



## Test Report

No.: T32120260288TY

Date: JUN 03, 2021

Page 1 of 16

IMAGEN BRANDS

401 US HWY 160 DONIPHAN, MO 63935, UNITED STATES

The following samples were submitted and identified by/on behalf of the client as:

CUDDLES

Item No. : CT855  
Manufacture Date : 2021  
Shipment Order Number : DP00037882  
Country of Origin : CHINA  
Country of Destination : CANADA, UNITED STATES  
Labeled Age Grading : AGES 0 AND UP  
Requested Age Grading : NOT STATED  
Age Group Assessed by  
SGS As Per Age Guideline : ALL AGES  
Age Group Applied in  
Testing : ALL AGES  
Sample Receiving Date : MAY 13, 2021  
Testing Period : MAY 13, 2021 TO JUN 03, 2021

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Test Requested		Conclusion
1.	Labeling review accordance to Pennsylvania subchapter H. STUFFED TOYS labeling requirement, Massachusetts 105 CMR 620.006 Stuffed toys labeling and Ohio RC 4101:6-1-05 Stuffed toy labeling.	PASS
2.	For compliance with the test requirement of ASTM F963-17 Standard Consumer Safety Specification on Toy Safety.	--
	ASTM F963-17 Standard Consumer Safety Specification for Toy Safety	PASS
3.	For compliance with test requirement of the Physical & Mechanical, Flammability test requirement of Title 16, Code of Federal Regulations, Chapter II – Consumer Products Safety Commission of U.S.A	--
	Physical and mechanical tests consisting US CPSC 16 CFR 1500.48, US CPSC 16 CFR 1500.49 and US CPSC 16 CFR 1501: <ul style="list-style-type: none"> <li>- US CPSC 16 CFR 1500.48 – Technical requirements for determining a sharp point in toys and other articles intended for use by children under 8 years of ages</li> <li>- US CPSC 16 CFR 1500.49 – Technical requirements for determining a sharp metal or glass edge in toys and other articles intended for use by children under 8 years of age</li> <li>- US CPSC 16 CFR 1501 – Method for identifying toys and other articles intended for use by children under 3 years of age which present choking, aspiration, or ingestion hazards because of small parts</li> </ul>	PASS
	US CPSC 16 CFR 1500.44 – Method for determining extremely flammable and flammable solids	PASS
4.	Title 16, Code of Federal Regulations, Chapter II - Consumer Products Safety Commission of U.S.A. - Part 1303 - Ban of Lead - Containing Paint and Certain Consumer Products Bearing Lead - Containing Paint – Lead Content	PASS
5.	Tracking label per Consumer Product Safety Improvement Act (CPSIA) of 2008 section 103 tracking labels for children’s products.	SEE RESULT PAGE
6.	Labeling requirements	PASS

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Test Requested	Conclusion
7. CPSIA section 101 and US California Proposition 65 (Superior Court of California – County of Alameda Case No. RG07356892) - Total Lead content	--
CPSIA section 101(f) (1) and US California Proposition 65 (Superior Court of California – County of Alameda Case No. RG07356892) – Lead in paint/similar surface coating material	PASS
CPSIA section 101(a) (2) and US California Proposition 65 (Superior Court of California – County of Alameda Case No. RG07356892) – Lead in accessible substrate materials (Including Children’s Metal Jewelry)	NOT APPLICABLE (SEE REMARK)
8. US 16 CFR Part 1307 – Phthalates	PASS
9. US Model Toxics in Packaging Legislation (TPCH: Toxics in Packaging Clearing House) (formerly drafted by CONEG) – Total Lead, Cadmium, Mercury and Hexavalent Chromium content	PASS
10. Public Act 097-0612 of the US State of Illinois, the Lead Poisoning Prevention Act – Lead in surface coating materials of painted toy / children’s jewelry / childcare article	PASS
11. US California Proposition 65 (ACSC Case No. BG07350969) – Phthalates Content	PASS
12. US California Proposition 65 (County of Alameda Case no. RG 13-678798) – Flame Retardants	NOT APPLICABLE
13. Tolerances of the Commonwealth of Pennsylvania Regulation for Stuffed Toys	PASS

