



Test Report

No.T32520281302SC

Date: Apr 07, 2025

Page 1 of 14

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

1.5 VOLT MERCURY FREE ALKALINE ZINC MANGANESE BUTTON CELL BATTERY

Case No. : CA325202821969
Style/ Item No. : G13, G12, G11, G10, G9, G8, G7, G6, G5, G4, G3, G2, G1, LR44, LR44 (EXP), LR44 (HG PB), LR43, LR721, LR1130, LR936, LR920, LR754 / LR626 LR736, LR726, LR626, SR44, SR43, SR721, SR1130, SR936, SR1120, SR927, SR920, SR754, SR626, SR41, SR726, SR62, LR1120, LR927, LR41, LR621
Country of Origin : CHINA
Sample Receiving Date : MAR 18, 2025
Testing Period : MAR 18, 2025 – APR 01, 2025



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Page 2 of 14

Selected test(s) as requested by the client, please refer to test result page(s) for details:

Test Requested		Conclusion
1.	Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 – Lead, Cadmium and Mercury Content	PASS
2.	US Public Law 104-142 (1996) Title II – Mercury-Containing Battery Management Act – Mercury Content	PASS
3.	Mercury requirement in compliance with various USA States requirement	PASS
4.	European RoHS Directive 2015/863/EU amending Annex II to Directive 2011/65/EU – Certain hazardous substances	--
	1. Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls (PBB), Polybrominated diphenyl ethers (PBDE) Content	SEE RESULTS
	2. Phthalate Content	SEE RESULTS

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

Signed for and on behalf of
SGS Hong Kong Ltd.

Lam Chi Ho, Jacko
Senior Chemist



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Test Results:
1. Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 – Lead, Cadmium and Mercury 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) / Atomic Absorption Spectrometer (AAS) / Direct Mercury Analyzer (DMA)

For portable batteries:

Test Item(s)	Lead (Pb)	Cadmium (Cd)	Mercury (Hg)
MDL (%)	0.001	0.001	0.0001
Labeling Requirement (%)	> 0.004	--	--
Permissible Limit (%)	0.01	0.002 [#]	0.0005
Specimen Description	Result(s) (%)		
1. Button cell (LR41)	0.003	ND	ND

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

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- [#] = Not applicable to portable batteries and accumulators intended to use in emergency and alarm systems and medical equipments
- ^{##} = According to (EU) 2023/1542, the corresponding chemical symbol beneath the cross-out wheeled bin logo is required if the heavy metal content in batteries and accumulators exceeded the values specified under labeling requirements.



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2. US Public Law 104-142 (1996) Title II – Mercury-Containing Battery Management Act – Mercury Content

Method: Acid digestion

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Direct Mercury Analyzer (DMA)

For Alkaline Manganese Button Cell

Test Item(s)	Mercury (Hg)
MDL (mg/cell)	10
Permissible Limit (mg/cell)	25
Specimen Description	Result(s) (mg/cell)
1. Button cell (LR41)	ND

Note:

- mg/cell = milligram per cell
- ND = Not Detected (lower than MDL)

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- * Exceeds Permissible Limit



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3. Mercury Requirement in Compliance with Various USA States Requirement

Method: Acid digestion

Analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Direct Mercury Analyzer (DMA)

Test Item(s)	Mercury (Hg)
MDL (mg/kg)	1
Requirement (mg/kg)	Prohibited
Specimen Description	Result(s) (mg/kg)
1. Button cell (LR41)	ND

- Note:
- mg/kg = milligram per kilogram
 - ND = Not Detected (lower than MDL)
 - 1% = 10000 mg/kg = 10000 ppm

The below note(s) is(are) applicable in case the relevant superscript(s) and symbol(s) was(were) shown in the result table:

