



CONSUMER PRODUCTS SERVICES DIVISION

## SILVERLIT TOYS MANUFACTORY LIMITED

**Technical Report:** (5220)076-0744(F)  
Date Received: April 03, 2020

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MARTIN CHIM  
SILVERLIT TOYS MANUFACTORY LIMITED  
RM1102 EAST OCEAN CENTRE  
98 GRANVILLE ROAD  
TSIM SHA TSUI  
KOWLOON  
HONG KONG

Sample Description:	PROGRAM A BOT X	Sample Size:	9
Vendor:	N/A	Style No(s):	(88071)
Manufacturer:	N/A	SKN/SKU No.:	N/A
Buyer:	N/A	PO No.:	N/A
Labeled Age Grade:	5+	Ref #:	N/A
Appropriate Age Grade:	OVER 8 YEARS OF AGE	Country of Origin:	CHINA
Client Specified Age Grade:	NOT SPECIFIED	Assortment No.:	N/A
Grade:			
Tested Age Grade:	OVER 5 YEARS OF AGE		
UPC Code:	N/A		

### **EXECUTIVE SUMMARY:**

The sample(s) MEET the following requirement(s):

- Labeling requirements of "CE marking, manufacturer/ Importer name and address, and product identification" under "Directive 2009/48/EC Safety of Toy".
- The BBP, DBP DEHP and DIBP content requirements of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 51 (amended up to EU No. 2018/2005).
- The BBP, DBP and DEHP content requirements of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 51.
- The DNOP, DINP and DIDP content requirements of the European Regulation (EC) No. 1907/2006 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII concerning the Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles, Item no. 52.
- The migration of certain elements in Category III - Scraped off toy material requirements of the European Standard, "Safety of Toys", EN 71 Part 3: 2019.
- The polycyclic aromatic hydrocarbons (PAHs) content requirement of European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 50, Paragraph 5 and 6 and its amendments.



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**EXECUTIVE SUMMARY:**

The sample(s) MEET the following requirement(s):

- The cadmium content in plastics requirement of the Swiss "Informations concernant L'Ordonnance sur les substances (Osubst)", No. 22 (1991).

Note: The received sample(s) contained accessible component(s) of less than 10 milligrams by weight on one single sample, therefore such component(s) was not subject to migration of certain elements of European Standard, "Safety of Toys", EN 71 Part 3: 2019, as specified in Clause 7.1 - Selection of test portions.

Note: The received sample(s) contained accessible component(s) of less than 50 milligrams by weight on one single sample, therefore such component(s) was not subject to the Polycyclic Aromatic Hydrocarbons (PAHs) Content requirement of European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 50, Paragraph 5 and 6.

BUREAU VERITAS HONG KONG LIMITED

Lai Ka Ming, Kent

Director

Toys and Juvenile Products Department

KL/by



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**RESULTS:**

**APPROPRIATE AGE GRADE DETERMINATION**

The Appropriate Age Grade is determined with reference to the EN71: Part 1 : 2014 +A1:2018, CEN ISO/TR 8124-8:2016 Safety of toys - Part 8: Age Determination Guidelines prepared by Technical Committee CEN/TC 52 and Age Grade Determination Guidelines of the Consumer Product Safety Commission (CPSC).

Note : The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.

Note : If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.

**2009/48/EC GENERAL LABELING REQUIREMENT**

Requirement	Result
CE Mark	M
Manufacturer/ Importer name and address	M
Product Identification	M

*M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section*



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**RESULTS:**

**MIGRATION OF CERTAIN ELEMENTS (European Standard EN 71 Part 3: 2019)**

Test Method : European Standard EN 71 Part 3: 2019, Section 9.

Class: Category III - Scraped off toy material

Sample Identity	Color	Location	Style
A.	silvery coating	robot, remote	
B.	white plastic	remote, robot	
C.	black plastic	buttons of robot, body, feet and wheels of robot	
D.	clear plastic	LED of remote	
E.	dull translucent black plastic	head of robot	
F.	dull black soft plastic	wheels of robot	

