

## **Classification of products for manual writing, drawing and painting as „article“ or „mixture“ - Contradictory statements in official guidance documents !**

EWIMA upholds its position from August 2007 (GE-03-2013, GE-08-2008, GE-10-2007):

**Writing instruments are considered as “articles”**  
(see attached technical information and table of products for details).

According to the European Regulation (EC) No.1907/2006 concerning “REACH”,

- Art. 3 (2) defines “**mixture**” as a mixture or solution composed of two or more substances.
- Art. 3 (3) defines “**article**” as an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.

**The legal text neither classifies writing, painting or drawing instruments as “articles” nor as “mixtures”.**

In May 2008, the European Chemicals Agency (ECHA) published several guidance documents in order to give advice to the parties concerned to fulfil the REACH obligations. These have been revised and updated in the past years.

The interpretation whether “pens” should be regarded as “articles” or as “mixtures” is highly contradictory in several guidance documents (current version):

*Guidance on requirements for substances in articles*<sup>1</sup> – version 4.0 June 2017:

- A wax crayon consists of paraffin wax and pigments and is used for colouring and drawing on paper. As its shape/surface/design are not more relevant for the function of the crayon (to bring pigment to paper) than its chemical composition, it is to be regarded as a **mixture**. (p 22)
- The examples should be applied to guide decisions on similar borderline cases, e.g. writing materials would (in analogy with the printer cartridge) be considered as combinations of an article (functioning as a container) and a **substance/mixture**. (p 70)

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<sup>1</sup> <https://echa.europa.eu/guidance-documents/guidance-on-reach>

*Guidance on information requirements and chemical safety assessment<sup>2</sup>*

- Chapter R.15: “Consumer Exposure Assessment” – version 3.0 June 2016:

- Oral B: The substance is contained in an **article** and migrates to the surface. Licking and sucking (e.g. by children) may promote leaching of the substance from the article matrix. This option [...] is applicable for example when a substance migrates from a pen, cutlery or textiles. (p 27)
- Table R.15-8 AC13: Plastic articles, **Article Subcategory**: Plastic, small articles (ball pen, mobile phone) (p 56)

- Chapter R.16: “Environmental Exposure Assessment” – version 3.0 February 2016:

The release is controlled by the user of the **article** (e.g. release of ink from a pen) and therefore dependent on use frequency and use time per event. The release is constant over the time of use to ensure its function. (p 167)

It is clearly stated in the guidance documents that the text of the REACH regulation is the only authentic legal reference and that the information in the guidance documents does not constitute legal advice. The ECHA does not accept any liability with regard to the contents of the guidance documents.

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<sup>2</sup> <https://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment>

## Technical properties of writing, painting and drawing instruments for hand-operated / manual use

Writing, painting or drawing instruments are specifically designed and intended for hand-operated (manual) precise writing or colouring. Due to ergonomic human requirements, the specific shape of pens has been developed in the course of time and improved permanently.

All parts of a writing instrument are specifically designed purely functional to achieve a precisely defined and constant transfer of the writing media (e.g. ink) at a miniscule rate that essentially dries instantly. Every single part of a writing instrument (e.g. writing media, capillary reservoir/ink feeder, tip) has to fit in with others in a technical manner that assures the performance.

It would be mistakenly inadequate with respect to the complex function of all parts involved to consider writing, painting or drawing instruments simply as “containers” for the writing media.

It is possible to enlarge the size of a container without losing its function to contain, store or transport the ink.

