The German Ecolabel

# BLUE ANGEL

# Writing Utensils and Stamps

## DE-UZ 200

**Basic Award Criteria**

**Edition January 2026**

**Version 1**

**The Environmental Label is supported by the following four institutions:**

Federal Ministry
for the Environment, Climate Action,
Nature Conservation and Nuclear Safety

The Federal Ministry for the Environment is the owner of the label, defines the fundamental guidelines for the award of the Blue Angel ecolabel and appoints the Environmental Label Jury.

Umwelt Bundesamt

The German Environment Agency with its specialist department for "Ecodesign, Eco-Labelling and Environmentally friendly Procurement" acts as the office of the Blue Angel ecolabel. It develops the technical criteria including the required compliance verifications in cooperation with relevant interest groups.

Jury Umweltzeichen

The Environmental Label Jury is the independent, decision-making body for the Blue Angel and includes representatives from environmental and consumer associations, trade unions, industry, the trade, crafts, local authorities, academia, churches, young people and the German federal states.

RAL gGmbH

RAL gGmbH is the awarding body for the environmental label. It examines the applications submitted by companies for the use of the Blue Angel ecolabel and concludes the "Contracts on the Use of the Environmental Label". It also monitors correct use of the ecolabel.

Please use the following format when adding citations:
German Environment Agency (20xy): Blue Angel ecolabel – Title of the Basic Award Criteria (DE-UZ xy). Edition January or July 20xy, Version xy. RAL gGmbH (Publisher). Bonn. Available online at: www.blauer-engel.de/uzxy (accessed on x/y/20xy).

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Version 1 (01/2026): New edition, term of validity until 31/12/2030

## Table of contents

**This document is a translation of a German original. In case of dispute, the original document should be taken as authoritative.**

# 1 Introduction

## 1.1 Preface

In cooperation with the Federal Ministry for the Environment, the German Environment Agency and considering the results of hearings held with relevant interest groups conducted by RAL gGmbH, the Environmental Label Jury has set up these criteria for the award of the ecolabel (Basic Award Criteria). RAL gGmbH has been tasked with awarding the ecolabel.
Upon application to RAL gGmbH and on the basis of a Contract on the Use of the Environmental Label to be concluded with RAL gGmbH, the permission to use the ecolabel may be granted to all products, provided that they comply with the requirements as specified hereinafter. The product must comply with all the legal requirements in the country in which it is to be marketed. The applicant shall declare that the product meets these conditions.

## 1.2 Background

The term "writing utensils" covers a wide range of different products that are used in office workplaces, in a school setting or in similar fields of activity. Many products such as ballpoint pens or lead pencils are used every day. In addition, there are writing utensils that are primarily intended for use in artistic fields. Writing utensils are thus a regular part of everyday life for many people.
In 2023, there were more than 300 million ballpoint pens, 400 million felt pens and 250 million lead pencils and indelible pencils produced in Germany alone. Around 330 million ballpoint pens, 177 million felt-tip pens and markers, 100 million wood-encased lead pencils and 5 million retractable lead pencils were consumed in Germany in 2023 (Destatis 2025a/b).
Products should be designed in the most resource-efficient way possible. This applies especially to everyday items that are produced in large quantities and have a relatively short service life, such as writing utensils and stamps. Selecting the right materials can make a valuable contribution in this context.
One option is to use recycled materials. Preference should be given here to the use of so-called post-consumer waste from private households, agriculture, trade and industry. This post-consumer waste accounts for by far the greatest proportion of all waste but only a small portion of it has been recycled up to now. From an ecological perspective, high-quality recycling according to the type of material is usually superior to all other forms of recycling and demand for these post-consumer recycled materials should be supported.
Another way of conserving resources is to use materials based on renewable raw materials such as wood, paper or bio-based plastics. In this context, however, it is important to take into account any conflicting goals related to other environmental aspects (e.g. sustainable management, land utilization, use of fertilizers) and also to social impacts so that the materials produced from renewable raw materials are also sustainable raw materials. It is also crucial to note when seeking to verify the origin of bio-based plastics that the existing process and plant technology for bio-based plastics (especially drop-in plastics) does not allow the origin to be traced in many cases when using the "Segregation", "identity Preserved" or "Controlled Blending" approaches. An interim solution that currently exists is the possibility of verifying sustainable cultivation using the mass balance of raw materials. Although it is possible to theoretically calculate the proportion of bio-based materials in the end product, it does not necessarily mean that they are physically present in the product. Where bio-based plastics are used, it would be desirable in future if the requirements also referred to the actual proportion of bio-based materials in the writing

utensil/stamp. The next revision of the Basic Award Criteria will examine whether the mass balance method can also be used as a CoC model for bio-based plastics.
Other important prerequisites for the responsible use of resources are the extension of the service life of the products, e.g. using refill systems, as well as the use of packaging that produces as little waste as possible. It is not only the quantity of waste that is important but also the qualitative composition of the packaging materials. To facilitate the recycling of packaging, companies should avoid using a mix of materials or composite materials.
From a consumer protection perspective, it is also important that writing utensils and stamps, as well as the respective writing and stamping media, are free of hazardous ingredients as far as possible. If the use of certain substances is unavoidable in order to ensure the fitness for use of the writing utensils and stamps, the use of these substances should be minimised.

### 1.3 Objectives of the Environmental Label

The Blue Angel ecolabel for writing utensils and stamps may be awarded to products with the following environmental properties:

- use of resource-conserving materials for the product and packaging
- measures to extend the service life
- a reduction or avoidance of harmful substances and mixtures in the product

Therefore, the following benefits for the environment and health are stated in the explanatory box:


### 1.4 Definitions

For the purpose of their use in these Basic Award Criteria, the following definitions are valid; a supplementary description of the different types of writing utensils can be found in Appendix B, sorted by the type of application mechanism:

**Substances of very high concern:** Substances of very high concern are all substances that have been included in the list of candidates in Annex XIV to the REACH Regulation.[1]
**Bio-circular plastics:** Plastics derived from waste and residues of biological origin. Examples include used cooking oil, tall oil and food waste.[2]

[1] List of candidates from the REACH Regulation (EC) No. 1907/2006: https://chem.echa.europa.eu/obligation-lists/candidateList.
[2] Based on the definition of bio-circular materials in https://www.iscc-system.org/certification/iscc-certification-schemes/iscc-plus/.

**Bio-based plastics:** Bio-based plastics are plastics that are wholly or partly made from biomass (renewable raw materials). These bio-based plastics can be biodegradable or permanently non-biodegradable plastics.[3]

**Lead pencil:** A lead pencil is a writing and drawing utensil with a lead made of graphite and clay that is encased in wood (=wood-encased lead pencil) or held in a plastic or metal barrel and extended using an advancing mechanism (=retractable lead pencil).

Blister pack: Packaging made of cardboard with a viewing window or a moulded part made of plastic (DIN EN 643:2014-11).

**Coloured pencil:** A coloured pencil is a writing utensil with a lead made of pigment and binders encased in wood.

**Retractable lead pencil:** A retractable lead pencil is a mechanical pencil with a replaceable lead made of graphite and clay that is held in a plastic or metal barrel and extended using an advancing mechanism.

**Fibre-tip colouring pen:** Fibre-tip colouring pens (also known as felt-tip colouring pens) are pens that apply the ink via a non-encased fibre tip. Fibre-tip colouring pens mainly comprise a casing (barrel and cap) and the tip including a tip setting that holds it in the barrel. The ink is stored in an ink reservoir or directly in the barrel. They are different to fibre-tip pens and markers.

**Fibre-tip pen:** A fibre-tip pen has a rounded tip with a diameter <3 mm.

**Fineliner:** Fineliners are pens with a tip made of extruded plastic threads (usually polyacetal) whose delicate ink ducts transport the ink. The tip on a fineliner normally has a smaller diameter that the tip on a fibre-tip colouring pen. Fineliner tips have a casing made of plastic or metal. Fineliners are primarily used for writing and drawing thin lines on paper (e.g. to produce sketches or detailed drawings).

**Marker:** A marker is a writing or drawing utensil with a fibre tip (round tip or chisel tip) that transports ink from an ink reservoir to the writing surface and usually has a diameter ≥3mm. Various type of markers are available (including text markers, permanent markers, whiteboard markers, paint markers and special markers) and are designed to fulfil special applications such as highlighting, permanent marking or artistic design.