**RESULTS:**

**MIGRATION OF CERTAIN ELEMENTS (European Standard EN 71 Part 3: 2019)**

Analyte	Requirement (mg/kg)	Result (mg/kg)					
		Sample ID					
	Category III	A.	B.	C.	D.	E.	F.
Aluminium (Al)	70000	12800	LT 2	LT 2	LT 2	LT 2	2
Arsenic (As)	47	0.204	0.151	LT 0.15	LT 0.15	LT 0.15	0.326
Boron (B)	15000	LT 5	LT 5	LT 5	LT 5	LT 5	LT 5
Barium (Ba)	18750	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Cadmium (Cd)	17	LT 0.15	LT 0.15	LT 0.15	LT 0.15	LT 0.15	LT 0.15
Cobalt (Co)	130	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Chromium III (Cr III)	460	0.217	0.033	LT 0.02	0.023	0.026	0.036
Chromium VI (Cr VI)	0.053	LT 0.002#					
Copper (Cu)	7700	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Mercury (Hg)	94	LT 0.25	LT 0.25	LT 0.25	LT 0.25	LT 0.25	LT 0.25
Manganese (Mn)	15000	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Nickel (Ni)	930	5	LT 2	LT 2	LT 2	LT 2	LT 2
Lead (Pb)	23	LT 0.2	LT 0.2	LT 0.2	LT 0.2	LT 0.2	LT 0.2
Antimony (Sb)	560	LT 2	3	LT 2	LT 2	LT 2	LT 2
Selenium (Se)	460	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Tin (Sn)	180000	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Organic tin	12	4	LT 2	LT 2	LT 2	LT 2	LT 2
Strontium (Sr)	56000	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2
Zinc (Zn)	46000	18	LT 5	LT 5	LT 5	LT 5	LT 5
Mass of trace amount (gram)		0.0325			0.0264		
Conclusion		Pass	Pass	Pass	Pass	Pass	Pass

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

LT = Less Than

\* = Average of duplicate analysis

Organic tin = migration of total organic tin is expressed as tributyl tin cation content in mg/kg

# = Verified results (see note)

Remark: - Results of Cr III and Cr VI were reported as sum of soluble Chromium content unless specified.  
- Result(s) of organic tin was (were) calculated while assuming the tin content wholly contributed from tributyltin cation unless specified.

Note:

If soluble chromium content or soluble tin content exceeded the screening limits of soluble chromium (VI) or organic tin content, the results were verified by below method

- Chromium VI: EN71 part 3:2019, Annex F
- Organic tin: EN71 part 3:2019, Annex G by Gas Chromatography – Mass Spectroscopy analysis.



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**RESULTS:**

**CADMIUM CONTENT IN PLASTICS**

Reference: Swiss "Informations concernant L'Ordonnance sur les substances (Osubst)",  
No. 22 (1991).

Category:			Plastics			
Element:			Cadmium			
Test Method			BS EN 1122: 2001, Method B			
Maximum Allowable Limit:			100 mg/kg			
Sample Description			Reading 1	Reading 2	Average	Conclusion
Color / Component	Location	Style	Result (mg/kg)			
(A) white plastic black plastic  clear plastic dull translucent black plastic	remote, robot buttons of robot, body, feet and wheels of robot LED of remote and robot head of robot		LT 10	#	-	Pass
(B) dull black soft plastic red soft plastic black soft plastic translucent soft plastic	wheels of robot wire of remote wire of remote wire wrapper of robot		LT 10	#	-	Pass
(C) black PVC red PVC yellow PVC	wire of robot wire of robot wire of robot		LT 10	#	-	Pass
(D) blue PVC green PVC white PVC	wire of robot wire of robot wire of robot		LT 10	#	-	Pass
(E) translucent/ black soft plastic matt white plastic dull black plastic	rubber key of remote gear of robot inner button of robot		LT 10	#	-	Pass
(F) flat white plastic flat grey plastic flat black plastic off white plastic	button of robot base of button of robot base of button of robot sound module of robot		LT 10	#	-	Pass
(G) bright clear plastic/ glue sharp black plastic	sound module of robot sensor of robot		LT 10	#	-	Pass



**RESULTS:**

**CADMIUM CONTENT IN PLASTICS**

Reference: Swiss "Informations concernant L'Ordonnance sur les substances (Osubst)",  
 No. 22 (1991).

