

Report No.: LCS190517071AR

Date:2019.07.01

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Applicant	: Fulton Science and Technology Lighting Co., Ltd
Address	7F, Building 17, Area C, Liantang Industrial Town, Shangcun Community, Gongming, Guangming New District, Shenzhen, Guangdong Province, China.

Report on the submitted samples said to be:

Sample Name	: LED Tri-proof light
Trade Mark	: Fulton
Client's information	: N/A
Style No.	FLT-TP-12L6, FLT-TP-14L6, FLT-TP-17L6, FLT-TP-20L6, FLT-TP-25L12, : FLT-TP-30L12, FLT-TP-35L12, FLT-TP-40L12, FLT-TP-35L15, FLT-TP-40L15, FLT-TP-50L15, FLT-TP-60L15
Testing Period	: June 05, 2019 ~ July 01, 2019
Results	: Please refer to next page(s).

TEST REQUEST	CONCLUSION
According to the customer's request, based on the performed tests on submitted	
sample, the result of Lead, Cadmium, Mercury, Hexavalent Chromium, PBBs,	
PBDEs, Dibuyl Phthalate(DBP), Benzylbutyl Phthalate(BBP), Bis(2-ethylhexyl)	PASS
Phthalate(DEHP), Diispbutyl phthalate(DIBP) content comply with the limit as set of	1400
RoHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU.	

Signed for and on behalf of LCS







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Results:

A.EU RoHS Directive 2011/65/EU and its amendment directives on XRF

Test method: With reference to IEC 62321-3-1:2013, Screening by X-ray Fluorescence Spectroscopy (XRF)

	Tested Part(s)			Re	esults			Date of sample submission/resu
Seq. No.		Cd	Pb	Hg	Cr▼		Br	
_		Cu	FD	ng	G	PBBs	PBDEs	bmission
1	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
2	Grey plastic ring	BL	BL	BL	BL	BL	BL	2019-06-05
3	Gray plastic sheet	BL 🔇	BL	BL	BL	BL	BL 🔍	2019-06-05
4	Silver metal sheet	BL	BL	BL	Х	/	/	2019-06-05
5	White metal sheet	BL	BL	BL	BL	/	/	2019-06-05
6	Yellow LED	BL	BL	BL	BL	BL	BL	2019-06-05
7	Tin solder	BL	BL	BL	BL	/	1	2019-06-05
8	PCB board	BL	BL	BL	BL	Х	Х	2019-06-05
9	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
10	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
11	Red plastic thread	BL	BL	BL	BL	BL	BL	2019-06-05
12	Black plastic thread	BL	BL	BL	BL	BL	BL	2019-06-05
13	Silver wire	BL	BL	BL	BL	/	/	2019-06-05
14	White plastic pipe	BL	BL	BL	BL	BL	BL	2019-06-05
15	Black plastic sheet	BL	BL	BL	BL	X	х	2019-06-05
16	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
17	Black plastic ring	BL	BL	BL	BL	BL	BL	2019-06-05
18	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
19	Light green plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
20	Silver metal sheet	BL	BL	BL	Х	/	/	2019-06-05
21	Golden metal sheet	Х	BL	BL	BL	/	/	2019-06-05
22	Brown plastic thread	BL	BL	BL	BL	BL	BL	2019-06-05
23	Blue plastic thread	BL	BL	BL	BL	BL	BL	2019-06-05
24	Yellow-green plastic thread	BL	BL	BL	BL	BL	BL	2019-06-05
25	Gold wire	BL	BL	BL	BL	/	/	2019-06-05

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Seq. No.	Tested Part(s)		Date of sample					
		Cd	Pb	Hg	Cr▼	Br		submission/resu bmission
						PBBs	PBDEs	
26	Silver metal sheet	BL	BL	BL	BL			2019-06-05
27	White metal sheet	BL	BL	BL	BL	/	/	2019-06-05
28	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
29	Yellow plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
30	Yellow plastic sheet	BL 🚫	BL	BL	BL	Х	x (2019-06-05
31	Silver plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
32	Brown plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
33	Silver plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
34	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
35	Black Ceramic Slices	BL	BL	BL	BL	BL	BL	2019-06-05
36	Gold wire	BL	BL	BL	BL	/	/	2019-06-05
37	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
38	Silver metal sheet	BL 🔇	BL	BL	BL	1	/ (2019-06-05
39	Silver metal sheet	BL	BL	BL	BL	1	/	2019-06-05
40	Grey metal sheet	BL	BL	BL	BL	/	/	2019-06-05
41	Brown paper	BL	BL	BL	BL	BL	BL	2019-06-05
42	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
43	Silver metal sheet	BL	BL	BL	BL	/	1	2019-06-05
44	Silver metal needle	BL	OL	BL	BL	/	/	2019-06-05
45	Yellow plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
46	Black Ceramic Slices	BL 🔇	BL	BL	BL	BL	BL 🔇	2019-06-05
47	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
48	Gold wire	BL	BL	BL	BL	/	/	2019-06-05
49	Purple plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
50	Silver metal sheet	BL	BL	BL	BL	1		2019-06-05