Remark : According to 16CFR Part 1500.91 Determinations Regulation Lead Content for Certain Materials or Products under Section 101 of CPSIA, the materials in the submitted samples fall into the exemption scope of total lead in substrate, the exemptions include paper and similar materials derived from wood or other cellulosic fiber, Natural and Untreated Wood, Textile

\*\*\*\*\* FOR FURTHER DETAILS, PLEASE REFER TO THE FOLLOWING PAGE(S) \*\*\*\*\*

Signed for and on behalf of  
SGS Hong Kong Ltd.



Wong Sau Wai, Athena  
Senior Technical Executive

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**Test Results:**

Pennsylvania subchapter H. STUFFED TOYS labeling requirement

AS SPECIFIED IN Pennsylvania subchapter H. STUFFED TOYS labeling requirement

Section	Description	Result
47.315(a)	Stuff toy shall have securely affixed to it a tag or label. Which is clearly legible and in sufficient size type so that it may be readily discerned	Pass
47.315(b)(1)	Statement of "All new material" or "All new (type) material"	Pass
47.315(b)(2)	Registration number of the manufacturer or importer assigned by the Commonwealth preceded by the abbreviations REG. NO. PA.	Pass
47.316	When filling material is designated, the filling material shall be designated by its accepted generic term as described in 47.311	Pass

Massachusetts 105 CMR 620.006 Stuffed toys labeling requirement

AS SPECIFIED IN Massachusetts 105 CMR 620.006 Stuffed toys labeling requirement

Section	Description	Result
620.006(A)(1)	A statement that "ALL NEW MATERIAL" (with type of material) or "ALL NEW (type) MATERIAL"	Pass
620.006(A)(2)	The name and address, or Massachusetts license number of the manufacturer or vendor.	Pass
620.006(B)	The information required on the label shall be clearly legible and in sufficient size type, so that it can be readily discerned.	Pass

Ohio RC 4101:6-1-05 Stuffed toy labeling requirement

AS SPECIFIED IN Ohio RC 4101:6-1-05 Stuffed toy labeling requirement

Section	Description	Result
4101:6-1-05B(1)	Every stuff toy shall bear a label, in which the information required on the label is clearly legible and in sufficient type so that it can be readily discerned.	Pass
4101:6-1-05B(2)(a)	Registered name and address or registered license number of the manufacturer, wholesaler or importer.	Pass
4101:6-1-05B(2)(b)	A statement that "All new material" was used in the manufacture of the stuffed toy and also specifying the types of filling materials used in the stuffed toy.	Pass

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## Test Report

No.: T32120260288TY

Date: JUN 03, 2021

Page 5 of 16

### ASTM F963-17 STANDARD CONSUMER SAFETY SPECIFICATION FOR TOY SAFETY

AS SPECIFIED IN ASTM F963-17 STANDARD CONSUMER SAFETY SPECIFICATION ON TOYS SAFETY

Clauses relevant to the item:

<u>Clause</u>	<u>Description</u>	<u>Result</u>
4	Safety Requirements	
4.1	Material Quality **	<u>Pass</u>
4.2	Flammability Test	<u>Pass</u> <u>(See Result Page)</u>
4.3	Toxicology	
4.3.5	Heavy Elements	
4.3.5.1	Heavy Elements in Paint/Similar Surface Coating Materials	<u>Pass</u> <u>(See Result Page)</u>
4.3.5.2	Heavy Metal in Substrate Materials	<u>Pass</u> <u>(See Result Page)</u>
4.3.7	Stuffing Materials	<u>Pass</u>
4.6.1	Small Objects	<u>Pass</u>
4.6.2	Mouth-Actuated Toys	<u>N/A</u>
4.6.3	Labelling Requirements	<u>N/A</u>
4.7	Accessible Edges	<u>Pass</u>
4.9	Accessible Points	<u>Pass</u>
4.27	Stuffed and Beanbag-Type Toys	<u>Pass</u>
5	Safety Labeling Requirements	
5.2	Age Grading Labeling	<u>Pass</u>
5.16	Promotional Materials	<u>Pass</u>
7	Producer's Markings	
7.1	Producer's Markings	<u>Pass</u>
8.5	Normal Use Testing	<u>Pass</u>
8.7	Impact Test	<u>Pass</u>
8.8	Torque Test	<u>Pass</u>
8.9	Tension Test	<u>Pass</u>

