

# REPORT

Technical Report: (8523)051-0331

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FEB 28, 2023





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VERITAS**





# TEST REPORT

SILVER TIMING LTD  
 UNIT 801-802, 8/F, PIONEER PLACE, 33 HOI  
 YUAN ROAD, KWUN TONG

**LAB LOCATION:** SHENZHEN  
**LAB NUMBER:** (8523)051-0331

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**DATE IN:** FEB 20, 2021

**MOD. LOG IN:** /  
**DATE OUT:** FEB 28, 2023

**REVISED DATE:** /  
**WORKING DAYS:** 7  
**PAGE:** 3 OF 10

OVERALL RATING	
PASS	_____ X _____
FAIL	_____
DATA	_____

**TESTING FOR  
 CALIFORNIA PROPOSITION 65  
 TOTAL LEAD CONTENT IN SURFACE COATING  
 CLIENT'S PHTHALATES CONTENT TEST-7P**

<b>Sample Description:</b>	HARVEST RECTANGLE / ROUND GALV METAL DECOR 4AST								
<b>Manufacturer:</b>	/			<b>P.O. No.:</b>	7276				
<b>Buyer:</b>	OWN NAME			<b>Style:</b>	/				
<b>Country of Origin:</b>	CHINA			<b>Country of Destination:</b>	USA				
<b>Color:</b>	/			<b>SKU Number:</b>	G94040				
<b>Re-test:</b>	<b>Yes:</b>	<input type="checkbox"/>	<b>No:</b>	<input checked="" type="checkbox"/>	<b>Charge Vendor:</b>	<b>Yes:</b>	<input checked="" type="checkbox"/>	<b>No:</b>	<input type="checkbox"/>
<b>Previous Report No.:</b>	/								



**EXECUTIVE SUMMARY:**

<b>Test content</b>	<b>Result/Rating</b>
Total lead content in surface coating	Meet/Pass
California proposition 65	Meet/Pass
Client's phthalates content test-7P	Meet/Pass

**REMARK:**

1. As per client's request, only the following tests were conducted.
  - California proposition 65
  - Total lead content in surface coating
  - Client's phthalates content test-7P
2. See enclosed protocol for test results in this report.

NOTE: If there are questions or concerns regarding above report, please contact the appropriate lab persons.

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BUREAU VERITAS SHENZHEN CO., LTD

LARRY CHING  
SENIOR MANAGER – HARDLINES DIVISION



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**RESULT:**

**Phthalates Content –California Proposition 65**

Parameter	CAS no.	Unit	Result	Maximum Allowable Limit
			1	
Dibutyl phthalate (DBP)	84-74-2	%	<0.005	0.1
Butyl benzyl phthalate (BBP)	85-68-7	%	<0.005	0.1
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	%	<0.005	0.1
Conclusion	-	-	PASS	-

Sample Description			
	Color / Component	Location	Style
1	Translucent soft glue	Glue	A4

Note: "<" = less than

Method: Sample was extracted with organic solvent and then analyzed by Liquid Chromatograph Mass Spectrometer / Gas Chromatograph Mass Spectrometer.



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Di-n-octyl phthalate (DNOP)	117-84-0	%	<0.005	0.1
Di-iso-nonyl phthalate (DINP)	28553-12-0	%	<0.005	0.1
Di-iso-decyl phthalate (DIDP)	26761-40-0	%	<0.005	0.1
Di-n-hexyl (DnHP)	84-75-3	%	<0.005	0.1
Conclusion	-	-	PASS	-

Sample Description			
	Color / Component	Location	Style
1	Translucent soft glue	Glue	A4

Note: “<” = less than

Method: Sample was extracted with organic solvent and then analyzed by Liquid Chromatograph Mass Spectrometer / Gas Chromatograph Mass Spectrometer.



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**Total Lead Content –California Proposition 65**

Parameter	Unit	Result			Maximum Allowable Limit
		1	2	3	
Total Lead (Pb)	mg/kg	<10	<10	16	300
<b>Conclusion</b>	-	<b>PASS</b>	<b>PASS</b>	<b>PASS</b>	-

Parameter	Unit	Result				Maximum Allowable Limit
		4	5	6	7	
Total Lead (Pb)	mg/kg	<10	<10	<10	<10	300
<b>Conclusion</b>	-	<b>PASS</b>	<b>PASS</b>	<b>PASS</b>	<b>PASS</b>	-

Sample Description			
	Color / Component	Location	Style
1	all coating(>4colors)	pattern	A4
2	white coating	rim of words	A4
	black coating	bead	A4
	orange coating	bead	A4
3	brown coating	metal sheet	A4
	bright black coating	wire	A4
4	translucent soft glue	glue	A4
	iridescent glitter	glitter	A4
5	brown composite wood	words	A4
6	silvery galvanized metal	metal sheet	A4
7	silvery metal	wire	A4

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: Sample was digested with acid reference to EPA3051 and then analyzed by Atomic Absorption Spectrophotometer or Inductively Coupled Argon Plasma Spectrometer.