- * Do not meet requirement



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Region	Act/Regulation	Scope	Effective Date
Connecticut State	Public Act 06-181 (HB 5446, 2006)	Button cell batteries containing mercury	July 1, 2011
		Button cell batteries used in Medical device for delivering insulin	January 1, 2015
		Silver oxide button cell batteries	July 1, 2012
Maine State	Public Law, Chapter 86 (LD 1026, 124th Maine State Legislature)	Mercury-added button cell batteries: 1. Zinc- air button cell battery 2. Alkaline manganese button cell battery 3. Silver oxide button cell stamped with the designation SR357, SR 364, SR371, SR377, SR395, SR44W, SR621SW, SR626SW, SR920SW or SR927SW	January 1, 2012
		Mercury-added silver oxide button cell batteries	January 2, 2015
Rhode Island State	H 6396, Chapter 387 (2007)	Mercury-added button cell batteries	July 1, 2011
		Silver oxide button cell batteries	January 1, 2012
Ohio State	Chapter 3734: Solid and Hazardous Wastes RC § 3734. 64 "Sale of mercury- added novelty for promotional purposes"	Mercury-added novelty products intended mainly for personal or household enjoyment or adornment including but not limited to products intended for use as practical jokes, figurines, adornments, toys, games, cards, ornaments, yards statues and figures, candles, jewelry, holiday decorations, footwear, other items of apparel, or similar products	December 4, 2007
		Mercury-added novelty products containing removable button cell batteries	January 1, 2011



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4.1 EU Directive 2015/863/EU amending Annex II to Directive 2011/65/EU (RoHS, Previously 2002/95/EC) - Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls (PBB), Polybrominated diphenyl ethers (PBDE) Content

Method :

For Lead, Cadmium : With reference to IEC 62321-5:2013, analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES) / Atomic Absorption Spectrometer (AAS).

For Mercury : With reference to IEC 62321-4:2013+AMD1:2017, analysis was performed by Inductively Coupled Plasma Optical Emission Spectrometer (ICP-OES).

For PBB and PBDEs : With reference to IEC 62321-6:2015, analysis was performed by Gas Chromatography Mass Spectrometer (GC-MS)

For Chromium (VI) : With reference to IEC 62321-7-1:2015, analysis was performed by Ultraviolet Visible Spectrophotometer (UV-Vis)

Test Item(s)	Result (mg/kg)	MDL (mg/kg)	Reference Limit (mg/kg)
	1		
Lead (Pb)	30	2	1000
Cadmium(Cd)	ND	2	100
Mercury (Hg)	ND	2	1000
Hexavalent Chromium by spot test / boiling (Cr(VI)) water extraction	Negative	#	#
Sum of PBBs	ND	--	1000
Monobromobiphenyl	ND	5	--
Dibromobiphenyl	ND	5	--
Tribromobiphenyl	ND	5	--
Tetrabromobiphenyl	ND	5	--
Pentabromobiphenyl	ND	5	--
Hexabromobiphenyl	ND	5	--
Heptabromobiphenyl	ND	5	--
Octabromobiphenyl	ND	5	--
Nonabromobiphenyl	ND	5	--
Decabromobiphenyl	ND	5	--
Sum of PBDEs	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	--

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Specimen Description:

1. Button cell (LR41)

- Note:
- mg/kg = milligram per kilogram
 - MDL = Method Detection Limit
 - ND = Not Detected (lower than MDL)
 - .# = Negative means the absence of CrVI on the tested areas; Positive means the presence of CrVI on the tested areas. The detected CrVI concentration in the boiling-water-extraction solution is equal to or greater than 0.02 mg/kg with 50cm² sample surface area.
 - The maximum reference limit is quoted from the EU Directive 2015/863/EU amending Annex II to Directive 2011/65/EU.



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4.2) EU Directive 2015/863/EU amending Annex II to Directive 2011/65/EU (RoHS, Previously 2002/95/EC) - Phthalates Content

Method: With reference to IEC 62321-8:2017

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

Test Item(s)	CAS No.	Result(s) (mg/kg)	MDL (mg/kg)	Reference Limit (mg/kg)
Specimen No.	--	1		
Dibutyl Phthalate (DBP)	84-74-2	ND	50	1000
Benzylbutyl Phthalate (BBP)	85-68-7	ND	50	1000
Bis-(2-ethylhexyl) Phthalate (DEHP)	117-81-7	ND	50	1000
Diisobutyl phthalate (DIBP)	84-69-5	ND	50	1000

Specimen Description:

1. Button cell (LR41)

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



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Remark:

When statement of conformity is made, unless inherent in the requested specification, 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%.