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Seq. No.	Tested Part(s)		Date of sample					
		Cd	Pb	Hg	Cr▼	Br		submission/resubmission
						PBBs	PBDEs	
51	Silver metal sheet	BL	BL	BL	BL			2019-06-05
52	Grey metal sheet	BL	BL	BL	BL	/	/	2019-06-05
53	Brown paper	BL	BL	BL	BL	BL	BL	2019-06-05
54	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
55	Silver metal sheet	BL 🔇	BL	BL	BL	1	/ (§	2019-06-05
56	Silver metal needle	OL	BL	BL	BL	/	/	2019-06-05
57	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
58	Red plastic sheet	BL	BL	BL	BL	X	х	2019-06-05
59	Black plastic sheet	BL	BL	BL	BL	X	X	2019-06-05
60	Golden metal sheet	BL	BL	BL	BL	1	1	2019-06-05
61	Gray plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
62	Red plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
63	Black plastic sheet	BL 🔇	BL	BL	BL	BL	BL 🔇	2019-06-05
64	Silver metal sheet	BL	BL	BL	BL	/	/	2019-06-05
65	Grey color ring resistance	BL	BL	BL	BL	BL	BL	2019-06-05
66	Green Ceramic Capacitance	BL	BL	BL	BL	BL	BL	2019-06-05
67	Blue Ceramic Capacitance	BL	BL	BL	BL	BL	BL	2019-06-05
68	Black Diode	BL	BL	BL	BL	Х	Х	2019-06-05
69	Tin solder	BL	BL	BL	BL	/	1	2019-06-05
70	chip resistor	BL 🔇	BL	BL	X	BL	BL 🤇	2019-06-05
71	Black IC	BL	BL	BL	BL	BL	BL	2019-06-05
72	Black IC	BL	BL	BL	BL	BL	BL	2019-06-05
73	White patch capacitor	BL	BL	BL	BL	BL	BL	2019-06-05
74	Brown patch capacitor	BL	BL	BL	BL	BL	BL	2019-06-05
75	Patch diode	BL	BL	BL	BL	BL	BL	2019-06-05







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0		X	Date of sample					
Seq. No.	Tested Part(s)	Cd	Pb	L L au	Cr▼	Br▼		submission/resu
NO.		Cu	FU	Hg	G	PBBs	PBDEs	bmission
76	PCB board	BL	BL	BL	BL	X	x	2019-06-05
77	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
78	Silver metal screw	BL	BL	BL	BL	/	/	2019-06-05
79	Silver metal screw	BL	BL	BL	BL	/	/	2019-06-05
80	Silver metal screw	BL	BL	BL	BL	/	1	2019-06-05
81	Black plastic sheet	BL 🔇	BL	BL	BL	BL	BL 🔇	2019-06-05
82	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
83	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
84	Black plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05
85	Silver metal sheet	BL	BL	BL	Х	1	1	2019-06-05
86	Silver metal screw	BL	BL	BL	BL	/	1	2019-06-05
87	White plastic sheet	BL	BL	BL	BL	BL	BL	2019-06-05

Note:

(1) Results were obtained by XRF for primary screening, and further chemical testing by ICP (for Cd, Pb, Hg), UV-Vis (for Cr(VI)) and GC-MS (for PBBs, PBDEs) are recommended to be performed, if the concentration exceeds the below warning value according to IEC 62321-3-1:2013.

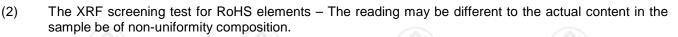
Element	Unit	Non-metal	Metal	Composite Material
Cd	m a /lk a	BL≤70-3σ<Χ	BL≤70-3σ<Χ	BL≤50-3σ<Χ
Cd	mg/kg	<130+3σ≤OL	<130+3σ≤OL	<150+3σ≤OL
Dh		BL≤700-3σ<Χ	BL≤700-3σ<Χ	BL≤500-3σ<Χ
Pb	mg/kg	<1300+3σ≤OL	<1300+3σ≤OL	<1500+3σ≤OL
Ца	malka	BL≤700-3σ<Χ	BL≤700-3σ<Χ	BL≤500-3σ<Χ
Hg	mg/kg	<1300+3σ≤OL	<1300+3σ≤OL	<1500+3σ≤OL
Cr	mg/kg	BL≤700-3σ<Χ	BL≤700-3σ<Χ	BL≤500-3σ<Χ
Br	mg/kg	BL≤300-3σ <x< td=""><td><u> </u></td><td>BL≤250-3σ<Χ</td></x<>	<u> </u>	BL≤250-3σ<Χ