N/A = Not Applicable

\*\* Visual Examination

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# Test Report

No.: T32120260288TY

Date: JUN 03, 2021

Page 6 of 16

## Result Page:

### Flammability Test (Clause 4.2)

### Flammability Test on Solid

Sample  
CUDDLES

Burning Rate (inch/sec)  
0.1(IBE)

Requirement: A toy / component is considered a “flammable solid” if it ignites and burns with a self-sustaining flame at a rate greater than 0.10 in/sec along its major axis.

IBE = Ignite But Self-Extinguished

## **ASTM F963-17, Clause 4.3.5.1 – Heavy Elements in Paint/Similar Surface Coating Materials**

Method: With reference to CPSC-CH-E1003-09.1

Method: With reference to ASTM F963-17 Clause 8.3

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

### Total Lead Content

<b>Test Item(s)</b>	<b>Lead (Pb)</b>
<b>MDL (ppm)</b>	10
<b>Total Limit (ppm)</b>	90
<b>Specimen Description</b>	<b>Result(s) (ppm)</b>
1. White w/ black coating on fabric (Sewn-in label)	ND

### Soluble Heavy Metal Content

Test Item(s)	Pb	Sb	As	Ba	Cd	Cr	Hg	Se
<b>MDL (ppm)</b>	5	5	2.5	10	5	5	5	10
<b>Migration Limit (ppm)</b>	90	60	25	1000	75	60	60	500
Specimen No.	Mass of trace amount (mg)	Adjusted Migration Result(s) (ppm)						
1	20.1	ND	ND	ND	ND	ND	ND	ND

### Specimen Description:

- White w/ black coating on fabric (Sewn-in label)

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# Test Report

No.: T32120260288TY

Date: JUN 03, 2021

Page 7 of 16

- Note:
- ppm = parts per million
  - 1% = 10000 mg/kg = 10000 ppm = 10000 µg/g
  - MDL = Method Detection Limit
  - ND = Not Detected (lower than MDL)
  - Migration results of eight elements shown are of the adjusted analytical results
  - For Soluble Heavy Metal Content: The decision rule has prescribed in the regulation or standard, conformity reporting will base on the standard.

## ASTM F963-17, Clause 4.3.5.2 – Heavy Elements in Substrate Materials

Method: With reference to ASTM F963-17 Clause 8.3

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

### Soluble Heavy Metal Content

Test Item(s)	Pb	Sb	As	Ba	Cd	Cr	Hg	Se	
MDL (ppm)	5	5	2.5	10	5	5	5	10	
Migration Limit (ppm) -- Other Than Modeling Clays	90	60	25	1000	75	60	60	500	
Migration Limit (ppm) -- Modeling Clays	90	60	25	250	50	25	25	500	
Specimen No.	Mass of trace amount (mg)	Adjusted Migration Result(s) (ppm)							
1	/	ND	ND	ND	ND	ND	ND	ND	ND
2	/	ND	ND	ND	ND	ND	ND	ND	ND
3	/	ND	ND	ND	ND	ND	ND	ND	ND
4	/	ND	ND	ND	ND	ND	ND	ND	ND
5	/	ND	ND	ND	ND	ND	ND	ND	ND
6	/	ND	ND	ND	ND	ND	ND	ND	ND
7	71.3	ND	ND	ND	ND	ND	ND	ND	ND

