

RESPONSE FROM NICNAS (National Industrial Chemicals Notification and Assessment Scheme)

Chemicals used in tattoo inks

Chemicals used in tattoo inks are classified as industrial chemicals. They are subject to the same requirements as any other industrial chemical under the *Industrial Chemicals (Notification and Assessment) Act 1989* (the Act).

If a chemical used in a tattoo ink is already listed on the Australian Inventory of Chemical Substances (AICS - see: <http://www.nicnas.gov.au/regulation-and-compliance/aics>), then in general the chemical is not subject to any intervention by NICNAS as it enters Australia.

However, if the chemical is not on the AICS - which means it is a 'new' chemical - the Act prescribes whether a pre-market assessment (as a 'new' chemical) is required.

Note: NICNAS assesses the impacts to human health, worker safety and the environment of 'new' industrial chemicals, including chemicals in formulations such as tattoo and other inks, and makes recommendations regarding their regulation. NICNAS does not test individual consumer products.

Persons who commercially import industrial chemicals into Australia (or manufacture them in Australia) need to be registered with NICNAS - but registration of an importer is unrelated to whether or not a chemical needs to be assessed.

A note about the role of NICNAS in chemical regulation in Australia

A range of state, territory and Commonwealth government agencies share responsibility for [chemical safety in Australia](#), with each chemical being regulated according to its use as a therapeutic good (e.g. medicine), veterinary medicine, pesticide, food additive or industrial chemical (which includes any chemical not falling into one of the other categories, such as tattoo inks).

[Industrial chemicals](#) include chemicals used in solvents, adhesives, plastics, paints, inks, fuels, or laboratory reagents, as well as in refrigeration, cosmetics and household cleaning.

The [National Industrial Chemicals Notification and Assessment Scheme](#) (NICNAS) helps to protect the Australian people and environment by detecting risks associated with manufacturing, importing or using industrial chemicals, and by maintaining a national standard for cosmetic products. NICNAS operates within the Australian Government Department of Health and Ageing and promotes the safe use of industrial chemicals by providing information and recommendations to other regulators, industry and to the public.

Any company or person proposing to introduce (import and/or manufacture) a [new industrial chemical](#), in Australia must notify NICNAS. Once NICNAS has assessed a chemical for its human health, worker safety and environmental risks, it publishes an [assessment report](#) that may include recommendations for further regulatory control of the chemical (such as by poisons scheduling, worker health and safety or environmental controls). NICNAS also issues a certificate or permit to the introducer, who must report any new information that becomes available about the chemical. Chemicals already in use in Australia are subject to review by NICNAS based on concerns raised.

After five years, NICNAS may authorise a chemical for wider use by listing it on the [Australian Inventory of Chemical Substances](#) (AICS), which currently includes about 40,000 industrial chemicals that may be used without notifying NICNAS. Many of these were listed without assessment when the scheme started, on the basis of their historical use, including a significant number of chemicals used in tattoo inks.

In July 2012, NICNAS started using the [Inventory Multi-tiered Assessment and Prioritisation](#) (IMAP) framework to review the risks of [3,000 chemicals](#) already listed on the AICS, which were

prioritised through a consultation process. Once an IMAP assessment is completed, NICNAS publishes an [IMAP assessment report](#) that may recommend further regulatory controls (as for new chemicals). Some chemicals used in tattoo inks are being assessed under the IMAP framework.

In summary, NICNAS aids in the protection of the Australian people and the environment by assessing the risks of industrial chemicals and providing information to promote their safe use.