

Verification Report

AP GROUP, LTD.

SPARTAKOVSKAYA STR., 88B, KAZAN, 420049 RUSSIAN FEDERATION (hereinafter APG)

Samples Description	Trade mark N.Y.S.E. Pigments for the production of permanent makeup products for eyebrows, lips, eyelids, areola and scarification.
Identified trade name	Trade mark N.Y.S.E. Pigments: #1 Honey; #2 Chili; #3 Olive; #4; #5; #6; #7; Sisi; Florida; Nigi; Naomi; Kissel; Belize; Orion; Kriss; Male; Zefir; Hysteric; Lava; Hate; Kelly; Raza; Purela; Retro; Joker; Aurora; Bad girl
Samples Form	Substances mixture.
Production Under Standards	TY-201224-01-42205928-2022 (Pigments for the production of permanent makeup products for tattoo) ¹ .
Verification Period	May 25, 2023 to August 1, 2023.
Verification Requested	With reference to REACH Regulation (EC) #1907/2006, CLP Regulation (EC) #1272/2008, CPR Regulation (EC) #1223/2009, Commission Regulation (EU)#2020/2081, its annexes and amendments.
Verification Method	Experts interviews; analytical routine.
Verification Results	Please refer to next page.

Based on the review of normative documents, expertise data and verification results of the submitted data, we certify that the APG produce mixtures which are defined as set forth in Article 3(2) of the REACH Regulation.

The analysis testifies that the APG does not utilize radio-active substances as well as included to the Candidate List or/and the Authorisation List of ECHA.

However, EU users of the APG products should pay attention to the new requirements of Annex XVII REACH regarding materials used for permanent makeup and tattoos. See Annex XVII REACH text extraction² on the substances and Table 2 column 'Recommendations for the REACH comply' here below.

Thus until EU import low 1 ton per year of substances on their own or in mixtures the APG does not have obligations to REACH register or to notify ECHA by itself or via an Only Representative as prescribed in the Article 7 and 23, REACH Regulation.

Signed for and
on behalf of
SPETSINTERPROJECT OY

Henrik Sjöblom
Managing Director



¹ - see Appendix #1 Specifications TY-201224-01-42205928-2022.

² - see Appendix #2 "Substances in tattoo inks and permanent make up".

Table 1. Identified chemicals in products of APG. Restricted or prohibited chemicals lists of EU.

№	EC#	CAS#	Name of substance	Product name	Harmonised classification chemicals	Cand.L.	An.XIV	An.XVII
1	215-277-5	1317-61-9	Triiron tetraoxide	N.Y.S.E. №3 Olive, №4, №5, №6, №7	not classified	no records	no records	no records
2	229-388-1	6505-28-8	2,2'-[(3,3'-dimethoxy[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[3-oxo-N-phenylbutyramide]	N.Y.S.E. Pigment Orange 16	not classified	no records	no records	no records
3	226-789-3	5468-75-7	2,2'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[N-(2-methylphenyl)-3-oxobutyramide]	N.Y.S.E. Pigment Yellow 14	not classified	no records	no records	no records
4	612-766-9	61932-63-6	2,9-Dichloro-5,12-dihydroquino[2,3-b]acridine-7,14-dione	N.Y.S.E. Florida, Nigi, Naomi, Kissel, Belize, Orion, Male, Zefir, Lava, Hate, Kelly, Raza, Purela, Avrora	not classified	no records	no records	no records
5	229-245-3	6448-95-9	3-hydroxy-4-[(2-methyl-5-nitrophenyl)azo]-N-phenylnaphthalene-2-carboxamide	N.Y.S.E. Purela	not classified	no records	no records	no records
6	228-768-4	6358-31-2	2-[(2-methoxy-4-nitrophenyl)azo]-N-(2-methoxyphenyl)-3-oxobutyramide	N.Y.S.E. Joker	not classified	no records	no records	no records
7	220-509-3	2786-76-7	4-[[4-(aminocarbonyl)phenyl]azo]-N-(2-ethoxyphenyl)-3-hydroxynaphthalene-2-carboxamide	N.Y.S.E. Sisi, Kriss	not classified	no records	no records	no records
8	263-272-1	61847-48-1	Methyl 4-[[[(2,5-dichlorophenyl)amino]carbonyl]-2-[[2-hydroxy-3-[[[(2-methoxyphenyl)amino]carbonyl]-1-naphthyl]azo]benzoate	N.Y.S.E. Orion, Raza, Retro, Joker	not classified	no records	no records	no records
9	602-733-7	122390-98-1	Pyrrolo[3,4-c]pyrrole-1,4-dione, 3,6-bis(4-chlorophenyl)-2,5-dihydro-	N.Y.S.E. Retro, Joker, Orion, Raza	not classified	no records	no records	no records
10	222-530-3	3520-72-7	4,4'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[2,4-dihydro-5-methyl-2-phenyl-3H-pyrazol-3-one]	N.Y.S.E. Florida, Nigi, Male, Lava, Hate, Retro, Joker, Avrora, Kelly	not classified	no records	no records	no records
11	229-419-9	6528-34-3	2-[(4-methoxy-2-nitrophenyl)azo]-N-(2-methoxyphenyl)-3-oxobutyramide	N.Y.S.E. Pigment Yellow 65	not classified	no records	no records	no records
12	416-250-2	84632-59-7	3,6-Bis-(4-tert-butyl-phenyl)-2,5-dihydro-pyrrolo[3,4-c]pyrrole-1,4-dione	N.Y.S.E. Pigment Orange 73	not classified	no records	no records	no records
13	221-424-4	3089-17-6	2,9-dichloro-5,12-dihydroquino[2,3-b]acridine-7,14-dione	N.Y.S.E. Sisi, Nigi, Belize, Kriss, Hysteric, Lava, Hate, Kelly, Raza, Avrora	not classified	no records	no records	no records
14	227-497-9	5858-81-1	Disodium 3-hydroxy-4-[(4-methyl-2-	N.Y.S.E. D + C Red 6	not classified	no records	no records	no records



