

Verification Report

No. HKTEC2304204205

Date : 20 Sep 2023

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RUBADUE WIRE CO., INC.
5610 BOEING DR. LOVELAND,
CO. 80538 USA

Sample Name : TCA

SGS Job No. : 5282608 - HK

Colour : VARIOUS

Sample Receiving Date : 28 Aug 2023

Verification Period : 28 Aug 2023 – 18 Sep 2023

Verification Requested : With reference to GB/T 26572-2011 Requirement of concentration limits for certain restricted substances in electrical and electronic products.

Verification Method : Please refer to next page(s)

Verification Result : Please refer to next page(s)

Verification Conclusion : Based on the review of previous reports and verification results of the submitted samples, the results do not exceed the limit as set by GB/T 26572-2011.

Signed for and on behalf of
SGS Hong Kong Limited



Lam Ka Yung, Allen
Senior Chemist

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Verification Methods:

1. Disassembly and disjointment were performed for the submitted samples.
2. With reference to GB/T 26125-2011, tests were performed for the samples indicated by the photos in this report (Decision Rule: please refer to appendix 1: Category 6)
 - (1) With reference to GB/T 26125-2011, Screening by EDXRF spectroscopy. (Decision Rule; please refer to appendix 1: Category 5)
 - (2) Wet chemical test method: With reference to GB/T 26125-2011, analyzed by ICP-OES/AAS, UV-Vis and GC-MS. (Decision Rule: please refer to appendix 1: Category 1)

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Details on Verification

Part No.	Part Description	BOM No.	Restricted Substances	Results of EDXRF ⁽¹⁾	Result of Wet Chemical Testing ⁽²⁾ (mg/kg)	Conclusion on GB/T 26572-2011	Sample Submitted / Resubmitted Date
24	Silvery metal plating - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
25	Coppery metal - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
26	Silvery metal plating - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
27	Coppery metal - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
28	Coppery metal - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
29	Red metal plating - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
30	Coppery metal - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	
31	Coppery metal - Wire		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	---	---	---	
			PBDEs	---	---	---	

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Details on Verification

Part No.	Part Description	BOM No.	Restricted Substances	Results of EDXRF ⁽¹⁾	Result of Wet Chemical Testing ⁽²⁾ (mg/kg)	Conclusion on GB/T 26572-2011	Sample Submitted / Resubmitted Date
32	Blue plastic - Pellet		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	BL	---	Comply	
			PBDEs		---	Comply	
33	Dark grey plastic - Pellet		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	BL	---	Comply	
			PBDEs		---	Comply	
34	Translucent plastic - Pellet		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	BL	---	Comply	
			PBDEs		---	Comply	
35	Orange plastic - Pellet		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	BL	---	Comply	
			PBDEs		---	Comply	
36	White plastic - Pellet		Cd	BL	---	Comply	Aug 28, 2023
			Pb	BL	---	Comply	
			Hg	BL	---	Comply	
			Cr(VI)	BL	---	Comply	
			PBBs	BL	---	Comply	
			PBDEs		---	Comply	

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Notes:

(1) Interpretation of screening results by X-ray fluorescence spectrometry (XRF):

(a) Screening limits in mg/kg for regulated elements in various matrices according to GB/T 26125-2011 Annex D as below table.

Element	Polymer	Metal	Composite Materials
Cd	$BL \leq (70-3\sigma) < X < (130+3\sigma) \leq OL$	$BL \leq (70-3\sigma) < X < (130+3\sigma) \leq OL$	$LOD < X < (150+3\sigma) \leq OL$
Pb	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (500-3\sigma) < X < (1500+3\sigma) \leq OL$
Hg	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (700-3\sigma) < X < (1300+3\sigma) \leq OL$	$BL \leq (500-3\sigma) < X < (1500+3\sigma) \leq OL$
Br	$BL \leq (300-3\sigma) < X$	Not applicable	$BL \leq (250-3\sigma) < X$
Cr	$BL \leq (700-3\sigma) < X$	$BL \leq (700-3\sigma) < X$	$BL \leq (500-3\sigma) < X$

(b) If the maximum allowed level restricts PBB/PBDE and Cr(VI) rather than Br and Cr, the exceptions are the XRF determinations of Br and Cr. If the quantitative results for the elements Br and/or Cr are higher than the limit (for Br calculated based on the stoichiometry of Br in the most common congeners of PBB/PBDE), the sample is "inconclusive".