Note:

BL = Below Limit OL = Over Limit X = Inconclusive

nit





- (3) The maximum permissible limit is quoted from the document 2015/863/EC amending RoHS directive 2011/65/EU:
- (4) ▼=For restricted substances PBBs and PBDEs, the results show the total Br content; The restricted substance was Cr(VI), and the results showed the total Cr content

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RoHS Restricted Substances	Maximum Concentration Value (mg/kg) (by weight in homogenous materials)					
Cadmium (Cd)	100					
Lead (Pb)	1000					
Mercury (Hg)	1000					
Hexavalent Chromium (Cr(VI))	1000					
Polybrominated biphenyls (PBBs)	1000					
Polybrominated diphenylethers (PBDEs)	1000					
Dibuyl Phthalate(DBP)	1000					
Benzylbutyl Phthalate(BBP)	1000					
Bis(2-ethylhexyl) Phthalate(DEHP)	1000					
Diispbutyl phthalate(DIBP)	1000					

Disclaimers:

This XRF Screening report is for reference purposes only. The applicant shall make its/his/her own judgment as to whether the information provided in this XRF screening report is sufficient for its/his/her purposes.

The result shown in this XRF screening report will differ based on various factors, including but not limited to, the sample size, thickness, area, surface flatness, equipment parameters and matrix effect (e.g. plastic, rubber, metal, glass, ceramic etc.). Further wet chemical pre-treatment with relevant chemical equipment analysis are required to obtain quantitative data.



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B. EU RoHS Directive 2011/65/EU and its amendment Directives 2015/863/EU on Lead, Cadmium, Mercury, Hexavalent Chromium, PBBs, PBDEs, DBP, BBP, DEHP, DIBP content.

Test method:

Lead(Pb) & Cadmium(Cd) Content:

With reference to IEC 62321-5:2013, by acid digestion and analysis was performed by inductively coupled plasma atomic emission spectrometer (ICP-OES)

Mercury(Hg) Content:

With reference to IEC 62321-4:2013+AMD1:2017 CSV, by acid digestion and analysis was performed by inductively coupled plasma atomic emission spectrometer (ICP-OES)

Hexavalent Chromium(Cr⁶⁺) Content:

With reference to IEC 62321-7-1:2015 or IEC 62321-7-2:2017, by alkaline digestion and analysis was performed by UV-visible spectrophotometer (UV-Vis)

PBBs & PBDEs Content:

With reference to IEC 62321-6:2015, by solvent extraction and analysis was performed by gas chromatographic-mass spectrometer (GC-MS)

BBP DBP DEHP & DIBP Content:

With reference to IEC 62321-8:2017, by solvent extraction and analysis was performed by gas chromatographic-mass spectrometer (GC-MS)

1) The test results of Lead (Pb) and Cadmium (Cd)

			Res		
Item	Unit	MDL	(4	4)	– Limit
Lead Content (Pb)	mg/kg	2	N	.D.	1000
		1			No. 1
Itom	Unit	MDL	Results		Limit
Item	Unit		(21)	(56)	Linin
Cadmium Content (Cd)	mg/kg	2	N.D.	N.D.	100

2) The test results of Hexavalent Chromium (Cr⁶⁺)(for nonmetal)

Item	Unit	MDL		Limit	
item		WIDE		(70)	
Hexavalent Chromium (Cr ⁶⁺)	mg/kg	8		N.D.	1000

3) The test results of Hexavalent Chromium (Cr⁶⁺)(metal)

Item	Unit	MDL -		Limit		
			(4)	(20)	(85)	
Hexavalent Chromium (Cr ⁶⁺)	ug/cm ²	0.10	N.D.	N.D.	N.D.	1000

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Note:

