



**PAGANI
PENS**

prodir[®]

PIGRA

Pretec

Guarantee Letter and SVHC declaration

After consulting of the legal office of the European Commission, EWIMA (European Writing Instrument Manufacturer's Association) members like Pagani Pens follow the European legislation on chemicals (REACH), which stipulates mandatory use of SDS for mixtures / substances but not for articles. We are referring to art.31 of Regulation EC No 1907/2006 of the European parliament and of the council of 18 December 2006.

Tips are considered as articles, so that there isn't any obligation to issue SDS. Ink is a preparation, therefore there is the legal obligation to issue SDS. Refills and pens are considered articles with inside a mixture: in this case there is the obligation to issue SDS only for ink in compliance to CLP regulation 1272/2008 EC.

According to Article 33 of the REACH Regulation, suppliers of articles must inform their customers if the delivered article contains a substance from the REACH Candidate List (SVHC list) in contents > 0.1% by mass.

As per last update of SVHC list (15/01/2019) we hereby inform you that the tips for writing instruments made with copper alloy contain Lead (Pb) CAS: 7439-92-1 EINECS: 231-100-4, in a quantity > 0.1% by weight.

The inclusion of lead as SVHC on the candidate list triggers an information obligation in the supply chain.

However, it's important to point out that the EU Commission updated the Annex XVII of Regulation (EC) 1907/2006, entry 63 about Lead in April 2015. Due to their small dimension and considering that they do not get in direct contact with skin, tips for writing instruments were exempted from the field of application of the standard Regulation. **This means that tips are to be considered as NOT dangerous and NO authorization is needed.**

All the tips made by SS, all the plastic parts and inks:

- Do not contain over 0.1% of SVHC (substances of very high concern as defined by the European Regulation 1907/2006/EC Reach), according to the last updated list published by ECHA (15/01/2019).

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Prodir, Pigra and Pretec are brands
of Pagani Pens SA

P:

- Do not contain phthalates or other substances included in the Annex XVII of Reach Regulation “Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles”
- Do not contain substances included in the Annex XIV of Reach Regulation, according to the latest updated ECHA Authorization list

Pagani Pens SA
Fausto Conti
Regulatory Affairs Manager



Lamone
15/01/2019

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