**Fountain pen:** A fountain pen is a writing utensil that writes using ink from a refillable or replaceable ink reservoir. The ink is applied to the paper in a controlled manner via the nib.

**Gel pen (also known as a gel roller):** A writing utensil whose gel-like ink (water-based) flows easier than the ink in a ballpoint pen but is still insoluble in water. The technical design is similar to that used for ballpoint pens.

**Mixture:** Mix, mixture or solution composed of two or more substances. Possible examples in these Basic Award Criteria include: inks and gels, colour or graphite leads, pre-formulated pigment pastes, etc.[4]

**Wood-encased pencil:** A wood-encased pencil contains a lead encased in a wooden barrel (e.g. lead pencils and coloured pencils).

**Cap:** A carrying part that comes into contact with the skin. It is used to seal, for example, fibre-tip pens or markers.

**Ballpoint pen (also retractable ballpoint pen):** A writing utensil that applies a thick, insoluble, oil-based writing paste onto the surface via a rotating ball in the tip of the nib.

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[3] Based on the definition of bio-based products in DIN EN16575:2014.

[4] See REACH Regulation, Article 3, and CLP Regulation, Article 2.

**Paint pen / paint marker / painter:** Paint pens are suitable for permanent, weather-proof writing, drawing and marking on almost all materials. Due to their high coverage, the solvent-based pigment ink is used especially on dark, transparent or smooth materials. Paint pens are primarily designed for private use (hobby, greeting cards, etc.) but can also be used in industry and warehouses (marking dark surfaces).
Paint pens use pigment ink with a lacquer-like finish and a high coverage that is waterproof, abrasion-resistant and heat-resistant. The ink sticks to smooth surfaces such as glass, metal or plastic and is ideal for industrial applications and creative projects.
**Refill:** A unit used to restore the function of a writing utensil/stamp. This includes, for example, refills/leads for ballpoint pens or pencils as well as liquid writing media in cartridges, bottles or dishes as well as ink pads.
It does not include other protective packaging for sale in the retail trade (grouped packaging).
**Permanent marker:** Permanent markers use a waterproof, solvent-based ink that sticks to almost all surfaces and cannot be wiped off. They stand out due to their high coverage and resistance to abrasion and the weather.
**Paint brush:** A paint brush is a utensil used for absorbing and transferring paints and varnishes. Paint brushes designed for use in the fine arts usually comprise a bristle and hair part (bristles), a metal band (ferrule) and the handle.
**Post-consumer material:** Material generated by households or by commercial and industrial facilities in their role as end users of the goods or service which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.[5]
**Barrel:** A carrying part of a writing utensil that forms the shape of the pen and comes into direct contact with the skin. Writing utensils whose outer material is the writing medium itself (such as e.g. some lead pencils or many chalks) are called "non-encased".
**Writing or stamping medium:** A solid, liquid or paste-like mixture containing a colourant that is applied by the writing utensil or stamp to the surface to be written on or to be stamped.
**Writing utensil:** A utensil whose main function is to write, paint, draw and mark on different surfaces. Possible surfaces include writing paper, boards, whiteboards, flipcharts, etc. They are generally designed in the shape of a "pen".
**Stamp:** A hand-operated device whose main function is to transfer a stamp imprint onto different surfaces such as paper. A built-in or separate ink pad (self-inking or manual stamping technology) or a text plate with an integrated storage function (pre-ink technology) serve as a reservoir for the stamping ink.
**Stamp frame:** The upper, movable, carrying part of a stamp (excluding possible accessories, such as an index window, separate handle parts, lock, decorative parts, etc.) that serves the main function of the product and generates, by its vertical offset a stamp imprint on a surface, e.g. paper.
**Stamp casing:** The lower, carrying part of a stamp. It mechanically controls the frame of the stamp and ensures the proper positioning of the imprint on the surface (excluding possible accessories, such as a positioning window, anti-slip control, etc.).
**Ink pad casing:** The outer casing of external ink pads that protects the ink pad from contamination and drying out.

[5] Based on DIN EN 14021.

**Substance:** A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.[4]
**Highlighter:** A highlighter is a writing utensil with a water-based ink that is specially designed to highlight passages of text and comes under the category of markers. It stands out due to its bright colours and anti-bleed properties that stop the ink bleeding through the paper and is often equipped with a chisel or dual tip for precise highlighting.
**Rollerball pen (also known as ink roller pen):** A writing utensil that applies a thin, water-based ink via a writing ball.
**Grouped packaging:** Packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale, irrespective of whether that grouping of sales units is sold as such to the end user or whether it serves as a means to facilitate the restocking of shelves at the point of sale or to create a stock-keeping or distribution unit, and which can be removed from the product without affecting its characteristics.[6]
**Sales packaging:** Packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale.[7]
**Impurity:** An unintended constituent present in a substance as manufactured. It may originate from the starting materials or be the result of secondary or incomplete reactions during the manufacturing process. While it is present in the final substance or mixture, it was not intentionally added.[8]
**Whiteboard marker:** A writing utensil for smooth surfaces such as whiteboards. It stands out due to its quick drying ink that can be wiped off without leaving any residue.

## 2 Scope

These Basic Award Criteria apply to all writing utensils and stamps designed for writing, drawing, painting and marking that are intended for use in offices, schools or the home environment on various different types of surfaces, including refill systems for the writing utensils and stamps. The scope of this ecolabel also covers paintbrushes for use in schools or for hobby or professional painters.
The writing utensils must have the shape of a pen or pencil.[9]

Products covered by the scope of these Basic Award Criteria include (non-exhaustive list):
- Ballpoint pens
- Gel pens
- Rollerball pens
- Fibre-tip pens
- Markers such as highlighters, flip-chart markers or permanent markers
- Fountain pens
- Fineliners
- Wood-encased lead pencils and coloured pencils

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6 See Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) § 3 (1) 6.
7 See Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) § 3 (1) 5.
8 Guidance for identification and naming of substances under REACH and CLP, Version 3.0 December 2023, Chapter 2.2, P. 16, https://echa.europa.eu/documents/10162/2324906/substance_id_de.pdf/.
9 Furthermore, the Environmental Label Jury can expand the scope of validity at any time.

- Paintbrushes
- Stamps

A comprehensive illustrated overview of the scope of the ecolabel can be found in Appendix E.

Excluded from the scope of these Basic Award Criteria are all types of chalk (e.g. street painting chalks, wax chalks, graphite chalks, pastel chalks, watercolour chalks, oil chalks).

# 3 Requirements

The writing utensils and stamps named under Paragraph 2 can be labelled with the Blue Angel ecolabel if they comply with the requirements in these Basic Award Criteria.

When submitting an application, the applicant must provide the required compliance verifications and enclose a **sample of the product** for which the Blue Angel should be awarded, including the sale packaging or a description of the sale packaging.

## 3.1 Use of resource-conserving materials

Unless otherwise expressly stated, the following requirements apply to the materials used in the barrel and cap of writing utensils, as well as in the frame and casing of stamps and ink pads.

### 3.1.1 Detailed description of the material composition of the writing utensil or stamp

Information on the use of resource-conserving materials in the barrel and cap of writing utensils, as well as in the frame and casing of stamps and ink pads, must be made available.
The applicant must state the relevant proportions (% by mass) of the following types of material:

- Plastics (including the type of plastic)
- Woods (including the type of wood)
- Metals (including the type of metal or alloy)
- Paper/cardboard
- Old textiles
- Other materials
- Varnishes / surface coatings

If the product contains composite materials (e.g. wood-plastic composites – WPC), the applicant must name the different components of the composite materials and assign them to the respective mono materials (plastic, wood, ...).
Alongside the proportions of each material, the applicant must provide the following information on their origin:

- For plastics: The proportion of post-consumer materials or bio-based plastics
- For paper / cardboard: The proportion of recycled paper

***Compliance verification***

*The applicant shall enclose a material document as Annex 2 to the application that specifies the material used for each component of the respective writing utensil or stamp and its composition, technical designation and weight in each case. For writing utensils: The applicant shall also submit a schematic drawing of the product on which the different materials are labelled. For stamps: The applicant shall also submit an exploded view diagram (Annex 2a) on which the different materials are labelled.*

### 3.1.2 Wood

All of the wood, cork and bamboo used in the product must come from legal sources in accordance with the European Timber Regulation EU 995/2010 and the Deforestation Regulation (EUDR 2023/1115).
In addition, 100% of the virgin wood, cork and bamboo used in the product must come from certified sources that can verify that they are managed in an ecological and socially responsible manner. Waste wood in waste wood categories AI and AII according to the German Waste Wood Ordinance[10] may be used.

