

ASSESSMENT REPORT PROPOSAL IN COMPLIANCE WITH REACH

We have been commissioned by the client to conduct REACH compliance assessment on their products (Contract No.: RT-SVHC-010-1200936). We have assessed the client's product under the European Regulation (EC) No 1907/2006 (hereinafter referred as REACH Regulation), including product categories, substances list, SVHC (Substances of Very High Concern) as well as the client's responsibilities and obligations for this product under REACH Regulation. The result and findings of the assessment and our proposals are described as follows:

1. Client's Information

Name:	SOYANG TECHNOLOGIES CO., LTD.
Address:	West 19th Floor, Yongtong Information Plaza, No. 141 Huancheng Bei Road, Hangzhou City, Zhejiang, P. R. China
Name of the contact person:	Jerry Zang
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Email:	jerry@soyang.net

2. Product Identification

Product name:	Tarpaulin/ Plastic Banner
Type/ model:	DY-BLOW-440EU
Physical appearance/colour:	Solid/ White
Product type:	Article

3. Product Substances Information

3.1 Substance on its own or in mixtures

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

3.2 Substance in article intended to be released

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

3.3 SVHC (Substance of Very High Concern) in article (Details see Annex 1)

4. Responsibilities and Obligations

4.1 Registration

4.1.1 According to the definition in Article 3(3), Chapter 2, Title I, the client's product, Tarpaulin/ Plastic Banner is regarded as "Article".

4.1.2 And according to Article 7(1), Chapter 2, Title 2, there is no substance intended to be released under normal or reasonably foreseeable conditions of use in the client's product. Therefore, registration is not required.



4.2 Notification

4.2.1 As some SVHCs defined in Article 57 of REACH regulation in the client's product exceed the concentration limit of 0.1 % weight by weight (w/w), (refer to the annex 1) if one (or more) of these substances is present in quantities totalling over 1 tonne per year per company, EU and EEA producers or importers of this product have to notify ECHA. The notifications have to be submitted not later than 1 June 2011.

Note 1: Dissenting views, questioning the application of the 0.1 % threshold to the entire article have been notified by 6 Member States (Austria, Belgium, Denmark, France, Germany and Sweden) and this calculation method was not endorsed by these Member States.

In this report, we adopt the opinions from these Member States that the 0.1% threshold should relate to individual articles, parts or materials that a complex article consists of.

Note 2: This item shall not apply where the importer can exclude exposure to humans or the environment during normal or reasonably foreseeable conditions of use including disposal. In such cases, the producer or importer shall supply appropriate instructions to the recipient of this product.

A notification is not required either when the substance has already been registered for that use up the same supply chain or any other supply chain.

4.3 Information Communication down the Supply Chain

4.3.1 As the concentrations of some SVHCs defined in Article 57 of REACH regulation in the client's product are above 0.1% weight by weight (w/w) (See details in annex 1), the obligation of communicating information down the supply chain may need to be fulfilled according to Article 33 of REACH Regulation.

4.3.2 From 28 October 2008, EU & EEA suppliers of this product must provide all the information he has, to his customers and, on request, to a consumer within 45 days of the receipt of this request. This information must ensure safe use of this product, and as a minimum it must include the name of the SVHC.

4.4 Others

4.4.1 Authorisation

Since the manufacture of this product is based outside the EU, and the lifecycle of related substances outside EU is irrelevant with respect to REACH Regulation, there is no obligation of authorisation required for our client's product.

4.4.2 Restriction

The directive on marketing and use of dangerous substances 76/769/EEC have been repealed since 1 June 2009, and our client should follow the restriction conditions outlined in Annex XVII in REACH Regulation from then on.

As we haven't received any testing request of Restricted Substance from our client, the detail of restricted substance in the product is unknown.

5. Assessment Conclusions

According to the product information provided by our client and related Articles of REACH Regulation, we draw the conclusion that:

<u>The product supplied by the client complies with REACH Regulation about SVHC as it currently stands, if</u> <u>article 6 "proposal for REACH compliance</u>" in this assessment report is fulfilled.