№	EC#	CAS#	Name of substance	Product name	Harmonised classification chemicals	Cand.L.	An.XIV	An.XVII
			sulphonatophenyl)azo]-2-naphthoate					
15	226-109-5	1234-98-6	Calcium 3-hydroxy-4-[(4-methyl-2-sulphonatophenyl)azo]-2-naphthoate	N.Y.S.E. D + C Red 7	not classified	no records	no records	no records
16	240-005-7	15876-39-8	Dialuminium tris[2-(2,4,5,7-tetrabromo-6-oxido-3-oxoxanthen-9-yl)benzoate]	N.Y.S.E. Hysteric, Raza, Bad girl, Naomi, Joker, Kelly, Lava	not classified	no records	no records	no records
17	219-163-6	2379-74-0	6-chloro-2-(6-chloro-4-methyl-3-oxobenzo[b]thien-2(3H)-ylidene)-4-methylbenzo[b]thiophene-3(2H)-one	N.Y.S.E. Belize	not classified	no records	no records	no records
18	271-524-7	68583-95-9	Aluminium, 6-hydroxy-5-[(2-methoxy-5-methyl-4-sulfophenyl)azo]-2-naphthalenesulfonic acid complex	N.Y.S.E. Raza	not classified	no records	no records	no records
19	235-428-9	12225-21-7	Aluminium, 4,5-dihydro-5-oxo-1-(4-sulfophenyl)-4-[(4-sulfophenyl)azo]-1H-pyrazole-3-carboxylic acid complex	N.Y.S.E. FD+C Yellow No. 5 Aluminum Lake	not classified	no records	no records	no records
20	239-888-1	15790-07-5	Aluminium, 6-hydroxy-5-[(4-sulfophenyl)azo]-2-naphthalenesulfonic acid complex	N.Y.S.E. FD+C Yellow 6 Lake	not classified	no records	no records	no records
21	220-491-7	2783-94-0	Disodium 6-hydroxy-5-[(4-sulphonatophenyl)azo]naphthalene-2-sulphonate	N.Y.S.E. Sunset yellow/ Food Yellow 3	not classified	no records	no records	no records
22	215-160-9	1308-38-9	Chromium (III) oxide	N.Y.S.E. №3 Olive, №4	not classified	no records	no records	no records
23	601-657-1	12001-99-9	C.I. Pigment Green 18	N.Y.S.E. №3 Olive, №4	not classified	no records	no records	no records
24	243-746-4	20344-49-4	Iron hydroxide oxide	N.Y.S.E. №1 Honey, №2 Chili, №3 Olive, №4, №5, №6, №7	not classified	no records	no records	no records
25	215-609-9	1333-86-4	Carbon black	N.Y.S.E. №4, Kelly, Florida	not classified	no records	no records	no records
26	200-338-0	57-55-6	Propane-1,2-diol	N.Y.S.E. Sisi, Florida, Nigi, Naomi, Kissel, Belize, Orion, Kriss, Male, Zefir, Hysteric, Lava, Hate, Kelly, Raza, Purela, Retro, Joker, Avrora, Bad girl, №1 Honey, №2 Chili, №3 Olive, №4, №5, №6, №7	not classified	no records	no records	no records
27	200-289-5	56-81-5	Glycerol	N.Y.S.E. Sisi, Florida, Nigi, Naomi, Kissel, Belize, Orion, Kriss, Male, Zefir, Hysteric, Lava, Hate, Kelly, Raza, Purela, Retro, Joker, Avrora, Bad girl, №1 Honey, №2 Chili, №3 Olive, №4, №5, №6, №7	not classified	no records	no records	no records
28	208-534-8	532-32-1	Sodium benzoate	N.Y.S.E. Sisi, Florida, Nigi, Naomi,	not classified	no records	no records	no records