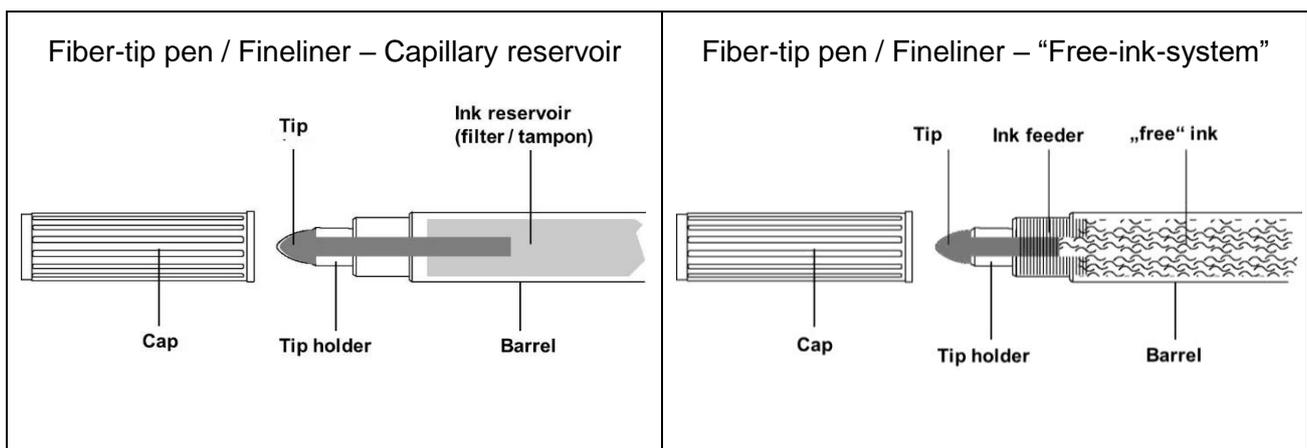
But the parts of a writing instrument incorporating the ink cannot be enlarged over a certain limit. A writing instrument will not function anymore for manual writing when the user cannot hold the writing instrument in his hand.

The function of writing instruments is determined primarily by the physical properties of the parts.

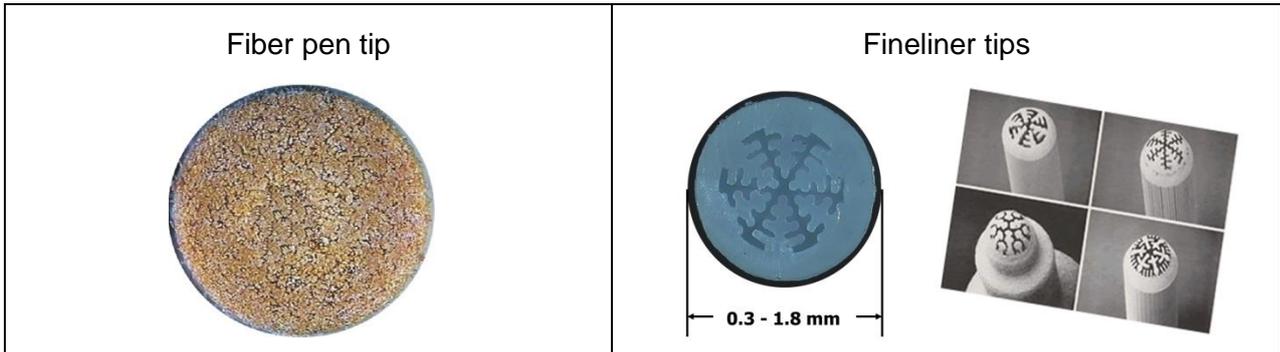
### Fiber-tip pens / fineliner and marking pens

The chemical composition influences the application of the ink, but not the function itself. When ink is dispensed, it becomes immediately incorporated with the substrate (e.g. paper, board) to become part of another article. There is never a time when the ink is used as a free chemical.

The transfer of ink from a fiber-tip pen for instance is closely related to capillary forces, increasing in a cascade from the capillary reservoir/ink reservoir to the tip and finally to paper or other suitable writing or painting carriers. Especially due to capillary forces, physically controlling the ink reservoir (filter/tampon), there is no release of ink if a pen is left cap-less in a horizontal or vertical position with the tip downwards.