6. Proposal for REACH Compliance

6.1 The client should provide his recipient of the product with information of SVHCs that are above 0.1% weight by weight (w/w) as soon as possible.

6.2 On request by a consumer, supplier of the product shall provide the consumer with the information of SVHCs that are above 0.1% weight by weight (w/w) freely within 45 days.

6.3 A notification to ECHA may be required on 1 June 2011 at the latest for substances which are present in the product above the concentration of 0.1%w/w and totalling over one tonne per year per company.

6.4 The client should pay constant attention to the SVHCs in the candidate list and fulfil related obligations if necessary. This list may be updated regularly and it is important to monitor any changes to it.

6.5 The client should pay special attention to the restricted substance in the annex XVII.

6.6 The client should ensure the exported products are consistent with the sample provided to Chemical Inspection & Regulation Service Limited in material, vendors and production process.

If you want to verify the authenticity of the report, please login the report verification system according to the operating instruction: www.cirstek.com/dvs/. If you have any question about the report, please contact us.

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STATEMENT

First: Instruction for the assessment conclusion

The above assessment conclusions that we have made is based on the understanding and analysis of the consignor's product and REACH regulation and only applies to the situation described in the report. This conclusion does not apply to any enterprise or product that fails to meet the description.

As parts of REACH regulation (for example Annex XIV) are still under modification, the above conclusion only applies to REACH regulation as it currently stands.

This report is only used to assist the consignor to know his own responsibility and obligation under REACH Regulation, and provide the actors in his supply chain with evidence that his products are in compliance with REACH regulation.

The consignor should study this report carefully. If there is any doubt or suggestion, please contact us and we will do our best to clarify and include any necessary amendments.

Second: Disclaimer Statement

We undertake no responsibility and no obligation to verify the authenticity of information supplied by the consignor.

The client should ensure the exported products are consistent with the sample provided to our company in material, vendors and production process. We can't be held responsible or bear any consequence which may result from differences between the sample products provided to us and the exported products.

We have completed this report with all professional competence, responsibility and reasonable due diligence, however due to the limited approach to the consignor, the products and the market we can't guarantee that the content of the report is fully accurate.

Consignor should make a cautious decision to adopt the assessment conclusion of this report. We assume no liability for any loss incurred as a result of the use of the conclusion.

Third: Privacy statement and others

This report has been completed by us independently. We guarantee that we shall not disclose information in the above report to any third party (except with the express written permission of consignor). We shall assume no responsibility for any loss caused by disclosure of the report.

We suggest that before offering the report the consignor should sign a security agreement with the third party in order to keep the information of consignor and products in the report from disclosure.

Chemical Inspection & Regulation Service Limited



ANNEX 1 TEST RESULTS OF SVHC (SUBSTANCE OF VERY HIGH CONCERNED)

Sample Description:

Name:	Tarpaulin/ Plastic Banner
Quantity:	1
Description:	White sheet
Date of receiving sample:	May 23, 2012
Date of test:	May 23, 2012–May 29, 2012
Test requested:	Seventy three (73) Substances of Very High Concern (SVHC) analysis. SVHC list is based on the publication by European Chemical Agency (ECHA) on 28 October 2008, 13 January 2010, 30 March 2010, 18 June 2010, 15 December 2010, 20 June 2011 and 19 December 2011 regarding regulation (EC) No 1907/2006 concerning the REACH.



