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-010-1100848). 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:	Chanzhou Often Plastic New Material Co., Ltd.
Address:	No. 880 Zhongwu Avenue, Changzhou City, Jiangsu Province, P. R. China
Name of the contact person:	Jinzhen Shi
Tel:	+86-519-88829083
Fax:	+86-519-88872825

2. Product Identification

Product name:	Flame retardant ABS
Type/ model:	CF-610B, CF-610T, CH-777D, CF610A
Physical appearance/colour:	Granule/ White
Product type:	mixture

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 The manufacturer "Chanzhou Often Plastic New Material Co., Ltd. "sells the product "Flame retardant ABS" to non-EU "Plastic parts" manufacturers. It is the "Plastic parts" which is placed in the EU market and falls into the scope of REACH Regulation.

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According to the definition in Article 3(3), Chapter 2, Title I, the "Plastic parts" is regarded as "Article" under REACH Regulation.

4.1.2 The Flame retardant ABS, as an integral part of Plastic parts, other than a mixture in a special container, is not intended to be released under normal and reasonable foreseeable conditions of use.

Therefore, the Flame retardant ABS will not trigger the obligation of registration according to Article 7(1), Chapter 2, Title 2 of REACH Regulation.

4.2 Notification

The concentrations of the SVHCs defined in Article 57 of REACH Regulation in Flame retardant ABS are all lower than 0.1% weight by weight (w/w), which is likely to result in even lower concentrations of those SVHCs in Plastic parts. Therefore the Flame retardant ABS will not trigger the obligation of notification according to Article 7(2) under REACH Regulation.

4.3 Information Communication down the Supply Chain

The concentrations of the SVHCs are lower than 0.1% weight by weight (w/w) in Flame retardant ABS and possibly even lower in Plastic parts, thus the Flame retardant ABS will not trigger the obligation of communicating information down the supply chain in accordance with Article 33.

4.4 Others

4.4.1 Authorisation

Since the manufacture of Flame retardant ABS and Plastic parts 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 both Flame retardant ABS and Plastic parts.

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:

1) It is the "Plastic parts" which is placed in the EU market and falls into the scope of REACH Regulation;

2) "Plastic parts" meets the definition of article (Article 3(3)) and the "Flame retardant ABS" supplied by our client is its integral part;

3) The "Flame retardant ABS" will not trigger further obligations under REACH Regulation about SVHC as it currently stands.

6. Proposal for REACH Compliance

6.1 The client should inform his downstream users as soon as possible that the products mentioned above comply with REACH.

6.2 The client should pay constant attention to the SVHCs in the candidate list and fulfil related obligations

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if necessary. This list may be updated regularly and it is important to monitor any changes to it.

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

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

6.5 The detection of Plastic parts is strongly recommended in order to comply with REACH Regulation.

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.

Contact information:

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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

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

Sample Description:

Name:	Flame retardant ABS
Quantity:	1
Description:	White granule
Date of receiving sample:	May 30, 2011
Date of test:	May 30, 2011 –June 3, 2011
Test requested:	Forty six (46) 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 and 15 December 2010, regarding regulation (EC) No 1907/2006 concerning the REACH.

Test parts:

No.	Parts No.	Parts Name
1	1100848	Flame retardant ABS

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1. Test Items and Methods:

(SVHCs publicized on 28 October 2008)

No.	Item	CAS No.	MCV	Method	MDL
1	Anthracene	120-12-7	1000	EPA 8270D	100
2	4,4'- Diaminodiphenylmethane	101-77-9	1000	EPA 8270D	100
3	5-tert-butyl-2,4,6-trinitro-m-xylene	81-15-2	1000	EPA 8270D	100
4	Hexabromocyclododecane	25637-99-4 3194-55-6 (134237-51-71 34237-50-6 134237-52-8)	1000	EDXRF	200
			1000	EPA 8270D	100
5	Alkanes, C10-13,chloro (Short ChainChlorinated Paraffins)	85535-84-8	1000	EPA 8270D	100
6	Dibutyl phthalate(DBP)	84-74-2	1000	EPA 8270D	10
7	Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	1000	EPA 8270D	10
8	Benzyl butyl phthalate(BBP)	85-68-7	1000	EPA 8270D	10
9	Cobalt dichloride	7646-79-9	1000	EDXRF	200
				EPA 3052+6010C	100
10	Bis(tributyltin)oxide	56-35-9	1000	EDXRF	200
				EPA 8270D	100
11	Sodium dichromate, dihydrate	10588-01-9	1000	EDXRF	200
				EPA 3060A+7196A	100
12	Lead hydrogen arsenate	7784-40-9	1000	EDXRF	200
				EPA 3052+6010C	100
13	Diarsenic trioxide	1327-53-3	1000	EDXRF	200
				EPA 3052+6010C	100
14	Diarsenic pentaoxide	1303-28-2	1000	EDXRF	200
				EPA 3052+6010C	100
15	Triethyl arsenate	15606-95-8	1000	EDXRF	200
				EPA 8270D	100

