

## CTPA Statement on the Legal Status of Butylphenyl Methylpropional (BMHCA, trade name 'Lilial') According to the UK Cosmetics Regulation

9 May 2022

EU/NI STATUS	GB STATUS
<p>Since 1 March 2022, BMHCA is listed in Annex II of the <a href="#">EU Cosmetic Products Regulation</a>. This means it will be prohibited in cosmetic products made available on the market in the EU and Northern Ireland. Cosmetic products containing BMHCA must not be available for sale in the EU and NI as of 1 March 2022 (the 'off-shelf' date). Please see the regulatory amendment <a href="#">here</a>.</p>	<p>BMHCA continues to be listed in Annex III of the <a href="#">UK Cosmetics Regulation</a>. Therefore, cosmetic and personal care products containing BMHCA can legally continue to be placed on the market and sold in GB until further notice. Please note that a ban is expected to come into force on BMHCA in GB on 15 October 2022 (placing on the market deadline) and 15 December 2022 (the 'off-shelf' date). All information can be found in this <a href="#">public news</a>.</p> <p>Annex III of the UK Cosmetics Regulation gives the labelling requirements for BMHCA as a fragrance ingredient, depending on the product type (leave-on or rinse-off).</p>

Butylphenyl methylpropional (BMHCA), sometimes referred to by its trade name 'Lilial', is a fragrance ingredient used in cosmetic products.

Since 1 March 2022, butylphenyl methylpropional (BMHCA/'Lilial') is classified as a Carcinogenic, Mutagenic or Reprotoxic (CMR) category 1B substance under the EU and GB Classification, Labelling and Packaging (CLP) Regulations.

Article 15 of the UK and EU Cosmetics Regulations requires CMR-classified substances to undergo an exemption process to assess whether they can continue to be used as cosmetic ingredients. This regulatory process has not yet been completed under the UK Cosmetics Regulation. Therefore, the new EU provisions for BMHCA/'Lilial' do not apply in GB. However, a ban is expected in GB on 15 December 2022 (the 'off-shelf' date).

While companies have been working towards the deadline of 1 March 2022 for products for both the EU and UK markets, as advised by CTPA, **as of revision date of this statement, BMHCA/'Lilial' can be legally used in cosmetic products in GB until:**

- **15 October 2022, as placing on the market deadline;**
- **15 December 2022, as making available (off-shelf) deadline.**

**The draft regulation implementing the BMHCA/'Lilial' ban in GB is still going through the legislative process, as per this [public news](#).** CTPA will keep companies updated on any further developments.

The legislative process for BMHCA began before the UK left the EU. It is important to stress that the CMR classification of BMHCA and the ban now in force in the EU, and expected in GB shortly, is based on the hazardous properties a substance might have under a "worst case" situation and does not take account of whether there is any risk associated with specific uses or exposures. Consumers who have bought cosmetic and personal care products that contain BMHCA, can be reassured that these products are still safe to use. They will have undergone a rigorous safety assessment by an expert safety assessor to ensure their safe use.