1. Test Items and Methods(Unit: mg/kg):

(SVHCs publicized on 28 October 2008)

No.	Item	CAS No.	MCV	Method	MDL
1	Anthracene	120-12-7	1000	EPA 3550C+8270D	100
2	4,4'- Diaminodiphenylmethane	101-77-9	1000	EPA 3550C+8270D	100
3	5-tert-butyl-2,4,6-trinitro-m-xylene	81-15-2	1000	EPA 3550C+8270D	100
4	Hexabromocyclododecane	25637-99-4 3194-55-6 (134237-51-71 34237-50-6 134237-52-8)	1000	EPA 3550C+8270D	100
5	Alkanes, C10-13,chloro (Short ChainChlorinated Paraffins)	85535-84-8	1000	EPA 3550C+8270D	100
6	Dibutyl phthalate(DBP)	84-74-2	1000	EPA 3550C+8270D	10
7	Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	1000	EPA 3550C+8270D	10
8	Benzyl butyl phthalate(BBP)	85-68-7	1000	EPA 3550C+8270D	10
9	Cobalt dichloride	7646-79-9	1000	EPA 3052+6010C	100
10	Bis(tributyltin)oxide	56-35-9	1000	EPA 3052+6010C	100
11	Sodium dichromate, dihydrate	10588-01-9	1000	EPA 3052+6010C	100
12	Lead hydrogen arsenate	7784-40-9	1000	EPA 3052+6010C	100
13	Diarsenic trioxide	1327-53-3	1000	EPA 3052+6010C	100
14	Diarsenic pentaoxide	1303-28-2	1000	EPA 3052+6010C	100
15	Triethyl arsenate	15606-95-8	1000	EPA 3052+6010C	100



(31)	res publicized on 15 sandary zoto and	50 11101011 2010	/		
No.	Item	CAS No.	MCV	Method	MDL
16	Anthracene oil	90640-80-5	1000	EPA 3550C+8270D	100
17	Anthracene oil, anthracene paste, distn. lights	91995-17-4	1000	EPA 3550C+8270D	100
18	Anthracene oil, anthracene paste, anthracene fraction	91995-15-2	1000	EPA 3550C+8270D	100
19	Anthracene oil, anthracene-low	90640-82-7	1000	EPA 3550C+8270D	100
20	Anthracene oil, anthracene paste	90640-81-6	1000	EPA 3550C+8270D	100
21	Pitch, coal tar, high temp.	65996-93-2	1000	EPA 3550C+8270D	100
22	Acrylamide	79-06-1	1000	EPA 3550C+8270D	100
23	2,4-Dinitrotoluene	121-14-2	1000	EPA 3550C+8270D	100
24	Diisobutyl phthalate	84-69-5	1000	EPA 3550C+8270D	10
25	Tris(2-chloroethyl)phosphate	115-96-8	1000	EPA 3550C+8270D	100
26*	Aluminosilicate Refractory Ceramic Fibres		1000	EPA 3052+6010C	100
27*	Zirconia Aluminosilicate, Refractory Ceramic Fibres		1000	EPA 3052+6010C	100
28	Lead chromate	7758-97-6	1000	EPA 3052+6010C	100
29	Lead chromate molybdate sulphate red(C.I. Pigment Red 104)	12656-85-8	1000	EPA 3052+6010C	100
30	Lead sulfochromate yellow (C.I. Pigment Yellow 34)	1344-37-2	1000	EPA 3052+6010C	100

(SVHCs publicized on 13 January 2010 and 30 March 2010)

Remark:

1. *: Be covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures:

(26*) Aluminosilicate Refractory Ceramic Fibres

- a) Al_2O_3 and SiO_2 are present within the following concentration ranges:
 - Al₂O₃: 43.5 47 % w/w, and SiO₂: 49.5 53.5 % w/w,
 - or $AI_2O_3{:}~45.5-50.5$ % w/w, and $SiO_2{:}~48.5-54$ % w/w,
- b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (μ m).

(27*) Zirconia Aluminosilicate Refractory Ceramic Fibres

a) AI_2O_3 , SiO2 and ZrO₂ are present within the following concentration ranges:

 $AI_2O_3:$ 35 – 36 % w/w, and SiO_2: 47.5 – 50 % w/w, and $ZrO_2:$ 15 - 17 % w/w

b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (μ m).