(c) Results are obtained by EDXRF for primary screening, LOD = Limit of Detection, BL = Below Limit, OL = Over Limit, IN (The symbol X marks the region)= Inconclusive, where further investigation is necessary, and further chemical testing by ICP-OES (for Cd, Pb, Hg), UV-Vis (for Cr(VI)) and GC-MS (for PBBs/PBDEs) are recommended to be performed.

(d) The EDXRF screening test for RoHS elements – The reading may be different to the actual content in the sample be of non-uniformity composition.

(2) Interpretation of results by chemical tests:

(a) mg/kg = 0.0001%, MDL=Method detection Limit, ND = Not Detected (<MDL), --- = Not Applicable.

(b) Unit and MDL in wet chemical test

Test Items	Pb	Cd	Hg
Unit	mg/kg	mg/kg	mg/kg
MDL	10	10	10

The MDL for single compound of PBBs and PBDEs is 100 mg/kg.

MDL of Cr(VI) for polymer, composite and leather sample is 10 mg/kg.

(c) ▼ =Metal sample

According to GB/T 26125-2011, result on Cr(VI) for metal sample is shown as Positive/Negative.

Positive = Presence of Cr(VI) coating, Negative = Absence of Cr(VI) coating.

Information on storage conditions and production date of the tested sample is unavailable and thus Cr(VI) results represent status of the sample at the time of testing.

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- (3) Restricted substances and maximum concentration values tolerated by weight in homogeneous materials under RoHS Directive: Cd: 0.01%, Pb/Hg/Cr(VI)/PBBs/PBDEs: 0.1%. The limit is quoted from GB/T 26572-2011 Requirement of concentration limits for certain restricted substances in electrical and electronic products.

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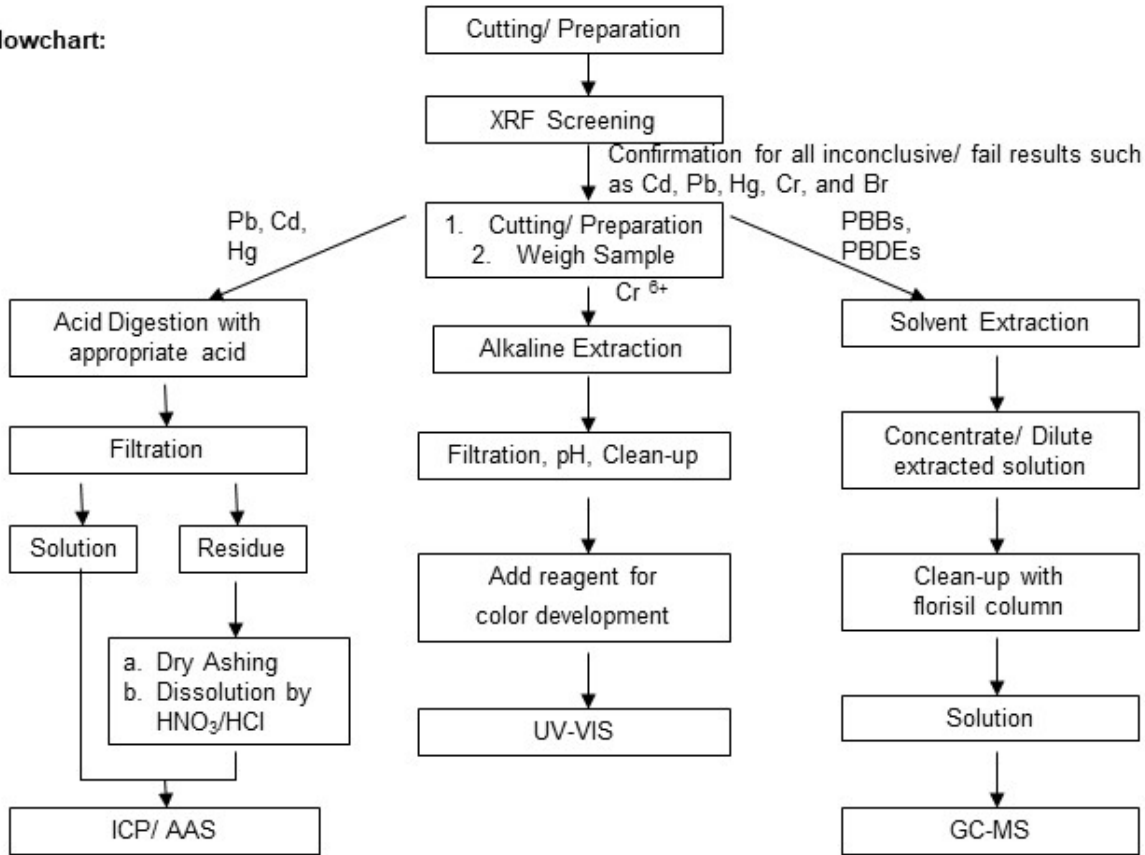
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Appendix 1