Category:			Plastics			
Element:			Cadmium			
Test Method			BS EN 1122: 2001, Method B			
Maximum Allowable Limit:			100 mg/kg			
Sample Description			Reading 1	Reading 2	Average	Conclusion
Color / Component	Location	Style	Result (mg/kg)			
(H) snow white plastic	plug of wire of robot		LT 10	#	-	Pass
beige plastic	socket on PCB of robot					
dull clear plastic	base of LED of robot					

LT = Less than

# = Insufficient sample for duplicate analyses

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

Operator: Leung Hon Kei, Tony

**RESULTS:**

**BBP/DBP/DEHP CONTENTS IN TOYS AND CHILDCARE ARTICLES (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 51)**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
A.	silvery/ blue/ black coating white coating/ silvery underlying	robot, remote robot, remote	
B.	white plastic black plastic clear plastic	remote, robot buttons of robot, body, feet and wheels of robot LED of remote and robot	
C.	dull translucent black plastic dull black soft plastic	head of robot wheels of robot	
D.	black PVC red PVC yellow PVC	wire of robot wire of robot wire of robot	
E.	blue PVC green PVC white PVC	wire of robot wire of robot wire of robot	
F.	red soft plastic black soft plastic translucent soft plastic	wire of remote wire of remote wire wrapper of robot	
G.	translucent/ black soft plastic matt white plastic dull black plastic	rubber key of remote gear of robot inner button of robot	
H.	flat white plastic flat grey plastic flat black plastic	button of robot base of button of robot base of button of robot	
I.	off white plastic bright clear plastic/ glue sharp black plastic	sound module of robot sound module of robot sensor of robot	
J.	snow white plastic beige plastic dull clear plastic	plug of wire of robot socket on PCB of robot base of LED of robot	





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**RESULTS:**

**BBP/DBP/DEHP CONTENTS IN TOYS AND CHILDCARE ARTICLES (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 51)**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
K.	creamy white plastic	motor of robot	
	dull translucent plastic	motor of robot	
	khaki/ white plastic	inner motor of robot	
L.	white printed green plastic	capacitor of robot	
	off black soft plastic	capacitor of robot	
	green/ white/ red/ black printed	main PCB of remote and robot	
	light brown PCB/ black body/ clear body		
M.	green/ white printed dull translucent PCB/ black body/ black paste	main PCB of robot	
	translucent ivory PCB	PCB of sound module of robot	

Test Parameter:	BBP	DBP	DEHP	Sum of three phthalates	
Limit (%):	0.1	0.1	0.1	0.1	
Sample	Result (%)				Conclusion
A.	LT 0.005	0.009	LT 0.005	LT 0.015	Pass
B.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
C.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
D.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
E.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
F.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
G.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
H.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
I.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
J.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
K.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
L.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
M.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass

Detection Limit :

BBP = Butyl benzyl phthalate (0.005%)

DBP = Dibutyl phthalate (0.005%)

DEHP = Di(2-ethylhexyl) phthalate (0.005%)

Results reported in percentage

LT = Less than

ND = None detected

**RESULTS:**

**DNOP/DINP/DIDP CONTENTS IN TOYS AND CHILDCARE ARTICLES WHICH CAN BE PLACED IN MOUTH BY THE CHILDREN (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 52)**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
A.	silvery/ blue/ black coating white coating/ silvery underlying	robot, remote robot, remote	
B.	white plastic black plastic clear plastic	remote, robot buttons of robot, body, feet and wheels of robot LED of remote and robot	
C.	dull translucent black plastic dull black soft plastic	head of robot wheels of robot	
D.	black PVC red PVC yellow PVC	wire of robot wire of robot wire of robot	
E.	blue PVC green PVC white PVC	wire of robot wire of robot wire of robot	
F.	red soft plastic black soft plastic translucent soft plastic	wire of remote wire of remote wire wrapper of robot	
G.	translucent/ black soft plastic matt white plastic dull black plastic	rubber key of remote gear of robot inner button of robot	
H.	flat white plastic flat grey plastic flat black plastic	button of robot base of button of robot base of button of robot	
I.	off white plastic bright clear plastic/ glue sharp black plastic	sound module of robot sound module of robot sensor of robot	
J.	snow white plastic beige plastic dull clear plastic	plug of wire of robot socket on PCB of robot base of LED of robot	



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**RESULTS:**

**DNOP/DINP/DIDP CONTENTS IN TOYS AND CHILDCARE ARTICLES WHICH CAN BE PLACED IN MOUTH BY THE CHILDREN (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 52)**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
K.	creamy white plastic	motor of robot	
	dull translucent plastic	motor of robot	
	khaki/ white plastic	inner motor of robot	
L.	white printed green plastic	capacitor of robot	
	off black soft plastic	capacitor of robot	
	green/ white/ red/ black printed light brown PCB/ black body/ clear body	main PCB of remote and robot	
M.	green/ white printed dull translucent PCB/ black body/ black paste	main PCB of robot	
	translucent ivory PCB	PCB of sound module of robot	

