

Test Report

No. SH7134097/CHEM

Date: Nov. 16, 2007

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UPM-KYMMENE (CHANGSHU) PAPER INDUSTRY CO., LTD.
XINGANG, CHANGSHU, JIANGSU, CHINA 215536

The following sample(s) was/were submitted and identified by/on behalf of the client as:

Sample Name : WOODFREE UNCOATED PAPER
SGS Ref No. : 10678898-1
Buyer : PRINTING HOUSE
Main substance : CHEMICAL PULP, STARCH, FILLER, MOISTURE
Supplier : RIAU, AVEBE, OMYA, DOW, BOTINIA

Sample Receiving Date : Nov.07, 2007
Testing Period : Nov.07 – 16, 2007

Test Requested : (1) In accordance with the RoHS Directive 2002/95/EC, and its amendment directives.
(2) To determine the PCBs (Polychlorinated Biphenyls) content of the submitted sample.
(3) To determine the Polychlorinated Naphthalene content of the submitted sample.
(4) As per client's request, to determination DBP, BBP, DEHP, DINP, DNOP and DIDP content of the submitted samples.
(5) To determine the Short Chain Chlorinated Paraffin content of the submitted sample.
(6) To determine the Organic-tin compounds content of the submitted sample.
(7) To determine the Extractable Formaldehyde content of the submitted sample.
(8) As specified by client, to test the specified material for compliance with the European Standard on Safety of Toys, EN 71 Part 3:1994 + A1:2000 – Migration of Certain Elements.
(9) *As specified by client, to detection and determination of certain listed aromatic amines derived from Azo Colorants
(10) **To determine the Asbestos Content in the submitted sample.

Test Method/Test Results: Please refer to next pages

Conclusion : (1) Based on the performed tests on submitted samples, the results comply with the RoHS Directive 2002/95/EC and its subsequent amendments.
(8) When tested as specified, the specified material of the submitted sample comply with the stated requirements of the European Standard EN 71 Part3:1994 + A1:2000.

Signed for and on behalf of
SGS-CSTC Chemical Laboratory

Ella Zhang
Section Manager

Signed for and on behalf of
SGS-CSTC Chemical Laboratory

Sandy Hao
Lab Manager

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Test Method

- (1) With reference to IEC 62321, Ed.1 111/54/CDV
Procedures for the Determination of Levels of Regulated Substances in
Electrotechnical Products
- (1-1) Determination of Cadmium by ICP.
 - (1-2) Determination of Lead by ICP.
 - (1-3) Determination of Mercury by ICP.
 - (1-4) Determination of Hexavalent Chromium by Colorimetric Method.
 - (1-5) Determination of PBBs and PBDEs by GC/MS.
 - (2) With reference to US EPA 8082, Analysis was performed by GC-MS.
 - (3) With reference to US EPA 8081, Analysis was performed by GC-MS.
 - (4) With reference to ASTM D3421-75. Analysis was performed by Gas Chromatography/ Mass Spectrometry.
 - (5) With reference to US EPA 8081, Analysis was performed by GC/MS.
 - (6) With reference to DIN ISO 17353-2004 with carbamate, Analysis was performed by GC/MS.
 - (7) With reference to EN 645:1993 (cold water extraction), followed by analysis using UV-visible Spectrophotometry.
 - (8) With reference to EN 71 Part 3:1994 + A1:2000 – Migration of Certain Elements, Analysis was performed by Inductively Coupled Argon Plasma – Atomic Emission Spectrometry (ICP-AES).
 - (9) * As per LFGB § 64 BVL B 82.02.2 - Direct test on coloured textiles – Detection of the use of certain azo colorants are accessible to reducing agents without extraction with the use of Gas Chromatographic Mass Spectrometry (GC-MS)
 - (10) **As per NIOSH 9000 method. Analysis was performed by XRD.