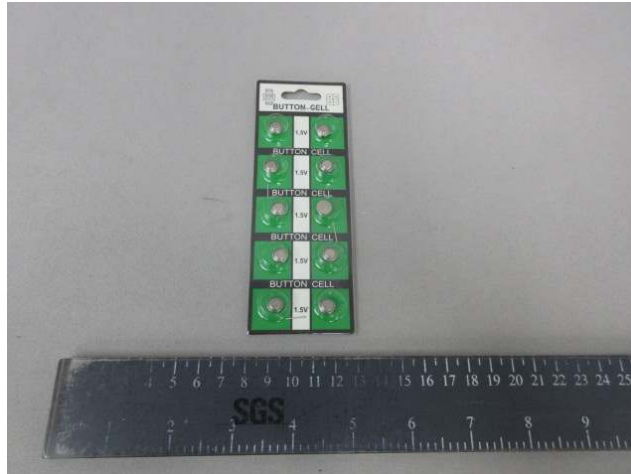
“Inconclusive – It is not possible to state the conformity. Either one or more measured values were observed in the portion of the expanded measurement uncertainty intervals at the points tested where the specific risk is up to 50%.”



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Sample Photo:

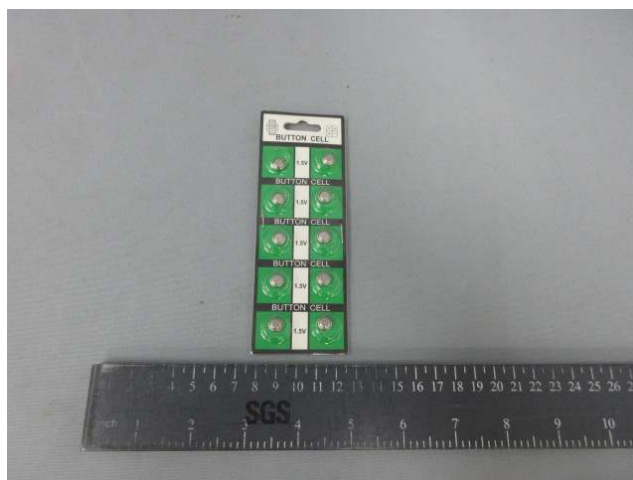
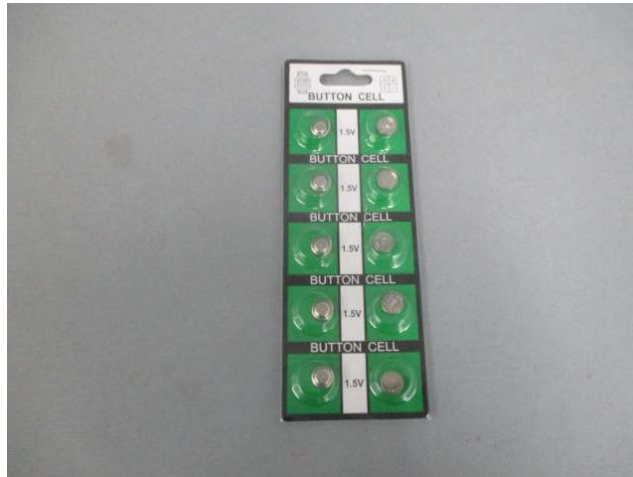


Received Sample



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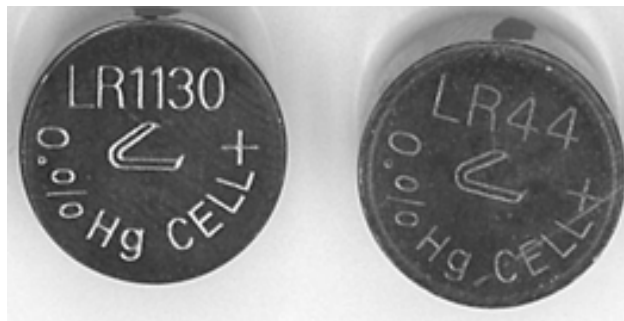


Photo provided by client

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