Category	Decision Rule Statement
1	<p>The decision rule for conformity reporting is based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability, $w = U95$) in ILAC-G8:09/2019 Clause 4.2.3.</p> <p>A. "Pass - the measured value is within (or below / above) the acceptance limit, where the acceptance limit is below / above to the guard band." or "Pass - The measured values were observed in tolerance at the points tested. The specific false accept risk is up to 2.5%."</p> <p>B. "Conditional Pass - The measured values were observed in tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values exceeded / out of tolerance. When the measured result is close to the tolerance, the specific false accept risk is up to 50%."</p> <p>C. "Conditional Fail - One or more measured values were observed out of tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values were in tolerance. When the measured result is close to the tolerance, the specific false reject risk is up to 50%."</p> <p>D. "Fail - the measured value is out of (or below / above) the tolerance limit added / subtracted to the guard band." or "Fail - One or more measured values were observed out of tolerance at the points tested". The specific false reject risk is up to 2.5%.</p>
2	<p>The decision rule for conformity reporting is based on EN 1811:2023: Reference test method for release of nickel from all post assemblies which are inserted into pierced parts of the human body and articles intended to come into direct and prolonged contact with the skin in Section 9.2 interpretation of results.</p>
3	<p>The decision rule for conformity reporting is based on the general consideration of simple acceptance as stated in ISO/IEC Guide 98-3: "Uncertainty of measurement - Part 3: Guide to the expression of uncertainty in measurement (GUM 1995)", and more specifically for analytical measurements to the EURACHEM/CITAC Guide 2012 "Quantifying Uncertainty in Analytical Measurement".</p>
4	<p>The decision rule for conformity reporting is according to the IEC 62321-7-1 Edition 1.0 2015-09 Section 7: Table 1-(comparison to standard and interpretation of result)</p>
5	<p>The decision rule for conformity reporting is according to the IEC 62321-3-1 Edition 1.0 2013-06 Annex A.3 interpretation of result.</p>
6	<p>The decision rule for conformity reporting is according to the GB/T 26125-2011 Annex A to H</p>
7	<p>The decision rule for conformity reporting is according to the requested specification or standard (ASTM F963-17 section 4.3.5)</p>
8	<p>The decision rule for conformity reporting is according to the requested specification or standard (AS/NZS ISO 8124 Part 3 section 4.2)</p>
Remark	<p>If the decision rule is not feasible to be used and the uncertainty of the result is able to be provided, the uncertainty range of the result will be shown in the report. Otherwise, only result will be shown in the report.</p>

Flowchart:



- Note : 1) Boiling water test method was also performed for Cr (VI) analysis in metal sample.
 2) The polymeric samples were dissolved totally by pre-conditioning method according to above flow chat for Cd, Pb and Hg contents analysis.

