

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 most relevant issues of the REACH Revision Public Consultation.

Our Association supports the introduction of a Generic Risk Management Approach (GRA) and the concept of “essential use” for substances classified as CMR Cat.1, ED Cat.1, PBT or vPvB. However, an efficient GRA approach already exists under the Cosmetic Products Regulation. Demonstrated safety of use should be more important than “essentiality” so that safe chemicals are not banned.

Regarding the information on use and exposure in the supply chain, we believe that in many cases it would be very useful to have such information from the downstream users. Information on use and exposure is already given to the Scientific Committee on Consumer Safety (SCCS), under the Cosmetic Products Regulation, when needed for the safety evaluation of specific substances. Systematic provision of such information on all substances would create a significant burden both on downstream users and the industry.

Regarding the application of the Mixture Assessment Factor (MAF) to all chemicals we believe that it would lead to unnecessary animal testing and unnecessary bans. MAF is useful on substances of high concern and furthermore, it should consider the different uses and exposures.

Finally, we welcome the revision of REACH as an opportunity to accept New Approach Methods (NAM) to ensure safety and reduce unnecessary animal testing.