***Compliance verification***

*The applicant shall declare the legality of the wood sources in accordance with the European Timber Regulation EU 995/2010[11] and the Deforestation Regulation (EUDR 2023/1115) in Annex 1.*
*Compliance with the requirement for using wood from sustainable forestry can by verified in the following ways:*

- *If the applicant is certified themselves according to the FSC or PEFC criteria for the chain of custody (CoC), the applicant shall submit the relevant certificate. No other verifications are required in this case (Annex 3).*
- *If the applicant is not certified themselves, the applicant shall submit appropriate certificates from its raw material suppliers (Annex 4). The following certificates will be accepted for the wood used in the product:*
  - *Forest Stewardship Council (FSC)*
  - *Programme for the Endorsement of Forest Certification Schemes (PEFC)*
  - *Naturland e.V.*
  - *Comparable certificates and individual verifications*
- *The applicant shall also submit confirmation of compliance with the wood requirement from an environmental verifier approved for this scope (NACE 16.21) by the German Society for the Accreditation and Registration of Environmental Verifiers (DAU) in accordance with the Environmental Audit Act or from an FSC or PEFC certifier accredited by the German Accreditation Body (DAkkS) (Annex 5).*

[10] German ordinance on requirements for the recycling and disposal of waste wood: https://www.gesetze-im-internet.de/altholzv/BJNR330210002.html
[11] Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (Timber Regulation) Text with EEA relevance https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=celex%3A32010R0995

*This confirmation must be submitted annually, for the first time when submitting the application and then by a deadline defined by RAL gGmbH.*

### 3.1.3 Plastics

The use of polyvinyl chloride (PVC) is not permitted.

In addition, all of the plastics used in the product must be

- manufactured using ≥ 80 % post-consumer materials or
- manufactured using ≥ 70% renewable raw materials (bio-based plastics including bio-circular plastics).
- manufactured if using both of these materials with ≥ 80 % post-consumer materials and renewable raw materials.

***Compliance verification***

*The applicant shall declare compliance with the requirement in Annex 1.*

***Post-consumer material***

*The applicant shall verify the origin and composition of the recycled plastics used in the product by submitting an appropriate certificate (including the report) (Annex 6).*
*The following are currently accepted:*

- *The RecyClass certification scheme[12] for the "recycling process"*
- *The Global Recycled Standard (GRS) certification scheme[13].*
- *Certified in accordance with the UL Environmental Claim Validation Procedure (ECVP) for Recycled Content (UL ECVP 2809-2[14]) in combination with the UL Environmental Claim Validation Procedure (ECVP) for Defined Source Content (UL ECVP 2809-1) with the following restrictions:*
  - *The certification must be completed according to Section 6.4 "Recycled Plastics" in UL ECVP 2809-2, which guarantees compliance with the guidelines in EN 15343.*
  - *Only the "Chain of Custody" models (CoC models) in Section 8[15] (Identity Preserved chain), 9[16] (Segregated Management of Materials) or 10[17] (Controlled Blending chain) of UL ECVP 2809-1 are permitted. The CoC models in Section 11[18] (Mass Balance chain) and 12 [19](Book and Claim) of UL ECVP 2809-1 are expressly prohibited.*

*The use of recycled plastic (record of the added materials and their use) must be checked, evaluated for their plausibility and confirmed in the form of a test report in accordance with Annex 7 by an independent specialist body at the site where the product is produced*
*or*

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12 https://recyclass.eu/
13 https://textileexchange.org/knowledge-center/documents/global-recycled-standard-grs/
14 https://www.ul.com/services/ul-2809-recycled-content-validation
15 "REQUIREMENTS FOR IDENTITY PRESERVED CHAIN OF CUSTODY"
16 "REQUIREMENTS FOR SEGREGATED MANAGEMENT OF MATERIALS"
17 "REQUIREMENTS FOR CONTROLLED BLENDING CHAIN OF CUSTODY"
18 "ALLOCATION SYSTEM (MASS BALANCE COC OR CREDIT ACCOUNTING)"
19 "BOOK AND CLAIM CHAIN OF CUSTODY"

*a material balance (according to the method in CEN/TR 16721:2014) must be submitted in combination with verifications of the delivered quantities (if this is not already evident in the submitted certificates) (Annex 8).*

*The confirmation (Annex 6 and 7 or 8) must be submitted annually, for the first time when submitting the application and then by a deadline defined by RAL gGmbH.*

*An independent specialist body is:*

- *an independent environmental verifier in accordance with Article 9 of the German Environmental Audit Act (Umweltauditgesetz) for approval area 38 (recycling, waste disposal) or*
- *a publicly certified expert in accordance with Article 36 of the German Industrial Code for the Specialist Areas of Waste Recycling, Waste Disposal Technology, Plastic Recycling, Plastic Technology and the Disposal of Packaging (Gewerbeordnung für die Sachgebiete Abfallverwertung, Abfalltechnik, Kunststoffrecycling, Kunststofftechnik bzw. Verpackungsentsorgung) or*

*an environmental verifier in accordance with Directive (EC) No. 1221/2009 (EU EMAS Regulation), Article 2, Definition no. 20. If the verification checks are carried out by environmental verification organisations (i.e. not by natural persons), the person responsible for the completion of the tests shall be specifically named by the organisation.*

***Bio-based plastics (including bio-circular plastics)***

*The applicant shall state the types of plastic used in the barrel/cap or stamp frame/casing and document the origin and proportions of the bio-based plastics in Annex 2.*

*The applicant shall also submit a certificate (Annex 9) to verify the origin of the bio-based plastics/granules (including the name of the plastic/granule and the delivered quantity (Annex 9a)) from one of the following certification systems.*

- *ISCC+ (International Sustainability and Carbon Certification)*
- *RSB (Roundtable on Sustainable Biomaterials)*
- *RSPO (Roundtable on Sustainable Palm Oil)*

*The permitted CoC models are described in ISO 22095:2020 in Sections 5.3.1 (Identity preserved model), 5.3.2 (Segregated model), 5.4.1 (Controlled blending model) and 5.4.2 (Mass balance model). Verification using "Book and Claim" certificates is not permitted.*

*To verify that the purchased bio-based plastic/granule was used in the writing utensils/stamps to be certified with the ecolabel, the applicant can either use one of the methods given in CEN/TR 16721:2014 to determine the bio-based content (radio carbon analysis, measurement of the stable isotope ratios or a material balance (Annex 10))*

*or the use of the bio-based plastics (record of the added materials and their use) must be checked by an independent specialist body at the site where the product is produced (confirmation in the form of a test report according to Annex 10a).*

*This confirmation must be submitted annually, for the first time when submitting the application and then by a deadline defined by RAL gGmbH.*

### 3.1.4 Paper / cardboard

All of the paper fibres used in the product must be certified in accordance with DE-UZ 217a or DE-UZ 14a. Accordingly, all of the paper fibres used in the product must have been sourced 100% from recovered paper.

***Compliance verification***

*The applicant shall declare compliance with the requirements and state in Annex 1 the trade name of the recycled paper used, its manufacturer and the relevant contract number for the contract pursuant to DE-UZ 217a or DE-UZ 14a.*

*This confirmation must be submitted annually, for the first time when submitting the application and then by a deadline defined by RAL gGmbH.*

### 3.1.5 Old textiles

Old textiles may be used as a material for the production of the barrel and cap if they are sourced from post-consumer waste in the respective country of production.