No.	Item	CAS No.	MCV	Method	MDL
31	Trichloroethylene	79-01-6	1000	EPA 3550C+8270D	100
32	Boric acid	10043-35-3/ 11113-50-1	1000	EPA 3052+6010C	100
33	Disodium tetraborate, anhydrous	1330-43-4 12179-04-3 1303-96-4	1000	EPA 3052+6010C	100
34	Tetraboron disodium heptaoxide, hydrate	12267-73-1	1000	EPA 3052+6010C	100
35	Sodium chromate	7775-11-3	1000	EPA 3052+6010C	100
36	Potassium chromate	7789-00-6	1000	EPA 3052+6010C	100
37	Ammonium dichromate	7789-09-5	1000	EPA 3052+6010C	100
38	Potassium dichromate	7778-50-9	1000	EPA 3052+6010C	100

10 ••

(SVHCs publicized on 15 December 2010)

No.	Item	CAS No.	MCV	Method	MDL
39	Chromium trioxide	1333-82-0	1000	EPA 3052+6010C	100
40	2-Ethoxyethanol	110-80-5	1000	EPA 3550C+8270D	100
41	2-Methoxyethanol	109-86-4	1000	EPA 3550C+8270D	100
42	Cobalt (di)acetate	71-48-7	1000	EPA 3052+6010C	100
43	Cobalt (II) carbonate	513-79-1	1000	EPA 3052+6010C	100
44	Cobalt dinitrate	10141-05-6	1000	EPA 3052+6010C	100
45	Cobalt (II) sulphate	10124-43-3	1000	EPA 3052+6010C	100
16	Chromic acid, Dichromic acid, Oligomers	7738-94-5,	1000		100
46	of chromic acid and dichromic acid	13530-68-2	1000	UUU EPA 3052+6010C	100

(SVHCs publicized on 20 June 2011)

No.	ltem	CAS No.	MCV	Method	MDL
47	2-Ethoxyethyl acetate	111-15-9	1000	EPA 3550C+8270D	100
48	Strontium chromate	7789-06-2	1000	EPA 3052+6010C	100
49	1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters	68515-42-4	1000	EPA 3550C+8270D	100
50	Hydrazine	7803-57-8 302-01-2	1000	EPA 3550C+8270D	100
51	N-methyl-2-pyrrolidone; 1-methyl-2-pyrrolidone	872-50-4	1000	EPA 3550C+8270D	100
52	1,2,3-trichloropropane	96-18-4	1000	EPA 3550C+8270D	100
53	1, 2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich	71888-89-6	1000	EPA 3550C+8270D	100



(SVI	HCs publicized on 19 December 2011)				
No.	Item	CAS No.	MCV	Method	MDL
54	Calcium arsenate	7778-44-1	1000	EPA 3052+6010C	100
55	Bis(2-methoxyethyl) ether	111-96-6	1000	EPA 3550C+8270D	100
56	Potassium hydroxyoctaoxodizincatedichromate	11103-86-9	1000	EPA 3052+6010C	100
57	Lead dipicrate	6477-64-1	1000	EPA 3052+6010C	100
58	N,N-dimethylacetamide	127-19-5	1000	EPA 3550C+8270D	100
59	Arsenic acid	7778-39-4	1000	EPA 3052+6010C	100
60	2-Methoxyaniline; o-Anisidine	90-04-0	1000	EPA 3550C+8270D	100
61	Trilead diarsenate	3687-31-8	1000	EPA 3052+6010C	100
62	1,2-dichloroethane	107-06-2	1000	EPA 3550C+8270D	100
63	Pentazinc chromate octahydroxide	49663-84-5	1000	EPA 3052+6010C	100
64	4-(1,1,3,3-tetramethylbutyl)phenol	140-66-9	1000	EPA 3550C+8270D	100
65	Formaldehyde, oligomeric reaction products with aniline	25214-70-4	1000	EPA 3550C+8270D	100
66	Bis(2-methoxyethyl) phthalate	117-82-8	1000	EPA 3550C+8270D	10
67	Lead diazide, Lead azide	13424-46-9	1000	EPA 3052+6010C	100
68	Lead styphnate	15245-44-0	1000	EPA 3052+6010C	100
69	2,2'-dichloro-4,4'-methylenedianiline	101-14-4	1000	EPA 3550C+8270D	100
70	Phenolphthalein	77-09-8	1000	EPA 3550C+8270D	100
71	Dichromium tris(chromate)	24613-89-6	1000	EPA 3052+6010C	100
72**	Aluminosilicate Refractory Ceramic Fibres		1000	EPA 3052+6010C	100
73**	Zirconia Aluminosilicate, Refractory Ceramic Fibres		1000	EPA 3052+6010C	100