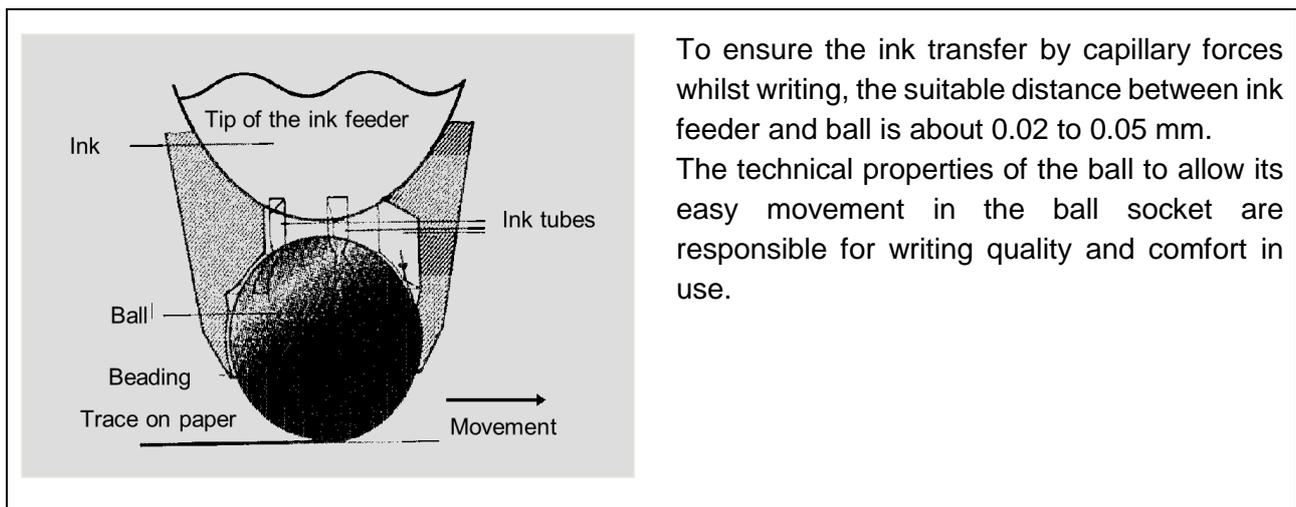
Writing instruments/marker pens designed without an ink reservoir use a complex ink feeder system combined with a tip to release a defined amount of ink on paper. A release of ink, e.g. by dropping or squirting or emitting to the environment does not take place.



Fiber-tip pens typically contain 1.5 to 2 ml ink (~ 20% of pen weight). This correlates with a writing length of about 500 m (trace on paper) and thus would lead to an **application of 4 µl per meter**. Marking pens typically contain 5 ml ink (~ 20% of pen weight). This correlates with a writing length of about 500 m (trace on paper) and thus would result in an **application of 10 µl per meter**.

**Ball point pens**

A small movable ball at the tip of the refill provides the transfer of ink from a ball point pen. Due to the movement of the ball on the writing surface, ink is transferred to the paper.



There is no release of ink, if a pen is left in a horizontal or vertical position with the tip downwards. A release of ink, e.g. by dropping or squirting or emitting to the environment is not possible. Refills typically contain 250-1000 mg ink. This correlates with a writing length from 2000 m - 10 000 m and thus would lead to an application of 0.1 to 0.13 mg/m.

The amount of ink transferred whilst writing manually in a correct manner on paper is not comparable with the amount of ink/paint applicated with a brush from a bottle or a container. The release of ink from a writing instrument to a significant extent is only likely with massive destructive force, which eliminates the function of a product.

### **Solid materials intended to leave a precise trace**

Solid materials intended to leave a trace (e.g. wax crayons, pencils) need to have a specific shape and design to be hand-held for correct function. Therefore solid materials as such, e.g. in form of granules, flakes or powder would not allow correct writing, painting or sketching. The shape of the solid material influences the function of these writing instruments to a greater degree than the chemical composition.

We would like to mention that writing, drawing and painting instruments are considered as “articles” with intended release of substances under normal or reasonably foreseeable conditions of use (Art. 7, (EC) 1907/2006). In contrast, products as e.g. liquid paints, are considered as “mixtures”. Please find enclosed the table “Classification of products for writing, drawing and painting as „article“ or „mixture“.

Manufacturers of the European Union operate globally. In other countries (e.g. US), “articles” are defined in the respective dangerous chemicals law. For years, writing, drawing and painting instruments have been in general considered as articles. This has never been disputed. Additionally, articles are consequently in the scope of the general consumer product legislation. Manufacturers are obliged to carry out risk assessments dedicated to their products.

## Classification of products for manual writing, drawing and painting as „article“ or „mixture“ (as defined by the European regulation (EC) 1907/2006 - REACH)

According to Art. 3 (EC 1907/2006, the “REACH-Regulation”)

- “**mixture**” means a mixture or solution composed of two or more substances;
- “**article**” means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.