***Compliance verification***

*The applicant shall verify the origin and composition of the secondary materials used in the product by submitting confirmation from an independent specialist body (Annex X) on an annual basis.*
*An independent specialist body is:*

- *an independent environmental verifier in accordance with Article 9 of the German Environmental Audit Act (Umweltauditgesetz) for approval area 38 (recycling, waste disposal) or*
- *a publicly certified expert in accordance with Article 36 of the German Industrial Code for the Specialist Areas of Waste Recycling, Waste Disposal Technology, Plastic Recycling, Plastic Technology and the Disposal of Packaging (Gewerbeordnung für die Sachgebiete Abfallverwertung, Abfalltechnik, Kunststoffrecycling, Kunststofftechnik bzw. Verpackungsentsorgung) or*
- *an environmental verifier in accordance with Directive (EG) No. 1221/2009 Article 2, Definition no. 20. If the verification checks are carried out by environmental verification organisations (i.e. not by natural persons), the person responsible for the completion of the tests shall be specifically named by the organisation.*

### 3.1.6 Composite materials

If composite materials made of plastics, wood, paper and/or old textiles are used, the material fractions must meet the relevant requirements in Paragraphs 3.1.2, 3.1.3, 3.1.4 and/or 3.1.5.

***Compliance verification***

*The applicant shall submit a description of the composition of the composite material in Annex 2 and enclose the relevant compliance verifications for the material fractions in accordance with Paragraphs 3.1.2, 3.1.3, 3.1.4 and/or 3.1.5.*

### 3.1.7 Metals and metallic surface coatings

The use of aluminium and metallic surface coatings[20] is not permitted.
An exemption applies to the use of aluminium for paintbrush ferrules.
Metals may not account for more than 15 percent by mass of the materials used for the barrel and cap.

***Compliance verification***

*The applicant shall document compliance with the requirement by completing the material document described in Paragraph 3.1.1 (Annex 2).*

## 3.2 Refillability

Writing utensils and stamps should be refillable in order to conserve resources. In order to achieve this aim, the manufacturers of the following writing utensils must make refill systems available:

- Mechanical lead pencils (retractable lead pencils, fine lead pencils / clutch pencils)
- Fountain pens, ballpoint pens, rollerball pens, gel pens
- Stamps

Information on the availability of refill packs for the product must be clearly visible on the sales packaging and/or at the point of sale (including on the Internet).
The following requirements apply to the refill systems:

- It must be possible to change the writing medium or refill the product without special tools.
- The technical and environmental/health-related quality of the writing media must match the quality of the original product.

***Compliance verification***

*The applicant shall declare compliance with the requirement in Annex 1 and enclose a sample of the refill pack with the application.*

[20] This exclusion also explicitly refers to metallic coatings on plastic substrates.

## 3.3 Quality requirements

### 3.3.1 Lightfastness

The writing media used in the product must comply with the following lightfastness values as specified in DIN EN ISO 105-B02:

- Coloured pencil leads (leads for clutch pencils; colour pencils) ≥ 3
- Ballpoint pen pastes, gels for gel pens, inks for rollerball pens ≥ 3
- Inks for fibre-tip pens and fineliners, except water-based non-permanent inks ≥ 3
- Inks for markers, including water-based non-permanent inks ≥ 1

Stamping inks designed for document authenticity must meet the standards for the permanence of documents (DIN ISO 14145-2).
Ageing resistant archive stamping inks must satisfy archive standards (DIN ISO 11798).

***Compliance verification***

*The applicant shall declare compliance with the requirements in Annex 1 and enclose a test report using the test method in DIN EN ISO 105-B02 to measure the lightfastness of the writing media used (Annex 11).*
*For stamping inks: The applicant shall submit a test certificate according to DIN ISO 14145-2 and DIN ISO 11798 (Annex 11a).*

### 3.3.2 Minimum filling quantities for ballpoint pen ink cartridges

The minimum filling quantities must comply with the recommendations issued by the "Industrieverband Schreiben, Zeichnen, Kreatives Gestalten e.V." (Industrial Association "Writing, Drawing and Creative Designing"). The filling quantities are listed in the following table.

Table 1: Filling quantities for ballpoint pen ink cartridges

| Type of ink cartridge | Designation according to ISO 12757-1; 1998 | Minimum filling quantity (mg) | |
|---|---|---|---|
| | | Plastic cartridge | Metal cartridge |
| Standard cartridge for retractable ballpoint pens | A1 | 250 | 400 |
| Standard cartridge for retractable ballpoint pens | A2 | 250 | 400 |
| Cartridge for multi-colour ballpoint pens | D | - | 120 |
| Large-capacity cartridge | G1 | - | 800 |
| Large-capacity cartridge | G2 | 700 | 1000 |

Non-standardised cartridges of similar dimensions must also fulfil the minimum filling quantity requirements[21].

[21] Filling quantities of ballpoint pen cartridges, voluntary agreement of suppliers within ISZ e.V. (Industrieverband Schreiben, Zeichnen, Kreatives Gestalten e.V. – Industrial Association "Writing, Drawing and Creative Designing") as of June 2010 https://isz-ev.de/wordpress/wp-content/uploads/2020/03/Fuellmengen_deutsch.pdf.

***Compliance verification***

*The applicant shall enclose technical documentation providing information on the filling quantity of the writing utensil (original filling) (Annex 12).*

## 3.4 Substance requirements

The substance requirements for writing utensils and stamps are formulated below.
Observance of European and German chemical law, as well as standard rules for the sector, is a prerequisite (especially the REACH Regulation Annex XVII, POP Regulation Annex I, CLP Regulation and the Biocidal Products Regulation)[22].
Products designed to be played with by children under 14 years of age must comply with the provisions of the Toy Safety Directive (2009/48/EC)[23].

Test reports verifying compliance with the requirements in Paragraph 3.4 must be produced by a testing institution accredited for these methods according to DIN EN ISO 17025. The test report must give the measured value and the measurement uncertainty of the method used.

### 3.4.1 General substance requirements for writing and stamping media

The writing and stamping media may not contain substances with the following hazard characteristics. The requirement is considered to be fulfilled if the concentrations stated in Appendix B Table 4 are not exceeded.

The concentration values comply with the concentration limits in the REACH Regulation Annex II Section 3.2. They refer to substances found in the end product.

The following substance properties must be avoided:

a) Substances which are identified as particularly alarming under the Chemicals Regulation REACH (1907/2006/EC) and which have been incorporated into the list drawn up in accordance with Article 59, Paragraph 10 of the REACH Regulation (so-called "list of candidates")[24].
b) Substances that according to Regulation (EC) No. 1272/2008 (CLP Regulation) have been classified in the following hazard categories or which meet the criteria for such classification[25]:

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[22] If substance restrictions from other regulations also apply to the specific product, these also need to be observed.

[23] Directive 2009/48/EC on the safety of toys has mainly been implemented in Germany in the Second Ordinance to the German Product Safety Act (2nd ProdSV).

[24] List of candidates from the REACH Regulation (EC) No. 1907/2006: https://chem.echa.europa.eu/obligation-lists/candidateList. The version of the list of candidates at the time of application is valid. The label holder is obligated to take into account current developments on the list of candidates. If an ingredient is newly added to the list of candidates during the term of the Basic Award Criteria, the label holder must submit an informal notification stating the name of the substance and its CAS or EC number. A substitution agreement will then be agreed with the label holder.

[25] CLP Regulation (EC) No. 1272/2008: http://data.europa.eu/eli/reg/2008/1272/oj. The version at the time of application is valid. If an ingredient is classified with one of the named hazard categories during the term of the Basic Award Criteria, the licence holder must submit an informal notification stating the name of the substance and its CAS or EC number and the new hazard category. A substitution agreement can then be agreed with the label holder.

- acute toxicity (poisonous) in categories Acute Tox. 1 or Acute Tox. 2
- respiratory sensitisers in the category Resp. Sens. 1, 1A or 1B or sensitive for the skin in the categories Skin Sens. 1, 1A or 1B
- toxic to specific target organs in categories STOT SE 1, STOT SE 2, STOT RE 1 or STOT RE 2
- carcinogenic in categories Carc. 1A, Carc. 1B or Carc. 2
- germ cell mutagenic in categories Muta. 1A, Muta. 1B or Muta 2
- reprotoxic (teratogenic) in categories Repr. 1A, Repr. 1B or Repr. 2, Lact.
- endocrine disruptors with a negative effect on human health in the categories ED HH 1 or ED HH 2[26]
- endocrine disruptors with a negative effect on the environment in the categories ED ENV 1 or ED ENV 2[26]
- persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) characteristics[26]
- persistent, mobile and toxic (PMT) or very persistent, very mobile (vPvM) characteristics[26]
- water-polluting substances in categories Aquatic Acute 1, Aquatic Chronic 1 or Aquatic Chronic 2
- substances hazardous to the ozone layer in category Ozone 1.