Test results by chemical method:

(1) Cadmium, Lead, Mercury, Hexavalent Chromium, PBBs(Polybrominated biphenyls) PBDEs(PBDEs) (Polybrominated biphenyl ethers) Content (Unit: mg/kg)

| Test Item(s): | Method (refer to) | 1 | MDL | RoHS Limit |
|--|----------------------|----|-----|---------------|
| Cadmium(Cd) | (1-1) | ND | 2 | 100 |
| Lead (Pb) | (1-2) | 6 | 2 | 1000 |
| Mercury (Hg) | (1-3) | ND | 2 | 1000 |
| Hexavalent Chromium (CrVI) by alkaline extraction | (1-4) | ND | 2 | 1000 |
| Sum of PBBs | (1-5) | ND | - | 1000 |
| Monobromobiphenyl | | ND | 5 | - |
| Dibromobiphenyl | | ND | 5 | - |
| Tribromobiphenyl | | ND | 5 | - |
| Tetrabromobiphenyl | | ND | 5 | - |
| Hexabromobiphenyl | | ND | 5 | - |
| Pentabromobiphenyl | | ND | 5 | - |
| Heptabromobiphenyl | | ND | 5 | - |
| Octabromobiphenyl | | ND | 5 | - |

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| | | | |
|-----------------------------|----|---|------|
| Nonabromobiphenyl | ND | 5 | - |
| Decabromobiphenyl | ND | 5 | - |
| Sum of PBDEs (Note 4) | ND | - | 1000 |
| Monobromodiphenyl ether | ND | 5 | - |
| Dibromodiphenyl ether | ND | 5 | - |
| Tribromodiphenyl ether | ND | 5 | - |
| Tetrabromodiphenyl ether | ND | 5 | - |
| Pentabromodiphenyl ether | ND | 5 | - |
| Hexabromodiphenyl ether | ND | 5 | - |
| Heptabromodiphenyl ether | ND | 5 | - |
| Octabromodiphenyl ether | ND | 5 | - |
| Nonabromodiphenyl ether | ND | 5 | - |
| Decabromodiphenyl ether | ND | 5 | - |
| Sum of PBDEs (Mono to Deca) | ND | - | - |

(2)~(3) PCBs (Polychlorinated Biphenyls), Polychlorinated Naphthalene Content (Unit: mg/kg)

| Test Item(s): | Method (refer to) | 1 | MDL |
|---|----------------------|----|-----|
| PCBs (Polychlorinated Biphenyls) content | | - | - |
| 2,4,4'-Trichlorobiphenyl (PCB 28) CAS 7012-37-5 | | ND | 0.5 |
| 2,2',5,5'-Tetrachloro-biphenyl (PCB 52) CAS 35693-99-3 | | ND | 0.5 |
| 2,2',4,5,5'-Pentachloro-biphenyl (PCB 101) CAS 37680-73-2 | (2) | ND | 0.5 |
| 2,3',4,4',5-Pentachlorobiphenyl (PCB 118) CAS 31508-00-6 | | ND | 0.5 |
| 2,2',3,4,4',5'-Hexachloro-biphenyl (PCB 138) CAS 35065-28-2 | | ND | 0.5 |
| 2,2',4,4',5,5'-Hexachloro-biphenyl (PCB 153) CAS 35065-27-1 | | ND | 0.5 |
| 2,2',3,4,4',5,5'-Heptachlorobiphenyl (PCB 180) CAS 35065-29-3 | | ND | 0.5 |
| Polychlorinated Naphthalene content | | - | - |
| 2-Chlorinated Naphthalene | | ND | 5 |
| 1,4-Dichlorinated Naphthalene | | ND | 5 |
| 1,5-Dichlorinated Naphthalene | | ND | 5 |
| 1,2-Dichlorinated Naphthalene | (3) | ND | 5 |
| 1,8-Dichlorinated Naphthalene | | ND | 5 |
| 1,2,3-Trichlorinated Naphthalene | | ND | 5 |
| 1,2,3,4-Tetrachlorinated Naphthalene | | ND | 5 |
| 1,2,3,4,6-Pentachlorinated Naphthalene | | ND | 5 |
| Octa-chlorinated Naphthalene | | ND | 5 |

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(4) Phthalates Content (Unit: %)

| Item | Method (refer to) | 1 | MDL |
|---|----------------------|----|-------|
| Dibutyl Phthalate (DBP) Content | (4) | ND | 0.003 |
| Benzylbutyl Phthalate (BBP) Content | | ND | 0.003 |
| Bis-(2-ethylhexyl) Phthalate (DEHP) Content | | ND | 0.003 |
| Diisononyl Phthalate (DINP) Content | | ND | 0.01 |
| Di-n-octyl Phthalate (DNOP) Content | | ND | 0.003 |
| Diisodecyl Phthalate (DIDP) Content | | ND | 0.01 |