- MDL = Method Detection Limit
- /= Not apply
- LOQ = Limit of Quantification, The LOQ of Hexavalent chromium is 0.10 μg/cm²
- mg/kg = ppm=parts per million
- N.D.=Not Detected(<MDL or LOQ)
- *The sample is negative for Cr(VI)-The Cr(VI) concentration is below 0.10ug/cm²
 The coating is considered a non-Cr(VI) based coating.
- #1 According to RoHS directive 2011/65/EU and its amendments, Lead is exempted in glass of cathode ray tubes, electronic components and fluorescent tubes.
- #2 According to RoHS directive 2011/65/EU and its amendments, Lead is exempted in electronic ceramic parts (e.g. piezoelectronic devices).
- #3 According to RoHS directive 2011/65/EU and its amendments, Lead is exempted as an alloying element in Copper containing up to 4% (40000ppm) by weight.
- #4 According to RoHS directive 2011/65/EU and its amendments, Lead is exempted in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead).
- #5 According to the statement provided by the customer, according to RoHS directive 2011/65/EU and its amendments, Lead is exempted as an alloying element in Aluminum containing up to 0.4% (4000ppm) by weight.
- #6 According to the statement provided by the customer, according to RoHS directive 2011/65/EU and its amendments, Cadmium and its compounds in electrical contact is exempted.

- Flow chart appendix is included.
- Photo appendix is included.

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4) The test results of DBP、BBP、DEHP & DIBP

Item	Unit	MDL		Results	Limit				
	Unit	WIDL	2	10	11	Limit			
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	N.D.	1000			
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	N.D.	1000			
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	N.D.	1000			
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	N.D.	1000			

Item	Unit	MDL		Results				
	Unit	WIDE	12	14	17	Limit		
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	57	1000		
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	N.D.	1000		
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	71	1000		
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	N.D.	1000		

Item	Unit	MDL		Results		Limit	
	Unit	WIDL	22	23	24	Limit	
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	215	N.D.	1000	
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	N.D.	1000	
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	57	N.D.	1000	
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	N.D.	1000	

Item	Unit	MDL		Limit	
	Unit	WIDL	70	28+29+31+33+34+37	
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	1000
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	1000
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	1000
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	1000

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Item	Unit	MDL	Results	Limit	
	Unit		41+42+45+49+53+54	87+1+3+6	Limit
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	1000
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	1000
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	1000
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	1000

Item	Unit	MDL	Results				
	Unit	WIDL	9+15+16+18+19+30	32+35+46+47+57+58	Limit		
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	1000		
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	1000		
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	1000		
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	1000		

Item	Unit	MDL	Results		Limit	
	Onic	MDL	61+62+63+65+66+67	71+72+73+74+75+76		
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	1000	
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	1000	
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	1000	
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	1000	

Item	Unit	MDI	Results		Limit	
	Unit	WIDL	77+81+82	8+59+68		
Dibuyl Phthalate(DBP)	mg/kg	50	N.D.	N.D.	1000	
Benzylbutyl Phthalate(BBP)	mg/kg	50	N.D.	N.D.	1000	
Bis(2-ethylhexyl) Phthalate(DEHP)	mg/kg	50	N.D.	N.D.	1000	
Diispbutyl phthalate(DIBP)	mg/kg	50	N.D.	N.D.	1000	

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5) The test results of PBBs & PBDEs

Item	Unit	MDL	Re	Limit	
	Unit		8+15	30+58	
Polybrominated Biphenyls (PBBs)					
Monobromobiphenyl	mg/kg	5	N.D.	N.D.	
Dibromobiphenyl	mg/kg	5	N.D.	N.D.	
Tribromobiphenyl	mg/kg	5	N.D.	N.D.	
Tetrabromobiphenyl	mg/kg	5	N.D.	N.D.	
Pentabromobiphenyl	mg/kg	5	N.D.	N.D.	
Hexabromobiphenyl	mg/kg	5	N.D.	N.D.	
Heptabromobiphenyl	mg/kg	5	N.D.	N.D.	
Octabromobiphenyl	mg/kg	5	N.D.	N.D.	
Nonabromodiphenyl	mg/kg	5	N.D.	N.D.	V
Decabromodiphenyl	mg/kg	5	N.D.	N.D.	
Total content	mg/kg	/	N.D.	N.D.	1000
Polybrominated Diphenylethers (PBDEs)(Mon-Deca)					
Monobromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Dibromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Tribromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Tetrabromodiphenyl ether	mg/kg	5	N.D.	N.D.	60
Pentabromodiphenyl ether	mg/kg	5	N.D.	N.D.	V
Hexabromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Heptabromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Octabromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Nonabromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Decabromodiphenyl ether	mg/kg	5	N.D.	N.D.	
Total content	mg/kg	/	N.D.	N.D.	1000