The hazard statements (H Phrases) that correspond to the hazard categories can be found in Table 4.
As an exemption to the general requirements, hazardous ingredients with the following functions and hazard categories are permitted in the writing and stamping media:

Table 2: Exemptions for certain functions in the writing and stamping media

| **Function of the substance** | **Hazard category** | **Hazard statement (H Phrase)** | **Maximum permissible concentration [%]** | | |
|---|---|---|---|---|---|
| | | | **Ballpoint pen pastes** | **Rollerball pen inks** | **Marker inks** |
| **Colourant** | Skin Sens. 1B | H317 | <10 | - | <1.0 |
| | Aquatic Chronic 2 | H411 | <10 | - | - |
| | Aquatic Acute 1 | H400 | - | - | <1.0[27] |
| **Solvent** | Skin Sens. 1B | H317 | <10 | - | - |
| **Solvent and corrosion protection** | Aquatic Acute 1 | H400 | <25 | - | - |
| **Corrosion protection** | Reprotoxic 2 | H361d | - | <1.0 | - |
| | vPvM | EUH451 | - | <1.0 | - |
| **Solvent and viscosity regulator** | STOT RE 2 | H373 | - | <10 | - |

Other requirements and exemptions for substances or mixtures with certain technical functions in the writing media are listed in Paragraph 3.4.2.

[26] ED, PBT, vPvB, PMT, vPvM: New hazard categories in the CLP Regulation, legally binding for substances newly placed onto the market since 1 May 2025 and for existing substances on the market by 1 November 2026 at the latest.
[27] At M-factor 10. Other M-factors will require a corresponding adjustment either upwards or downwards to the permissible concentrations (e.g. 10% at M-factor =1).

***Compliance verification***

*The applicant shall submit a list of the writing or stamping media used in the product with their trade names and suppliers (Annex 13). For every writing or stamping medium used, the applicant shall also submit the ingredients used in the formulation and their proportion in the mixture to RAL gGmbH (Annex 14). The applicant shall confirm compliance with the requirement in Annex 1 and submit a safety data sheet according to Annex II Article 31.2 of the REACH Regulation (EC) No. 1907/2006 for the writing or stamping medium (Annex 15).*
*The safety data sheets should not be more than 2 years old.*
*If the exemption in Table 2 is utilised, the declaration submitted by the applicant must include a list of the relevant hazardous substances and their functions (Annex 14). If necessary, this information can also be submitted to RAL in the form of a supplier declaration (Annex 14).*

*If changes are made to the substances or their hazard classification (classification or SVHC status) during the term of the contract, the applicant must submit the associated documents to RAL gGmbH in order to continue labelling the product with the Blue Angel ecolabel. As soon as the applicant becomes aware of the fact that the substances in the product have an endocrine effect that exceeds the concentrations in Appendix B, the applicant must notify RAL gGmbH accordingly.*

### 3.4.2 Specific substance requirements for writing and stamping media

The specific substance requirements supplement the general substance requirements in Paragraph 3.4.1. The requirements apply to the writing and stamping medium.

#### 3.4.2.1 Requirements for biocidal products and biocidal substances

The only biocidal substances or biocidal products permitted in the writing and stamping media are in-can preservatives, i.e. products designed to protect writing and stamping media in the writing utensil or stamp against microbial deterioration to extend their shelf life (product type 6 according to the Biocidal Product Regulation (EU) No. 528/2012). Only those substances may be used as biocidal products and biocidal substances for which an active substance dossier for preservatives for products during storage (product-type 6) according to the Biocidal Product Regulation has been submitted. If inclusion on the list of approved substances for product type 6 is rejected after an evaluation has been completed, the use of this substance is no longer permitted.
As an exemption to the general substance requirements in Paragraph 3.4.1, approved biocidal substances classified with the hazard categories "environmental hazard" or "skin sensitisation" may be used if they fulfil the following requirements:

In-can preservatives are permitted if the bioaccumulation potential is < 3.0 (log Pow octanol/water partition coefficient) or the bioconcentration factor is ≤ 100.

The isothiazolinone content in the writing and stamping medium in its ready-to-use form must not exceed the following maximum limits:

- 5-chlor-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one (CIT/MIT) ≤ 15 ppm
- 1,2-benzisothiazol-3(2H)-one (BIT): 1,2-benzisothiazol-3(2H)-one ≤ 360 ppm

***Compliance verification***

*The applicant shall declare compliance with the requirements for the biocides used as in-can preservatives during the production process in Annex 1. In addition, the applicant shall state which biocidal substances have been added to the respective writing or stamp medium, give their IUPAC names and CAS numbers and submit the safety data sheet (Annex 15) for the writing medium. The applicant shall state the mass concentrations of every biocide in the product (Annex 14).*

#### 3.4.2.2 Dimethyl sulfoxide (DMSO)

Dimethyl sulfoxide (DMSO) promotes the transport of hazardous substances into the skin and is not generally permitted in those writing and stamping media that contain any of the hazardous substances listed in Paragraph 3.4.1. As an exemption, a small amount of DMSO (≤ 5%) is permitted in all writing and stamping media.

***Compliance verification***

*The applicant shall confirm compliance with the requirements in Annex 1.*

#### 3.4.2.3 Colourants

No azo dyes or pigments that can cleave to any of the aromatic amines named in REACH Regulation (EC) No. 1907/2006, Annex XVII may be added to the product as colourants. These amines are listed in Appendix C Table 6.
The use of other carcinogenic or potentially sensitizing colourants according to Appendix C Table 6 is also prohibited.

***Compliance verification***

*The applicant shall verify the absence of the excluded substances listed in Paragraph 3.4.2.3 in Annex 1.*
*The applicant shall also verify the absence of azo dyes by submitting a test report in accordance with the requirements in DIN EN 71-10/11. This verification should be provided indirectly by determining the absence of the amines stated in Annex XVII of Regulation (EC) No. 1907/2006 (Annex 16).*
*The applicant shall also verify the absence of carcinogenic or potentially sensitizing colourants by submitting a test report in accordance with the requirements in DIN EN 71-10/11 (Annex 16).*

#### 3.4.2.4 Perfluorinated and polyfluoroalkyl substances (PFAS)

To avoid the release of persistent substances into the environment, no perfluorinated and polyfluoroalkyl substances (PFAS) may be added to the writing and stamping media.

***Compliance verification***

*The applicant shall declare in Annex 14 that the stated substances have not been added to the writing and stamping medium.*

#### 3.4.2.5 Polycyclic aromatic hydrocarbons (PAHs)

In order to avoid unhealthy impurities during the reuse of the described paper fibres, the substances and mixtures may not contain any polycyclic aromatic hydrocarbons (PAHs – e.g. the use of rust as a colourant).

***Compliance verification***

*The applicant shall verify the absence of PAHs in the writing and stamp medium by submitting a test report in accordance with the requirements in AfPS GS 2019:01 PAH. The requirements for category 2 for "Materials not covered by Cat 1 with foreseeable long-term skin contact (longer than 30 seconds) or repeated short-term skin contact during intended use of the product or in the event of foreseeable use" must be fulfilled (Annex 17).*

#### 3.4.2.6 Fragrances and aromas

Fragrances and aromas whose main function is to provide a fragrance (e.g. fragrant oils) are not permitted in the writing and stamping media. The use of substances based on renewable raw materials whose main function is not to provide a fragrance but to fulfil another technical purpose (bio-based pigments used as a colourant) is permitted.

***Compliance verification***

*The applicant shall declare in Annex 1 that the excluded substances are not present in the product and submit the formulation of the writing/stamping medium to RAL gGmbH (Annex 14).*

### 3.4.3 General substance requirements for the barrel, cap, frame and casing

Plastics, varnishes, adhesives, printing inks and surface coatings used in the production of the barrels and caps of writing utensils or in the production of the frames and casings of stamps and ink pads may not contain substances with the following hazard categories. The requirement is considered to be fulfilled if the concentrations stated in Appendix B Table 4 are not exceeded.

