

From: [REDACTED]
To: [REDACTED] <(GROW)>
Cc: [REDACTED] <(GROW)>; [REDACTED] <(GROW)>; [REDACTED] <(GROW)>;
[REDACTED] <(GROW)>; [REDACTED] <@ccecosmetic.org>; [REDACTED] <@ccecosmetic.org>; [REDACTED] <@ccecosmetic.org>;
[REDACTED] <@ccecosmetic.org>; [REDACTED] <@ccecosmetic.org>
Subject: AW: Cannabis-related ingredients
Date: jeudi 7 février 2019 14:18:42
Attachments: [image001.png](#)
[image003.png](#)
[image004.jpg](#)

Dear Mr. [REDACTED];

Thank you for our answer; as mentioned, my colleagues [REDACTED] and [REDACTED] will be at the meeting and attend the further discussion.

In regard to “*Apocynum cannabinum* L. and its preparations” we will for now not insist on further addressing it; we had it brought up as we are discussing Cannabis. Yet, in regard to your remarks on the entry, we do not agree. Well aware that the Indian Hemp contains cardiac glycosides, it is also known that most species of the Apocynaceae family do contain these and/or other toxins; e.g., the well known Oleander (*Nerium Oleander*) is part of this plant family and known to be one of the most poisonous commonly grown garden plants. Yet, NERIUM OLEANDER LEAF EXTRACT as well as 35 other Apocynaceae extracts show upon searching COSING for ‘Apocynaceae’, with none being restricted or prohibited. It is the ‘poison’ that often made the plants being used in natural medicines and makes the extracts, at the appropriate concentration following Paracelsus, used today in cosmetics.

Well knowing what attraction the affix 'cannabium' has on cosmetics inspectors all over the EU, we further on assume that this affix was the reason for listing *Apocynum cannabinum* on Annex II. ASEAN adopts the EU's substance regulations in full, so no surprise it appears there. Why Cannada lists it on the hot list is unknown to us and we did not further research it for the moment; yet, it may be a good approach finding out if Canada really has more convincing data on the species.

We believe at this specific junction that the regulation on Apocynaceae is contradictory.

Kind regards,

Dr. [REDACTED], CONUSBAT

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CONUSBAT is Member of Cosmetics Consultants Europe

Von: [REDACTED]@ec.europa.eu [mailto:[REDACTED]@ec.europa.eu]
Gesendet: Mittwoch, 6. Februar 2019 13:40
An: [REDACTED]@conusbat.com
Cc: [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu;
 [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu
Betreff: RE: Cannabis-related ingredients

Dear Dr. [REDACTED],

Thank you for your kind input. We are waiting for other comments in order to discuss further in the WG meeting on the 18th of February.

Nevertheless, we would like to make a comment concerning the WHO ECDD expert group. The ECDD makes recommendations, as such they have no legal value, unless they are voted and adopted at the UN level. If and when the entry of Cannabis is amended with the addition of the suggested footnote in the Single Convention, we will proceed accordingly. Nevertheless, we acknowledge this as a valid point.

Concerning the second part of your email, we would like to inform you the following:

The ingredient "*Apocynum cannabinum* L. and its preparations" is indeed prohibited according to Annex II entry 41 (it was actually prohibited already in the Cosmetics Directive). We consider the reason for that is not a name confusion (as you mentioned in your email), rather than the fact that *Apocynum cannabinum* is a poisonous plant. According to the available information: "*all parts of the plant are poisonous and can cause cardiac arrest if ingested*". Except from the EU, it is also banned in ASEA and it is registered under the Canadian hotlist. Therefore, we consider this issue not relevant to the topic of Cannabis to be discussed under the AOBs.

Kind regards

[REDACTED], PhD



European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs
Unit D4 – Health Technology and Cosmetics

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From: [REDACTED] [REDACTED]@conusbat.com>

Sent: Wednesday, February 6, 2019 11:25 AM

To: [REDACTED] (GROW) [REDACTED]@ec.europa.eu>; "Undisclosed recipients:"@pps.reinject

Cc: [REDACTED]@ccecosmetic.org; [REDACTED]@ccecosmetic.org; [REDACTED]@ccecosmetic.org;

[REDACTED]@ccecosmetic.org; [REDACTED]@ccecosmetic.org

Subject: AW: Cannabis-related ingredients

Dear Mr [REDACTED];

Cosmetics Consultant Europe has comments on your suggestions in 'Cannabis-Hemp_CIRCABC_GM_240119.docx', pls. find attached.

If this is not the best way of forwarding our comments, pls. advise; yet, I have not found an upload key on CIRCABC.

My CCE colleagues [REDACTED] and [REDACTED] will be attending the Meeting on 18 February and available for further discussion.

Kind regards,

[REDACTED]
[REDACTED]

Dr. [REDACTED], CONUSBAT
logo-globe-upd-hell-klein



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Von: DIGIT-CIRCABC@nomail.ec.europa.eu [<mailto:DIGIT-CIRCABC@nomail.ec.europa.eu>]

Gesendet: Donnerstag, 31. Januar 2019 12:55

An: Undisclosed recipients:

Betreff: Cannabis-related ingredients

CIRCABC



You received a new message

As member of the interest group [COSMETICS - Working group on cosmetic products](#) (Category: Internal Market, Industry, Entrepreneurship and SME's), you received the following message.

Message

From the user [REDACTED]

Dear Members of the Working Group on Cosmetic Products,

as discussed in the last Working Group meeting (10/12/2018) please find attached a document concerning Cannabis-related ingredient and their use in Cosmetics. We would appreciate your feedback before the Working Group meeting on the 18th of February 2019.

Thank you for your understanding and collaboration.

Kind regards



Attachments:

[Cannabis-Hemp_CIRCABC_GM_240119.docx](#)

Best regards,
The CIRCABC team
<https://circabc.europa.eu>

