

REACH - key aspects discussed at WCTP 2021

Please see below the key aspects that were raised during the panel discussion “*REACH, where to go from here?*”

1. Ban of pigment Blue 15 and Green 7: It was pointed out, that a legal complaint could be raised towards the European Commission regarding the legitimacy of a ban of Pigment Blue 15 & Green 7 since they are explicitly banned in Annex II of the Cosmetics Directive only for hair dying. All parties interested in joining forces in such matters please contact the ESTP via info@cap-partner.eu
2. Concentration limits of other substances banned by the REACH restriction: Changes in the REACH restriction can only take place when the European Commission addresses the ECHA in this manner. The Commission might only do so if multiple countries raise concerns or report problems with this restriction. Therefore, the activation of member states and the corresponding ministries that are in charge of REACH legislations is crucial to stimulate toxicological sound levels taken from single-substance risk assessment for the ingredients and impurities. As pointed out by different speakers and participants, the ban of irritants such as isopropanol, the type 6 instead of type 1 assignment of tattoo inks in the Biocidal Product Regulation and impurities such as aldehydes and certain metals are disputed the most. Several members of the ESTP are already on their way to address these issues.
3. Join forces and connect the community of researchers and other stakeholders such as tattooist organizations for the future: A good connection is needed to exchange information and knowledge on an international level. The need for an organization of tattoo ink producers was pointed out as necessary to involve in future legislative procedures due to their higher financial power.

Although especially for point 3, the time was too limited to paint a path towards the future, the ESTP will engage and support these efforts. Any proposals for solutions are still welcome.