**[Revision of EU legislation on hazard classification, labelling and packaging of chemicals](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12975-Revision-of-EU-legislation-on-hazard-classification-labelling-and-packaging-of-chemicals)**

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Cosmetics Europe is the European trade association for the cosmetics and personal care industry whose key priority is to ensure that consumers have access to safe, innovative, and sustainable cosmetics and personal care products, while maximizing the potential of the industry for innovation and growth.

Cosmetics Europe welcomes the European Commissions Proposal for the Revision of the Regulation on classification, labelling and packaging of chemicals (CLP) and supports its general objectives. Nevertheless, Cosmetics Europe would like to draw the attention of the European Institutions on several aspects which are developed hereafter.

On MOCS (which is not limited to fine fragrances, but also impact on other cosmetics): - The proposed CLP revision would restrict the method of classification of multi-component substances as CMR or ED to a theoretical calculation approach and would no longer allow the use of actual experimental test data conclude on non-classification. - Even if a multi-component substance, such as a natural extracts or essential oil, has been tested in an adequate test system and found not to have CMR properties, it would still have to be classified as CMR if a classified constituent is present above a certain threshold. - These classification thresholds are default values which are not determined based on scientific studies. - Under the new approach, theoretical default values would be given more weight in the classification than actual test data. - Formal classification of a substance as CMR or ED then triggers automatic bans in consumer products, including cosmetics. Consequently, under this new approach hundreds of ingredients, mainly from natural origin, could therefore be banned as CMR substances, although actual test data would show that they do not have CMR properties. This would have huge consequences for tens of thousands of cosmetic products on the market. Therefore, Cosmetics Europe asks that the scientific principle that relevant test data should override theoretical default values should be upheld. There is no justified reason to selectively deviate from this principle for specific hazard categories.

On CLH for groups of substances (grouping): - To speed up harmonised classification, the Commission is seeking to shift from a substance-by-substance approach and proposes to classify groups of substances based on a similar classification approach. This approach assumes that substances having a similar molecular structure have the same impacts on health and environment. This is an incorrect approach as structurally similar substances can have different behaviour and effects. - The consequences that a non-scientific, arbitrary grouping could cause are huge. Substances which are safely used could be heavily restricted and/or banned in cosmetics only because they are part of a group of substances, which is targeted for a CLH, based on the presence of a single substance that has been classified as such. Also, a broad application of grouping for CLH could lead to an increased numbers of substances to be managed simultaneously and may decrease the quality of scientific assessments. To this end, sufficient time should be given to allow for a thorough examination of each CLH dossier, ensuring harmonised classifications are assigned where justified based on a comprehensive review of the weight of scientific evidence. More generally, it is important that CLP reflects actual data to retain the integrity and value of the classification. Therefore, Cosmetics Europe asks that grouping is based on sound scientific principles. The assessment of similarity must be based on a review of all available data on the substances physicochemical, ecotoxicological and toxicological properties. This review must include a Weight of Evidence assessment across all relevant criteria for the hazard in question. Such an approach will help avoid over-classifying and over-regulating substances based on presumed properties.