	Definitely considered as „Article“		Definitely considered as „Mixture“
<b>Writing and drawing instruments</b>	Fiber-tip pens and fiber-tip refills (e.g. fineliner, marker, fiber-tip pens)	<b>Inks, paints</b>	Ink cartridges, ink in containers: Fountain pen ink cartridges, fountain pen ink in bottles Indian ink / China ink
	Ball-point pens and ball-point pen refills (e.g. ball-point pens, gel pens, roller ball pens)		Paint in bottles, containers, tubes, tins or tablets (e.g. finger paint, water colour, paint for use in play / didactical / creative / artistic use)
	Fountain pens		Modelling clay, modelling material, casting material for use in play / didactical / creative / artistic use
	Wood / Plastic cased pencils (e.g. black lead pencils, coloured pencils for use in play/ didactical / creative / artistic use), mechanical pencils and leads		
	Technical drawing instruments (e.g. technical pen)		
	Valve markers		
<b>Accessories</b>	Sharpener	<b>Accessories</b>	
	Eraser		
	Ruler, stencil		
	Compass		
	Correction tape		Correction fluid
	Glue tape		

This list does not claim to be exhaustive.

**ATTESTATION OF THE PRESENCE OF SUBSTANCES SVHC  
IN ARTICLES IN ACCORDANCE WITH REACH LEGISLATION (CE) No 1907/2006.**

On behalf of the company, Pilot Corporation of Europe we certify:

**Presence of substances SVHC in certain articles.**

None of the articles hereafter delivered currently to our client contain substances of very high concern (SVHC) as defined in the latest version of the « Candidate List » (17/01/2022 – 223 substances) compiled by the European Chemical Agency (ECHA)) in concentrated form in excess of 0,1%.

Mixtures or articles supplied to our client, which contain substances of very high concern (SVHC), are listed in the table here below:

EAN CODE	Article code	NAME	SVHC	CAS No
4902505130205	BL-G1-5T-B-FF	G-1 - ROLLER ENCRE GEL - NOIR - POINTE FINE	Lead	7439-92-1
4902505138225	BL-G1-5T-G-FF	G-1 - ROLLER ENCRE GEL - VERT - POINTE FINE	Lead	7439-92-1
4902505130212	BL-G1-5T-L-FF	G-1 - ROLLER ENCRE GEL - BLEU - POINTE FINE	Lead	7439-92-1
4902505130229	BL-G1-5T-R-FF	G-1 - ROLLER ENCRE GEL - ROUGE - POINTE FINE	Lead	7439-92-1
4902505130236	BL-G1-7T-B-FF	G-1 - ROLLER ENCRE GEL - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505156465	BL-G1-7T-G-FF	G-1 - ROLLER ENCRE GEL - VERT - POINTE MOYENNE	Lead	7439-92-1
4902505156342	BL-G1-7T-GD	G-1 - ROLLER ENCRE GEL - OR - POINTE MOYENNE	Lead	7439-92-1
4902505130243	BL-G1-7T-L-FF	G-1 - ROLLER ENCRE GEL - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505130250	BL-G1-7T-R-FF	G-1 - ROLLER ENCRE GEL - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505156359	BL-G1-7T-SI	G-1 - ROLLER ENCRE GEL - ARGENT - POINTE MOYENNE	Lead	7439-92-1
4902505209802	BLGP-G1-10-B	G-1 GRIP - ROLLER ENCRE GEL - NOIR - POINTE LARGE	Lead	7439-92-1
4902505201509	BLGP-G1-10-GD	G-1 GRIP - ROLLER ENCRE GEL - OR - POINTE LARGE	Lead	7439-92-1
4902505209826	BLGP-G1-10-L	G-1 GRIP - ROLLER ENCRE GEL - BLEU - POINTE LARGE	Lead	7439-92-1
4902505209819	BLGP-G1-10-R	G-1 GRIP - ROLLER ENCRE GEL - ROUGE - POINTE LARGE	Lead	7439-92-1
4902505201516	BLGP-G1-10-SI	G-1 GRIP - ROLLER ENCRE GEL - ARGENT - POINTE LARGE	Lead	7439-92-1