Test Parameter:	DNOP	DINP	DIDP	Sum of three phthalates	
Limit (%):	0.1	0.1	0.1	0.1	
Sample	Result (%)				Conclusion
A.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
B.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
C.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
D.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
E.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
F.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
G.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
H.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
I.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
J.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
K.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
L.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass
M.	LT 0.005	LT 0.005	LT 0.005	LT 0.015	Pass

*Detection Limit :*

DNOP = Di-n-octyl phthalate (0.005%)

DINP = Di-iso-nonyl phthalate (0.005%)

DIDP = Di-iso-decyl phthalate (0.005%)

*Results reported in percentage*

LT = Less than

ND = None detected



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**RESULTS:**

**BBP/DBP/DEHP/DIBP CONTENTS (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 51 (amended up to EU No. 2018/2005))**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
A.	silvery/ blue/ black coating white coating/ silvery underlying	robot, remote robot, remote	
B.	white plastic black plastic clear plastic	remote, robot buttons of robot, body, feet and wheels of robot LED of remote and robot	
C.	dull translucent black plastic dull black soft plastic	head of robot wheels of robot	
D.	black PVC red PVC yellow PVC	wire of robot wire of robot wire of robot	
E.	blue PVC green PVC white PVC	wire of robot wire of robot wire of robot	
F.	red soft plastic black soft plastic translucent soft plastic	wire of remote wire of remote wire wrapper of robot	
G.	translucent/ black soft plastic matt white plastic dull black plastic	rubber key of remote gear of robot inner button of robot	
H.	flat white plastic flat grey plastic flat black plastic	button of robot base of button of robot base of button of robot	
I.	off white plastic bright clear plastic/ glue sharp black plastic	sound module of robot sound module of robot sensor of robot	
J.	snow white plastic beige plastic dull clear plastic	plug of wire of robot socket on PCB of robot base of LED of robot	



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**RESULTS:**

**BBP/DBP/DEHP/DIBP CONTENTS (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 51 (amended up to EU No. 2018/2005))**

Test Method: With referenced to EN 14372:2004 Section 6.3.2, sample was extracted with organic solvent and then analyzed by Gas Chromatograph Mass Spectrometer

Sample Identity	Test Component	Location	Style
K.	creamy white plastic	motor of robot	
	dull translucent plastic	motor of robot	
	khaki/ white plastic	inner motor of robot	
L.	white printed green plastic	capacitor of robot	
	off black soft plastic	capacitor of robot	
	green/ white/ red/ black printed light brown PCB/ black body/ clear body	main PCB of remote and robot	
M.	green/ white printed dull translucent PCB/ black body/ black paste	main PCB of robot	
	translucent ivory PCB	PCB of sound module of robot	

Test Parameter:	BBP	DBP	DEHP	DIBP	Sum of four phthalates	
Limit (%):	0.1	0.1	0.1	0.1	0.1	
Sample	Result (%)					Conclusion
A.	LT 0.005	0.009	LT 0.005	LT 0.005	LT 0.020	Pass
B.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
C.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
D.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
E.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
F.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
G.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
H.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
I.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
J.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
K.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
L.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass
M.	LT 0.005	LT 0.005	LT 0.005	LT 0.005	LT 0.020	Pass

*Detection Limit :*

BBP = Butyl benzyl phthalate (0.005%)  
 DBP = Dibutyl phthalate (0.005%)  
 DEHP = Di(2-ethylhexyl) phthalate (0.005%)  
 DIBP = Diisobutyl phthalate (0.005%)

*Results reported in percentage*  
 LT = Less than  
 ND = None detected



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**RESULTS:**

**POLYCYCLIC AROMATIC HYDROCARBONS (PAHs) CONTENT (European Regulation (EC) No. 1907/2006 REACH Annex XVII, Item no. 50, Paragraph 5 and 6 and its amendments)**

Test Method : With reference to test method mentioned in German AfPS GS 2014:01 PAK