No	EC#	CAS#	Name of substance	Product name	Harmonised classification chemicals	Cand.L.	An.XIV	An.XVII
				Kissel, Belize, Orion, Kriss, Male, Zefir, Hysteric, Lava, Hate, Kelly, Raza, Purela, Retro, Joker, Avrora, Bad girl				
29	618-363-4	9003-39-8	2-Pyrrolidinone, 1-ethenyl-, homopolymer	N.Y.S.E. Sisi, Florida, Nigi, Naomi, Kissel, Belize, Orion, Kriss, Male, Zefir, Hysteric, Lava, Hate, Kelly, Raza, Purela, Retro, Joker, Avrora, Bad girl	not classified	no records	no records	no records
30	213-561-3	980-26-7	5,12-dihydro-2,9-dimethylquino[2,3-b]acridine-7,14-dione	N.Y.S.E. Florida, Nigi, Kissel, Zefir, Hysteric, Purela, Avrora	not classified	no records	no records	no records
31	215-168-2	1309-37-1	Diiron trioxide	N.Y.S.E. №2 Chili, №4, №5, №6, №7, Florida, Zefir, Kelly, Lava, Purela, Retro, Joker, Avrora, Kissel	not classified	no records	no records	no records
32	231-784-4	7727-43-7	Barium sulfate	N.Y.S.E. Sisi, Florida, Nigi, Naomi, Kissel, Belize, Orion, Kriss, Male, Zefir, Hysteric, Lava, Hate, Kelly, Raza, Purela, Retro, Joker, Avrora, Bad girl, №1 Honey, №2 Chili, №3 Olive	not classified	no records	no records	no records



Table 2. Identified chemicals in products of APG. Recommendations to suit with REACH EU.

No	EC#	Name of substance	Under evaluation	Annex II of Regulation (EC)#1223/2009	Annex IV of Regulation (EC)#1223/2009	Appendix 13 of Regulation (EU)#2020/2081	Recommendations for the REACH comply
1	215-277-5	Triiron tetraoxide	no	no records	no records	no records	
2	229-388-1	2,2'-[(3,3'-dimethoxy[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[3-oxo-N-phenylbutyramide]	no	banned from use	no records	concentration limit (by weight): 0,1%	The substance banned from use in any cosmetic products marketed for sale or use in the European Union
3	226-789-3	2,2'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[N-(2-methylphenyl)-3-oxobutyramide]	no	no records	no records	concentration limit (by weight): 0,1%	See requirements of the Cosmetic Products Regulation
4	612-766-9	2,9-Dichloro-5,12-dihydroquino[2,3-b]acridine-7,14-dione	no	no records	no records	concentration limit (by weight): 0,1%	See requirements of the Cosmetic Products Regulation
5	229-245-3	3-hydroxy-4-[(2-methyl-5-nitrophenyl)azo]-N-phenylnaphthalene-2-carboxamide	no	no records	no records	concentration limit (by weight): 0,1%	See requirements of the Cosmetic Products Regulation
6	228-768-4	2-[(2-methoxy-4-nitrophenyl)azo]-N-(2-methoxyphenyl)-3-oxobutyramide	Yes. Under assessment as PBT	no records	no records	concentration limit (by weight): 0,1%	This subs. should be carefully monitored to comply with new restrictions in the future. Also see requirements of the Cosmetic Products Regulation
7	220-509-3	4-[[4-(aminocarbonyl)phenyl]azo]-N-(2-ethoxyphenyl)-3-hydroxynaphthalene-2-carboxamide	no	no records	no records	no records	
8	263-272-1	Methyl 4-[[[(2,5-dichlorophenyl)amino]carbonyl]-2-[[[2-hydroxy-3-[[[2-methoxyphenyl)amino]carbonyl]-1-naphthyl]azo]benzoate	no	no records	no records	no records	
9	602-733-7	Pyrrolo[3,4-c]pyrrole-1,4-dione, 3,6-bis(4-chlorophenyl)-2,5-dihydro-	no	no records	no records	no records	
10	222-530-3	4,4'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)bis(azo)]bis[2,4-dihydro-5-methyl-2-phenyl-3H-pyrazol-3-one]	no	no records	no records	concentration limit (by weight): 0,1%	See requirements of the Cosmetic Products Regulation
11	229-419-9	2-[(4-methoxy-2-nitrophenyl)azo]-N-(2-methoxyphenyl)-3-oxobutyramide	Yes. Under assessment as PBT	no records	no records	concentration limit (by weight): 0,1%	This subs. should be carefully monitored to comply with new restrictions in the future. Also see requirements of the Cosmetic Products Regulation
12	416-250-2	3,6-Bis-(4-tert-butyl-phenyl)-2,5-dihydro-pyrrolo[3,4-c]pyrrole-1,4-dione	Yes. Under assessment as PBT	no records	no records	no records	This subs. should be carefully monitored to comply with new restrictions in the future