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EAN CODE	Article code	NAME	SVHC	CAS No
4902505158797	BLGP-G1-5-B-FF	G-1 GRIP - ROLLER ENCRE GEL - NOIR - POINTE FINE	Lead	7439-92-1
4902505158827	BLGP-G1-5-G-FF	G-1 GRIP - ROLLER ENCRE GEL - VERT - POINTE FINE	Lead	7439-92-1
4902505158810	BLGP-G1-5-L-FF	G-1 GRIP - ROLLER ENCRE GEL - BLEU - POINTE FINE	Lead	7439-92-1
4902505158803	BLGP-G1-5-R-FF	G-1 GRIP - ROLLER ENCRE GEL - ROUGE - POINTE FINE	Lead	7439-92-1
4902505158834	BLGP-G1-7-B-FF	G-1 GRIP - ROLLER ENCRE GEL - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505158865	BLGP-G1-7-G-FF	G-1 GRIP - ROLLER ENCRE GEL - VERT - POINTE MOYENNE	Lead	7439-92-1
4902505158858	BLGP-G1-7-L-FF	G-1 GRIP - ROLLER ENCRE GEL - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505158841	BLGP-G1-7-R-FF	G-1 GRIP - ROLLER ENCRE GEL - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505408847	BPCP-1SRM-WBBL-BL	COUPE - STYLO BILLE - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505408854	BPCP-1SRM-WBBL-RL	COUPE - STYLO BILLE - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505408861	BPCP1SRM-WBBL-WL	COUPE - STYLO BILLE - BLANC - POINTE MOYENNE	Lead	7439-92-1
4902505084560	BP-SF-B-E	BP-S - STYLO BILLE - NOIR - POINTE FINE	Lead	7439-92-1
4902505084591	BP-SF-G	BP-S - STYLO BILLE - VERT - POINTE FINE	Lead	7439-92-1
4902505084584	BP-SF-L-E	BP-S - STYLO BILLE - BLEU - POINTE FINE	Lead	7439-92-1
4902505084577	BP-SF-R	BP-S - STYLO BILLE - ROUGE - POINTE FINE	Lead	7439-92-1
4902505134630	BP-SF-V	BP-S - STYLO BILLE - VIOLET - POINTE FINE	Lead	7439-92-1
4902505142765	BPS-GP-F-B-E	BPS-GP - STYLO BILLE - NOIR - POINTE FINE	Lead	7439-92-1
4902505160752	BPS-GP-F-G	BPS-GP - STYLO BILLE - VERT - POINTE FINE	Lead	7439-92-1
4902505142789	BPS-GP-F-L-E	BPS-GP - STYLO BILLE - BLEU - POINTE FINE	Lead	7439-92-1
4902505142772	BPS-GP-F-R	BPS-GP - STYLO BILLE - ROUGE - POINTE FINE	Lead	7439-92-1
4902505142796	BPS-GP-M-B-E	BPS-GP - STYLO BILLE - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505160776	BPS-GP-M-G	BPS-GP - STYLO BILLE - VERT - POINTE MOYENNE	Lead	7439-92-1
4902505142819	BPS-GP-M-L-E	BPS-GP - STYLO BILLE - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505142802	BPS-GP-M-R	BPS-GP - STYLO BILLE - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505160523	BPS-GP-XB-B	BPS-GP - STYLO BILLE - NOIR - POINTE EXTRA LARGE	Lead	7439-92-1
4902505160554	BPS-GP-XB-G	BPS-GP - STYLO BILLE - VERT - POINTE EXTRA LARGE	Lead	7439-92-1
4902505160547	BPS-GP-XB-L	BPS-GP - STYLO BILLE - BLEU - POINTE EXTRA LARGE	Lead	7439-92-1
4902505160530	BPS-GP-XB-R	BPS-GP - STYLO BILLE - ROUGE - POINTE EXTRA LARGE	Lead	7439-92-1
4902505084621	BP-SM-B-E	BP-S - STYLO BILLE - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505084652	BP-SM-G	BP-S - STYLO BILLE - VERT - POINTE MOYENNE	Lead	7439-92-1
4902505084645	BP-SM-L	BP-S - STYLO BILLE - BLEU - POINTE MOYENNE	Lead	7439-92-1

