitory nor kitchen and canteen are available in the auditee area.

The main business products were pens and note books. The main processes include injection, printing, assembly, inspection and packing.

There were 9 employees working in the factory. Among them 7 were production employees and 2 were non-production employees. All employees were permanent employees, 5 migrant employees worked in the factory. And there were total 7 female employees.

[Summary of working hour]:

Factory used electric attendance system to record workers' working time. All employees work for 5 days a week from Monday to Friday in one shift. The normal working hours is 8 hours from 8:00 to 17:00 with one hour for lunch time from 11:00 to 12:00.

The attendance records from September 2018 to the audit day were reviewed in the audit. 12 sampled workers' attendance records from August 2019 (current month), March 2019 (random month) and December 2018 (random month) were selected for checking. No obvious peak season is in the facility. As per provided attendance records and workers interviews, the maximum daily overtime hours are 2 hours, the maximum weekly overtime hours are 14 hours per week and the maximum monthly overtime hours are 58 hours in December 2018.

[Summary of compensation]:

The local minimum wage was RMB 2010 per month equivalent to RMB 11.55 (2010/21.75/8) per hour since 1 December, 2017. 5 sampled workers' payroll records from August 2019 (current month), March 2019 (random month) and December 2018 (random month) were selected for checking.

Workers were paid by monthly rate basis; the minimum basic wage was RMB 2010 per month, which was met the legal requirement. Wages was released by cash at around 30th of the following month. The factory paid 150% and 200% of normal rate for the overtime on regular working days and rest days respectively. No overtime work was arranged on holidays.

[Summary of interview]:

Worker interview were conducted by individually and in group.

5 workers were interviewed on site, including 4 females and 1 male. Among them, 4 workers were migrant workers, and all of them were permanent workers.

[Special scene during on site observed]:

- 1. There was one company located in the same building with the auditee, which was named as Ningbo Baijisheng Import and Export Co., Ltd. This company was a trading company. Through employee interview on site. No employees transferred between each other
- 2. There are no agencies and contractor used by the auditee, which makes the contractor license/permit and agency labour contract not applicable. No government waivers and collective bargaining agreements are available in the auditee.

 3. This audit was conducted by one auditor named as Simon Jia (Lead auditor), the APSCA registration number of Simon Jia was RA21703309.



DBID: and Audit Id: Audit Type: Full Audit Audit Date : 25/10/2019



Ratings Summary



Auditee's background	l information		
Auditee's name :		Legal status :	Sino-foreign joint
Local Name :	宁波锐特文具礼品有限公司	Year in which the auditee was founded :	2004
Address:		Contact person (please select) :	Meijiao Fang
Province :	Zhejiang	Contact's Email :	
City:	Ningbo	Auditee's official language(s) for written communications :	Chinese
Region :	North East Asia	Other relevant languages for the auditee :	None
Country:	China	Website of auditee (if applicable) :	Nil
GPS coordinates :	Longitude: 121°24'53"E, Latitude: 29°59'29'N	Total turnover (in Euros) :	500000.00
Sector :	Non-Food	Of which exports % :	90.00
Industry :	Accessories	Of which domestic market % :	10.00
If other, please specify :		Production volume :	1000000 pieces per month
Product Group :	other accessories (please specify)	Production cost calculation :	No
If other, please specify :	Notebook, ball pen, plastic items	Lost time injury calculation cost :	Yes
Product Type :	Notebook, ball pen, plastic items		

Auditee's employment structure at the time of	the audit	
Total number of workers : 9 To	tal number of workers in the production unit to be	monitored (if applicable) : 0
	MALE WORKERS	FEMALE WORKERS
Permanent workers	2	7
Temporary workers	0	0
In management positions	1	1
Apprentices	0	0
On probation	0	0
With disabilities	0	0
Migrants (national citizens)	2	3
Migrants (foreign citizens)	0	0
Workers on the permanent payroll	2	7
Production based workers	0	0
With shifts at night	0	0
Unionised	0	0
Pregnant	-	0
On maternity leave	-	0



DBID: and Audit Id:
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Audit Date : 25/10/2019



Finding Report



Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: D

Deadline date: 28/02/2020

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee partially fulfils the requirement of this performance area. The auditee had set up a series of procedures and policies that states their mission, vision and objectives to match the amfori BSCI Code of Conduct and their dedication to comply with social responsibilities. The established procedures and records had included the overall social responsibility policies which consist of anti-discrimination, freedom of association, no child labor, protection for young workers, wages and benefits, working hours, occupational health and safety, environment protection, anti-corruption, etc. Appointment documents for amfori BSCI affair and various of training records such as legal requirements training, health and safety training, etc. And the auditee preformed internal audit and management review for CSR system once per year. The auditee had nominated one senior management, who had some understanding of amfori BSCI standards, for the establishment, implementation and maintenance of the amfori BSCI system. Consideration about amfori BSCI Code of Conduct compliant ability was taken for the business partner selection in procedures, such as conducting the social compliance audit for the suppliers. However, gaps were identified in implementation.

总体而言被审核方部分满足该部分的要求.被审核方建立了表明其使命、愿景和目标的且符合amfori BSCI行为准则和社会责任需要的程序和政策。建立的程序和政策包括总体的社会责任政策比如反歧视、自由结社、未成年工保护、工资和福利、工作时间、职业健康安全、环境保护、反腐败等,以及amfori BSCI事宜任命书,以及各种结训记录比如法规培训、健康安全培训等。被审核方每年定期进行社会责任体系的内审和管理评审。被审核方指定了一名对amfori BSCI要求有所了解的高级管理人员来负责amfori BSCI系统的建立、施行和维护。程序文件显示受审核方在商业伙伴的选择中考虑了其社会责任表现,例如对供应商和分包商进行社会责任审核。但是,仍有部分不足。

