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## **WHAT CAN REALISTICALLY BE IMPLEMENTED AND FOLLOWED: THE GERMAN PERSPECTIVE**

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A regulation of tattoo inks is enforced in Germany since May 1, 2009. Based on the principles of resolution ResAP(2008)1 of the Council of Europe, the document provides negative lists of substances that are prohibited in tattoo inks, e.g., aromatic amines and pigments with known carcinogenic, mutagenic, reprotoxic or sensitizing properties. Furthermore, restrictions of the European Regulation 1223/2009 on cosmetic products are adopted. In comparison to the criteria laid down in ResAP(2008)1, the German regulation is not specifying maximum concentrations of PAHs and certain elements. Implementation of the document is followed by the federal surveillance program, which has reported deficiencies like incorrect labelling, use of forbidden pigments or excessive concentrations of preservatives on a regular basis. Taking into account the rising number of tattoo studios countrywide, more resources are urgently required to follow up on implementation of the existing legal requirements. Furthermore, it seems appropriate to consider proven adverse effects to a certain substance for a continuous amendment of the existing negative lists. Tattooing is a phenomenon with lifelong relevance for an increasing number of people, especially young adults. It is therefore important to systematically collect and evaluate data on health effects in close cooperation between physicians, surveillance agencies and risk assessors. With regard to the traceability of potential health effects as well as an important prerequisite for the choice of appropriate methods for tattoo removal, the customer should be informed in advance of the treatment by the responsible tattoo artist on the inks to be applied and their ingredients. Apart from such a step-by-step improvement of the existing regulation and its follow-up, further research, especially on biokinetics and chronic effects is urgently required as a basis for the reliable risk assessment of tattoo inks and the establishment of positive lists. Due to the legal consideration of tattooing as a procedure for beautification which does not justify animal testing, use of human data and *in vitro* methods needs to be taken forward wherever possible for generation of the missing data.