
Test Report

Report No. : AGC05443250637-001

SAMPLE NAME : Recycled stainless steel pen/Recycled stainless steel pen
MODEL NAME : MO2637/MO2636
APPLICANT : MID OCEAN BRANDS B.V.
STANDARD(S) : Please refer to the following page(s).
DATE OF ISSUE : Jun. 19, 2025

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Applicant : MID OCEAN BRANDS B.V.
Address : Unit 711-716, 7/F., Tower A, 83 King Lam Street, Cheung Sha Wan, Kowloon, Hong Kong.
Test Site : 6/F., Building 2, Sanwei Chaxi Industrial Park, Sanwei Community, Hangcheng Street, Bao'an District, Shenzhen, Guangdong, China

Report on the submitted sample(s) said to be:

Sample Name : Recycled stainless steel pen/Recycled stainless steel pen
Model : MO2637/MO2636
Vendor code : 104901
Country of Origin : CHINA
Country of Destination : EUROPE
Sample Received Date : Jun. 17, 2025
Testing Period : Jun. 17, 2025 to Jun. 18, 2025
Test Requested : Selected test(s) as requested by client.

Test Requested:**Conclusion**

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 63
- Lead(Pb) Content

Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 23
-Cadmium(Cd) Content

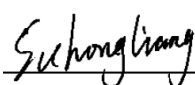
Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 51&52
- Phthalates Content

Pass

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 50
- Polycyclic-aromatic Hydrocarbons (PAHs) Content

Pass

Approved by: 

Suhongliang

Technical Director

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Report Revise Record

Report Version	Issued Date	Valid Version	Notes
/	Jun. 19, 2025	Valid	Initial release

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The photo of the sample



MO2636



MO2637

The photo of AGC05443250637-001 is for use only with the original report.

Test Point Description

Test point	Test point description
1-1	Metal pen tip
1-2	Black coating
1-3	Metal pen tube
1-4	Metal ring
1-5	Metal pen cap
1-6	Black plastic (inside the pen cap)
1-7	Yellow plastic (inside the pen cap)
1-8	White plastic (inside the pen cap)
1-9	Metal tube (inside the pen cap)
1-10	Black plastic pen tip
1-11	Metal pen tail
1-12	Metal pen grip
1-13	Metal pen clip
1-14	Blue plastic thrust device
1-15	Black plastic pen core pipe
1-16	Metal pen core pipe
1-17	Blue ink
1-18	Black ink
1-19	Spring(thin)
1-20	Spring(thick)
1-21	Black paper box(MO2637)
1-22	Black paper box(MO2636)

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Test Results:

Note: N.D.=Not Detected (less than method detection limit), MDL = Method Detection Limit, 1mg/kg=0.0001%

Unless otherwise stated, the decision rule for conformity reporting is based on Binary Statement for Simple Acceptance Rule (w=0) stated in ILAC-G8:09/2019/CNAS-GL015:2022.

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 63

- Lead(Pb) Content

Test Methods and Equipment: IEC 62321-5:2013; ICP-OES

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-1	1-2	1-3
Lead(Pb)	mg/kg	500	10	76	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-4	1-5	1-6+1-7+1-8
Lead(Pb)	mg/kg	500	10	60	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-9	1-10	1-11
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	45
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-12	1-13	1-14+1-15
Lead(Pb)	mg/kg	500	10	56	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-16	1-17	1-18
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-19	1-20	1-21
Lead(Pb)	mg/kg	500	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-22	
Lead(Pb)	mg/kg	500	10	N.D.	
Conclusion				Conformity	

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points: 1-6+1-7+1-8,1-14+1-15
2. As specified by client, the submitted samples were dried to test, the test points: 1-2
3. Raw materials were sampled at the following test points:1-2

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Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 23
-Cadmium(Cd) Content

Test Methods and Equipment: IEC 62321-5:2013; ICP-OES

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-2	1-6+1-7+1-8
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.
Conclusion				Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-10	1-14+1-15
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.
Conclusion				Conformity	Conformity

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points: 1-6+1-7+1-8,1-14+1-15
2. As specified by client, the submitted samples were dried to test, the test points: 1-2
3. Raw materials were sampled at the following test points:1-2

Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 51&52
- Phthalates Content

Test Methods and Equipment: IEC 62321-8:2017; GC-MS

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-2	1-6+1-7+1-8
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.
Conclusion				Conformity	Conformity

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Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-10	1-14+1-15
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.
Sum of DIBP+DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.
Conclusion				Conformity	Conformity

Remark:

1. As specified by client, the submitted samples were mixed to test, the test points: 1-6+1-7+1-8,1-14+1-15
2. As specified by client, the submitted samples were dried to test, the test points: 1-2
3. Raw materials were sampled at the following test points:1-2

Limit requirements of Phthalates

Toys and childcare articles	Each of DEHP, DBP, BBP, DIBP is less than 0.1% or the sum of DEHP+DBP+BBP+DIBP is less than 0.1%
Toys and childcare articles which can be placed in the mouth by children	The sum of DINP+DIDP+DNOP is less than 0.1%

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Annex XVII of the REACH Regulation (EC) No 1907/2006, entry 50

- Polycyclic-aromatic Hydrocarbons (PAHs) Content

Test Methods and Equipment: Afps GS 2019:01 PAK; GC-MS

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-2	1-10
Benzo[a]pyrene(BaP)	mg/kg	1	0.1	N.D.	N.D.
Benzo[e]pyrene(BeP)	mg/kg	1	0.1	N.D.	N.D.
Benzo[a]anthracene(BaA)	mg/kg	1	0.1	N.D.	N.D.
Benzo[b]fluoranthene(BbF)	mg/kg	1	0.1	N.D.	N.D.
Benzo[j]fluoranthene(BjFA)	mg/kg	1	0.1	N.D.	N.D.
Benzo[k]fluoranthene(BkF)	mg/kg	1	0.1	N.D.	N.D.
Chrysene(CHR)	mg/kg	1	0.1	N.D.	N.D.
Dibenzo[a,h]anthracene(DBA)	mg/kg	1	0.1	N.D.	N.D.
Conclusion				Conformity	Conformity

Remark:

- As specified by client, the submitted samples were dried to test, the test points: 1-2
- Raw materials were sampled at the following test points:1-2

Limit requirements of Polycyclic-aromatic Hydrocarbons (PAHs) (Unit: mg/kg)

Items	CAS No.	Extender oils or used for the production of tyres or parts of tyres	Any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity	Toys, including activity toys, and childcare articles, any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity
Benzo[a]pyrene(BaP)	50-32-8	≤ 1	≤ 1	≤ 0.5
Benzo[e]pyrene(BeP)	192-97-2	/	≤ 1	≤ 0.5
Benzo[a]anthracene(BaA)	56-55-3	/	≤ 1	≤ 0.5
Benzo[b]fluoranthene(BbF)	205-99-2	/	≤ 1	≤ 0.5
Benzo[j]fluoranthene(BjFA)	205-82-3	/	≤ 1	≤ 0.5
Benzo[k]fluoranthene(BkF)	207-08-9	/	≤ 1	≤ 0.5
Chrysene(CHR)	218-01-9	/	≤ 1	≤ 0.5
Dibenzo[a,h]anthracene(DBA)	53-70-3	/	≤ 1	≤ 0.5
Sum of BaP+ BeP+ BaA+ BbF+ BjFA+ BkF+ CHR+ DBA	/	≤ 10	/	/