**TOTAL LEAD CONTENT IN SURFACE COATING**

- Consumer Product Safety Improvement Act (CPSIA) of 2008 "Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint", (16 CFR 1303)
  - Canadian Hazardous Products Act (CHPA), R.S., c. H-3, Schedule I, Part 1, Item 2
  - Client's total lead in surface coating
- NO COMPOSITE     COMPOSITE

Element:				Lead			
Requirement: Maximum allowable limit:							
<input type="checkbox"/> CPSIA limit :				<input type="checkbox"/> 90 mg/kg			
<input type="checkbox"/> CHPA limit:				<input type="checkbox"/> 600 mg/kg			
<input checked="" type="checkbox"/> Client's limit:				<input checked="" type="checkbox"/> 90 mg/kg			
Sample Description				Result	Conclusion		
	Color / Component	Location	Style	(mg/kg)	<input type="checkbox"/> CPSIA (90ppm) <input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input type="checkbox"/> CHPA (600ppm) <input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input checked="" type="checkbox"/> Client's Limit 90ppm <input type="checkbox"/> PASS <input type="checkbox"/> FAIL
1.	all coating(>4colors)	pattern	A4	<10	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL
2.	white coating	rim of words	A4	<10	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL
	black coating	bead	A4				
	orange coating	bead	A4				
3.	brown coating	metal sheet	A4	16	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL
	bright black coating	wire	A4				

LT = Less Than

mg/kg = milligrams per kilogram (ppm = parts per million)

\* = Average of duplicate analyses

Remark:            In some cases, the tested component cannot be tested individually due to overlapped coatings. And it is not considered as "COMPOSITE".

**CPSIA Third Party Report (COULD/ COULDN'T/NO COMMENT) be issued.**





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BV Lab Number: (8523)051-0331  
 Technician Name: HL  
 Test Date: FEB 28, 2023  
 Reviewed By/Date: DA / FEB 28, 2023  
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<b>Protocol Number</b>	CPSD-AN-06572-USA	<b>Version</b>	129
<b>Protocol Description</b>	CALIFORNIA PROPOSITION 65		
<b>Country</b>	United States		
<b>Scope</b>	This protocol covers the California Proposition 65 requirements and warning statements for specific products, from various Consent Decrees of the State of California.  Note: Clients who are a party to a settlement may use the old warning label referencing in settlement.		
<b>Creation Date</b>	29/Apr/2014	<b>Last Revision Date</b>	
<b>Client Approval Date</b>		<b>Approver</b>	
<b>No. of Sample for testing</b>	6	See below pricing chart for exceptions	
<b>No. of Carton for transit testing</b>	1		
<b>No. of Working Days for testing</b>	7	20 (subcontracted out tests)	

Keys			
A	Additional Charge For This Test	M	Mandatory
		R	Regulatory

#		Evaluation	Citation / Method	Criteria	Result / Rating
2.295	A	Phthalates in holiday decor	Santa Clara Superior Court 114CV267502 / Solvent extraction with GC-MS/LC-MS analysis / CPSD-AN-00108-MTHD	<p>[Holiday decor] Product shall not contain more than 0.1% (1000ppm) of each of DEHP, BBP and DBP.</p> <p>Labeling is not allowed by the Consent Judgment. Reformulation of product is required.</p> <p>Note: - Applicable to 1) holiday greenery including but not limited to trees and wreaths; 2) holiday ornaments and holiday decorations; and 3) larger ornamental or decorative holiday oriented products, including sculptures and figurines with or without string lights. - Actual testing would be conducted on soft plastic for item 2 only, i.e. holiday ornaments and holiday decorations. - Soft plastic is defined as plastic materials with shore A hardness &lt; 90.</p>	<p>M/PASS</p> <p>SEE RESULT TABLE</p>



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#		Evaluation	Citation / Method	Criteria	Result / Rating
				<ul style="list-style-type: none"> <li>- Actual testing would be conducted on all accessible vinyl/PVC components including both substrates and surface coatings for all items (1-3).</li> <li>- BVCPS recommends documentation or material bill for material identification is provided for all products. If documentation is not provided, the Beilstein test will be conducted on all plastic substrates and surface coatings to confirm the presence of PVC.</li> <li>- If insufficient surface coating to conduct a beilstein, then all surface coating should be tested.</li> <li>- Vendor is responsible for compliance of all other vinyl materials.</li> </ul>	
2.96	A	Total lead in bottle openers, cabinet, door knobs and decorated galvanized metal products	San Francisco Superior Court CGC-11-511552 / EPA 3050B (Mod)	<p>[Bottle openers, cabinet, door knobs and decorated galvanized metal products] Product shall not exceed 300 ppm (0.03%) total lead content.</p> <p>Products that exceed the limit shall utilize a warning statement. Please refer to labeling requirement and the warning statement in CPSD-AN-00108-STIP05 or the labeling section at the beginning of this protocol.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Applicable to bottle openers, cabinet and door knobs made of brass, brass alloys or bronze alloys and galvanized metal products for decoration.</li> <li>- Actual testing would be conducted on accessible surface coatings and substrates only.</li> <li>- Non-suspect materials, except leather, as defined by the Consumer Products Safety Commission in 16 CFR 1500.91 (d) and (e) will not be tested. Vendor is responsible for compliance of these materials.</li> </ul>	<p>M/PASS</p> <p>SEE RESULT TABLE</p>

END OF REPORT