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Item		MDI	Res	sults	1 :	
item	Unit	MDL	59+68	76	Limit	
Polybrominated Biphenyls (PBBs)						
Monobromobiphenyl	mg/kg	5	N.D.	>> N.D.		
Dibromobiphenyl	mg/kg	5	N.D.	N.D.		
Tribromobiphenyl	mg/kg	5	N.D.	N.D.		
Tetrabromobiphenyl	mg/kg	5	N.D.	N.D.		
Pentabromobiphenyl	mg/kg	5	N.D.	N.D.		
Hexabromobiphenyl	mg/kg	5	N.D.	N.D.		
Heptabromobiphenyl	mg/kg	5	N.D.	N.D.		
Octabromobiphenyl	mg/kg	5	N.D.	N.D.		
Nonabromodiphenyl	mg/kg	5	N.D.	N.D.		
Decabromodiphenyl	mg/kg	5	N.D.	N.D.	W)	
Total content	mg/kg	/	N.D.	N.D.	1000	
Polybrominated Diphenylethers (PBDEs)(Mon-Deca)						
Monobromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Dibromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Tribromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Tetrabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Pentabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Hexabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Heptabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Octabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Nonabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Decabromodiphenyl ether	mg/kg	5	N.D.	N.D.		
Total content	mg/kg	/	N.D.	N.D.	1000	

Remark:

- mg/kg = ppm
- N.D. = Not detected

立讯检测股份

LCS Testing Lab 代码: 871117

Report No.: LCS190517071AR

股票

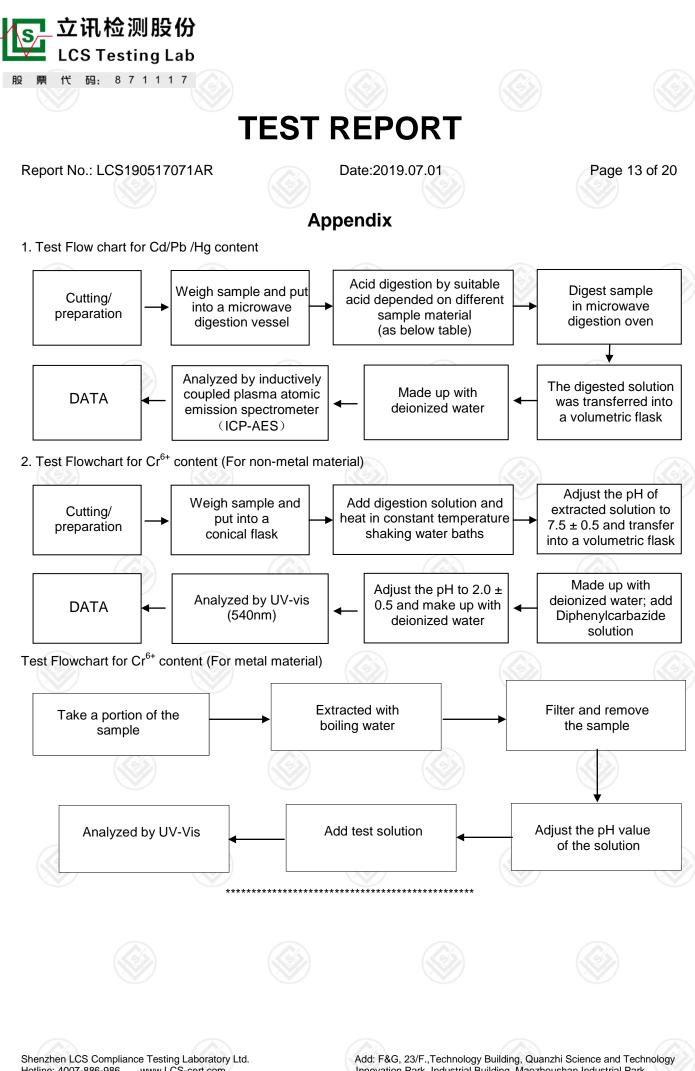
- MDL=Method detected limited
- Flow chart appendix is included
- Photo appendix is included.