No	EC#	Name of substance	Under evaluation	Annex II of Regulation (EC)#1223/2009	Annex IV of Regulation (EC)#1223/2009	Appendix 13 of Regulation (EU)#2020/2081	Recommendations for the REACH comply
13	221-424-4	2,9-dichloro-5,12-dihydroquino[2,3-b]acridine-7,14-dione	yes	no records	no records	no records	
14	227-497-9	Disodium 3-hydroxy-4-[(4-methyl-2-sulphonatophenyl)azo]-2-naphthoate	no	no records	purity criteria as set out in Directive 95/45/EC (E 180)	no records	See requirements of the Cosmetic Products Regulation and Directive #95/45/EC ³
15	226-109-5	Calcium 3-hydroxy-4-[(4-methyl-2-sulphonatophenyl)azo]-2-naphthoate	yes	no records	purity criteria as set out in Directive 95/45/EC (E 180)	no records	See requirements of the Cosmetic Products Regulation and Directive #95/45/EC ³
16	240-005-7	Dialuminium tris[2-(2,4,5,7-tetrabromo-6-oxido-3-oxoxanthene-9-yl)benzoate]	no	banned from use in hair dye products	no records	no records	The substance banned from use in tattoo inks or permanent make-up in concentration more than 0,00005% by weight in the European Union ⁴
17	219-163-6	6-chloro-2-(6-chloro-4-methyl-3-oxobenzo[b]thien-2(3H)-ylidene)-4-methylbenzo[b]thiophene-3(2H)-one	no	banned from use in hair dye products	colorant	no records	The substance banned from use in tattoo inks or permanent make-up in concentration more than 0,00005% by weight in the European Union ⁴
18	271-524-7	Aluminium, 6-hydroxy-5-[(2-methoxy-5-methyl-4-sulfophenyl)azo]-2-naphthalenesulfonic acid complex	no	no records	no records	no records	
19	235-428-9	Aluminium, 4,5-dihydro-5-oxo-1-(4-sulfophenyl)-4-[(4-sulfophenyl)azo]-1H-pyrazole-3-carboxylic acid complex	no	no records	no records	no records	
20	239-888-1	Aluminium, 6-hydroxy-5-[(4-sulfophenyl)azo]-2-naphthalenesulfonic acid complex	no	no records	no records	no records	
21	220-491-7	Disodium 6-hydroxy-5-[(4-sulphonatophenyl)azo]naphthalene-2-	no	no records	purity criteria as set out in Directive	no records	See requirements of the Cosmetic Products Regulation and Directive #95/45/EC ³

³ - See Commission Directive #95/45/EC (E 180): CI Pigment Red 57, Rubinpigment, Carmine 6B; Purity: Subsidiary colouring matters - Not more than 0,5 %; Organic compounds other than colouring matters: 2-Amino-5-methylbenzenesulfonic acid, calcium salt - Not more than 0,2 %; 3-hydroxy-2-naphthalenecarboxylic acid, calcium salt - Not more than 0,4 %; Unsulfonated primary aromatic amines - Not more than 0,01 % (expressed as aniline); Ether extractable matter - From a solution of pH 7, not more than 0,2 %; Arsenic - Not more than 3 mg/kg; Lead - Not more than 10 mg/kg; Mercury - Not more than 1 mg/kg; Cadmium - Not more than 1 mg/kg; Heavy metals (as Pb) - Not more than 40 mg/kg.

