

30.09.2013

Til Sundheds- og Forebyggelsesudvalget

I forbindelse med den bekendtgørelse der er på vej fra Miljøstyrelsens side, har Dansk Tatovør Laug indhentet en uvildig udtalelse fra Cand. Scient. Ole Olsen, Medico Chemical Lab, Vedbæk.

Hans udtalelse mener vi stiller et par vigtige spørgsmål - set fra Branchens synspunkt. Vi sender derfor videre til udvalget.

Derudover vil Lauget gerne henlede udvalgets opmærksomhed på nedenstående udtalelse fra CTL, Bielefeld - vel nok Europas førende indenfor analyse og sikkerhedsgodkendelse af tatoveringsfarver(<http://ctl-tattoo.net/News/index.php?o=79>):

2 August 2013

## Legislation in Denmark

The main problem with the new law is the risk assessment. This is based on the products but also on the purity of these. This means a full analysis for any impurities must be conducted in order to set up the risk assessment.

Although there are similarities with EU and German Laws, this part is completely different and will be quite expensive and time-consuming. Without this part in the law all would be no problem for the manufacturers.

A note on Denmark:

The population in Denmark is just over 1% of the total population of the EU.

The GDP is just below 2% of the GDP of the EU and under 10% of the GDP in Germany.

The majority of Tattoo Ink Manufacturers are global players, exporting to Europe, Asia, South America, Australia and the US and Canada. In this respect the Danish market is minute and it is questionable whether the global players are interested in such a small market.

A further question, which was also discussed at the meeting of the BVL in Germany in June 2013, is where can a manufacturer buy the required products in order to fulfil the requirements.

Another mishap of this law, besides not mentioning permanent make-up, are the missing analytical methods for the denoted limits. Without mentioning methods these limits are questionable. This is basic analytical chemistry knowledge.

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Dansk Tatovør Laug skal med henvisning til vores sidste henvendelse endnu engang anmode om at bekendtgørelsen i sin nuværende form bliver trukket tilbage.

Med venlig hilsen

Lars W.Kristensen, Smiling Tattoo

Formand, Dansk Tatovør Laug