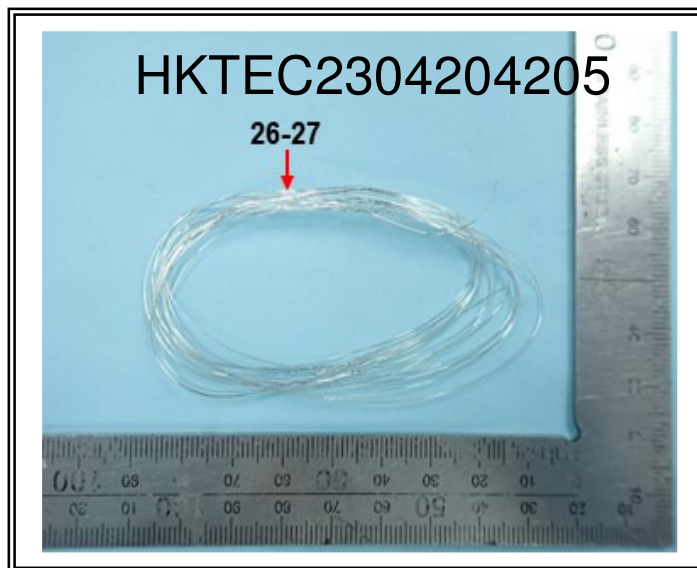
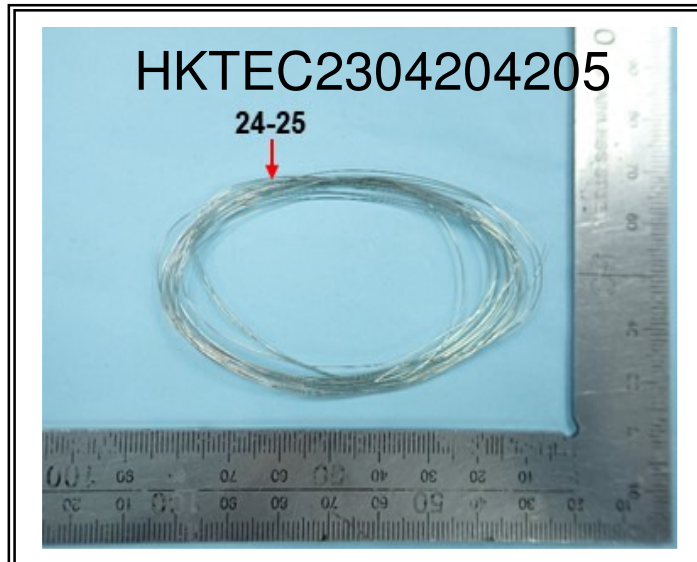
Operator : Keith Fung (XRF)
Chiu Kan Yuen/ Tang Koon Pang (Acid digestion)
Chiu Kan Yuen (Dry Ashing)
Nick Liu (Hexavalent Chromium)
Kent Wan (PBBs and PBDEs)