- 1.1 The auditee has established a system of social responsibility, conducted internal assessment and management review, and conformed to amfori BSCI requirements and relevant local law requirements in most performance areas, however, some performance areas should be improved, for example, systematically overtime was found.
 - 被审核方建立了社会责任体系,进行了内审及管理评审,在大部分执行领域符合了amfori BSCI要求和相关的法规要求,但一些领域仍需要提高,如存在统性地加班。
- 1.4 The auditee does not conduct production cost calculation. There's no satisfactory evidence that the workforce capacity in the company is sufficient and properly planned to match delivery order contracts' expectations and excessive overtime was detected. 被审核方没有进行生产成本计算,没有关于劳动生产能力分析及生产计划的完善记录,并存在加班超时的情况。

Remarks from Auditee:

Performance Area 2: Workers Involvement and Protection

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: C

Deadline date:31/12/2019

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee partially fulfills the requirement of this performance area. There were workers' representatives in the auditee and relevant election procedures and records were provided for review. amfori BSCI Code of Conduct was displayed on the notice board in the production area. The auditee periodically conducted internal communication meetings with workers and workers' representatives regarding workplace-related issues, and also had set up grievance mechanism which allowed workers to use the mechanism via suggestion box, workers' representatives or senior management directly. Satisfactory evidences had shown that workers knew the channels of reflecting their grievances. However, gaps were identified in implementation.

总体观察显示工厂部分符合该执行领域的要求。被审核方选举了员工代表,并提供了相关的选举程序和记录。amfori BSCl行为准则张贴在生产区域的公告栏内。被审核方周期性地和员工以及员工代表就工作现场的事宜进行沟通。同时,建立了员工申诉机制,允许员工通过意见箱、员工代表或者直接找管理者代表反映问题或者意见。充分证据表明员工知道申诉的渠道。但是,仍有部分不足:

- **2.2 -** The auditee did not define long term goals to protect workers according to the amfori BSCI BSCI Code of Conduct. 被审核方未根据amfori BSCI行为准则建立起长期目标以保护员工。
- 2.4 The auditee had posted the amfori BSCI Code of Conduct publicly, and provided amfori BSCI training with all employees, but according to interviews, it was noted that the sampled worker representative was not quite aware of amfori BSCI values and principles. 被审核方张贴了amfori BSCI行为准则,提供了amfori BSCI行为准则的培训给所有员工,但抽样访谈的员工代表并不太清楚amfori BSCI的标准和原则。



DBID: and Audit ld:
Audit Type: Full Audit

Audit Date : 25/10/2019



Performance Area 3: The rights of Freedom of Association and Collective Bargaining

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee fulfilled the requirement of this performance area. The auditee has established policies to guarantee the rights of freedom of association and collective bargaining. Per the workers' and worker representative's statement, they were not limited or other unfair treatment by the factory on forming, joining and voting for a legal worker organization and collective bargaining. Currently, no collective bargaining existed in the factory.

no collective bargaining existed in the factory. 总体观察显示受审核方符合了该项目的要求,受审核方建立了政策去保证自由结社和集体谈判的权利。根据员工和员工代表的陈述,受审核方对于员工成立、参加和投票一个合法工人组织和集体谈判没有任何限制和其他的不公平对待。访谈显示员工与员工代表之间的沟通并无受限。当前厂内没有进行集体谈判事项。

Remarks from Auditee:

Performance Area 4: No Discrimination

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee fulfilled the requirement of this performance area. They had set their objectives refer to local regulation and amfori BSCI Code of Conduct. The auditee publicly stated they forbidden any terms of discrimination when workers are hired, promoted, fired or assigned benefits. Workers would not be discriminated because of their race, religion, age, sex, disability etc. Pregnant worker would not be discriminated. The policy was communicated to all management and workers regularly through training. Grievance channels were also available through directly reporting or via suggestion box or talk to worker representatives.

总体观察显示受审核方满足了该项目的要求。已根据当地法律法规和**amfori BSC**l行为准则设立了目标。公开声明将在招聘,升迁,解聘及离职中禁止任何形式的歧视。员工不会因为肤色,宗教,年龄,性别及残疾被歧视。通过定期培训将这一政策传达给了管理层及工人。员工可以通过直接汇报或通过意见箱或汇报给员工代表进行申诉。

Remarks from Auditee:

Performance Area 5: Fair Remuneration

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:31/12/2019

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee partially fulfilled the BSCI requirement of this performance area. During this audit, it was noted that the factory had established wage system based on BSCI standards and local requirements. Workers were paid by monthly rate. Wages were issued at around 30th of the following month by cash. The minimum wage was guaranteed. The lowest basic wages paid for workers were RMB 2010 per month, which was met the local minimum wage of RMB 2010 per month. Wages were issued timely and sufficiently per the payroll records and interview. Pay slips were provided so workers could understand the composition of their wages. All employees except one retirement employee had participated in all 5 types social insurance. No illegal deduction was made. However, gaps have been identified in implementation. 总体观察显示工厂在该执行领域部分符合BSCI的要求。审核发现工厂有基于BSCI标准和当地法规要求建立起了一套薪酬系统。员工以月薪制支付。工资在下个月的30号左右通过现金发放。最低工资受到保障。员工最低月薪为 2010元,高于当地最低月薪2010元的水平。根据工资记录和访谈、工资在时,足够发放。工厂提供工资条给员工以使员工明白其工资构成。除了一名退休员工其它所有员工参加了全部5项社会保险。没有非法扣款的情况。但是在执行的过程当中还是存在以下差距:

5.4 - The wages paid to all randomly selected workers met the living wage, but the auditee did not evaluate the living wage for all workers. 所有随机抽取的员工发放的工资满足生活工资,但被审核方没有评估工人的生活工资。



