

9 April 2015

## Proposal for selection of substances in the field of cosmetic products for the impact assessment

### 1. Comments regarding the selection made by the JRC in the draft report:

- The availability of data from SCCS opinions is a relevant criterion for the selection of substances. However, the availability of data on a substance constitutes only a starting point and not the main criterion for selection.
- After a review of the excel listing, we noticed that many substances used in biocides and pesticides are also used in cosmetics but have not been marked as cosmetics ingredients in the listing. Some of them have been assessed by the SCCS (e.g.: formaldehyde) and other substances (e.g.: lauric acid, carbon dioxide) have not been assessed.

There is a risk that these omissions give an inaccurate and incomplete view to the public of the uses of certain substances, as data are also available from the cosmetics sector.

Such omissions can be corrected by checking the substances for their potential use in cosmetic products through the Cosmetic Ingredient database ("CosIng"):

<http://ec.europa.eu/consumers/cosmetics/cosing/>.

- Moreover, we noticed that some substances used in cosmetics and assessed by the SCCS are missing in the listing, such as cyclotetrasiloxane (CAS number 556-67-2 / 293-51-6), that we suggest adding to the listing.

### 2. Suggested additional criteria for the selection of substances used in cosmetic products:

- Select substances already classified as CMR of categories 1A, 1B and 2, in particular those which are toxic for reproduction.
- Select substances which have been flagged by the Member States as potential endocrine disruptors and discussed at the Standing Committee on Cosmetic Products (e.g.: certain types of parabens).

The allocated timeframe (10 April) has allowed us to review parts of the listing only. On that basis, we have selected 77 substances for the screening process (column "cosmetic selection"), including the ones for which the scientific opinion discusses the endocrine disruptor properties. Please note that 14 out of those substances have also been selected for REACH (selection 1).

However, the review of all cosmetic substances mentioned in the listing, in light of our comments above, would be a thorough exercise requiring more time, if necessary.