



Maroussi, 1 November 2021

Summary of the comments from PSVAK: The Hellenic Cosmetic, Toiletry and Perfumery Association:

The Hellenic Cosmetic, Toiletry and Perfumery Association, founded in 1964, is the Greek Association for Cosmetics. Our Association is a member of Cosmetics Europe and has 70 members (manufacturers, producers, and distributors) that are mainly categorized as SMEs.

We would like to thank the Commission for providing us with the opportunity to communicate our comments on the Inception Impact Assessment on the revision of the Cosmetic Products Regulation (CPR).

Our Association fully supports the European Green Deal and the Chemicals Strategy for Sustainability and is committed to working towards a pollution-free Europe and an environment free of toxic substances.

We welcome the generic approach to risk management for harmful chemicals, but we would like to highlight the significance of the Cosmetics Safety Assessment which already assesses the toxicological profile of the cosmetic and ensures safe use for consumers and professionals.

The essential use concept could be applied when safe use data is missing and should be based on the non-availability of suitable alternatives. Clear and solid criteria to assess “essentiality” should be applied, and a new competent body from various backgrounds should be established to assess the “essentiality” of cosmetic products.

Combination effects are already dealt with in the Cosmetic Safety Assessment. Further extension of this analysis could result to an unfeasible long time for research and development of new products for the market.

We welcome the implementation of OSOA as the basis for further assessment of the chemicals on a sector specific way. SCCS should maintain its independent role and continue its work as an expert committee regardless of the management body. Its expertise on alternative methods to animal testing is essential for the CPR concept of animal testing ban.

We support a clear definition of nanomaterials. An exemption process from provisions application is needed in the CPR, when it is scientifically demonstrated that nanomaterials lose their nano structure when added in the product, or during use of the product.

We support the digital labelling as it will help companies quickly include information and it will favor the reduction of packaging and packaging waste which is a significant environmental request, although we believe that risk based, and environmental labeling should not be extended to cosmetic products.



We would like to draw your attention to one of the major problems that SMEs are faced with; the Cosmetics sector is gradually being Overregulated with SMEs being left practically unable to respond financially to the imposed changes.

Please refer to the document attached for the detailed comments.

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