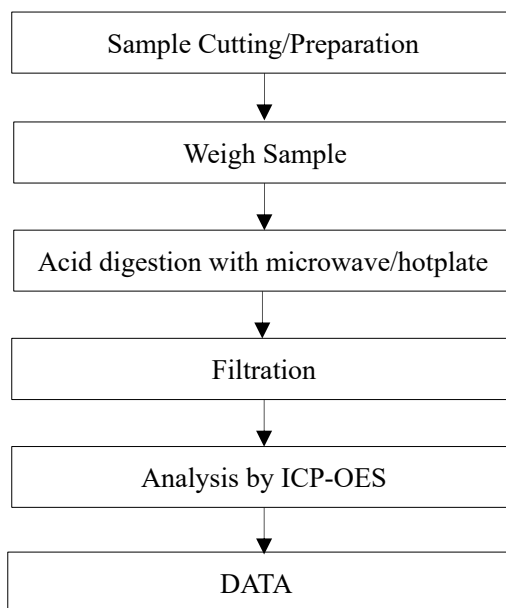
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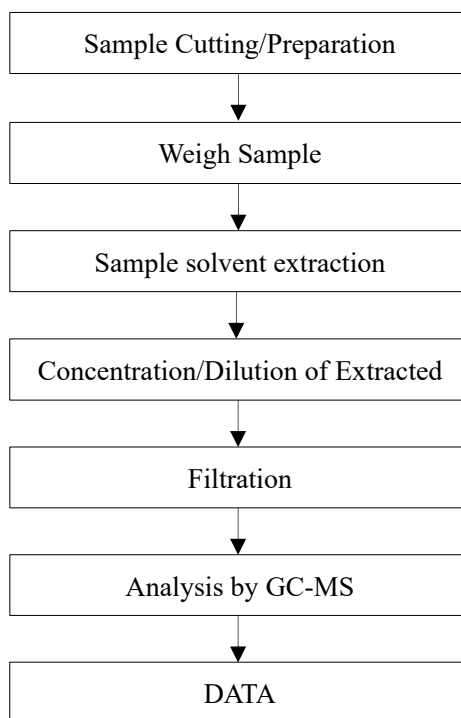
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Test Flow Chart of Heavy Metal Content



Test Flow Chart of Phthalates



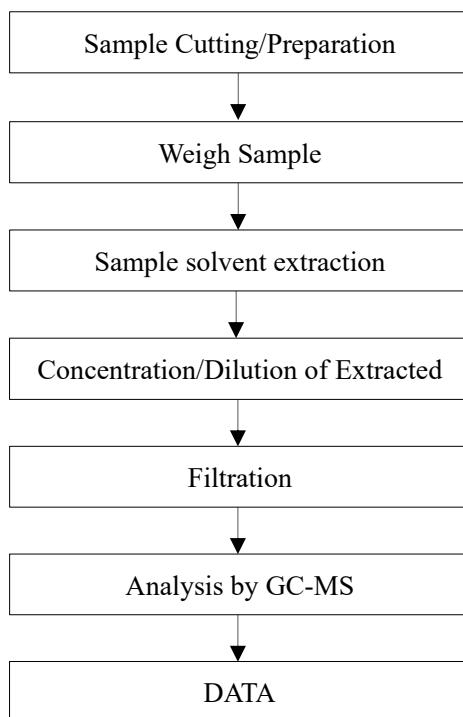
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Test Flow Chart of Polycyclic-aromatic Hydrocarbons (PAHs)



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3. The Company shall not be called or be liable to be called to give evidence or testimony on the Report in a court of law without its prior written consent, unless required by the relevant governmental authorities, laws or court orders.
4. In the event of the improper use of the report as determined by the Company, the Company reserves the right to withdraw it, and to adopt any other additional remedies which may be appropriate.
5. Samples submitted for testing are accepted on the understanding that the Report issued cannot form the basis of, or be the instrument for, any legal action against the Company.
6. The Company will not be liable for or accept responsibility for any loss or damage however arising from the use of information contained in any of its Reports or in any communication whatsoever about its said tests or investigations.
7. Clients wishing to use the Report in court proceedings or arbitration shall inform the Company to that effect prior to submitting the sample for testing.
8. The Company is not responsible for recalling the electronic version of the original report when any revision is made to them. The Client assumes the responsibility to providing the revised version to any interested party who uses them.
9. Subject to the variable length of retention time for test data and report stored hereinto as otherwise specifically required by individual accreditation authorities, the Company will only keep the supporting test data and information of the test report for a period of six years. The data and information will be disposed of after the aforementioned retention period has elapsed. Under no circumstances shall we provide any data and information which has been disposed of after retention period. Under no circumstances shall we be liable for damage of any kind, including (but not limited to) compensatory damages, lost profits, lost data, or any form of special, incidental, indirect, consequential or punitive damages of any kind, whether based on breach of contract of warranty, tort (including negligence), product liability or otherwise, even if we are informed in advance of the possibility of such damages.

*** End of Report ***

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