DBID: and Audit Id: Audit Type : Full Audit Audit Date: 25/10/2019



Performance Area 6: Decent Working Hours

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: D

Deadline date: 28/02/2020

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee partially fulfills the requirement of this performance area. The auditee had made its own working hour regulations and rules based on the legal requirements and amfori BSCI Code of Conduct. As per on site observation and documents review, the auditee used electronic attendance recording system to record all workers' working hours including overtime hours. As per sampled payroll and attendance records, it was found that one rest day in every 7-day period was guaranteed. And the auditee also provided orientation training to new hired workers about the rules on working hours and etc. However, gaps were identified in implementation. 总体观察显示被审核方部分符合该执行领域的要求,被审核方根据法律要求以及amfori BSCI要求建立了工作时间规章制度。被审核方采用电子考勤系统记录员工的工作时间包括加班时间。根据所抽样员工的工资和考勤记录发现,所有员工能确保连续工作六天后休息一天。同时被审核方给新进程工工和股份的证明。根据所抽样员工的工资和考验记录发现,所有员工能确保连续工作六天后休息一天。同时被审核方给新进程工工和股份的证明。

的员工入职培训有包括关于工作时间的规定。但是,仍有部分不足:

Monthly overtime hours exceeded the legal requirement (36 hours per month). The auditee had provided the attendance records from September 2018 to audit day. According to the sampled records, the maximum monthly overtime hours of all randomly selected workers were 48 hours in August 2019 (current month),48 hours in March 2019 (random month) and 58 hours in December 2018 (random month) respectively. Reference law: the PRC Labour Law article 41.

工人的工作时间超出法规要求(每月36小时)。工厂提供了2018年9月到审核当天的考勤记录。抽样发现,所有抽取的员工每月最大加班时间2019 年8月份(当前月)为48小时,2019年3月份(随机月)为48小时,2018年12月份(随机月)为58小时。



DBID: and Audit Id:
Audit Type: Full Audit

Audit Date : 25/10/2019



Performance Area 7: Occupational Health and Safety

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:31/12/2019

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee partially fulfills the requirements of this performance area. The auditee had established policies and procedures on occupational health and safety based on amfori BSCI standards and local law requirements. The auditee regularly carried out risk assessments for safe, healthy and hygienic working conditions, and used the risk assessments to develop and maintain an action plan which contains all the necessary measures to promote and maintain safe, healthy and hygienic working conditions. Regular health and safety training were provided to employees on work station safety, machine safety, use of PPE, fire evacuation, fire-fighting etc. Written accident and emergency procedures were developed and implemented. Accident and injuries reporting procedure was established and followed effectively and accident was required to be recorded and kept as per requirements, and no accident happened in the past one year. OHS procedure documented workers' right to remove workers themselves from imminent danger and the right was well-informed to workers by training. Fire-fighting equipment such as fire hydrants, fire extinguishers, fire alarms were available and well maintained in the auditee. Escape routes and aisles and emergency exits were fully and simultaneously unblocked and unlocked. Exit signs and evacuation indicating signs were properly installed inside factory building and well-functioning and verified once per month. Proper evacuation plans were posted inside workshops and warehouses. Production machines were maintained by competent personnel regularly and maintenance records were kept. Written emergency procedures were established and communicated to workers, and adequate qualified first aiders and first aid kits were available in the factory. The washing facilities and sufficient restrooms were always accessible without restriction. The space, illumination was adequate for the health and safety of workers. (Remark: 7.21 No kitchen and canteen are available in the facility

总体观察显示被审核方部分符合该执行领域的要求。工厂基于amfori BSCI标准和当地法规对于职业健康和安全的要求建立了政策和程序。 被审核方定期针对安全、健康、卫生工作条件进行了风险评估,并且运用风险评估来开发和维持一个包含能够促进和维护安全、健康和卫生的工作条件的所有必要措施的改善计划。在工作场所安全、机器安全、劳保用品适用、消防疏散及防火安全等方面为工人提供了定期的职业健康培训给员工。建立并执行了事故应急程序。建立并执行了工伤汇报程序,要求记录并保留了工伤记录,过去一年内未发生过工伤事故。职业健康安全程序中规定了工厂尊重工人在迫切危险发生时可无需批准离开的权利,并将该权利通过培训的方式传达给了工人。消防器材如灭火器、消防栓、警铃安装适当,并对其进行了有效维护。工厂的逃生路线和走廊及紧急出口未被堵塞、未被上锁。安全出口指示及疏散指示适当安装在厂房内,且运行良好,一个月检查一次。适当的消防平面图张贴在了车间和仓库内。生产机器安装由有资质的人员定期维护保养并保留有维护保养记录。建立了书面的急救程序并将之传达给了工人,有足够的经培训合格的急救人员以及充足的急救药品。洗漱设施和充足的卫生间不受限制的提供。工作场所的空间、照明足以确保工人的健康和安全。备注: 7.21 被审核方没有提供厨房和餐厅; 7.23 被审核方未提供交通; 7.24 被审核方没有提供宿舍。但是,在该执行领域仍然存在差距。

