



COSMETICS AND PERSONAL CARE INDUSTRY

OUR KEY ASKS

CTPA.ORG.UK/CTPAMANIFESTO2024



CTPA REQUESTS THAT THE NEXT UK GOVERNMENT IN THE NEXT PARLIAMENTARY TERM DEVELOPS A DEDICATED STRATEGY FOR THE COSMETICS, PERSONAL CARE AND BEAUTY INDUSTRY, WHICH:



Promotes the essentiality of the industry's products and services



Maintains strict risk-based safety legislation



Protects science-led decision-making



Provides a framework for growth with sustainability at its core



Enhances the competitiveness of the UK industry for both import and export



Champions the UK industry as a leader in product manufacture, design and innovation

CTPA AND THE INDUSTRY

225+
MEMBERS

85%
UK INDUSTRY
COVERAGE

£8.9BN
2022
RETAIL SALES

5.4%
INDUSTRY
GROWTH
2021 - 2022

1,413
UK SMEs

550K
INDUSTRY
EMPLOYEES

£24.5BN
INDUSTRY
CONTRIBUTION
TO GDP

CTPA (the Cosmetic, Toiletry and Perfumery Association) is the UK trade association for the cosmetics and personal care industry: www.ctpa.org.uk/about-us

The Association's over 225 membership represents the manufacturers of cosmetics and personal care products, from multi-nationals to SMEs, and suppliers to the industry. CTPA membership covers over 85% of the UK industry, which was valued at over £8.9 billion at retail sales value in 2022¹, growing 5.4% over 2021. Our sector employs people across manufacturing, design, R&D, marketing, sales, export/import, retail and services, including hair and beauty salons and spas. In 2022, the personal care industry supported a total GDP contribution of £24.5 billion².

It is a highly innovative, creative, skilled and successful UK industry - entirely grounded in science. Companies are based across the nation, and impressively the UK cosmetics and personal care industry has the largest number of SMEs in Europe, at 1,413³. The industry offers employment opportunities for a range of backgrounds, including scientific and technical expertise and highly skilled manufacturing roles. The industry supported employment of 550,000 across all channels of economic impact in 2022², thus providing opportunities for individuals from all walks of life to bring new trends and innovative ideas to the market and contribute to GDP.

The UK cosmetics industry is acutely aware of the need to reduce the environmental impact of cosmetics and personal care products wherever possible. As an Association, CTPA has had an ambitious sustainability strategy in place since 2018, aiming to drive towards being net positive in its impact on people and planet, focusing on ingredient sourcing, product manufacture, waste and end-of-life fate and wellbeing. CTPA also has an active diversity and inclusivity strategy which aims to identify and address issues related to the promotion of diversity, equity and inclusivity to ensure that everyone feels represented within and by the industry.

Our industry is a major success story, it is scientific, it is creative, it is diverse, it is innovative, it is both export-led and strong domestically and it is essential every day for hygiene, wellbeing, self-esteem and positive mental health. The industry is a major employer, exporter and investor in R&D. This is despite the many challenges that the industry faces, including the UK's departure from the EU, the global pandemic, climate change, supply chain issues and the cost-of-living crisis.

1 CTPA 2022 Annual Report. (2023). Data provided by Kantar and Circana
2 Value of Beauty Report. (March 2023). Oxford Economics for the British Beauty Council
3 Market Performance Report 2022. (2023). Cosmetics Europe

A Safe Industry

Strict safety laws, the UK Cosmetics Regulation (UKCR)⁴, cover all cosmetic products⁵ placed on the UK market. The UKCR has the safety of cosmetic products, and so the consumer, at its core.

There are three layers of legal obligations to the safety assurance process:

The legislation requires cosmetic products and their ingredients to be safe.

The duly qualified and experienced Safety Assessor must personally confirm that the cosmetic product is safe.

Products are monitored via post-market surveillance; any adverse reactions are addressed by companies and may have to be reported to the authorities.

The UKCR not only ensures human safety but also protects consumers by ensuring all claims made with regard to the effectiveness and product characteristics are adequately substantiated.

CTPA'S OVERARCHING KEY ASK

To-date, the cosmetics, personal care and beauty industry has not had a holistic, Government-supported strategy dedicated to the sector. CTPA is calling for such a strategy to be developed, based on, and maintaining, the strict legislative framework already in place.

