
Test Report

Report No. : AGC05443251041-001

SAMPLE NAME : Recycled Aluminium ball pen
MODEL NAME : MO2799
APPLICANT : MID OCEAN BRANDS B.V.
STANDARD(S) : Please refer to the following page(s).
DATE OF ISSUE : Oct. 29, 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 Aluminium ball pen
Model : MO2799
Vendor code : 104901
Country of Origin : CHINA
Country of Destination : EUROPE
Sample Received Date : Oct. 27, 2025
Testing Period : Oct. 27, 2025 to Oct. 28, 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

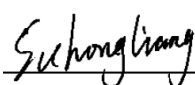
Pass

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
/	Oct. 29, 2025	Valid	Initial release

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The photo of the sample



The photo of AGC05443251041-001 is for use only with the original report.

Test Point Description

Test point	Test point description
1-1	Black coating (pen barrel)
1-2	Dark blue coating(pen barrel)
1-3	Wine red coating(pen barrel)
1-4	Translucent coating (pen barrel)
1-5	Metal spring (large)
1-6	Metal spring (long)
1-7	Metal spring (short)
1-8	Blue ink
1-9	Metal pen barrel
1-10	Metal pen clip
1-11	Black plastic thrust device
1-12	Blue plastic refill cap
1-13	White plastic pen refill tube
1-14	Dark blue pen tube inside pen barrel
1-15	Black plastic tube inside pen barrel
1-16	Wine red plastic tube inside pen barrel

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Test point	Test point description
1-17	Black plastic ring inside pen barrel
1-18	Dark blue plastic pen tip
1-19	Dark blue plastic pen tail
1-20	Black plastic pen tip
1-21	Black plastic pen tail
1-22	Wine red plastic pen tip
1-23	Wine red plastic pen tail

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Test Results:

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

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+1-4	1-5
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)		
				1-6	1-7	1-8
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)		
				1-9	1-10	1-11+1-12 +1-13
Lead(Pb)	mg/kg	500	10	20	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-14+1-15 +1-16	1-17	1-18+1-19 +1-20
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)	
				1-21+1-22+1-23	
Lead(Pb)	mg/kg	500	10	N.D.	
Conclusion				Conformity	

Remark:

- As specified by client, the submitted samples were mixed to test, the test points: 1-1+1-2,1-3+1-4,1-11+1-12+1-13,1-14+1-15+1-16,1-18+1-19+1-20,1-21+1-22+1-23
- As specified by client, the submitted samples were dried to test, the test points: 1-1+1-2,1-3+1-4
- Raw materials were sampled at the following test points: 1-1+1-2,1-3+1-4
- As specified by client, the submitted samples were directly tested without drying, the test points: 1-8

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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)		
				1-1+1-2	1-3+1-4	1-11+1-12 +1-13
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-14+1-15 +1-16	1-17	1-18+1-19 +1-20
Cadmium(Cd)	mg/kg	100	10	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-21+1-22+1-23	
Cadmium(Cd)	mg/kg	100	10	N.D.	
Conclusion				Conformity	

Remark:

- As specified by client, the submitted samples were mixed to test, the test points:
1-1+1-2,1-3+1-4,1-11+1-12+1-13,1-14+1-15+1-16,1-18+1-19+1-20,1-21+1-22+1-23
- As specified by client, the submitted samples were dried to test, the test points: 1-1+1-2,1-3+1-4
- Raw materials were sampled at the following test points: 1-1+1-2,1-3+1-4

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)		
				1-1+1-2	1-3+1-4	1-11+1-12 +1-13
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.	N.D.

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Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-1+1-2	1-3+1-4	1-11+1-12 +1-13
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)		
				1-14+1-15 +1-16	1-17	1-18+1-19 +1-20
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.	N.D.	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.	N.D.	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.	N.D.	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.	N.D.	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.	N.D.	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.	N.D.	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.	N.D.	N.D.
Conclusion				Conformity	Conformity	Conformity

Test Item(s)	Unit	Limit	MDL	Test Result(s)
				1-21+1-22+1-23
Diisobutyl phthalate (DIBP) CAS:84-69-5	%	0.1	0.005	N.D.
Dibutyl phthalate (DBP) CAS:84-74-2	%	0.1	0.005	N.D.
Butylbenzyl phthalate (BBP) CAS:85-68-7	%	0.1	0.005	N.D.
Di-(2-ethylhexyl) Phthalate (DEHP) CAS:117-81-7	%	0.1	0.005	N.D.
Di-n-octyl phthalate (DNOP) CAS:117-84-0	%	/	0.005	N.D.
Di-isononyl phthalate (DINP) CAS:28553-12-0, 68515-48-0	%	/	0.005	N.D.
Di-isodecyl phthalate(DIDP) CAS:26761-40-0, 68515-49-1	%	/	0.005	N.D.
Sum of DIBP +DBP+BBP+DEHP	%	0.1	/	N.D.
Sum of DNOP+DINP+DIDP	%	0.1	/	N.D.
Conclusion				Conformity

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- As specified by client, the submitted samples were mixed to test, the test points: 1-1+1-2,1-3+1-4,1-11+1-12+1-13,1-14+1-15+1-16,1-18+1-19+1-20,1-21+1-22+1-23
- As specified by client, the submitted samples were dried to test, the test points: 1-1+1-2,1-3+1-4
- Raw materials were sampled at the following test points: 1-1+1-2,1-3+1-4

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%

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)	
				1-1+1-2	1-3+1-4
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