- 7.1 1. The auditee was in line with most of the regulations on occupational health and safety relevant for its activities such as the regulations on fire protection, first aid, etc. But the auditee was not fully in line with the occupational health and safety regulations applicable for its activities such as personal protective equipment, chemical storage, etc. 2. It was noted that no occupational health examination was provided to all printing workers who contacting the chemicals and all injection workers who contacting the noise. Reference law: PRC Law of Prevention and Control of Occupational Diseases Article 35.
 - 1. 被审核方大部分符合了职业健康安全与其活动相关的规定如关于防火、急救等方面的规定。但是,被审核方没有完全遵守适用于其活动的职业健康安全规定,如个人防护用品、化学品储存等。 2. 审核发现接触化学品的所有印刷工人和所有接触噪音的注塑工人没有进行职业病体检。
- 7.2 1.Workers and their representative were not involved in health and safety risk assessment. 2.The auditee did not purchase commercial insurance for only one retirement employee.
 - 1.工人和工人代表没有参与健康与安全的风险评估。2.被审核方没有给一名退休员工购买商业保险。
- 7.3 During facility tour, auditor noted that hazardous factors such as noise in injection workshop and Benzene and xylene in printing workshop. However, the facility could not provide evaluation report of occupational hazardous factors for review. 在现场巡查时,审核员发现企业生产中存在职业病危害因素,例如注塑车间存在职业危害因素如噪音,印刷车间存在职业危害因素如苯和二甲苯。但是,企业未能提供其作业场所的职业危害因素监测报告供审阅。
- 7.6 Although the factory has established the PPE procedure, provided the PPE and relevant training to employees. However,it was noted that all injection workers who contacting the noise did not wear the provided earplugs during the working time. Reference law: Work Safety Law of the People's Republic of China (2014), Article 42. 尽管工厂建立了个人保护用品程序,提供了相关劳保用品及培训,但是审核发现所有接触噪音的注塑工人上班期间没有佩戴提供的耳塞。
- 7.7 Although secondary containers were installed for the chemicals and MSDS for the chemical was also posted on site. but it was noted that the chemicals such as thinner and ink were stored on the printing workshop directly instead of the separate chemical warehouse. Reference law: The Regulations on the Safety Management of Dangerous Chemicals Article 24.

尽管化学品设置了二次容器,现场也粘贴了化学品物资安全资料表,但审核发现工厂的化学品如稀释剂和油墨直接存放在材料仓库,没有设置独立 的化学品仓库。

7.11 - It was noted partial goods in all warehouses were directly leaned against the wall and post. Reference law: Article 6.8 of General Rules for Fire Safety Management of Storage Occupancies: Objects shall be piled up in the storeroom as per the following requirements. 审核发现企业所有仓库的部分货物都接墙靠柱存放。



Producer:

DBID: and Audit Id: Audit Type: Full Audit Audit Date: 25/10/2019



Performance Area 8: No Child Labour

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee fulfills the requirement of this performance area. It was noted that the factory had established policies and procedure to prevent recruitment of child labor. The age verification procedure was used during hiring process and periodic check was conducted to indentify suspicious child labor. A child labor remedition procedure was also established to handle child labor issue. Currently

the youngest worker in the factory was 29 years old. 总体观察显示工厂符合了该执行领域的要求。工厂建立政策和程序去防止雇佣到童工。在招聘中会使用到年龄核实程序并且会定期检查确认可疑童工身份。工厂同时建立了童工补救措施去处理童工问题。当前工厂最年轻员工为 29岁。

Remarks from Auditee:

Performance Area 9 : Special protection for young workers

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee fulfilled the requirement of this performance area. They established policy and procedure regarding identify the young worker. Risk assessment about young worker is conducted. If young workers were hired, they would not be arranged in hazardous position and would not work overtime or in night shift. Especial training would be provided including facility rules, health & safety, grievance measures, etc. (Remark: 9.6 No young worker in the facility.) 总体观察显示受审核方符合了该项目的要求。工厂建立了政策和程序去识别未成年工。组织了相应的风险评估。如果雇佣未成年工,工厂将不会将

他们安排在危险岗位,不会安排加班,不会安排在夜班工作。给未成年工安排关于工厂政策,健康安全及申诉机制等的培训。(备注:工厂没有未 成年工)

Remarks from Auditee:

Performance Area 10: No Precarious Employment

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:31/12/2019

GOOD PRACTICES:

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee has established a policy based on BSCI standards and local law requirements to protect employment relationship. All employees were recruited by the auditee directly. No labour agency was used to hire employees. No temporary employee, apprenticeship schemes or home employee was identified by the auditor. The auditee signed labour contracts with the employees within one month, and all interviewed employees stated that they kept a copy of labour contracts by themselves. However, gaps had been identified in the performance area

总体观察显示受审核方部分符合了该项目的要求。被审核方依据BSCI的标准和当地法规要求建立了包含雇佣关系的政策和程序。所有的员工都被 被审核方直接招募。没有通过劳务派遣公司招募员工。没有临时雇员,学徒工或家庭工。被审核方在一个月内与员工签订劳动合同,所有访谈员工 都表示,他们自己保留了一份劳动合同的副本。但是在执行的过程中还存在差距。

10.2 - 1.1t was noted that the labor contracts signed with the employees who involve potential occupational disease hazards (such as noise) did not include the content of potential occupational disease hazards and the consequences in the course of work. Reference law: Article 34 of Law of the People's Republic of China on Prevention and Control of Occupational Diseases (extracted). 2. It was noted that insufficient items were in the employee roster. Through document review, the employee roster provided by facility did not include the information of contact information. Reference law: Regulations on Implementation of the PRC Employment Contract Law (article 8). 1.申核发现企业涉及职业危害因素(如噪音)的岗位没有在劳动合同上具体写明该岗位有什么职业危害及后果。 2. 申核发现职工名册的项目不足。

通过文件审核,审核员发现企业建立的职工名册没有包含联系方式的内容。

Remarks from Auditee:

Performance Area 11: No Bonded Labour

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

AREAS OF IMPROVEMENT:

The overall observation showed that the auditee fully fulfilled the requirement of this performance area. The auditee has established a policy based on amfori BSCI standards and local law requirements to identify and prevent bonded labor. Training regarding identifying and reporting bonded labor was provided to workers periodically. No any form of bonded labor observed or reported during the audit 总体观察显示受审核方符合了该项目的要求。工厂依据amfori BSCI的标准和当地法规要求建立了识别和防止强迫劳工的政策和程序,定期给员工提供强迫劳工的识别与汇报。在此次审核中没有发现或者收到报告任何形式的强迫劳工。



DBID: and Audit ld:
Audit Type: Full Audit

Audit Date : 25/10/2019



Performance Area 12: Protection of the Environment

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: C

Deadline date:28/02/2020

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee partially fulfills the amfori BSCI requirement of this performance area. No industrial waste water and obvious noise were generated from the auditee. The production hazardous wastes were submitted to the qualified unit to treat. The result of the monitoring report for the air emissions met the local law requirement. The auditee had established BSCI management manual and related procedures, including procedures of environmental protection. Training regarding environment protection was provided to workers. The living wastes were handled by the sanitation department. However, gaps have been identified in implementation.

