



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU Consultation: Revision of the Cosmetic Products Regulation

European Association of Chemical Distributors (Fecc)
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Fecc acknowledges the consultation for the upcoming initiative on revising the Cosmetics Products Regulation under the Chemical Strategy for Sustainability ([link](#)). At the same time we would like to raise the following points in this consultation:

1. The reattribution of tasks between EU agencies must be accompanied with the proper scientific and regulatory support: In line with the objectives of the Chemical Strategy for Sustainability (CSS), we support the strategy's objective to further simplify the chemicals legislations across sectors. However, with recent plans to redesignate mandates from Scientific Committee on Consumer Safety (SCCS) to the European Chemicals Agency (ECHA) when it comes to providing opinions on health and safety risks, the Commission must ensure ECHA is well-equipped in terms of the regulatory and scientific expertise. The assessments of cosmetic ingredients remain under cosmetic expertise, and as we expect ECHA to take on more tasks and mandates during this transition period, the appropriate resources for such assessments should be maintained to provide a reasonable time period for the safety evaluation.

2. A clear definition of what constitutes a nanomaterial must be streamlined: In the SCCS report on testing and safety evaluation of cosmetics (SCCS/1628/21 - [link](#)), it was concluded that currently there are uncertainties with regard to whether the endpoints identified by the current testing methods will be sufficient to identify and characterise all the hazards that may be associated with a nanomaterial. However, the SCCS has also published a number of scientific opinions in the past few years on the nano-form of different materials, which are (but are not limited to) sunscreen products (ETH50 - [link](#)), products containing zinc oxide ([link](#)) and colloidal silver ([link](#)). These opinions have been comprehensively prepared by the SCCS, along with data that industry has provided over the years to ensure that the safety assessments on nanomaterials are as robust and data-driven as possible. Should the mandate on nanomaterials be shifted under ECHA's role and responsibility, we request that ECHA further builds up on these SCCS opinions as much as possible when reviewing the options on the current definition used in the Cosmetic Products Regulation. Given ECHA's role in REACH and CLP, an alignment with other chemical legislations would be valuable as it would ensure a coherent application across European legislation.

3. The role of the industry in this initiative must be clearly defined and supported: Fecc advocates for a long-term supply chain and business model that is robust and resilient. Regulators should also acknowledge the industry-led initiatives that have been set up when it comes to cosmetics safety assessment and quality control. Fecc for example, has set up a working group to streamline safety, sustainability and quality requirements for cosmetic ingredient distributors through a questionnaire ([link](#)). Fecc requests the Commission to consider these examples of best practices and how it supports companies, especially for SMEs, with the target to reduce administrative burdens and complexity in line with the Commission's Better Regulation agenda.

As the association that represents cosmetic ingredient distributors, most of which are SMEs, we believe that cosmetics safety and a sound regulatory framework go hand-in-hand. We would be happy to engage further with the Commission in the pursuit of sustainable, future-oriented solutions in this area.

To access the Fecc's response on the EU Commission's website, please [click here](#).