Section Chief : Chan Chun Kit, Dickson

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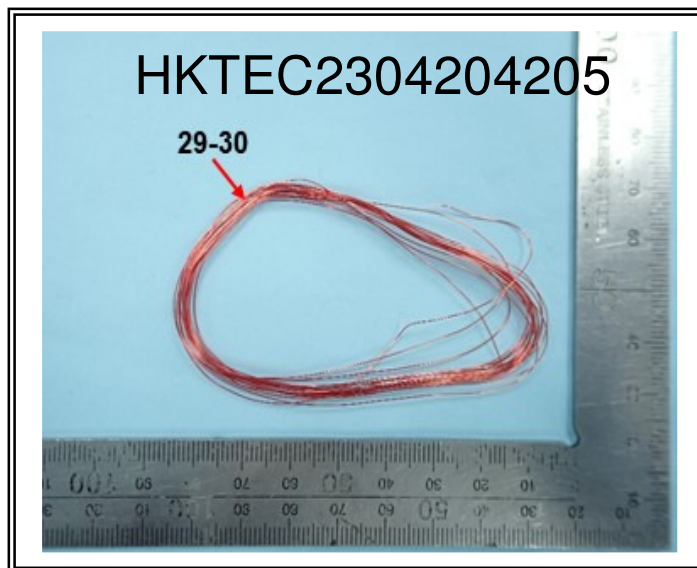
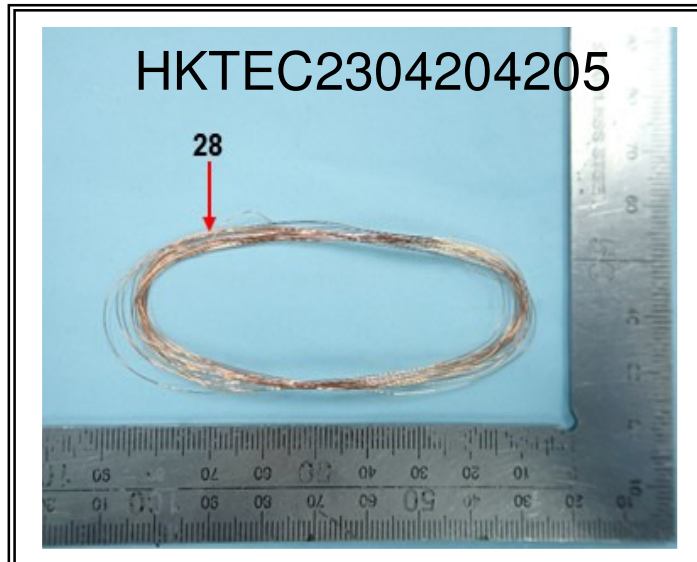
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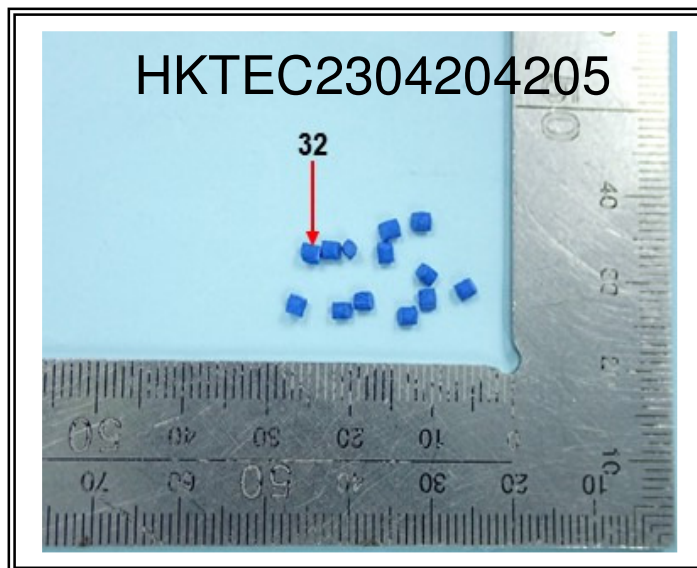
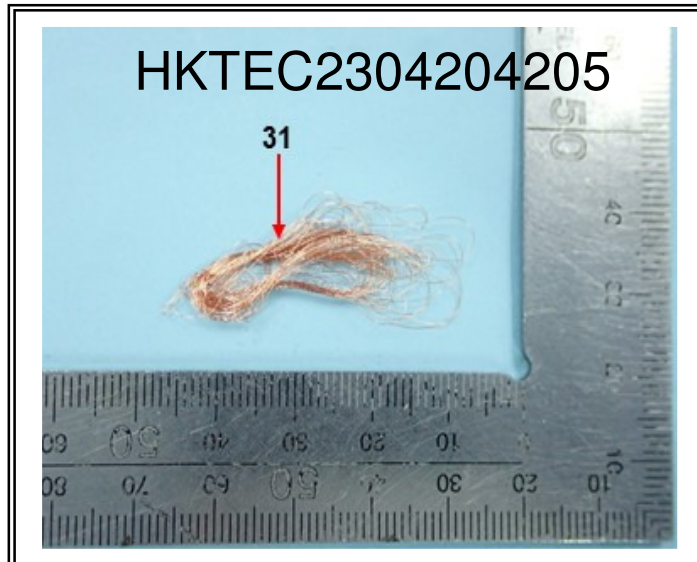