The concentration values comply with the concentration limits in REACH Regulation Annex II Section 3.2. They refer to substances found in the end product.

The following substance properties must be avoided:

a) Substances which are identified as particularly alarming under the Chemicals Regulation REACH (1907/2006/EC) and which have been incorporated into the list drawn up in accordance with Article 59, Paragraph 10 of the REACH Regulation (so-called "list of candidates")[28].

b) Substances that according to Regulation (EC) No. 1272/2008 (CLP Regulation) have been classified in the following hazard categories or which meet the criteria for such classification[29]:

- carcinogenic in categories Carc. 1A or Carc. 1B
- germ cell mutagenic in categories Muta. 1A or Muta. 1B
- reprotoxic (teratogenic) in categories Repr. 1A or Repr. 1B
- sensitive for the skin in the categories Skin Sens. 1, 1A or 1B
- endocrine disruptors with a negative effect on human health in the categories ED HH 1 or ED HH 2[30]
- endocrine disruptors with a negative effect on the environment in the categories ED ENV 1 or ED ENV 2[30]
- persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) characteristics[30]
- persistent, mobile and toxic (PMT) or very persistent, very mobile (vPvM) characteristics[30]

As an exemption to the general requirements, hazardous ingredients with the following functions and hazard categories are permitted in the relevant components of the barrels and caps of writing utensils or in the frames and casings of the stamps and ink pads:

Table 3: Exemptions for certain functions in the barrel and cap of writing utensils and the frame and casing of stamps and ink pads

| **Function of the substance** | **Hazard category** | **Hazard statement (H Phrase)** | **Maximum permissible concentration [%]** | |
|---|---|---|---|---|
| | | | **Dry printed ink** | **Plastic part** |
| Colourant, binding agent (impurity) | Skin Sens. 1 | H317 | <1.0 | - |
| Wetting agent | Skin Sens. 1 | H317 | <1.0 | - |
| Colourant | Skin Sens. 1, 1B | H317 | - | <0.30 |

[28] List of candidates from the REACH Regulation (EC) No. 1907/2006: https://chem.echa.europa.eu/obligation-lists/candidateList. The version of the list of candidates at the time of application is valid. The label holder is obligated to take into account current developments on the list of candidates. If an ingredient is newly added to the list of candidates during the term of the Basic Award Criteria, the label holder must submit an informal notification stating the name of the substance and its CAS or EC number. A substitution agreement will then be agreed with the label holder.

[29] CLP Regulation (EC) No. 1272/2008: http://data.europa.eu/eli/reg/2008/1272/oj. The version at the time of application is valid. If an ingredient is classified with one of the named hazard categories during the term of the Basic Award Criteria, the licence holder must submit an informal notification stating the name of the substance and its CAS or EC number and the new hazard category. A substitution agreement can then be agreed with the label holder.

[30] ED, PBT, vPvB, PMT, vPvM: New hazard categories in the CLP Regulation, legally binding for substances newly placed onto the market since 1 May 2025 and for existing substances on the market by 1 November 2026 at the latest.

***Compliance verification***

*The applicant shall declare compliance with the requirements in Annex 1. The applicant shall document the plastic materials (including additives and colour batches) used in the production of the barrel, cap, frame or casing, as well as the mixtures used for their surface coatings, printing, varnishing or adhesion (Annex 18). If the plastic materials or the stated auxiliary aids require a safety data sheet in accordance with Annex II Article 31.2 of the REACH Regulation (EC) No. 1907/2006, the applicant shall enclose it with the application documents (Annex 19). The safety data sheets should not be more than 2 years old.*
*If the exemption in Table 3 is utilised, the declaration submitted by the applicant must include a list of the relevant substances and their functions (Annex 20). If necessary, this information can also be submitted to RAL in the form of a supplier declaration.*
*The declaration by the applicant must also contain a conversion of the concentration values from the safety data sheet into the expected concentration of the substance in or on the barrel, cap, frame or casing. If a substance is no longer expected in the barrel, cap, frame or casing due to reactivity or evaporation during the production process, the applicant shall indicate this in their declaration.*

*If changes are made to the substances or their hazard classification (classification or SVHC status) during the term of the contract, the applicant must submit the associated documents to RAL gGmbH in order to continue labelling the product with the Blue Angel. As soon as the applicant becomes aware of the fact that the substances in the product have an endocrine effect that exceeds the concentrations in Appendix B, the applicant must notify RAL gGmbH accordingly.*

### 3.4.4 Excluded metals / elements

The formulations of the writing and stamping media, as well as the varnishes, adhesives, printing inks or surface coatings used for the barrel and cap of the writing utensils or the frame and casing of the stamp and ink pads, may not contain the following elements and their compounds: cadmium, lead, chromium (VI), mercury, arsenic, barium (exemption: barium sulphate), cobalt, antimony, selenium.

***Compliance verification***

*The applicant shall submit declarations from the respective suppliers of the writing and stamping media (Annex 14) and the stated auxiliary aids to verify that the excluded metals and elements have not been added (Annex 21).*

### 3.4.5 Migration limits for metals / elements

The following maximum permissible migration limits according to the Toy Safety Directive 2009/48/EC (as listed in Appendix D Table 7) apply to the writing and stamping media, as well as to the plastics, varnishes, adhesives, printing inks and surface coatings used in the production of the barrels and caps of writing utensils or in the production of the frames and casings of stamps and ink pads.[31]

[31] These types of substances can be present in the media and materials in the form of e.g. impurities.

***Compliance verification***

*The applicant shall submit a test report for each of materials used in accordance with the test method in DIN EN ISO 71-3 to verify compliance with the limits (Annex 22).*

## 3.5 Packaging materials

### 3.5.1 Sales packaging

The sales packaging must comply with the following requirements:

- If paper and cardboard are used, it must be manufactured using 80% recycled fibres. Composite materials or coating of the paper/cardboard with plastics or metals are not permitted.
- Blister packs containing plastic parts (viewing window / film, moulded parts) are not permitted.
- If plastic is used, it must be manufactured using at least 50% post-consumer recycled materials (% by mass).
- Halogenated organic plastics are not permitted.
- Metallic coatings on the packaging are not permitted.

***Compliance verification***

*The applicant shall state the papers, cardboards and/or plastics used and, if paper, cardboard and/or plastic are used for the packaging, verify the source of the materials in the form of written confirmations from the suppliers and, if necessary, by providing further verifications (Annex 23.).*

### 3.5.2 Grouped packaging

Grouped packaging of writing utensils or refill packs must be exclusively made out of paper and/or cardboard. Recycled fibres must account for at 80% of the grouped packaging. Composite materials or coating with plastics or metals are not permitted.

***Compliance verification***

*The applicant shall state the papers and/or cardboard used and, if paper, and/or cardboard are used for the packaging, verify the source of the materials in the form of written confirmations from the suppliers and, if necessary, by providing further verifications (Annex 24).*

### 3.6 Outlook

In the event of a future revision of the Basic Award Criteria, the following requirements will be examined in particular:

- A review of the requirements with respect to the proportions of PCR and bio-based plastics, as well as a review of the compliance verifications, including the approved CoC models especially for bio-based plastics
- A review of possible requirements for the origin of the metals in the product
- The ability to store writing utensils and stamps in the open if suitable test methods exist
- A review of the (general) substance requirements to determine whether the exemptions are still up to date

## 4 Applicants and Parties Involved

Manufacturers of final products according to Paragraph 2 shall be eligible for application.

Parties involved in the award process are:

- RAL gGmbH to award the Blue Angel Environmental Label,
- the federal state being home to the applicant's production site,
- Umweltbundesamt (German Environmental Agency) which after the signing of the contract receives all data and documents submitted in applications for the Blue Angel in order to be able to further develop the Basic Award Criteria.

## 5 Use of the Environmental Label

The use of the Environmental Label by the applicant is governed by a contract on the use of the Environmental Label concluded with RAL gGmbH.

Within the scope of such contract, the applicant undertakes to comply with the requirements under Paragraph 3 while using the Environmental Label.

Contracts on the Use of the Environmental Label are concluded to fix the terms for the certification of products under Paragraph 2. Such contracts shall run until December 31, 2030.
They shall be extended by periods of one year each, unless terminated in writing by March 31, 2030 or March 31 of the respective year of extension.
After the expiry of the contract, the Environmental Label may neither be used for labelling nor for advertising purposes. This regulation shall not affect products being still in the market.