(5)~(6) Short Chain Chlorinated Paraffin and Organic-tin compounds Content (Unit: mg/kg)

| Test Item(s): | Method (refer to) | 1 | MDL |
|----------------------------------|----------------------|----|-----|
| Short Chain Chlorinated Paraffin | (5) | ND | 30 |
| Organic-tin compounds content | (6) | - | - |
| Triphenyl Tin(TPT) | | ND | 0.5 |
| Tributyl Tin(TBT) | | ND | 0.5 |

(7) Extractable formaldehyde Content (Unit: mg/kg)

| Test Item(s): | Method (refer to) | 1 | MDL |
|--------------------------|----------------------|----|-----|
| Extractable formaldehyde | (7) | ND | 5 |

(8) EN 71 Part3:1994 + A1:2000 – Migration of Certain Element (Unit: mg/kg)

| Element | Method (refer to) | 1 | MDL | Limit |
|-----------------------|----------------------|----|-----|-------|
| Soluble Lead (Pb) | (8) | ND | 5 | 90 |
| Soluble Antimony (Sb) | | ND | 5 | 60 |
| Soluble Arsenic (As) | | ND | 2.5 | 25 |
| Soluble Barium (Ba) | | ND | 10 | 1000 |
| Soluble Cadmium (Cd) | | ND | 5 | 75 |
| Soluble Chromium (Cr) | | ND | 5 | 60 |
| Soluble Mercury (Hg) | | ND | 6 | 60 |
| Soluble Selenium (Se) | | ND | 10 | 500 |

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(9) *To detection and determination of certain listed aromatic amines derived from Azo Colorants.

(Unit: mg/kg)

| No. | Forbidden Amines Substances | CAS-No. | Result |
|----------------|--|----------|--------|
| | | | 1 |
| 1. | 4-aminodiphenyl/xenylamine/ Biphenyl-4-ylamine | 92-67-1 | ND |
| 2. | Benzidine | 92-87-5 | ND |
| 3. | 4-chloro- <i>o</i> -toluidine | 95-69-2 | ND |
| 4. | 2-naphthylamine | 91-59-8 | ND |
| 5. | <i>o</i> -aminoazotoluene/ 4- <i>o</i> -tolylazo- <i>o</i> -toluidine/ 4-amino-2',3-dimethylazobenzene | 97-56-3 | ND |
| 6. | 2-amino-4-nitrotoluol/5-nitro- <i>o</i> -toluidine | 99-55-8 | ND |
| 7. | <i>p</i> -chloranilin/4-chloroaniline | 106-47-8 | ND |
| 8. | 2,4-diaminoanisol/ 4-methoxy- <i>m</i> -phenylenediamine | 615-05-4 | ND |
| 9. | 4,4'-diaminodiphenylmethane/ 4,4-methylenedianiline | 101-77-9 | ND |
| 10. | 3,3'-dichlorobenzidine/ 3,3'-dichlorobiphenyl-4,4'-ylenediamine | 91-94-1 | ND |
| 11. | 3,3'-dimethoxybenzidine/ <i>o</i> -dianisidine | 119-90-4 | ND |
| 12. | 3,3'-dimethylbenzidine/4,4'-bi- <i>o</i> -Toluidine | 119-93-7 | ND |
| 13. | 3,3'-dimethyl-4,4'-diaminodiphenylmethane/ 4,4'-methylenedi- <i>o</i> -toluidine | 838-88-0 | ND |
| 14. | <i>p</i> -cresidin/6-methoxy- <i>m</i> -toluidine | 120-71-8 | ND |
| 15. | 4,4'-methylen-bis-(2-chloro-aniline)/ 2,2'-dichloro-4,4' methylene-dianiline | 101-14-4 | ND |
| 16. | 4,4'-oxydianiline | 101-80-4 | ND |
| 17. | 4,4'-thiodianiline | 139-65-1 | ND |
| 18. | <i>o</i> -toluidine/2-aminotoluene | 95-53-4 | ND |
| 19. | 2,4-toluylendiamine/ 4-methyl- <i>m</i> -phenylenediamine | 95-80-7 | ND |
| 20. | 2,4,5-trimethylaniline | 137-17-7 | ND |
| 21. | 4-aminoazobenzene ♦ | 60-09-3 | ND |
| 22. | <i>o</i> -anisidine/ 2-methoxyaniline | 90-04-0 | ND |
| 23. | 2,4-Xylidine | 95-68-1 | ND |
| 24. | 2,6-Xylidine | 87-62-7 | ND |
| Overall Rating | | | # |

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Note: ND = Not Detectable

Detection limit = 5 ppm (mg/kg)

Remark: For textiles no relevant amine exceeding 30 ppm (mg/kg) is required, the test method is applicable for textile and the result is only for client's information.