Sample Identity	Test Component	Location	Style
A.	Composite of white plastic black plastic	remote, robot buttons of robot, body, feet and wheels of robot	
B.	clear plastic dull translucent black plastic	LED of remote head of robot	
C.	dull black soft plastic	wheels of robot	

<b>Maximum Allowable Limit:</b>	<b>Type I</b>	Articles includes amongst others: - sport equipment such as bicycles, golf clubs, racquets - household utensils, trolleys, walking frames tools for domestic use - clothing, footwear, gloves and sportswear - watch-straps, wrist-bands, masks, head-bands <b>1 mg/kg (Each of all listed PAHs)</b>
	<b>Type II</b>	Toys, including activity toys, and childcare articles <b>0.5 mg/kg (Each of all listed PAHs)</b>

Tested Item(s)	Type	Result		Conclusion
		Detected Analyte(s)	Conc. (mg/Kg)	
A.	II	ND	ND	Pass
B.	II	ND	ND	Pass
C.	II	ND	ND	Pass

ND = Not detected

">" = More than

Conc. = Concentration

mg/kg = milligram per kilogram

Detection Limit : Each PAHs 0.2 mg/kg

Remark:

- The list of polycyclic aromatic hydrocarbons is summarized in table of Appendix.

**APPENDIX**

<b>List of Polynuclear Aromatic Hydrocarbons:</b>					
No.	Name of Analytes	CAS-No.	No.	Name of Analytes	CAS-No.
1	Benzo[a]pyrene (BaP)	50-32-8	5	Benzo[b]fluoranthene (BbFA)	205-99-2
2	Benzo[e]pyrene (BeP)	192-97-2	6	Benzo[j]fluoranthene (BjFA)	205-82-3
3	Benzo[a]anthracene (BaA)	56-55-3	7	Benzo[k]fluoranthene (BkFA)	207-08-9
4	Chrysene (CHR)	218-01-9	8	Dibenzo[a,h]anthracene (DBAhA)	53-70-3



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**RESULTS:**





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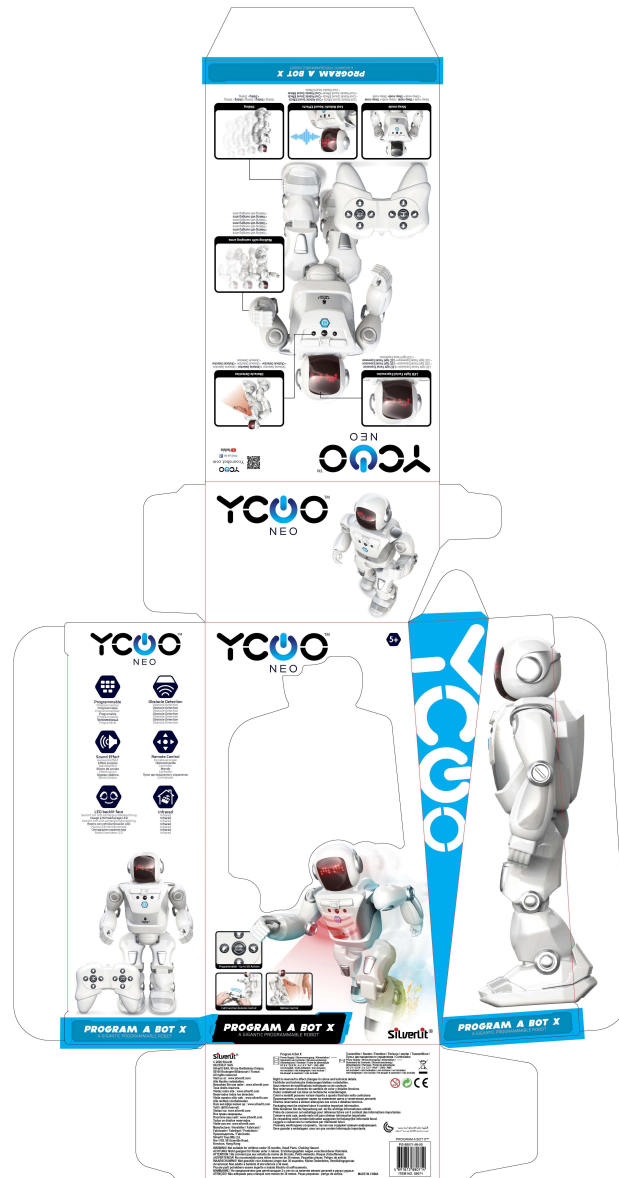
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