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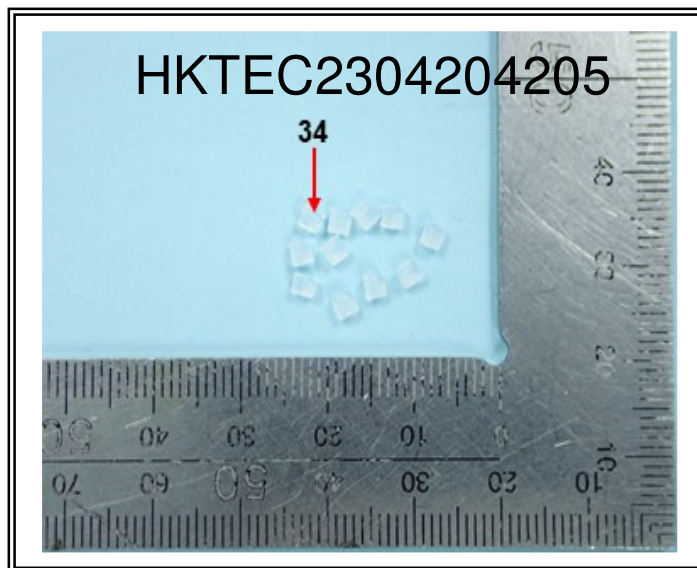
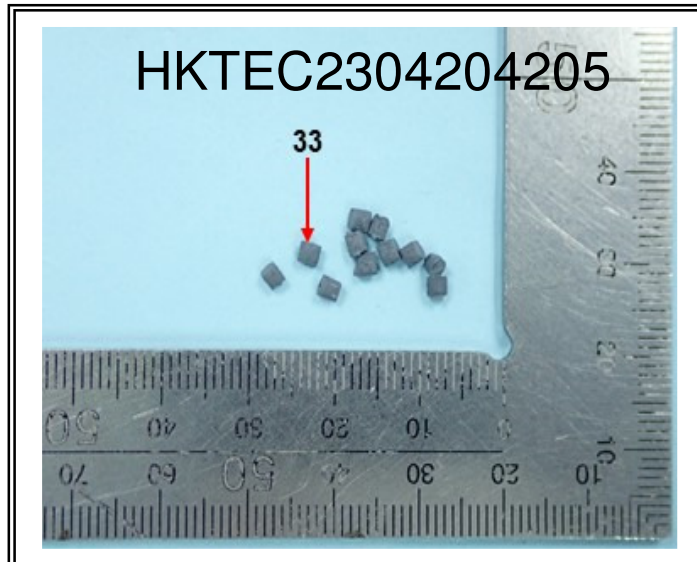
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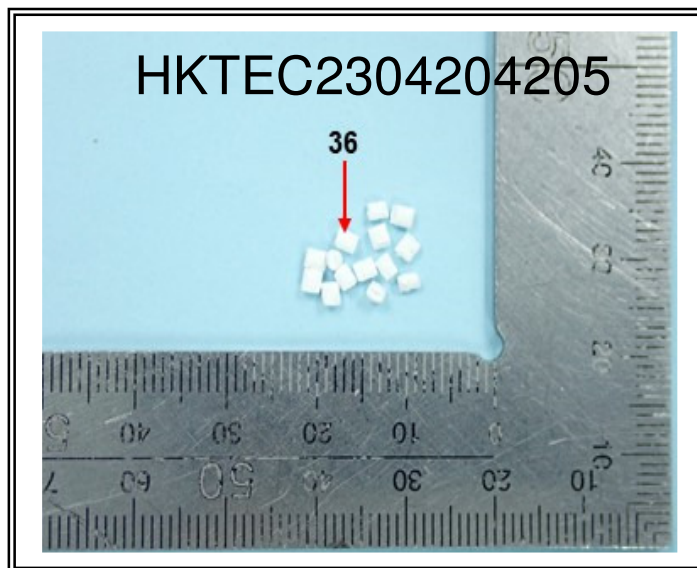
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