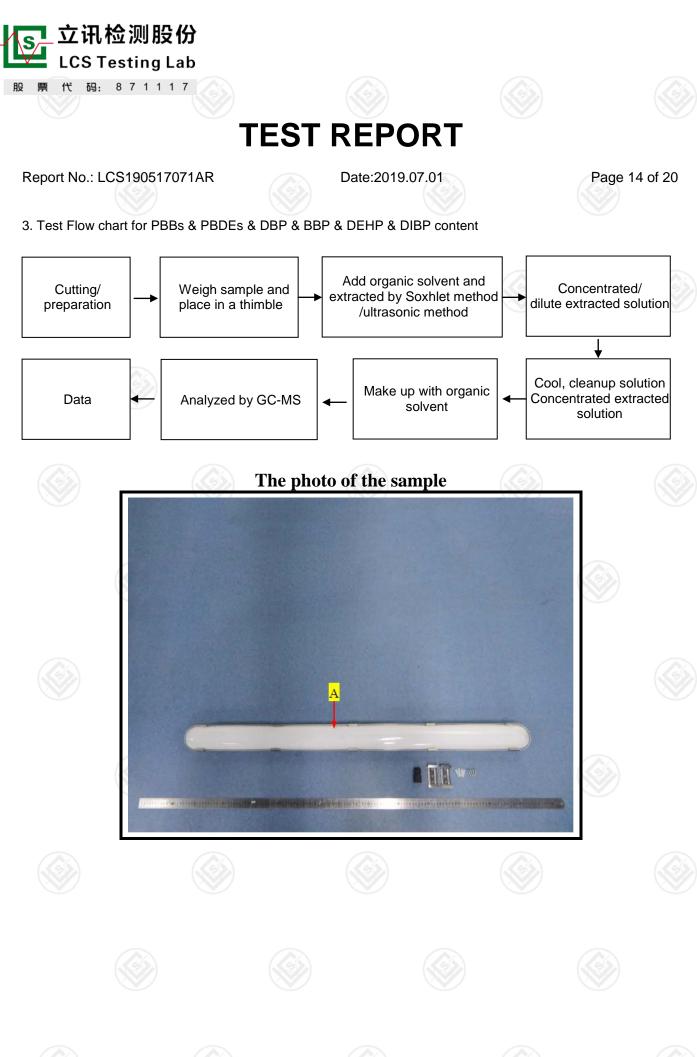


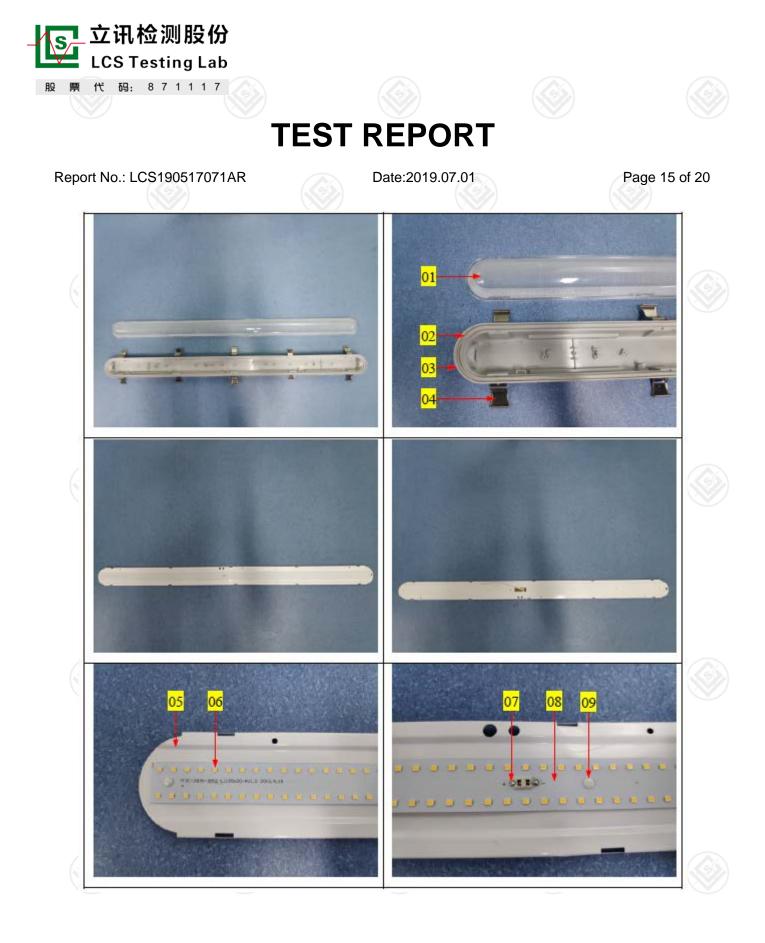
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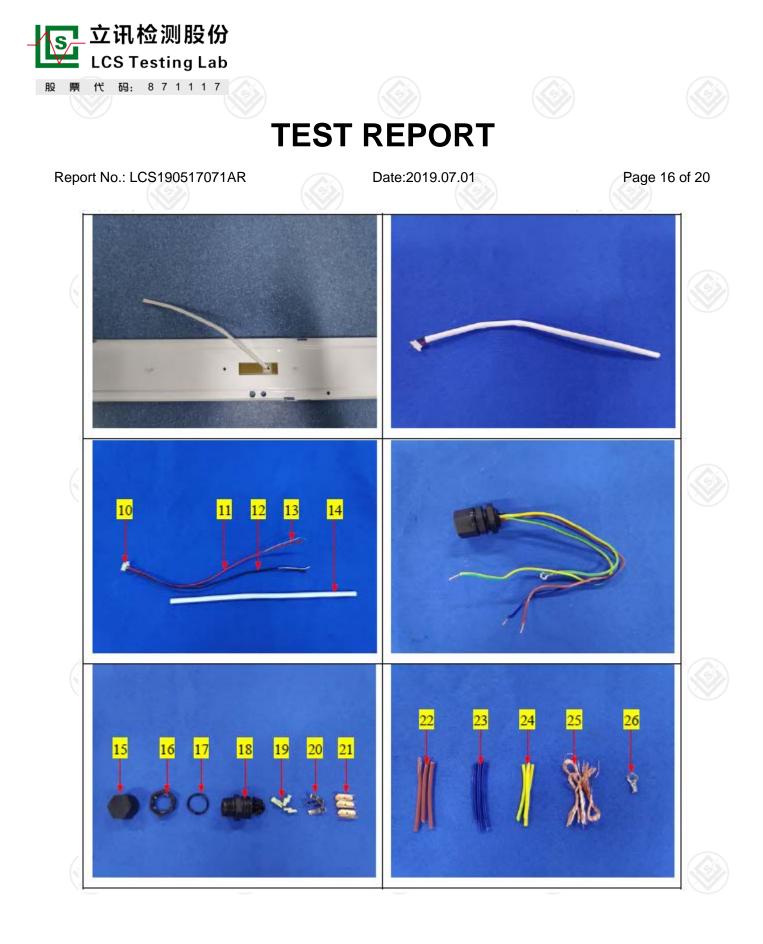






