

# Eastpoint Product Compliance Assessment

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Name:	<b>Pens</b>
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1. Mandatory Requirement	Directives and Regulations	Requirements	Help notes and explanation
General Product Safety Directive	2001/95/EC	Must comply	This directive ensures the safety of general products without sector specific legislation.
	<b>Evaluation and Test method</b>	<b>Requirements</b>	<b>Help notes and explanation</b>
	BS 7272-1: 2008 Writing and marking instruments. Specification for caps to reduce the risk of asphyxiation	Must comply where appropriate	Used to ensure pen caps are adequately ventilated to prevent asphyxiation if swallowed. Certain sizes of cap are exempt.
	BS 7272-2: 2008+A1: 2014 Writing and marking instruments. Specification for end closures to reduce the risk of asphyxiation	Must comply where appropriate	Used to ensure pen end closures are adequately ventilated to prevent asphyxiation if swallowed or secure enough to not be removed from pens. Certain designs of end closure are exempt.
	BS EN71-3: 2013 + A1: 2014 Safety of toys. Migration of certain elements	Must comply	All external skin contact areas must comply with EN71-3 which is a toy standard but used with pencils and graphic instruments. This standard should also be used with the pencil grips.
	Toxicological Risk Assessment (TRA)	Must be conducted	Must be conducted to EU restrictions on inks contained. The inks must be assessed for the hazards they present consumers when used as an ink in a pen.
REACH Annex XVII Entry 51 restriction of 6 phthalates	Must comply	To be used with PVC materials (i.e. wallet cases) only. A test report is usually supplied. Phthalates DEHP, DBP and BBP are not to be used as substances or in mixtures, in concentrations greater than 0.1% by weight of the plasticised material. Phthalates DINP, DIDP and DNOP are not to be used as substances or in mixtures, in concentrations greater than 0.1% by weight of the plasticised material, in toys and childcare articles which can be placed in the mouth by children.	
2. Mandatory Restrictions	Directives and Regulations	Requirements	Help notes and explanation
Classification, labelling and packaging of substances and mixtures	1272/2008	Must comply	Can be assessed within the TRA or must be done separately if no TRA available.
3. Mandatory Restrictions	Directives and Regulations	Requirements	Help notes and explanation
REACH SVHC's	EC1907/2006	Must comply – product, ink and packaging	Substances of Very High Concern (SVHC) - all products and packaging must comply with REACH. At the time of writing 163 SVHC's are restricted. A Declaration of Conformity is acceptable to demonstrate conformity to this restriction.
REACH Annex XVII	EC1907/2006	Must comply	Annex XVII lists specific product category restrictions the supplier

			should be able to define which ones are appropriate and supply suitable compliance evidence (in addition to the phthalates test above). A declaration is often used to confirm this.
REACH	EC1907/2006	Must comply	Importers must monitor the tonnage of imported ingredients. For pens this will be for the inks. Certain tonnages trigger obligations under REACH.
<b>4. Mandatory Restrictions</b>	<b>Directives and Regulations</b>	<b>Requirements</b>	<b>Help notes and explanation</b>
Packaging and Packaging Waste Directive	94/62/EC	Must comply	Restrictions on over packaging and the heavy metal content of packaging components. The heavy metal limits are the same for the USA "CONEG" packaging regulations.
	<b>Evaluation and Test method</b>	<b>Requirements</b>	<b>Help notes and explanation</b>
	PD CEN/TR 13695-2: 2004 Packaging. Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging, and their release into the environment. Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment	Must comply	
	PD CR 13695-1:2000 Packaging. Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment. Requirements for measuring and verifying the four heavy metals present in packaging	Must comply	
<b>5. Other issues</b>	<b>Requirements</b>	<b>Help notes and explanation</b>	
Technical Documentation	Held by Eastpoint	Test reports Packaging text and instructions	
<b>6. Labelling</b>	<b>Requirements</b>		
Minimum Labelling requirements (initial estimate)	<ul style="list-style-type: none"> <li>Name, identification address and trademark of Eastpoint – on product and packaging</li> <li>Manufacturers model identification or type reference – on product and packaging</li> <li>Country of origin – on product and packaging</li> <li>CLP related warnings if applicable</li> <li>Plastic bags – Warning! To avoid danger of suffocation keep this bag away from babies and young children</li> </ul>		

This compliance sheet is written with certain products in mind only as defined in the compliance sheet index. New products or significant changes in products may result in a need to review this sheet.

Suppliers must ensure that all products conform to the appropriate Eastpoint Policy documents. This list has been completed to the best of our ability and with due care but is only correct at the time of writing. Suppliers must ensure they remain familiar with all legislation relevant to their products and materials used and ensure they are using the latest version of all standards whatever the date quoted above. Where used all test certificates must be from an independent laboratory accredited to ISO17025 unless agreed otherwise.