procedures, including procedures of environmental protection. Training regarding environment protection was provided to workers. The living wastes were handled by the sanitation department. However, gaps have been identified in implementation. 总体观察显示被审核方在该执行领域部分符合amfori BSCI的要求。被审核方没有工业废水和明显噪音生成。危险废弃物递交给有资质的单位处理。大气污染物的报告监测结果符合当地法规要求。 被审核方已经建立amfori BSCI管理手册和相关程序,包括环境保护程序。针对环境保护的培训也有提供给员工。生活垃圾由环卫部门统一处理。但是在执行的过程中还存在差距。

12.1 - No Environmental Impact Assessment (EIA) for construction project was conducted by the auditee. Reference law: PRC Environmental Impact Assessment Law Article 16.

被审核方没有对其建设项目进行环境影响评价。

12.3 - 1.No Environmental Impact Assessment (EIA) approval / registration for construction project was obtained by the factory. Reference law: PRC Environmental Impact Assessment Law article 22. 2. The air pollutants were generated from the printing process and treatment facilities were installed, but no environmental protection acceptance checks report for completed construction project were provided for review. Reference law: Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project article 17. 1. 企业没有取得建设项目环境影响审查批复/备案。 2. 被审核方印刷工序产生大气污染物,相应的处理设施也安装了,但企业没有提供建设项目环境保护竣工验收报告供审核。

Remarks from Auditee:

Performance Area 13: Ethical Business Behaviour

Full Audit [Audit Id - 165832] Audit Date: 25/10/2019 PA Score: A

Deadline date: 31/12/2019

GOOD PRACTICES:

None observed.

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee partially fulfills the amfori BSCI requirement of this performance area. The auditee had established the business ethic policy for their business integrity. Corruption, extortion or embezzlement or any forms of bribery was not permitted in the business relationship. The disclosure of information policy indicated that all documents/records were required to be accurate and no falsifying information was permitted in their supply chain. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context. No unethical behaviour was observed during this audit. However, gaps have been identified in implementation.

总体观察显示被审核方在该执行领域部分符合amfori BSCI的要求。 被审核方为其商业诚信建立了商业道德政策。商业关系中不允许腐败、敲诈勒索、盗用或任何形式的行贿受贿行为。信息公开政策指出所有的文件均要求准确,并且在其供应链中不允许伪造信息。 被审核方已识别会导致贿赂和腐败发生的可能的情况。此次审核中未有发现不道德商业行为。但是在执行的过程中还存在差距。

13.1 - The auditee did not establish the reward for ethical behavior and integrity. 被审核方没有建立商业道德行为的奖励机制。



Producer:

DBID: and Audit Id: Audit Type: Full Audit Audit Date : 25/10/2019



Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	25/10/2019	165832	D	С	A	A	A	D	A	A	A	A	A	С	A	С



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Audit Date : 25/10/2019

DBID: and Audit Id: Audit Type : Full Audit



Producer Photos









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Photo of chemical storage room (if applicable)



Photo of fire safety equipmen



Photo of fire safety equipment

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Photo of non-conformity Attendance records of August 2019.JPG

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Producer:

DBID: and Audit ld: Audit Type : Full Audit Audit Date : 25/10/2019







Photo of the inside of the main production ha























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TEST REPORT

APPLICANT : Favorite Logistics B.V.

ADDRESS : Het Eek 1 4004 LM Tiel The Netherlands, , NETHERLANDS

SAMPLE DESCRIPTION : Bal pen white with coloured clip and matching ring. On top a

black and white football. Writing colour blue.

<u>ITEM NO.</u> : 9909

MANUFACTURER :

MANUFACTURER ADRRESS :

COUNTRY OF ORIGIN : China

AGE REQUESTED ON APPLICATION FORM : 3+

LABELED AGE GRADE : Not Present

AGE GRADE APPLIED IN TESTING : 3+

SAMPLE RECEIVED DATE : 12-Dec-2019

SAMPLE RESUBMISSION DATE : 07-Jan-2020

TURN AROUND TIME : 12-Dec-2019 to 10-Jan-2020

REVISED DATE : 14-Jan-2020



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The following test item(s) was/were performed on selected sample(s) and/or component(s) confirmed by applicant

TEST REQUESTED	TEST METHOD/REGULATION	RESULT
Mechanical and Physical Properties	EN71 Part 1:2014+A1:2018	Pass
Labeling Requirement	Directive 2009/48/EC	Pass
Flammability of Toys	EN71 Part 2:2011+A1:2014	Pass
Migration of Certain Elements	EN71 Part 3:2019	Pass
Total Cadmium Content	REACH Annex XVII, Entry 23	Pass
Phthalates Content	REACH Annex XVII, Entry 51 & 52, (EU) 2018/2005	Pass
Polycyclic Aromatic Hydrocarbons (PAHs)	REACH Annex XVII, Entry 50	Pass

This report cancels and supersedes report number EFHZ19121012-CG-01 issued on Jan 10, 2020. Modification description:

1. Per client's request, revise the regulation of Polycyclic Aromatic Hydrocarbons (PAHs) and the test report is revised accordingly.