◆: If the LFGB § 64 BVL B 82.02.2 method enabled further cleavage of 4-aminoazobenzene to non-forbidden amines: aniline or 1,4-phenylenediamine, therefore, the test method of LFGB § 64 BVL B 82.02.9 would be employed to verify the presence of 4-aminoazobenzene

If the amines are detected by GC-MS method, then confirmation must be made using TLC method.

Forbidden Arylamines for Azo Dye Regulations

No. 1-22 – Commission of the European Communities: Directive 2002/61/EC adopted by the Council on 19 July 2002

No. 23-24 – Client requirement

(10) **Asbestos Content (Unit: %)

| Test Item(s): | Method (refer to) | 1 | MDL |
|--------------------------------------|----------------------|----------|-----|
| Anthophyllite (CAS NO.: 017068-78-9) | (10) | Negative | 1 |
| Crocidolite (CAS NO.: 012001-28-4) | | Negative | 1 |
| Amosite (CAS NO.: 012172-73-5) | | Negative | 1 |
| Tremolite (CAS NO.: 014567-73-8) | | Negative | 1 |
| Chrysotile (CAS NO.: 012001-29-5) | | Negative | 1 |
| Actinolite (CAS NO.: 013768-00-8) | | Negative | 1 |

Note: Negative =<1.0%, Positive= >1.0%

Test Part Description:

1. White paper

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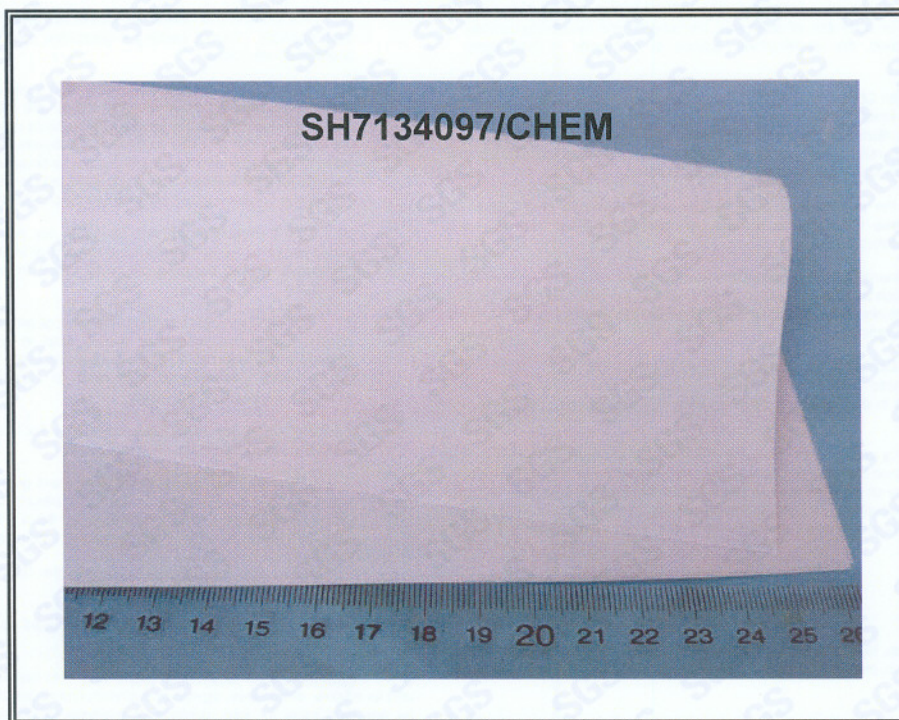
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Note:

- (1) mg/kg = ppm
- (2) ND = Not Detected
- (3) MDL = Method Detection Limit
- (4) Sum of Mono to NonaBDE & according to 2005/717/EC DecaBDE is exempt.
- (5) "-" = Not Regulated
- (6) % = percentage by weight
- (7) The maximum permissible limit is quoted from the document 2005/618/EC amending RoHS directive 2002/95/EC
- (8) *These tests were subcontracted to SGS-SHSL TEXTLIE LAB (Date of testing: 2007/11/07~11/10).
- (9) **These tests were subcontracted to SGS Taiwan Ltd (Date of testing: 2007/11/08-11/15).

Sample photo:



SGS authenticate the photo on original report only

*** End of Report ***

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