

REACH – tattoo industry shutdown 2022

consequences for manufacturers and importers

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Goal of the speech

- Show the real market situation,
- explain the main manufacturers problems to comply with REACH regulation,
- point out the risks resulting for importers,
- **summarize the problems and suggest solutions to avoid massive market distortion.**

current market situation

Tattoo

- only 2 brands with black inks REACH compliant
 - I AM INK (+ White)
 - Premier Products announced for December:
 - JUST INK, Sailor Jerry announced:
 - Panthera, Eternal, World Famous
- no colour tattoo inks today available announced for December:
 - Sailor Jerry, Just INK announced:
 - Eternal, World Famous

Permanent make-up

- less than 30% of inks on the market comply,
- only one company claims to have compliant inks with iron oxides.

manufacturer challenges

1. heavy metals:

- a) no pigments offered by pigment manufacturer that fulfill the requirements,
- b) critical concentration limits: As, Co, Pb
commercially market with maximum concentration of 10 ppm
- c) even the most purest iron oxides do not fully comply with the concentration limits, especially Co.

manufacturer challenges

2. Findings of contaminants listed in Annex II to Regulation (EC) No. 1223/2009 (cosmetic Regulation):
 - a) testing of raw materials now shows contaminations of substances above the limit of 0,5 ppm,
 - b) radiation of inks can form substances which are not present in the raw material,
 - c) inks can solve contaminants from the bottle (phthalates e.g.), increasing with storage time

manufacturer challenges

3. Substitution of pigment:

- a) no blue pigment available that is suitable for tattoo to replace pigment blue 15,
- b) CI 69800 (INCI), Pigment blue 60 (Indanthron) is getting dull and greyish violet if mixed with white -> not suitable
- c) inorganic blue pigments have higher concentrations of heavy metals, do not stay as required in the skin.

importer problems

- false information on labels,
- no analysis summary or analysis available for each batch,
- labels must be modified for each country, booklet labels are not allowed for basic information,
- MSDS files according to REACH for each country
- no risk assessment available if the product is classified harmful or not (label requirements)

Summary and conclusion

- not enough inks available on the market in January 2022,
- artist have mainly non compliant inks in stock and use,
- heavy metal limits need to be increased at least for As, Co, Pb to minimum 2 ppm better 4 ppm,
- the limit for contaminants listed in Annex II to (EC) 2009/1223 should be set temporary to 1.000 ppm, collected and evaluated by authorities within the next 2 years to modify regulation according to values technical achievable.



Questions?

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Thank you for your audience.

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