Eurofins (Hangzhou) contact information

Customer service: <u>LilyBu@eurofins.com</u> / +86 571 81907003 Sales specialist: <u>SammyDong@eurofins.com</u>/ +86 571 81907003

Signed for and on behalf of

Eurofins Product Testing Service (Shanghai) Co., Ltd. Hangzhou Branch

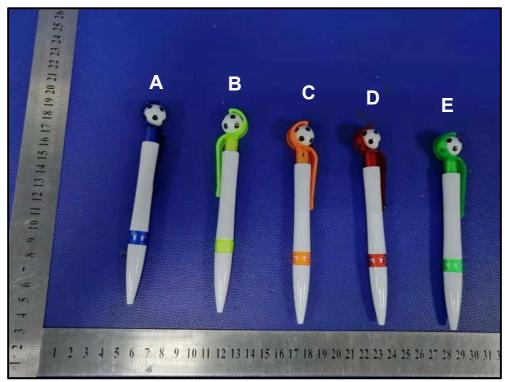
Sara Liu Lab Manager

Samples are obtained by express delivery, Results obtained refer only to samples, products or material received in Laboratory, as described in point related to sample description, and tested in conditions shown in present report. Eurofins Product Testing Service (Shanghai) Co., Ltd ensures that this job has been performed according to our Quality System and complying contract and legal conditions. If you happen to have any comments, please do it by sending email to <u>info.hz@eurofins.com</u> and referring to this report number. Reproduction of this document is only valid if it is done completely and under the written permission of Eurofins Product Testing Service (Shanghai) Co., Ltd. If you happen to have any complaints, please do it by sending email to <u>chinacomplaint@eurofins.com</u> and referring to this report number.



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SAMPLE PHOTO(S)



EFHZ19121012-CG-01+Rev1



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OMPONENT LIST

Component No.	Component	Sample No.
1	Black coating on plastic(football)	ABCDE
2	White plastic(football)	ABCDE
3	White plastic(barrel)	ABCDE
4	Blue plastic(clip/handle)	A
5	Light green plastic(clip/handle)	В
6	Orange plastic(clip/handle)	С
7	Red plastic(clip/handle)	D
8	Green plastic(clip/handle)	E



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TEST RESULT

Mechanical and Physical Properties

As specified in European Standard on Safety of Toys EN71 Part 1:2014+A1:2018 Test Request:

Section	Description	Result
4	General requirements	
4.1	Material cleanliness (by visual assessment)	Р
4.2	Assembly	N/A
4.3	Flexible plastic sheeting	N/A
4.4	Toy Bags	N/A
4.5	Glass	N/A
4.6	Expanding Materials	N/A
4.7	Edges	Р
4.8	Points and Metallic Wires	Р
4.9	Protruding parts	N/A
4.10	Parts moving against each other	
4.10.1	Folding and sliding mechanisms	N/A
4.10.2	Driving mechanisms	N/A
4.10.3	Hinges	N/A
4.10.4	Springs	N/A
4.11	Mouth-actuated toys and other toys intended to be put in the mouth	N/A
4.12	Balloons	N/A
4.13	Cords of toy kites and other flying toys	N/A
4.14	Enclosures	
4.14.1	Toys which a child can enter	N/A
4.14.2	Masks and helmets	N/A
4.15	Toys intended to bear the mass of a child	
4.15.1	Toys propelled by the child or by other means	N/A
4.15.2	Toy bicycles	N/A
4.15.3	Rocking horses and similar toys	N/A
4.15.4	Toys not propelled by a child	N/A
4.15.5	Toys scooters	N/A
4.16	Heavy immobile toys	N/A
4.17	Projectiles	N/A
4.17.1	General	N/A
4.17.2	All projectiles	N/A
4.17.3	Projectile toy with stored energy	N/A
4.17.4	Certain projectile toys without stored energy	N/A
4.18	Aquatic toys and inflatable toys	N/A
	Percussion caps specifically designed for use in toys and toys using	N1/A
4.19	percussion caps	N/A
4.20	Acoustics	
4.20.2.1	General	N/A
4.20.2.2	Close-to-the-ear toys	N/A
4.20.2.3	Table-top or floor toys	N/A
4.20.2.4	Hand-held toys	N/A
4.20.2.5	Toys using headphones or earphones	N/A
4.20.2.6	Rattles	N/A
4.20.2.7	Squeeze toys	N/A
4.20.2.8	Pull-along or push toys	N/A
4.20.2.9	Percussion toys	N/A
4.20.2.10	Wind toys	N/A
4.20.2.11	Cap-firing toys	N/A



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TEST RESULT

Section	Description	Result
4.20.2.12	Voice toys	N/A
4.21	Toys containing a non-electrical heat source	N/A
4.22	Small balls	Р
4.23	Magnets	N/A
4.24	Yo-yo balls	N/A
4.25	Toys attached to food	N/A
4.26	Toy disguise costumes	N/A
4.27	Flying toys	N/A
4.27.1	General	N/A
4.27.2	Rotors and propellers on flying toys	N/A
4.27.3	Rotors and propellers on remote controlled flying toys	N/A
5	Toys intended for children under 36 months	14// \
5.1	General requirements	N/A
5.2	Soft-filled toys and soft-filled parts of a toy	N/A
5.3	Plastic sheeting	N/A
5.4	Cords, chains and electrical cables in toys	N/A
5.5	Liquid-filled toys	N/A
5.6	Speed limitation of electrically-driven ride-on toys	N/A N/A
5.6	Glass and porcelain	N/A N/A
5.8		N/A N/A
5.8	Shape and size of certain toys	N/A N/A
	Toys comprising monofilament fibres	
5.10	Small balls	N/A
5.11	Play figures	N/A
5.12	Hemispheric-shaped toys	N/A
5.13	Suction cups	N/A
5.14	Straps intended to be worn fully or partially around the neck	N/A
5.15	Sledges with cords for pulling	N/A
6	Packaging	N/A
7	Warnings, markings and instructions for use	
7.1	General	Р
7.2	Toys not intended for children under 36 months	Р
7.3	Latex Balloons	N/A
7.4	Aquatic toys	N/A
7.5	Functional Toys	N/A
7.6	Hazardous sharp functional edges and points	N/A
7.7	Projectiles toys	N/A
7.8	Imitation protective masks and helmets	N/A
7.9	Toy kites	N/A
7.10	Roller skates, inline skates, skateboards and certain other ride-on toys	N/A
7.11	Toys intended to be strung across a cradle, cot, or perambulator	N/A
7.12	Liquid-filled teethers	N/A
7.13	Percussion caps specifically designed for use in toys	N/A
7.14	Acoustics	N/A
7.15	Toys bicycles	N/A
7.16	Toys intended to bear the mass of a child	N/A
7.17	Toys comprising monofilament fibres	N/A
7.18	Toy scooters	N/A
7.19	Rocking horses and similar toys	N/A
7.20	Magnetic/electrical experimental sets	N/A
7.21	Toy with electrical cables exceeding 300mm in length	N/A
	Toys with cords or chains intended for children of 18 months and over	
7.22	but under 36 months	N/A