Test Item(s)	Unit	Limit	MDL	Test Result(s)	
				1-18+1-19+1-20	1-21+1-22+1-23
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 mixed to test, the test points: 1-1+1-2,1-3+1-4,1-18+1-19+1-20,1-21+1-22+1-23
- As specified by client, the submitted samples were dried to test, the test points: 1-1+1-2,1-3+1-4
- Raw materials were sampled at the following test points: 1-1+1-2,1-3+1-4

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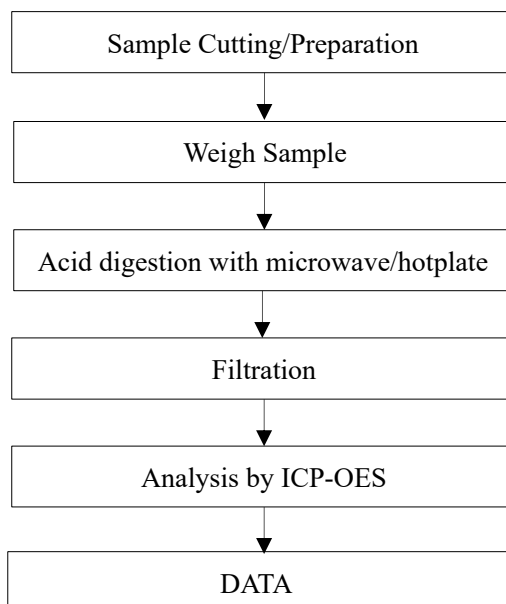
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Limit requirements of Polycyclic-aromatic Hydrocarbons (PAHs) (Unit: mg/kg)

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	/	/

Test Flow Chart of Heavy Metal Content



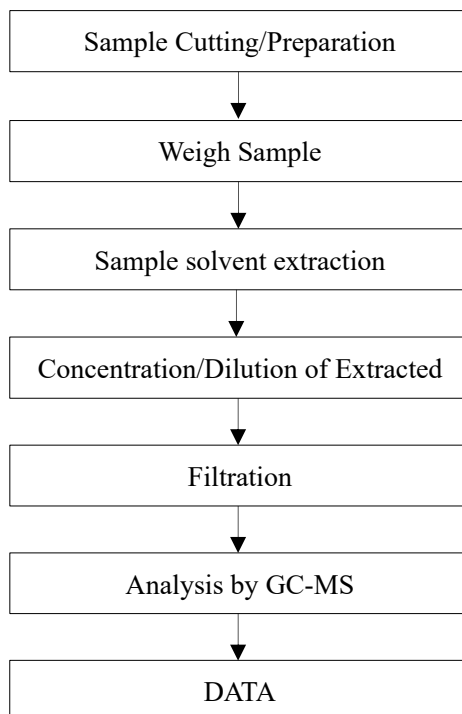
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Test Flow Chart of Phthalates

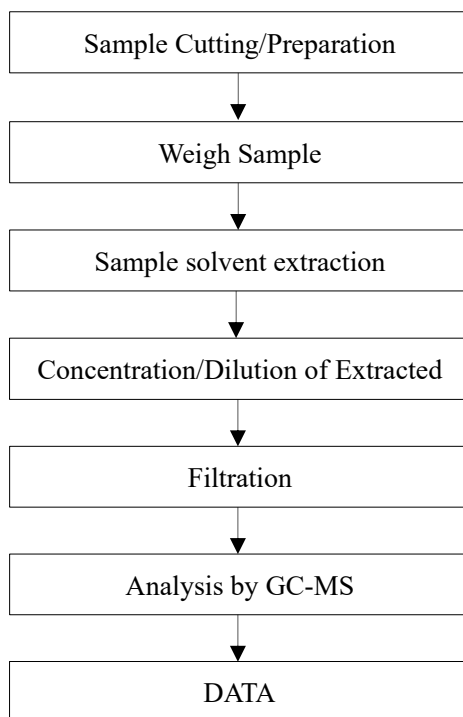


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Test Flow Chart of Polycyclic-aromatic Hydrocarbons (PAHs)

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Conditions of Issuance of Test Reports

1. All samples and goods are accepted by the Attestation of Global Compliance (Shenzhen) Std & Tech Co., Ltd. (the “Company”) solely for testing and reporting in accordance with the following terms and conditions. The company provides its services on the basis that such terms and conditions constitute express agreement between the company and any person, firm or company requesting its services (the “Clients”).
2. Any report issued by Company as a result of this application for testing services (the “Report”) shall be issued in confidence to the Clients and the Report will be strictly treated as such by the Company. It may not be reproduced either in its entirety or in part and it may not be used for advertising or other unauthorized purposes without the written consent of the Company. The Clients to whom the Report is issued may, however, show or send it, or a certified copy thereof prepared by the Company to its customer, supplier or other persons directly concerned. The Company will not, without the consent of the Clients, enter into any discussion or correspondence with any third party concerning the contents of the Report, unless required by the relevant governmental authorities, laws or court orders.
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 ***

Any report having not been signed by authorized approver, or having been altered without authorization, or having not been stamped by the “Dedicated Testing/Inspection Stamp” is deemed to be invalid. Copying or excerpting portion of, or altering the content of the report is not permitted without the written authorization of AGC. The test results presented in the report apply only to the tested sample. Any objections to report issued by AGC should be submitted to AGC within 15days after the issuance of the test report. Further enquiry of validity or verification of the test report should be addressed to AGC by agc01@agccert.com.