### Specimen Description:

1. Brown plush w/ black, white embroidery (Body)
2. Brown flannel w/ black, white fabric thread (Body)
3. Black flannel (Body)
4. White fabric (Sewn-in label)
5. White polyfiber (Inner)
6. White woven band (Inner)
7. White tricot (Inner)

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**Test Report**

No.: T32120260288TY

Date: JUN 03, 2021

Page 8 of 16

- Note:
- ppm = parts per million
  - 1% = 10000 mg/kg = 10000 ppm = 10000 µg/g
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - Migration results of eight elements shown are of the adjusted analytical results
  - For Soluble Heavy Metal Content: The decision rule has prescribed in the regulation or standard, conformity reporting will base on the standard.

**US CPSC**

**PHYSICAL AND MECHANICAL TESTS CONSISTING US CPSC 16 CFR 1500.48, US CPSC 16 CFR 1500.49 AND US CPSC 16 CFR 1501**

AS SPECIFIED IN PHYSICAL AND MECHANICAL TESTS CONSISTING US CPSC 16 CFR 1500.48, US CPSC 16 CFR 1500.49 AND US CPSC 16 CFR 1501

	<u>No. of sample tested</u>	<u>Sharp point (16 CFR 1500.48)</u>	<u>Sharp edge (16 CFR 1500.49)</u>	<u>Small part (16 CFR 1501)</u>
As received	1	Pass	N/A	N/A
Impact test (16 CFR 1500.51b)	1	Pass	N/A	N/A
Bite test (16 CFR 1500.52c)	1	N/A	N/A	N/A
Flexure test (16 CFR 1500.53d)	0	N/A	N/A	N/A
Torque test (16 CFR 1500.53e)	1	Pass	N/A	N/A
Tension test (16 CFR 1500.52f)	1	Pass	N/A	N/A
Compression test (16 CFR 1500.53g)	0	N/A	N/A	N/A

N/A = Not Applicable

**US CPSC 16 CFR 1500.44 – METHOD FOR DETERMINING EXTREMELY FLAMMABLE AND FLAMMABLE SOLIDS**

AS SPECIFIED IN US CPSC 16 CFR 1500.44 – METHOD FOR DETERMINING EXTREMELY FLAMMABLE AND FLAMMABLE SOLIDS

<u>Sample</u>	<u>Burning Rate (inch/sec)</u>
CUDDLES	0.1(IBE)

Requirement: A toy / component is considered a “flammable solid” if it ignites and burns with a self-sustaining flame at a rate greater than 0.10 in/sec along its major axis.

IBE = Ignite But Self-Extinguished

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## Test Report

No.: T32120260288TY

Date: JUN 03, 2021

Page 9 of 16

### CPSC 16 CFR 1303 - Lead in Paint/Similar Surface Coating Materials

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Test Item(s)	Lead (Pb)
Permissible Limit (ppm)	90
Specimen Description	Result(s) (ppm)
1. White w/ black coating on fabric (Sewn-in label)	ND

- Note:
- ppm = parts per million
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit = 10 ppm
  - 1% = 10000 mg/kg = 10000 ppm

### **As specified in Consumer Product Safety Improvement Act (CPSIA) of 2008 section 103 tracking labels for children's products.**

- Tracking label found on the packaging: N/A
- Tracking label found on the product:
  - 1) Name: Chelsea teddy bear co.
  - 2) Location: Made in China DP37882
  - 3) Date: 060521
  - 4) Cohort information: 060521

Note: The tracking label assessment was based on the submitted samples and the information provided by the applicant. There was no verification on the validity of such information.