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EAN CODE	Article code	NAME	SVHC	CAS No
4902505084638	BP-SM-R	BP-S - STYLO BILLE - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505111907	H-335	BIRDIE - PORTE-MINES - ARGENT - 0,5 MM	Lead	7439-92-1
4902505237713	H-415V-BT	VÉGA - PORTE-MINES - NOIR NÉON - 0,5 MM	Lead	7439-92-1
4902505237737	H-415V-LT	VÉGA - PORTE-MINES - BLEU NÉON - 0,5 MM	Lead	7439-92-1
4902505139314	BL-GC4-B	G-TEC-C4 - ROLLER ENCRE GEL - NOIR - POINTE EXTRA FINE	Lead	7439-92-1
4902505139345	BL-GC4-G	G-TEC-C4 - ROLLER ENCRE GEL - VERT - POINTE EXTRA FINE	Lead	7439-92-1
4902505139338	BL-GC4-L	G-TEC-C4 - ROLLER ENCRE GEL - BLEU - POINTE EXTRA FINE	Lead	7439-92-1
4902505139376	BL-GC4-LB	G-TEC-C4 - ROLLER ENCRE GEL - TURQUOISE - POINTE EXTRA FINE	Lead	7439-92-1
4902505139321	BL-GC4-R	G-TEC-C4 - ROLLER ENCRE GEL - ROUGE - POINTE EXTRA FINE	Lead	7439-92-1
4902505139369	BL-GC4-V	G-TEC-C4 - ROLLER ENCRE GEL - VIOLET - POINTE EXTRA FINE	Lead	7439-92-1
4902505466502	BL-GCM4-AO	MAICA - ROLLER ENCRE GEL - ABRICOT - POINTE EXTRA FINE	Lead	7439-92-1
4902505466458	BL-GCM4-B	MAICA - ROLLER ENCRE GEL - NOIR - POINTE EXTRA FINE	Lead	7439-92-1
4902505466557	BL-GCM4-BB	MAICA - ROLLER ENCRE GEL - BLEU MARINE - POINTE EXTRA FINE	Lead	7439-92-1
4902505466564	BL-GCM4-BN	MAICA - ROLLER ENCRE GEL - CHOCOLAT - POINTE EXTRA FINE	Lead	7439-92-1
4902505466526	BL-GCM4-BP	MAICA - ROLLER ENCRE GEL - ROSE CLAIR - POINTE EXTRA FINE	Lead	7439-92-1
4902505466496	BL-GCM4-G	MAICA - ROLLER ENCRE GEL - VERT - POINTE EXTRA FINE	Lead	7439-92-1
4902505466472	BL-GCM4-L	MAICA - ROLLER ENCRE GEL - BLEU - POINTE EXTRA FINE	Lead	7439-92-1
4902505466489	BL-GCM4-LB	MAICA - ROLLER ENCRE GEL - TURQUOISE - POINTE EXTRA FINE	Lead	7439-92-1
4902505466519	BL-GCM4-O	MAICA - ROLLER ENCRE GEL - ORANGE - POINTE EXTRA FINE	Lead	7439-92-1
4902505466533	BL-GCM4-P	MAICA - ROLLER ENCRE GEL - ROSE - POINTE EXTRA FINE	Lead	7439-92-1
4902505466465	BL-GCM4-R	MAICA - ROLLER ENCRE GEL - ROUGE - POINTE EXTRA FINE	Lead	7439-92-1
4902505466540	BL-GCM4-V	MAICA - ROLLER ENCRE GEL - VIOLET - POINTE EXTRA FINE	Lead	7439-92-1
4902505139277	BLS-GC4-B	RECHARGE BLS-GC - NOIR - POINTE EXTRA FINE	Lead	7439-92-1
4902505139291	BLS-GC4-L	RECHARGE BLS-GC - BLEU - POINTE EXTRA FINE	Lead	7439-92-1
4902505139284	BLS-GC4-R	RECHARGE BLS-GC - ROUGE - POINTE EXTRA FINE	Lead	7439-92-1
4902505325328	LHG-20C4-B-BG	G-TEC-C4 GRIP - ROLLER ENCRE GEL - NOIR - BEGREEN - POINTE EXTRA FINE	Lead	7439-92-1
4902505325335	LHG-20C4-L-BG	G-TEC-C4 GRIP - ROLLER ENCRE GEL - BLEU - BEGREEN - POINTE EXTRA FINE	Lead	7439-92-1

