

CTPA Statement on the Legal Status of Methyl Salicylate Under the UK and EU Cosmetics Regulations

26 October 2022

EU/NORTHERN IRELAND STATUS	GB STATUS
From 17 December 2022, methyl salicylate will be listed in Annex III (the list of ingredients with specific requirements of use) of the EU Cosmetic Products Regulation, setting specific concentration limits for a number of different product types. Please see the regulatory amendment here.	Methyl salicylate is not listed in Annex III of the UK Cosmetics Regulation. Therefore, cosmetics and personal care products containing methyl salicylate can continue to be placed on the market and sold in GB without a specific restriction until further notice. These products are both safe and legal; they have undergone a rigorous safety assessment by an expert safety assessor. As part of the new GB legislative procedure, methyl salicylate will undergo an assessment under the UK Cosmetics Regulation to reconfirm its safety. This is expected during 2023. This legislative process is expected to result in a new restriction in Annex III of the UK Cosmetics Regulation for methyl salicylate. The industry safety data support an Annex III restriction reflecting the concentrations and product types in which methyl salicylate is currently safely used. CTPA will work with the UK authorities to ensure transition periods allow the UK supply chain time to prepare for the entry into force of any new restrictions. CTPA will keep the UK cosmetics industry well informed.

Methyl salicylate is used in cosmetic products as part of fragrance mixtures and as a flavouring and soothing agent in oral hygiene products.

European Union (EU)

From 17 December 2022, methyl salicylate is classified as a Carcinogenic, Mutagenic or Reprotoxic (CMR) category 2 substance under the EU Classification, Labelling and Packaging (CLP) Regulations. Article 15 of the EU Cosmetic Products Regulations requires CMR-classified substances to undergo an exemption process to confirm that they can still continue to be safely used as cosmetic ingredients. This exemption process has been completed in the EU, which has led to the inclusion of this ingredient in Annex III of the EU Cosmetic Products Regulation. Read more about CMR substances [here](#).

Great Britain (GB)

The GB Classification, Labelling and Packaging (CLP) Regulation applies in GB (England, Scotland and Wales). Methyl salicylate is not yet classified as a CMR 2 substance under GB CLP. This regulatory process is ongoing and when it is complete, methyl salicylate will undergo the associated required safety review under the UK Cosmetics Regulation, to reconfirm its safe use in cosmetics. **Therefore, the new EU provisions for methyl salicylate do not apply in GB. However, methyl salicylate is expected to be added to an Annex of the UK Cosmetics Regulation at a future date once the UK regulatory process is complete.**

Methyl salicylate can be safely and legally used in cosmetic products in GB without a specific legal restriction until further notice.

It is important to stress that the CMR classification of methyl salicylate 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. **All** cosmetic products placed on the GB market must be safe and have to undergo a full safety assessment before being allowed on the shelves and this is a strict requirement under UK cosmetics law, which also provides guidance on how this safety assessment must be carried out. The safety assessment ensures that all cosmetic products, and their ingredients, are safe to use.