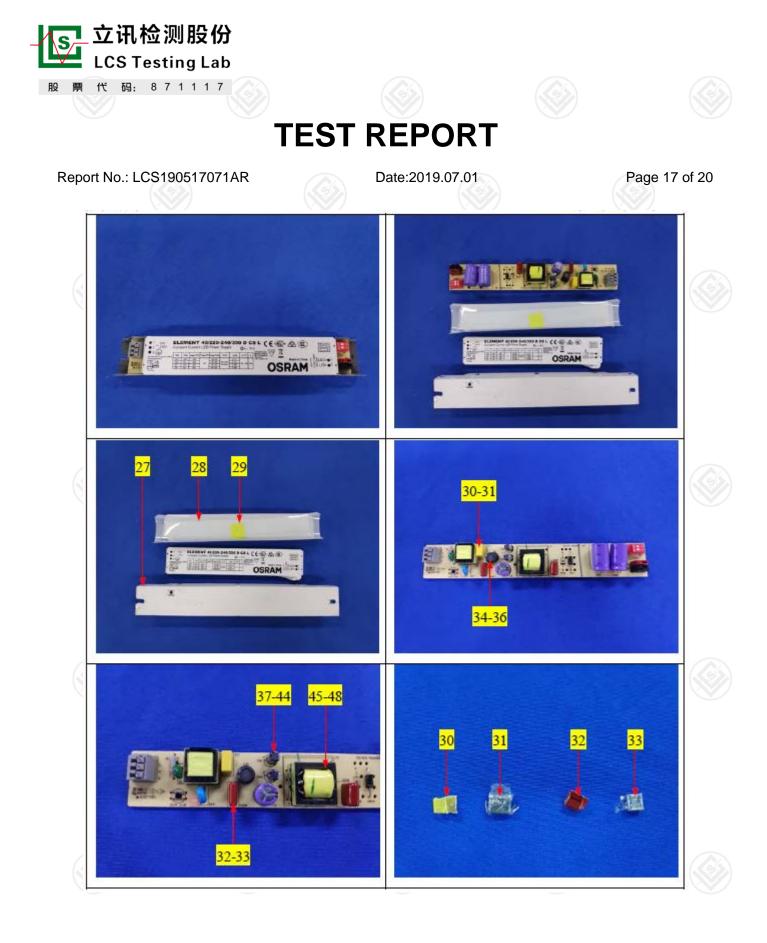






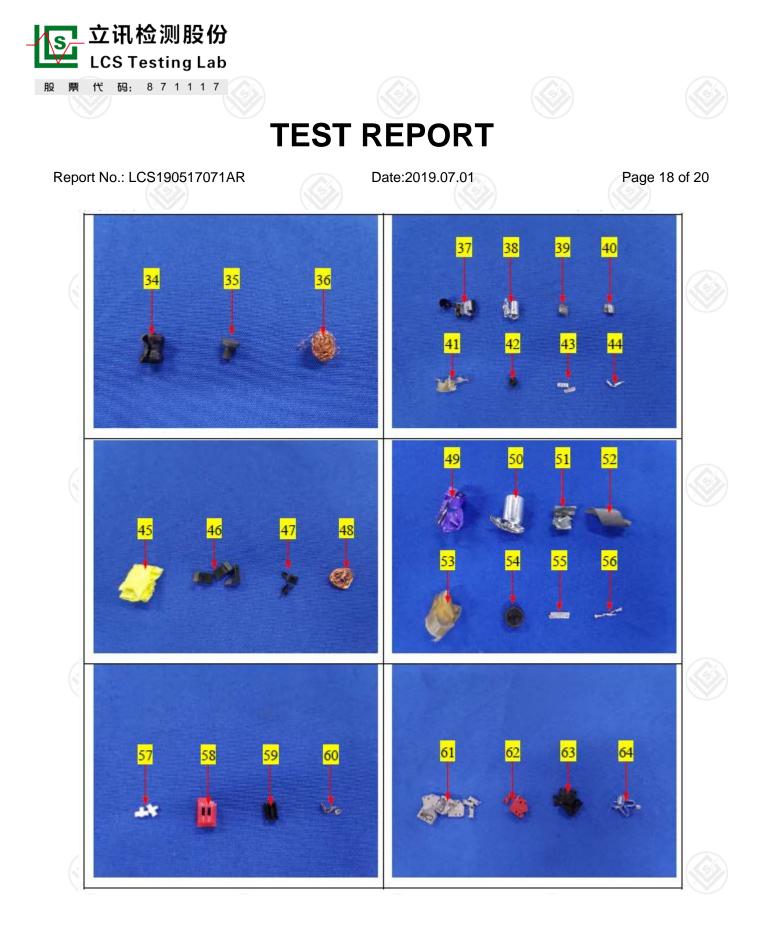






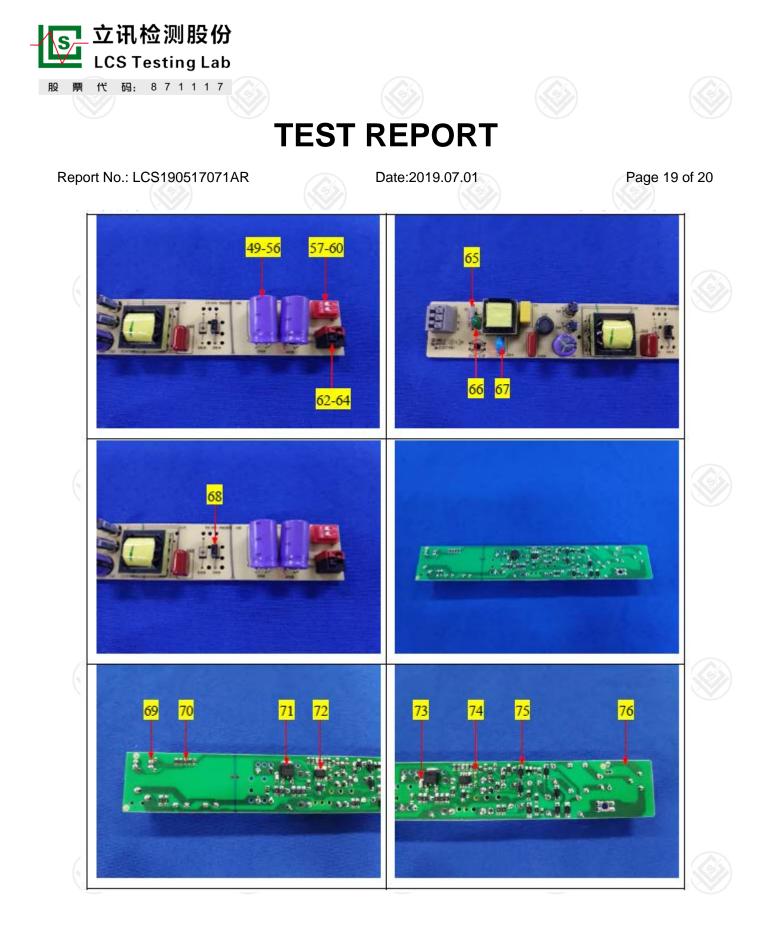




















Statement:

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- 2. The result(s) shown in this report refer only to the sample(s) tested.
- 3. Without written approval of LCS, this report can't be reproduced except in full.
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