The applicant (manufacturer) shall be entitled to apply to RAL gGmbH for an extension of the right to use the ecolabel on the product entitled to the label if it is to be marketed under another brand/trade name and/or other marketing organisations.

The Contract on the Use of the Environmental Label shall specify:

- Applicant (manufacturer)
- Brand/trade name, product description
- Distributor (label user), i.e. the above-mentioned marketing organisations.

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## Appendix A Quoted laws and standards, literature

This list is arranged alphabetically. More specific citations will be added at a later date.

AfPS GS 2019:01 PAH: Testing and assessment of polycyclic aromatic hydrocarbons (PAHs) in the course of awarding the GS mark – specification according to § 21 (1) No. 3 ProdSG. GS specification.
https://www.baua.de/DE/Aufgaben/Geschaeftsfuehrung-von-Ausschuessen/AfPS/pdf/AfPS-GS-2019-01-PAK.pdf?__blob=publicationFile&v=6

Destatis (2025a): Produktion im Verarbeitenden Gewerbe: Deutschland, Jahre, Güterverzeichnis (9-Steller), Tabelle 42131-0004. Bundesamt für Statistik, Wiesbaden (Destatis (2025a): Production in the manufacturing sector: Germany, Years, Goods classification (9-digit), Table 42131-0004. Federal Statistical Office, Wiesbaden).

Destatis (2025b): Aus- und Einfuhr (Außenhandel): Deutschland, Jahre, Warensystematik. Table 51000-0005. Bundesamt für Statistik, Wiesbaden (Destatis (2025b): Exports and imports (foreign trade): Germany, Years, Goods Classification System. Table 51000-0005. Federal Statistical Office, Wiesbaden).

DIN EN 643:2014-11: Paper and board - European list of standard grades of paper and board for recycling.

DIN EN ISO 105-B02: Textiles - Tests for colour fastness - Part B02: Colour fastness to artificial light: Xenon arc fading lamp test (ISO 105-B02:2014); German version EN ISO 105-B02:2014.

DIN ISO 11798: Information and documentation - Permanence and durability of writing, printing and copying on paper - Requirements and test methods.

DIN ISO 14145-2: Roller ball pens and refills - Part 2: Documentary use.

DIN EN ISO 14001: Environmental management systems - Requirements with guidance for use; German and English version EN 14001:2015.

DIN EN ISO 17025: General requirements for the competence of testing and calibration laboratories (ISO/IEC 17025:2017); German and English version prEN ISO/IEC 17025:2017.

DIN EN 71-3: Safety of toys - Part 3: Migration of certain elements; German version EN 71-3:2019+A1:2021.

DIN EN 71-10: Safety of toys - Part 10: Organic chemical compounds - Sample preparation and extraction; German version EN 71-10:2005.

DIN EN 71-11: Safety of toys - Part 11: Organic chemical compounds - Methods of analysis; German version EN 71-11:2005.

DIN EN 14021: Environmental labels and declarations - Self-declared environmental claims (Type II environmental labelling) (ISO 14021:2016 + Amd 1:2021); German version EN ISO 14021:2016 + A1:2021.

German Industrial Code (GewO)
https://www.gesetze-im-internet.de/gewo/
Directive 2009/48/EC (Toy Directive): Directive on the safety of toys.
http://data.europa.eu/eli/dir/2009/48/2022-12-05

German Environmental Audit Act (UAG): Act on the participation by organisations in a community eco-management and audit scheme.
https://www.gesetze-im-internet.de/uag/

Regulation (EC) No. 1907/2006 (REACH Regulation): Regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH).
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32006R1907

Regulation (EC) No. 1272/2008 (CLP Regulation): Regulation on classification, labelling and packaging of substances and mixtures.
http://data.europa.eu/eli/reg/2008/1272/oj

Regulation (EC) No. 528/2012 (Biocidal Product Regulation): Regulation concerning the making available on the market and use of biocidal products.
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32012R0528

Regulation (EU) No. 2019/1021 (POP Regulation): Regulation on persistent organic pollutants.
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32019R1021

Regulation (EU) No. 2025/40 (PPWR): Regulation on packaging and packaging waste.
https://eur-lex.europa.eu/eli/reg/2025/40/oj

Regulation (EU) No. 995/2010 (European Timber Regulation): Regulation to obligate market participants to fight against illegal logging.
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32010R0995

Regulation (EU) 2023/1115 (EU Deforestation Regulation): Regulation to prevent deforestation for certain raw materials and products.
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32023R1115

Regulation (EC) No. 1221/2009 (EMAS Regulation): Regulation on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).
https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32009R1221

Second Ordinance to the German Product Safety Act (2nd ProdSV): Ordinance on the safety of toys.
https://www.gesetze-im-internet.de/gpsgv_2/2._ProdSV.pdf

## Appendix B Hazard categories and consideration thresholds for hazardous substances in mixtures

Table 4: Excluded hazard categories and their consideration thresholds for classified substances in mixtures.

| Hazard categories | Hazard statements (H Phrases) | Wording | Consideration from …% |
|---|---|---|---|
| **Acute toxicity substances** | | | |
| Acute Tox. 1<br>Acute Tox. 2 | H300 | Fatal if swallowed | 0,1 |
| Acute Tox. 1<br>Acute Tox. 2 | H310 | Fatal in contact with skin | 0,1 |
| Acute Tox. 1<br>Acute Tox. 2 | H330 | Fatal if inhaled | 0,1 |
| **Sensitizing substances** | | | |
| Resp. Sens. 1A | H334 | May cause allergy or asthma symptoms or breathing difficulties if inhaled | 0,01[32] |
| Resp. Sens. 1<br>Resp. Sens. 1B | | May cause allergy or asthma symptoms or breathing difficulties if inhaled | 0,1 |
| Skin Sens. 1A | H317 | May cause an allergic skin reaction | 0,01 |
| Skin Sens. 1<br>Skin Sens. 1B | | May cause an allergic skin reaction | 0,1 |
| **Carcinogenic substances, Germ cell mutagenic substances** | | | |
| Muta. 1A<br>Muta. 1B | H340 | May cause genetic defects | 0,1 |
| Muta. 2 | H341 | Suspected of causing genetic defects | 1,0 |
| Carc. 1A<br>Carc. 1B | H350 | May cause cancer | 0,1 |
| Carc. 1A<br>Carc. 1B | H350i | May cause cancer if inhaled | 0,1 |
| Carc. 2 | H351 | Suspected of causing cancer | 0,1 |
| Repr. 1A<br>Repr. 1B | H360F | May damage fertility | 0,1 |
| Repr. 1A<br>Repr. 1B | H360D | May damage the unborn child | 0,1 |
| Repr. 1A<br>Repr. 1B | H360FD | May damage fertility<br>May damage the unborn child | 0,1 |
| Repr. 1A<br>Repr. 1B | H360Fd | May damage fertility<br>Suspected of damaging the unborn child | 0,1 |
| Repr. 1A<br>Repr. 1B | H360Df | May damage the unborn child<br>Suspected of damaging fertility. | 0,1 |
| Repr. 2 | H361f | Suspected of damaging fertility | 0,1 |
| Repr. 2 | H361d | Suspected of damaging the unborn child | 0,1 |
| Repr. 2 | H361fd | Suspected of damaging fertility<br>Suspected of damaging the unborn child | 0,1 |
| Lakt. | H362 | May harm infants through breast milk. | 0,1 |

[32] Or one-tenth of the specific concentration limit for substances classified as skin allergens or inhalation allergens with a specific concentration limit.