N/A = Not Applicable

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**Labeling requirements**

Test Property	Test Method	Test Principle/Requirements/	Rating
<b>US</b>			
Country of Origin Marking	19 CFR 134	Shall indicate country of origin legibly to comparable size and close proximity to any mention of country other than country in which the article was manufactured or produced. Must be visible at point of purchase.	Pass

**CPSIA and US California Proposition 65 (Superior Court of California – County of Alameda Case No. RG07356892) - Lead in Paint/Similar Surface Coating Materials**

Method: With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Test Item(s)	Lead (Pb)
<b>Permissible Limit (ppm)</b>	90
<b>Specimen Description</b>	<b>Result(s) (ppm)</b>
1. White w/ black coating on fabric (Sewn-in label)	ND

- Note:
- ppm = parts per million
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit = 10 ppm
  - 1% = 10000 mg/kg = 10000 ppm

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**US 16 CFR Part 1307 – Phthalates Content**

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Test Item(s)	CAS No.	Result (s) (%)	MDL (%)	Permissible Limit (%)
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	0.003	0.1
Benzylbutyl Phthalate (BBP)	85-68-7	ND	0.003	0.1
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003	0.1
Diisononyl Phthalate (DINP)	28553-12-0 68515-48-0	ND	0.010	0.1
Di-n-Hexyl phthalate (DHP/DnHP/DHEXP)	84-75-3	ND	0.003	0.1
Diisobutyl phthalate (DIBP)	84-69-5	ND	0.003	0.1
Di-n-pentyl phthalate(DPP/DPEP/DPENP)	131-18-0	ND	0.003	0.1
Dicyclohexyl phthalate (DCHP)	84-61-7	ND	0.003	0.1

Specimen Description:

- White w/ black coating on fabric (Sewn-in label)

- Note:
- % = percentage by weight
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - 1% = 10000 mg/kg = 10000 ppm

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**US Model Toxics in Packaging Legislation (TPCH: Toxics in Packaging Clearing House) (formerly drafted by CONEG) – Total Lead, Cadmium, Mercury and Hexavalent Chromium content**

Method: With reference to IEC 62321-4:2013+AMD1:2017, IEC 62321-5:2013  
 Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES)

Test Item(s)	Pb	Cd	Hg	Cr(VI)	Total (Pb + Cd + Cr(VI)+ Hg)
<b>MDL (mg/kg)</b>	5	5	5	8	--
<b>Permissible Limit (mg/kg)</b>	--	--	--	--	100
<b>Specimen No.</b>	--	--	--	--	--
1	ND	ND	ND	ND#	ND
2	ND	ND	ND	ND#	ND

Specimen Description:

1. White paper card (Card) w/ Translucent white plastic (Holder) + Black printed transparent plastic sheet (Bag)
2. Multi-color coating on paper card (Card)

- Note:
- mg/kg = milligram per kilogram
  - 1% = 10000 mg/kg = 10000 ppm
  - MDL = Method Detection Limit
  - ND = Not Detected (lower than MDL)
  - Results shown as ND are ignored in the sum calculation
  - # = The result of Hexavalent chromium (Cr(VI)) is considered as “Not Detected” since the total chromium content determined by acid digestion is “Not Detected”.
  - The result(s) is (are) calculated using the minimum specimen weight for composite test
  - The TPCH legislation has been enacted by California, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington and Wisconsin.

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**Public Act 097-0612 of the US State of Illinois, the Lead Poisoning Prevention Act - Lead in Surface Coating Materials of Painted Toy / Children's Jewelry / Childcare Article**

Method (coating materials): With reference to CPSC-CH-E1003-09.1 - Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings

Test Item(s)	Lead (Pb)
MDL (ppm)	10
Permissible Limit (ppm)	90
Warning Limit (ppm)	40 <sup>#</sup>
Specimen Description	Result(s) (ppm)
1. White w/ black coating on fabric (Sewn-in label)	ND

- Note:
- ppm = parts per million
  - ND = Not Detected (lower than MDL)
  - MDL = Method Detection Limit
  - 1% = 10000 mg/kg = 10000 ppm
  - <sup>#</sup> = Effective 1 January, 2010, total Lead content in any surface coating materials of toy, children's jewelry and childcare article that is more than 40ppm but lower than 90ppm should bear the following warning statement on the product or the packaging to indicate the product contains Lead.