⁴ - See Commission Regulation (EU) #2020/2081 Annex, point 1 Shall not be placed on the market in mixtures for use for tattooing purposes, and mixtures containing any such substances shall not be used for tattooing purposes, after 4 January 2022 if the substance or substances in question is or are present in the following circumstances; condition (e) in the case of a substance listed in Annex II to Regulation (EC) No 1223/2009, the substance is present in the mixture in a concentration equal to or greater than 0,00005 % by weight.



No	EC#	Name of substance	Under evaluation	Annex II of Regulation (EC)#1223/2009	Annex IV of Regulation (EC)#1223/2009	Appendix 13 of Regulation (EU)#2020/2081	Recommendations for the REACH comply
		sulphonate			95/45/EC (E 180)		
22	215-160-9	Chromium (III) oxide	yes	no records	shall be free from chromate ion	no records	See requirements of the Cosmetic Products Regulation ⁵
23	601-657-1	C.I. Pigment Green 18	no	no records	shall be free from chromate ion	no records	See requirements of the Cosmetic Products Regulation ⁵
24	243-746-4	Iron hydroxide oxide	no	no records	no records	no records	
25	215-609-9	Carbon black	yes	no records	see below link #6	no records	See requirements of the Cosmetic Products Regulation ⁶
26	200-338-0	Propane-1,2-diol	yes	no records	no records	no records	
27	200-289-5	Glycerol	yes	no records	no records	no records	
28	208-534-8	Sodium benzoate	yes	no records	no records	no records	See requirements of the Cosmetic Products Regulation
29	618-363-4	2-Pyrrolidinone, 1-ethenyl-, homopolymer	no	no records	no records	no records	
30	213-561-3	5,12-dihydro-2,9-dimethylquino[2,3-b]acridine-7,14-dione	yes	no records	rinse-off products. colorant	no records	The substance banned from use in tattoo and permanent make-up cosmetic products in concentration more than 0,00005% by weight in the European Union ⁴
31	215-168-2	Diiron trioxide	no	no records	purity criteria as set out in Directive 95/45/EC (E 172)	no records	See requirements of the Cosmetic Products Regulation and Directive #95/45/EC ⁷
32	231-784-4	Barium sulfate	no	no records	no records	no records	

⁵ - See Commission Regulation (EU) #2020/2081 Annex, point 1 Shall not be placed on the market in mixtures for use for tattooing purposes, and mixtures containing any such substances shall not be used for tattooing purposes, after 4 January 2022 if the substance or substances in question is or are present in the following circumstances; condition (g) in the case of a substance for which a condition is specified in column h (Maximum concentration in ready for use preparation) or column i (Other) of the table in Annex IV to Regulation (EC) No 1223/2009, the substance is present in the mixture in a concentration, or in some other way, that does not accord with the condition specified in that column.

⁶ - See Regulation #1223/2009/EC on Cosmetic Products, Annex IV - Allowed Colorants: Purity > 97 %, with the following impurity profile: Ash content ≤ 0.15 %, total sulphur ≤ 0.65 %, total PAH ≤ 500 ppb and benzo(a)pyrene ≤ 5 ppb, dibenz(a,h)anthracene ≤ 5 ppb, total As ≤ 3 ppm, total Pb ≤ 10 ppm, total Hg ≤ 1 ppm. If nano: Not to be used in applications that may lead to exposure of the end user's lungs by inhalation; Only nanomaterials having the following characteristics are allowed: Purity > 97 %, with the following impurity profile: Ash content ≤ 0.15 %, total sulphur ≤ 0.65 %, total PAH ≤ 500 ppb and benzo(a)pyrene ≤ 5 ppb, dibenz(a,h)anthracene ≤ 5 ppb, total As ≤ 3 ppm, total Pb ≤ 10 ppm, and total Hg ≤ 1 ppm; Primary particle size ≥ 20 nm. Max concentration limit (by weight): 10%.

⁷ - See Commission Directive #95/45/EC (E 172): CI Pigment Red 101 and 102; Purity (by total dissolution) Water soluble matter - Not more than 1,0 %; Arsenic - Not more than 5 mg/kg; Barium - Not more than 50 mg/kg; Cadmium - Not more than 5 mg/kg; Chromium - Not more than 100 mg/kg; Copper - Not more than 50 mg/kg; Lead - Not more than 20 mg/kg; Mercury - Not more than 1 mg/kg; Nickel - Not more than 200 mg/kg; Zinc - Not more than 100 mg/kg.