Remarks:

1. **: Be covered by index number 650-017-00-8 in Annex VI, part 3, table 3.1 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures:

(72**) Aluminosilicate Refractory Ceramic Fibres

a) oxides of aluminium and silicon are the main components present (in the fibres) within variable concentration ranges

b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (μ m)

c) alkaline oxide and alkali earth oxide (Na₂O+K₂O+CaO+MgO+BaO) content less or equal to 18% by weight (73**) Zirconia Aluminosilicate Refractory Ceramic Fibres

a) oxides of aluminium, silicon and zirconium are the main components present (in the fibres) within variable concentration ranges

b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (μ m).

c) alkaline oxide and alkali earth oxide(Na₂O+K₂O+CaO+MgO+BaO) content less or equal to 18% by weight.



2. Test parts and photos:

1200936

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3. Test results:

No.	Test Item	Results(mg/kg)
		1200936
1	Anthracene	N.D.(QT)
2	4,4'- Diaminodiphenylmethane	N.D.(QT)
3	5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	N.D.(QT)
4	Hexabromocyclododecane	N.D.(QT)
5	Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	N.D.(QT)
6	Dibutyl phthalate(DBP)	N.D.(QT)
7	Bis (2-ethyl(hexyl)phthalate) (DEHP)	38
8	Benzyl butyl phthalate(BBP)	N.D.(QT)
9	Cobalt dichloride	N.D.(ST)
10	Bis(tributyltin)oxide	N.D.(ST)
11	Sodium dichromate	N.D.(ST)
12	Lead hydrogen arsenate	N.D.(ST)
13	Diarsenic trioxide	N.D.(ST)
14	Diarsenic pentaoxide	N.D.(ST)
15	Triethyl arsenate	N.D.(ST)
16	Anthracene oil	N.D.(QT)
17	Anthracene oil, anthracene paste, distn. lights	N.D.(QT)
18	Anthracene oil, anthracene paste, anthracene fraction	N.D.(QT)
19	Anthracene oil, anthracene-low	N.D.(QT)
20	Anthracene oil, anthracene paste	N.D.(QT)
21	Pitch, coal tar, high temp.	N.D.(QT)
22	Acrylamide	N.D.(QT)
23	2,4-Dinitrotoluene	N.D.(QT)
24	Diisobutyl phthalate	N.D.(QT)
25	tris(2-chloroethyl)phosphate	1414
26	Aluminosilicate Refractory Ceramic Fibres	N.D.(ST)
27	Zirconia Aluminosilicate, Refractory Ceramic Fibres	N.D.(ST)
28	Lead chromate	N.D.(ST)
29	Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	N.D.(ST)
30	Lead sulfochromate yellow (C.I. Pigment Yellow 34)	N.D.(ST)