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TEST RESULT

Section	Description	Result
7.23	Toys intended to be attached to a cradle, cot or perambulator	N/A
7.24	Sledges with cords for pulling	N/A
7.25	Flying toys	N/A
7.25.1	Flying toys	N/A
7.25.2	Remote controlled flying toys	N/A
7.26	Improvised projectiles	N/A

Remark:

P – Pass

N/A - Not Applicable



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TEST RESULT

Labeling Requirement

Test Request: Labeling requirement including Washing/Cleaning instruction, CE mark, importer /

manufacturer name and address, product identification as specified in Directive 2009/48/EC -

Safety of toys

Labeling Content	Observation Result	Location	Conclusion
Washing/Cleaning Instruction	Not Applicable	-	-
CE Mark	Present, Correct form, CE marking (height = 7.1mm)	Packaging	Pass
Importer's Name & Address	Present	Packaging	Pass
Manufacturer's Name & Address	Present	Packaging	Pass
Product ID	Present	Packaging	Pass



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TEST RESULT

Flammability of Toys

Test Request: As specified in European Standard on Safety of Toys EN71 Part 2:2011+A1:2014

Section	Description	Result
4	Requirements	
4.1	General Requirements	Р
4.2	Toys to be worn on the head	N/A
4.3	Toy disguise costumes and toys intended to be worn by a child in play	N/A
4.4	Toys intended to be entered by a child.	N/A
4.5	Soft-filled toys (animals and dolls, etc) (Sample was not tested if its maximum dimension is 150mm or less.)	N/A

Remark:

P – Pass

N/A - Not Applicable



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TEST RESULT

Migration of Certain Elements

Test Request: Migration of certain elements as specified in European Standard on Safety of Toys EN71 Part

3:2019

Test Method: General elements, with reference to EN 71 Part 3:2019, analysis was performed by ICP-MS;

Extractable Chromium (VI), with reference to EN 71 Part 3:2019, analysis was performed by

IC-ICP-MS;

Extractable organic tin, with reference to EN 71 Part 3:2019, analysis was performed by

GC-MS.

Tost Itom(s):		Result									
Test Item(s):	Unit	1	2	3	4	5	6	7	8		
Category Type		III	III	III	III	III	III	III	III		
Extractable Lead (Pb)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Antimony (Sb)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Arsenic (As)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Barium (Ba)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Cadmium (Cd)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Mercury (Hg)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Selenium (Se)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Boron (B)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Cobalt (Co)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Manganese (Mn)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Strontium (Sr)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Zinc (Zn)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Copper (Cu)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Aluminum (Al)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Nickel (Ni)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Tin (Sn)	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Organic Tin#1	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Chromium#2	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND		
Extractable Chromium (III) (Cr III)#3	mg/kg	-	-	-	-	-	-	-	-		
Extractable Chromium (VI) (Cr VI)	mg/kg	-	-	-	-	-	-	-	-		

Note:

- #1 Result of Organic Tin is calculated by assuming the extractable Tin content is wholly contributed from tributyltin (TBT) cation unless further specified.
- #2 If the migration of total Chromium is below the maximum limit for Chromium (VI), it can be inferred that the material complies with the requirements for both Chromium(III) and Chromium(VI).
- #3 In particular Chromium (III) is calculated by subtracting the Chromium (VI) concentration from the total chromium concentration.

Remarks:

mg/kg = milligram per kilogram MDL = Method Detection Limit ND = Not Detected, less than MDL

As per client's request, only the appointed materials have been tested.



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TEST RESULT

Limits -MDL per category type:

Test Item(s):	Unit	Limit	MDL	Limit	MDL	Limit	MDL	
Category Type				I	İ		İİI	
Extractable Lead (Pb)	mg/kg	2.0	1.0	0.5	0.2	23	10	
Extractable Antimony (Sb)	mg/kg	45	5	11.3	1	560	10	
Extractable Arsenic (As)	mg/kg	3.8	0.2	0.9	0.1	47	5	
Extractable Barium (Ba)	mg/kg	1500	50	375	10	18750	50	
Extractable Cadmium (Cd)	mg/kg	1.3	0.1	0.3	0.05	17	1	
Extractable Mercury (Hg)	mg/kg	7.5	0.5	1.9	0.2	94	10	
Extractable Selenium (Se)	mg/kg	37.5	2	9.4	1	460	10	
Extractable Boron (B)	mg/kg	1200	50	300	10	15000	50	
Extractable Cobalt (Co)	mg/kg	10.5	1	2.6	0.2	130	10	
Extractable Manganese (Mn)	mg/kg	1200	50	300	10	15000	50	
Extractable Strontium (Sr)	mg/kg	4500	50	1125	50	56000	50	
Extractable Zinc (Zn)	mg/kg	3750	50	938	50	46000	50	
Extractable Copper (Cu)	mg/kg	622.5	10	156	10	7700	50	
Extractable Aluminum (AI)	mg/kg	5625	50	1406	50	70000	50	
Extractable Nickel (Ni)	mg/kg	75	5	18.8	2	930	10	
Extractable Tin (Sn)	mg/kg	15000	50	3750	50	180000	50	
Extractable Organic Tin	mg/kg	0.9	0.2	0.2	0.2	12	0.2	
Extractable Chromium	mg/kg	-	0.02	-	0.005	-	0.02	
Extractable Chromium (III) (Cr III)	mg/kg	37.5	2	9.4	1	460	10	
Extractable Chromium (VI) (Cr VI)	mg/kg	0.02	0.02	0.005	0.005	0.053	0.02	

Category I: dry, brittle, powder-like or pliable toy material

Category II: liquid or sticky toy material Category III: scrapped-off toy material

"-" = Not Regulated



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TEST RESULT

Total Cadmium Content

Test Request: Total cadmium content as specified in Commission Regulation (EU) 2016/217 amending entry

23 of Annex XVII of REACH Regulation (EC) No 1907/2006.

