

Cosmetics Europe Delegation of Senior Industry Executives to Commissioner Thierry Breton

Key Meeting Points:

→ With €80 billion at retail sales price in 2021, the European cosmetics and personal care industry is the largest market for cosmetic products in the world, now along-side the USA-c.f. 2020. Exports of cosmetic products from Europe total €24.2 billion (trade value) in 2021, with France and Germany being Europe's main exporters, exporting over €12.6 billion between them and accounting for over 50% of total global exports from Europe.

→ Health and consumer safety are at the core of our business: delivering safe products to consumers is our key priority: our products are assessed through a scientific safety-based ingredients approach, which is the foundation of our sectoral and internationally recognised legislation - the EU Cosmetic Products Regulation (CPR) - a global "gold standard" and key driver for our sector competitiveness.

→ Responding to consumers demand for environmentally and socially sustainable products is also at the heart of how our industry operates. As part of the fight against climate change and for sustainable development, many companies are investing and taking significant actions to integrate environmental and social sustainability into their business strategies.

→ Cosmetics are essential to consumers, as they bring wider societal benefits to their health, self-esteem, well-being and the quality of life. Ingredients and the functions they perform are essential for product performance, which is what consumers value the most. A wide variety of ingredients is critical to maintain innovation capacity and continue to offer safe high-performing cosmetic products, which meet consumers' needs.

While our industry strongly supports the overarching objectives of the Chemicals Strategy for Sustainability (CSS) in relation to health and the environment, **it is essential that the implementation of the CSS, notably under the form of the REACH, CLP and CPR revisions, does not follow a "one size fits all" approach, which does not consider the specificities of our cosmetic products.** A regulatory "one size fits all" approach of the CSS concepts that is not adapted to cosmetics specificities would be the **loss of critical safe ingredients**, leading to complex, time consuming and costly reformulation of potentially hundreds of thousands of cosmetic products or even their complete disappearance from the market. This would result in a **huge economic impact**, but also **negatively affect the societal value of our products**. It would lead to consumers being deprived of products they need and love, which are essential for their health and self-esteem.

Therefore, the **implementation of the CSS concepts should allow for a regulatory mechanism** that takes full **account of the specificities of cosmetics, the functionality of our ingredients** and their **criticality for the performance of our products**. This evaluation should involve scientific experts/regulators that know well our sector. Particularly, it is essential that the **(General Risk Approach) derogation mechanism** our industry already has **under its sectoral legislation (CPR) is maintained** and that **environmental risk management measures for certain categories of cosmetic ingredients are processed under the CPR and not REACH.**