

## Plastic Packaging Tax Consultation - Chemical Recycling and Adoption of a Mass Balance Approach

The consultation is available on [GOV.UK](https://www.gov.uk). The deadline for responses is 10 October 2023.

[CTPA](#), the Cosmetic, Toiletry and Perfumery Association, is the trade association representing the UK's cosmetics and personal care industry. [Membership](#) covers over 85% of the UK cosmetics and personal care market by value, which in 2022 was £8.9bn, and comprises small, medium, large and multi-national companies supplying the UK market. Member companies include manufacturers, distributors, ingredient suppliers, contract laboratories, contract manufacturers and retailers.

In the UK, cosmetic products must comply with a strict regulatory framework. Article 2 of the [UK Cosmetics Regulation](#) (UKCR) includes the legal definition of a cosmetic product. Article 2(a) defines a 'cosmetic product' as:

*“any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours”*

This definition covers a wide range of products, from oral care and hair care, to sun protection, deodorant and colour cosmetics.

**CTPA supports the PPT Chemical Recycling and Adoption of a Mass Balance Approach consultation response submitted by the [British Plastics Federation](#).**

In addition, CTPA would like to highlight some areas of particular importance to the cosmetics and personal care industry.

According to Article 10 of the UKCR, cosmetic products must undergo a safety assessment before being placed on the market. The safety assessor looks at the individual ingredients, how they are used in the final product and whether the finished product is safe. This evaluation includes the relevant characteristics of packaging material, in particular purity and stability, and any potential interaction between the packaging and product during the proposed life of the product.

Annex I of the UKCR describes the information that needs to be considered in the content of the Cosmetic Product Safety Report (CPSR). Section 4 provides details with regard to impurities, traces, information about the packaging material:

- The purity of the substances and mixtures.
- In the case of traces of prohibited substances, evidence for their technical unavoidability.
- The relevant characteristics of packaging material, in particular purity and stability.

This safety requirement has a huge impact on the types of materials that can be used in cosmetic packaging. For example, in order for a company to use recycled content in plastic packaging for cosmetic products, the recyclate must be of high quality and from a known and trusted source to

ensure that there are very limited levels of impurities, and its safety can be fully assessed. Chemical recycling not only allows for quality feedstocks of recycled plastics to be safely used in cosmetic packaging, but it also allows for otherwise unrecyclable plastics to be recycled.

CTPA would also add that whilst the idea of using food-grade material in cosmetic packaging can provide a source of known quality, there is a responsibility by the industry to ensure that food-grade recyclate is not used for cosmetic packaging. This is because after recycling, it cannot be used again in food packaging, and therefore disrupts circularity.