Page 11 / 13



No	Test Item	Results(mg/kg)
NU.		1200936
31	Trichloroethylene	N.D.(QT)
32	Boric acid	N.D.(QT)
33	Disodium tetraborate, anhydrous	N.D.(QT)
34	Tetraboron disodium heptaoxide, hydrate	N.D.(QT)
35	Sodium chromate	N.D.(ST)
36	Potassium chromate	N.D.(ST)
37	Ammonium dichromate	N.D.(ST)
38	Potassium dichromate	N.D.(ST)
39	Chromium trioxide	N.D.(ST)
40	2-Ethoxyethanol	N.D.(QT)
41	2-Methoxyethanol	N.D.(QT)
42	Cobalt (di)acetate	N.D.(ST)
43	Cobalt (II) carbonate	N.D.(ST)
44	Cobalt dinitrate	N.D.(ST)
45	Cobalt (II) sulphate	N.D.(ST)
46	Chromic acid, Dichromic acid,	N D (ST)
	Oligomers of chromic acid and dichromic acid	
47	2-Ethoxyethyl acetate	N.D.(QT)
48	Strontium chromate	N.D.(ST)
49	1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters	N.D.(QT)
50	Hydrazine	N.D.(QT)
51	N-methyl-2-pyrrolidone; 1-methyl-2-pyrrolidone	N.D.(QT)
52	1,2,3-trichloropropane	N.D.(QT)
53	1, 2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP)	N.D.(QT)
54	Calcium arsenate	N.D.(ST)
55	Bis(2-methoxyethyl) ether	N.D.(QT)
56	Potassium hydroxyoctaoxodizincatedichromate	N.D.(ST)
57	Lead dipicrate	N.D.(ST)
58	N,N-dimethylacetamide	N.D.(QT)
59	Arsenic acid	N.D.(ST)
60	2-Methoxyaniline; o-Anisidine	N.D.(QT)
61	Trilead diarsenate	N.D.(ST)



No.	Test Item	Results(mg/kg)
		1200936
62	1,2-dichloroethane	N.D.(QT)
63	Pentazinc chromate octahydroxide	N.D.(ST)
64	4-(1,1,3,3-tetramethylbutyl)phenol	N.D.(QT)
65	Formaldehyde, oligomeric reaction products with aniline	N.D.(QT)
66	Bis(2-methoxyethyl) phthalate	N.D.(QT)
67	Lead diazide, Lead azide	N.D.(ST)
68	Lead styphnate	N.D.(ST)
69	2,2'-dichloro-4,4'-methylenedianiline	N.D.(QT)
70	Phenolphthalein	N.D.(QT)
71	Dichromium tris(chromate)	N.D.(ST)
72	Aluminosilicate Refractory Ceramic Fibres	N.D.(ST)
73	Zirconia Aluminosilicate, Refractory Ceramic Fibres	N.D.(ST)

Remarks:

1. Test parts may be single material or a variety of materials which could not be divided by physical ways. Unless otherwise noted, components of base material, coating metal, coating paint and/or colouring pigment were no longer divided, but tested as one whole.

2. All results are applicable only to the test samples.

3. Unit: mg/kg. 1000mg/kg= 1000ppm= 0.1%

4. N.D. = Not detected (<MDL), MDL= Method Detection Limits, MCV= Maximum Concentration Values.

ST= Screening Test method; QT= Qualitative Test method.

5. Because it is difficult to detect the substances CoCl₂, C₂₄H₅₄OSn₂, Na₂Cr₂O₇, PbAsHO₄, As₂O₃, As₂O₅, Triethyl arsenate PbCrO₄, Lead chromate molybdate sulphate red (C.I. Pigment Red 104), Lead sulfochromate yellow (C.I. Pigment Yellow 34), Triethyl arsenate, H₃BO₃, Na₂B₄O₇, Na₂B₄O₇•7H₂O, Na₂CrO₄, K₂CrO₄, (NH₄)₂Cr₂O₇, K₂Cr₂O₇, CrO₃, Co(CH₃COO)₂, CoCO₃, Co(NO₃)₂, CoSO₄, SrCrO₄, Calcium arsenate, Potassium hydroxyoctaoxodizincatedichromate, Lead dipicrate, Arsenic acid, Trilead diarsenate, Pentazinc chromate octahydroxide, Lead diazide, Lead azide, Lead styphnate, Aluminosilicate Refractory Ceramic Fibres, Zirconia Aluminosilicate, Refractory Ceramic Fibres, Dichromium tris(chromate), Chromic acid, Dichromic acid, Oligomers of chromic acid and dichromic acid via direct tests (but via converting them into detectable elements), we consider that all the relative elements exist in the form of their compounds when having the test.

6. Chemical Inspection & Regulation Service Limited reserves the right of final explanations.