| Hazard categories | Hazard statements (H Phrases) | Wording | Consideration from …% |
|---|---|---|---|
| **Substances with specific target organ toxicity, Endocrine disruptors (Human)** | | | |
| STOT SE 1 | H370 | Causes damage to organs | 1,0 |
| STOT SE 2 | H371 | May cause damage to organs | 1,0 |
| STOT RE 1 | H372 | Causes damage to organs through prolonged or repeated exposure | 1,0 |
| STOT RE 2 | H373 | May cause damage to organs through prolonged or repeated exposure | 1,0 |
| ED HH 1 | EUH380 | May cause endocrine disruption in humans | 0,1 |
| ED HH 2 | EUH381 | Suspected of causing endocrine disruption in humans | 0,1 |
| **Environmental impacts** | | | |
| Aquatic Acute 1 | H400 | Very toxic to aquatic life. | 1,0[33][34] |
| Aquatic Chronic 1 | H410 | Very toxic to aquatic life with long-lasting effects. | 1,0[34] |
| Aquatic Chronic 2 | H411 | Toxic to aquatic organisms with long-lasting effects. | 1,0 |
| ED ENV 1 | EUH430 | May cause endocrine disruption in the environment | 0,1 |
| ED ENV 2 | EUH431 | Suspected of causing endocrine disruption in the environment | 1,0[34] |
| PBT | EUH440 | Accumulates in the environment and living organisms including in humans | 0,1 |
| vPvB | EUH441 | Strongly accumulates in the environment and living organisms including in humans | 0,1 |
| PMT | EUH450 | Can cause long-lasting and diffuse contamination of water resources | 0,1 |
| vPvM | EUH451 | Can cause very long-lasting and diffuse contamination of water resources | 0,1 |
| Ozone 1 | H420 | Harms public health and the environment by destroying ozone in the upper atmosphere. | 0,1 |

[33] For substances with high toxicity, the threshold value is divided by the M-factor. The M-factor is part of the classification and is intended to lower the classification threshold value of the mixture if the tested toxicity of the substance is significantly higher than the threshold value for category 1 (LC50 << 1 mg/l).

[34] Notwithstanding REACH Annex II, Section 3.2.

## Appendix C Colourants excluded in writing and stamping media

Table 5: Aromatic amines that could potentially be released from azo dyes

| **Substance** | **CAS number** |
|---|---|
| biphenyl-4-ylamine / 4-aminobiphenyl / xenylamine | 92-67-1 |
| benzidine | 92-87-5 |
| 4-chloro-o-toluidine | 95-69-2 |
| 2-naphthylamine | 91-59-8 |
| o-aminoazotoluene / 4-amino-2',3-dimethylazobenzene / 4-o-tolylazo-o-to-luidine | 97-56-3 |
| 5-nitro-o-toluidine | 99-55-8 |
| 4-chloroaniline | 106-47-8 |
| 4-methoxy-m-phenylenediamine | 615-05-4 |
| 4,4'-methylenedianiline / 4,4'-diaminodiphenylmethane | 101-77-9 |
| 3,3'-dichlorobenzidine / 3,3'-dichlorobiphenyl-4,4'-ylenediamine | 91-94-1 |
| 3,3'-dimethoxybenzidine / o-dianisidine | 119-90-4 |
| 3,3'-dimethylbenzidine / 4,4'-bi-o-toluidine | 119-93-7 |
| 4,4'-methylenedi-o-toluidine | 838-88-0 |
| 6-methoxy-m-toluidine / p-cresidine | 120-71-8 |
| 4,4'-methylene-bis-(2-chloro-aniline) / 2,2'-dichloro-4,4'-methylene-diani-line | 101-14-4 |
| 4,4'-oxydianiline | 101-80-4 |
| 4,4'-thiodianiline | 139-65-1 |
| o-toluidine / 2-aminotoluene | 95-53-4 |
| 4-methyl-m-phenylenediamine | 95-80-7 |
| 2,4,5-trimethylaniline | 137-17-7 |
| o-anisidine / 2-methoxyaniline | 90-04-0 |
| 4-amino azobenzene | 60-09-3 |

Table 6: Colourants prohibited in the product

| **Colour index name** | **CAS number** |
|---|---|
| Disperse Blue 1 | 2475-45-8 |
| Disperse Blue 3 | 2475-46-9 |
| Disperse Blue 106 | 12223-01-7 |
| Disperse Blue 124 | 61951-51-7 |
| Disperse Yellow 3 | 2832-40-8 |
| Disperse Orange 3 | 730-40-5 |
| Disperse Orange 37/76 | 12223-33-5 / 13301-61- |
| Disperse Red 1 | 2872-52-8 |
| Solvent Yellow 1 | 60-09-3 |
| Solvent Yellow 2 | 60-11-7 |
| Solvent Yellow 3 | 97-56-3 |
| Basic Red 9 | 569-61-9 |
| Basic Violet 1 | 8004-87-3 |
| Basic Violet 3 | 548-62-9 |
| Acid Red 26 | 3761-53-3 |
| Acid Violet 49 | 03/09/1694 |

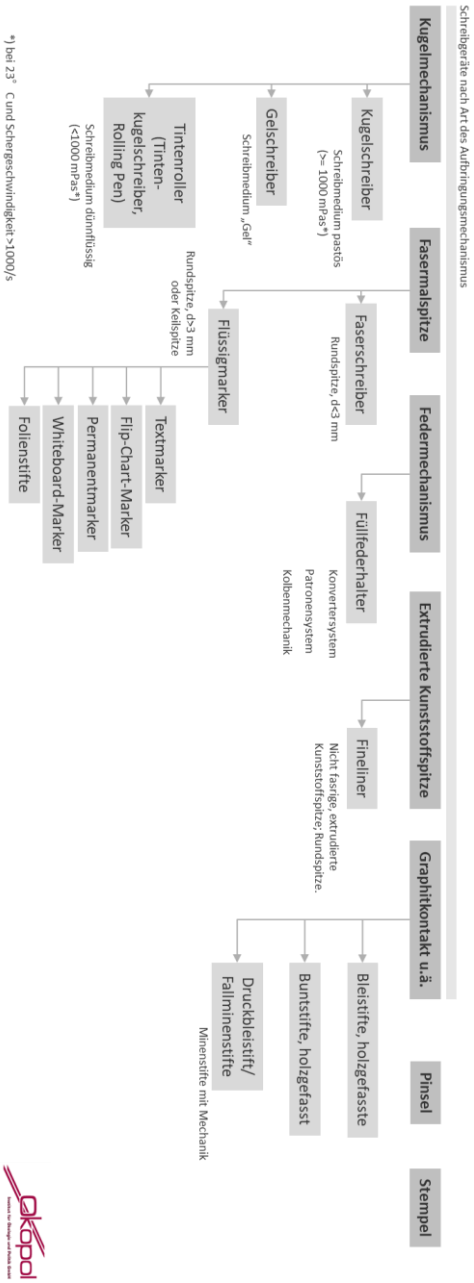
## Appendix D Migration limits for metals / elements

Table 7: Migration limits for metals and elements

| Element | mg/kg in dry, brittle, powder-like or pliable toy materials | mg/kg in liquid or adhesive toy materials | mg/kg in scraped-off toy materials |
|---|---|---|---|
| Aluminium | 2250 | 560 | 28130 |
| Antimony | 45 | 11.3 | 60* |
| Arsenic | 3.8 | 0.9 | 25* |
| Barium | 1500 | 375 | 1000* |
| Boron | 1200 | 300 | 15000 |
| Cadmium | 1.3 | 0.3 | 17 |
| Chromium (III) | 37.5 | 9.4 | 460 |
| Chromium (VI) | 0.02 | 0.005 | 0.053 |
| Cobalt | 10.5 | 2.6 | 130 |
| Copper | 622.5 | 156 | 7700 |
| Lead | 2.0 | 0.5 | 23 |
| Manganese | 1200 | 300 | 15000 |
| Mercury | 7.5 | 1.9 | 60* |
| Nickel | 75 | 18.8 | 930 |
| Selenium | 37.5 | 9.4 | 460 |
| Strontium | 4500 | 1125 | 56000 |
| Tin | 15000 | 3750 | 180000 |
| Organotin compounds | 0.9 | 0.2 | 12 |
| Zinc | 3750 | 938 | 46000 |

## Appendix E Illustration of the scope

The following illustration provides an overview of the types of writing utensils (and stamps), sorted by type of application mechanism, to describe the scope of the Basic Award Criteria (non-exclusive illustration):



## Appendix F Version history

The following changes were made to ecolabel DE-UZ 200 [Writing Utensils and Stamps, Edition January 2026, Version 1] and required the issuing of an updated version in each case. The version at the time of application is valid. If the changes were required for the implementation of new legal regulations, they apply to all certified products.