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EAN CODE	Article code	NAME	SVHC	CAS No
4902505183065	PM-UF-B	PHOTOGRAPHIC MARKER - MARQUEUR - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505244360	SCAN-UF-B	SCAN - MARQUEUR - NOIR - POINTE ULTRA FINE	Lead	7439-92-1
4902505244384	SCAN-UF-L	SCAN - MARQUEUR - BLEU - POINTE ULTRA FINE	Lead	7439-92-1
4902505244377	SCAN-UF-R	SCAN - MARQUEUR - ROUGE - POINTE ULTRA FINE	Lead	7439-92-1
4902505086304	SWN-DR-01-B	DRAWING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE EXTRA FINE	Lead	7439-92-1
4902505086403	SWN-DR-01-L	DRAWING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE EXTRA FINE	Lead	7439-92-1
4902505086359	SWN-DR-01-R	DRAWING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE EXTRA FINE	Lead	7439-92-1
4902505086311	SWN-DR-02-B	DRAWING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE FINE	Lead	7439-92-1
4902505086410	SWN-DR-02-L	DRAWING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE FINE	Lead	7439-92-1
4902505086366	SWN-DR-02-R	DRAWING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE FINE	Lead	7439-92-1
4902505086328	SWN-DR-03-B	DRAWING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505086427	SWN-DR-03-L	DRAWING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505086373	SWN-DR-03-R	DRAWING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE MOYENNE	Lead	7439-92-1
4902505086335	SWN-DR-05-B	DRAWING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE LARGE	Lead	7439-92-1
4902505086434	SWN-DR-05-L	DRAWING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE LARGE	Lead	7439-92-1
4902505086380	SWN-DR-05-R	DRAWING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE LARGE	Lead	7439-92-1
4902505086342	SWN-DR-08-B	DRAWING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE EXTRA LARGE	Lead	7439-92-1
4902505086441	SWN-DR-08-L	DRAWING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE EXTRA LARGE	Lead	7439-92-1
4902505086397	SWN-DR-08-R	DRAWING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE EXTRA LARGE	Lead	7439-92-1
4902505086489	SWN-DRL-10-B	LETTERING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE FINE	Lead	7439-92-1
4902505086540	SWN-DRL-10-L	LETTERING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE FINE	Lead	7439-92-1
4902505086519	SWN-DRL-10-R	LETTERING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE FINE	Lead	7439-92-1
4902505086496	SWN-DRL-20-B	LETTERING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE MOYENNE	Lead	7439-92-1
4902505086557	SWN-DRL-20-L	LETTERING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505086526	SWN-DRL-20-R	LETTERING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE MOYENNE	Lead	7439-92-1

## PILOT CORPORATION OF EUROPE

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 SIÈGE SOCIAL : PAE de la Caille - Saint-Martin-Bellevue - 74350 ALLONZIER-LA-CAILLE - FRANCE

EAN CODE	Article code	NAME	SVHC	CAS No
4902505086502	SWN-DRL-30-B	LETTERING PEN - FEUTRE D'ÉCRITURE - NOIR - POINTE LARGE	Lead	7439-92-1
4902505086564	SWN-DRL-30-L	LETTERING PEN - FEUTRE D'ÉCRITURE - BLEU - POINTE LARGE	Lead	7439-92-1
4902505086533	SWN-DRL-30-R	LETTERING PEN - FEUTRE D'ÉCRITURE - ROUGE - POINTE LARGE	Lead	7439-92-1
4902505462818	BLLFBK7-WB-SI-L	FRIXION BALL LX - ROLLER ENCRE GEL - ARGENT - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505462795	BLLFBK7-WB-L-L	FRIXION BALL LX - ROLLER ENCRE GEL - BLEU - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505462832	BLLFBK7-WB-BO-L	FRIXION BALL LX - ROLLER ENCRE GEL - BORDEAUX - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505462788	BLLFBK7-WB-B-L	FRIXION BALL LX - ROLLER ENCRE GEL - NOIR - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505462825	BLLFBK7-WB-GD-L	FRIXION BALL LX - ROLLER ENCRE GEL - OR - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505462801	BLLFBK7-WB-LG-L	FRIXION BALL LX - ROLLER ENCRE GEL - VERT CLAIR - BLEU - POINTE MOYENNE	Lead	7439-92-1
4902505111860	H-575-B	BIRDIE TWIN 2 EN 1 - PORTE-MINES & STYLO - ARGENT - 0,5 MM	Lead	7439-92-1

**Notification to the ECHA - European Chemical Agency - of the presence of substances SVHC in articles**

Our company has met its obligations and duly informed the ECHA of the presence of SVHC substances (importation) in certain products. (Level of substance present in excess of 0,1% weight / total weight and one ton per year)

Our company is not concerned by this obligation to inform the ECHA (PCE don't import more than 1 ton of lead per year).

Place: Allonzier La Caille

Date: 16/03/2022

Name: Yoshio WADA

Signature and company stamp:



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