Test Method: EN 1122:2001 Method B, acid digestion method was used and total cadmium content was

determined by ICP-OES.

Tostod Itom(s)	Unit	Limit	MDL	Result
Tested Item(s)	Oilit	Lilling	IVIDE	1
Total Cadmium(Cd)	%	0.1	0.0005	ND

Tested Item(s)	Unit	Limit	MDL	Result				
rested item(s)	Oilit	Lillit	IVIDE	2+3+4	5+6+7	8		
Total Cadmium(Cd)	%	0.01	0.0005	ND	ND	ND		

Remark:

MDL = method detection limit

ND = Not detected, less than MDL

According to client's request, tests are combination tests. The experimental results are the total result of mixed samples.

As per client's request, only the appointed materials have been tested.



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TEST RESULT

Phthalates Content

Test Request: Phthalates content as specified in entry 51&52 of annex XVII of REACH Regulation (EC) No

1907/2006 and its amendment Commission Regulation (EU) 2018/2005.

Test Method: EPA 3550C:2007, EPA 8270E:2018, solvent extraction and quantification by GC-MS.

Tested Item(s)	CAS No.	CAS No. Unit		MDL	Result				
, ,					1	2+3+4	5+6+7	8	
Dibutylphthalate (DBP)	84-74-2	%	-	0.005	ND	ND	ND	ND	
Benzylbutylphthalate (BBP)	85-68-7	%	-	0.005	ND	ND	ND	ND	
Diethylhexylphthalate (DEHP)	117-81-7	%	ı	0.005	ND	ND	ND	ND	
Diisobutylphthalate (DIBP)	84-69-5	%	-	0.005	ND	ND	ND	ND	
Sum (DBP + BBP + DEHP + DIBP)	-	%	0.1	-	ND	ND	ND	ND	
Di-n-octylphthalate (DNOP)	117-84-0	%	-	0.005	ND	ND	ND	ND	
Diisononylphthalate (DINP)	28553-12-0	%	-	0.005	ND	ND	ND	ND	
Diisodecylphthalate (DIDP)	26761-40-0	%	-	0.005	ND	ND	ND	ND	
Sum (DNOP + DINP + DIDP)	-	%	0.1	-	ND	ND	ND	ND	

Remark:

MDL = method detection limit

ND = Not detected, less than MDL

According to client's request, tests are combination tests. The experimental results are the total result of mixed samples.

As per client's request, only the appointed materials have been tested.



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TEST RESULT

Polycyclic Aromatic Hydrocarbons (PAHs)

Test Request: Polycyclic Aromatic Hydrocarbons (PAHs) content as specified in Regulation (EU) 2015/326

amending entry 50 of Annex XVII of REACH Regulation (EC) No 1907/2006.

Test Method: Solvent extraction and quantification by gas chromatography-mass selective detection (GC-MS)

with respect to AfPS GS 2014:01 PAK (PAK=PAHs) requirement

Tested Item(s)	CAS No.	AS No. Unit		MDL	Result			
rested item(s)	CAS NO.	Oilit	Limit	MIDL	1	2	3	4
Benzo(a)anthracene	56-55-3	mg/kg	0.5	0.2	ND	ND	ND	ND
Chrysene	218-01-9	mg/kg	0.5	0.2	ND	ND	ND	ND
Benzo(b)fluoranthene	205-99-2	mg/kg	0.5	0.2	ND	ND	ND	ND
Benzo(j)fluoranthene	205-82-3	mg/kg	0.5	0.2	ND	ND	ND	ND
Benzo(k)fluoranthene	207-08-9	mg/kg	0.5	0.2	ND	ND	ND	ND
Benzo(a)pyrene	50-32-8	mg/kg	0.5	0.2	ND	ND	ND	ND
Dibenzo(a,h)anthracene	53-70-3	mg/kg	0.5	0.2	ND	ND	ND	ND
Benzo(e)pyrene	192-97-2	mg/kg	0.5	0.2	ND	ND	ND	ND

Tested Item(s)	CAS No.	Unit	Unit Limit		Result				
rested item(s)	CAS NO.	Oilit	Lillit	MDL	5	6	7	8	
Benzo(a)anthracene	56-55-3	mg/kg	0.5	0.2	ND	ND	ND	ND	
Chrysene	218-01-9	mg/kg	0.5	0.2	ND	ND	ND	ND	
Benzo(b)fluoranthene	205-99-2	mg/kg	0.5	0.2	ND	ND	ND	ND	
Benzo(j)fluoranthene	205-82-3	mg/kg	0.5	0.2	ND	ND	ND	ND	
Benzo(k)fluoranthene	207-08-9	mg/kg	0.5	0.2	ND	ND	ND	ND	
Benzo(a)pyrene	50-32-8	mg/kg	0.5	0.2	ND	ND	ND	ND	
Dibenzo(a,h)anthracene	53-70-3	mg/kg	0.5	0.2	ND	ND	ND	ND	
Benzo(e)pyrene	192-97-2	mg/kg	0.5	0.2	ND	ND	ND	ND	

Remark:

mg/kg = milligram per kilogram
MDL = method detection limit
ND = Not detected, less than MDL

END OF THE REPORT