**WARNING: CONTAINS LEAD.  
MAYBE HARMFUL IF EATEN OR CHEWED.  
COMPLIES WITH FEDERAL STANDARDS.**

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**California Prop 65 - Phthalates Content**

Method: With reference to CPSC-CH-C1001-09.4

Analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

Test Item(s)	CAS No.	Result(s) (%)	MDL (%)
<b>Specimen No.</b>	--	<b>1</b>	
Dibutyl phthalate (DBP)	84-74-2	ND	0.003
Benzyl butyl phthalate (BBP)	85-68-7	ND	0.003
Di-(2-ethyl hexyl) phthalate (DEHP) / Dioctyl Phthalate (DOP)	117-81-7	ND	0.003
Di-"isodecyl" phthalate (DIDP)	26761-40-0	ND	0.010
Di-n-Hexyl phthalate (DHP/DnHP/DHEXP)	84-75-3	ND	0.003

Specimen Description:

- White w/ black coating on fabric (Sewn-in label)

- Note:
- % = percentage by weight
  - MDL = Method Detection Limit
  - ND = Not Detected (lower than MDL)
  - 1% = 10000 mg/kg = 10000 ppm

**Summary of Permissible Limit of Requirement(s) otherwise warning label required:**

Requirement(s)	Permissible Limit
California Proposition 65 (ACSC Case No. BG07350969)	
- Toys for children under 6 or childcare articles for children under 3	≤ 0.1% for each of DBP, BBP, DEHP, DIDP and DnHP

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**Tolerances of the Commonwealth of Pennsylvania Regulation for Stuffed Toys**

Method: With reference to Pennsylvania Regulation for Stuffed Toys

Test Item(s)	Result(s)	MDL	Permissible Limit
	1		
Material Visibly Reveal a Pattern, Weave, or Other Mechanical Unification of Threads to Indicate Prior Use or a Previous Manufacturing Process	Absent	--	Absent
Dirt and Foreign Matter	ND	0.1%	1.0%
Oil and Grease (use Petroleum Ether as Solvent)	ND	0.1%	1.0%
Lead Content (as Pb)	ND	0.002%	0.002%
Arsenic Content (as As <sub>2</sub> O <sub>3</sub> )	ND	0.0002%	0.0002%
Ammonia Content	ND	5.0%	5.0%
Urea Content	ND	1.0%	1.0%
Plastic or Metal Ornaments	Not Applicable	--	Not Detached
Stones or Other Materials Having Jagged or Sharp Edges	Absent	--	Absent
Electrostatic Charge	Absent	--	Absent
Surface Burn Rate	> 3 seconds per 12inches <sup>2</sup>	--	> 3 seconds per 12 inches <sup>2</sup>

**Specimen Description:**

1. White polyfiber (Inner)

- Note:
- % = percentage by weight
  - > = greater than
  - MDL = Method Detection Limit
  - ND = Not Detected (lower than MDL)

N.B. : - Only applicable clauses were shown.

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Remark:

1. When statement of conformity is made, unless the decision rule was mentioned in above specified test items, the decision rule would be based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability,  $w = U_{95}$ ) in ILAC-G8:09/2019 Clause 4.2.3.  
 "Pass - the measured value is within (or below / above) the acceptance limit, where the acceptance limit is below / above to the guard band." or "Pass - The measured values were observed in tolerance at the points tested. The specific false accept risk is up to 2.5%."  
 "Fail - the measured value is out of (or below / above) the tolerance limit added / subtracted to the guard band." or "Fail - One or more measured values were observed out of tolerance at the points tested". The specific false reject risk is up to 2.5%.  
 "Inconclusive – It is not possible to state the conformity. Either one or more measured values were observed in the portion of the expanded measurement uncertainty intervals at the points tested where the specific risk is up to 50%."

**Sample Photo:**



SGS authenticate the photo on original report only

\*\*\* End of Report \*\*\*

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