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

No.	Item	CAS No.	MCV	Method	MDL
16	Anthracene oil	90640-80-5	1000	EPA 8270D	100
17	Anthracene oil, anthracene paste, distn. lights	91995-17-4	1000	EPA 8270D	100
18	Anthracene oil, anthracene paste, anthracene fraction	91995-15-2	1000	EPA 8270D	100
19	Anthracene oil, anthracene-low	90640-82-7	1000	EPA 8270D	100
20	Anthracene oil, anthracene paste	90640-81-6	1000	EPA 8270D	100
21	Pitch, coal tar, high temp.	65996-93-2	1000	EPA 8270D	100
22	Acrylamide	79-06-1	1000	EPA 8270D	100
23	2,4-Dinitrotoluene	121-14-2	1000	EPA 8270D	100
24	Diisobutyl phthalate	84-69-5	1000	EPA 8270D	10
25	Tris(2-chloroethyl)phosphate	115-96-8	1000	EPA 8270D	100
26	Aluminosilicate Refractory Ceramic Fibres	--	1000	EDXRF	200
				EPA 3052+6010C	100
27	Zirconia Aluminosilicate, Refractory Ceramic Fibres	--	1000	EDXRF	200
				EPA 3052+6010C	100
28	Lead chromate	7758-97-6	1000	EDXRF	200
				EPA 3052+6010C	100
29	Lead chromate molybdate sulphate red(C.I. Pigment Red 104)	12656-85-8	1000	EDXRF	200
				EPA 3052+6010C	100
30	Lead sulfochromate yellow (C.I. Pigment Yellow 34)	1344-37-2	1000	EDXRF	200
				EPA 3052+6010C	100

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(SVHCs publicized on 18 June 2010)

No.	Item	CAS No.	MCV	Method	MDL
31	Trichloroethylene	79-01-6	1000	EPA 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

(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 8270D	100
41	2-Methoxyethanol	109-86-4	1000	EPA 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
46	Chromic acid, Dichromic acid, Oligomers of chromic acid and dichromic acid	7738-94-5, 13530-68-2	1000	EPA 3052+6010C	100

Remarks:

1.Unit: mg/kg;
1000mg/kg = 1000ppm= 0.1%.

2. MCV= Maximum Concentration Values; MDL= Method Detection Limits.

3. EDXRF (X-ray fluorescence spectrometry) = Screening Test (ST) method;
EPA 3052+6010C = Qualitative Test (QT) method.

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2. Test results:

No.	Test Item	Results(mg/kg)
		1100848
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)	N.D.(QT)
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	N.D.(QT)
26	Aluminosilicate Refractory Ceramic Fibres	N.D.(ST)

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No.	Test Item	Results(mg/kg)
		1100848
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)
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, Oligomers of chromic acid and dichromic acid	N.D.(ST)

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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. N.D. = Not detected (<MDL) MDL= Method Detection Limits
4. Because it is difficult to detect the substances $CoCl_2$, $C_{24}H_{54}OSn_2$, $Na_2Cr_2O_7$, $PbAsHO_4$, As_2O_3, As_2O_5, $PbCrO_4$, Lead chromate molybdate sulphate red (C.I. Pigment Red 104), Lead sulfochromate yellow (C.I. Pigment Yellow 34), Triethyl arsenate, H_3BO_3, $Na_2B_4O_7$, $Na_2B_4O_7.7H_2O$, Na_2CrO_4, K_2CrO_4, $(NH_4)_2Cr_2O_7$, $K_2Cr_2O_7$, CrO_3, $C_4H_6CoO_4$, $CCoO_3$, CoN_2O_6, $CoSO_4$ and Chromic acid, Dichromic acid, Oligomers of chromic acid and dichromic acid via direct tests, we detect the substances via converting them into detectable elements by considering that all the relative elements exist in the form of their compounds when having the test.
5. Chemical Inspection & Regulation Service Limited reserves the right of final explanations.

3. Photos :

1100848

CIRS authenticate the photo on original report only

The end of report************************************

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