CTPA would like to work with the next Government together, as a trusted partner, on the dedicated strategy to secure the continued sustainable growth of this indispensable industry for the next five years.

This Manifesto sets out the main asks of this approach based on these key pillars.

 ESSENTIALITY

 REGULATION

 SCIENCE

 SUSTAINABILITY

 BUSINESS



CTPA would be delighted to discuss the contents with you at your earliest opportunity. Its Director-General, **Dr Emma Meredith**, can be contacted at: emeredith@ctpa.org.uk or info@ctpa.org.uk

⁴ 'UKCR' - Assimilated Regulation (EC) No. 1223/2009 on cosmetic products, as amended. <https://www.legislation.gov.uk/eur/2009/1223/contents>

⁵ Article 2: (a) of the UKCR states: 'cosmetic product' means 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.



Ask

 CTPA wants to ensure that UK Government policy recognises the essentiality and economic significance of our industry and addresses the needs of the industry accordingly, as is the case with other sectors, enabling it to continue contributing to the UK's scientific leadership, diverse workforce, economy and growth. In 2022, the personal care industry supported a total GDP contribution of £24.5 billion².

Rationale

The cosmetics, personal care and beauty sectors form an essential industry. The pandemic not only reminded us of the vital importance of hygiene, but also of self-esteem and positive mental health, both of which are enhanced by taking care of personal care and hygiene, including by visiting hair and beauty salons and spas.

The industry produces products that are absolutely critical to everyday life, including sun protection, oral care (including toothpaste), soap, antiperspirants and deodorants, shampoos and conditioners, hand washes and skin care as well as colour cosmetics, hair styling and grooming products for both women and men. **Research** conducted in 2022 for the CTPA by Opinium⁶ showed that 85% of UK adults class cosmetics and personal care products as essential to their lives; the figure is even higher among women, at 94%.

UK COSMETICS REGULATION (UKCR)



Ask

 **A fundamental ask of the industry is that the framework of the UK Cosmetics Regulation (UKCR)⁴, a key safety law, is preserved and continues to be sector-specific, risk-based and regulates the safe use of cosmetic ingredients and finished cosmetic products.**

Rationale

The UKCR is an excellent framework that is well understood by industry, regulators and international trading partners, which enables the success of the sector in the UK. The UKCR applies to all cosmetic products placed on the UK market, meaning these rules enable UK consumers access to safe and effective products, while creating a level playing field for all companies placing cosmetic products on the UK market.

The UKCR has consumer safety at its core, providing a balance of responsibilities for product safety between the regulator and industry, whereby the Responsible Person must ensure the product has been assessed for safety via a strict risk assessment; that the labelling of cosmetic products includes all information needed to use the product safely; and that the authorities are notified about the products in the market. In addition, cosmetic ingredients are regulated according to expert and independent, scientific advice.

It is important that a sector-specific regime which is demonstrably enabling industry to provide essential safe products to consumers, such as the risk-based UK Cosmetics Regulation, is maintained following the OPSS Product Safety Review.

The UKCR is the bedrock of the industry's success and is without doubt an enabler of industry success and consumer trust in safety. As such, it is a key part of the UK's international trade strategy for cosmetics and personal care products because our international trading partners know, understand and trust the UK Cosmetics Regulation and would be concerned if the UK were ever to move away from it.

UK REACH REGULATION

Asks

 **UK REACH (Registration, Evaluation and Authorisation of Chemicals) must maintain the availability of safe chemicals already on the UK market, thus ensuring the future of UK manufacturing.**

Future submissions for UK REACH must be achievable for companies of all sizes in terms of cost and resource, whilst maintaining protection of health and the environment.

CTPA welcomes the policy paper published by the Department for the Environment, Food and Rural Affairs (Defra) on the Alternative Transitional Registration model (ATRm) for UK REACH. We continue to request that the new model protects human health and the environment through a proportionate approach, to alleviate the burden on downstream users, such as cosmetic product manufacturers, as well as former EU downstream users (now UK importers under UK REACH).

The submissions must not expose companies to potential legal challenges from owners of the data, consortia or from other regulators. It is crucial that the process for the alternative submission model is transparent, provides industry with the opportunity to feed back and time to implement within the new registration timeline(s).

Rationale

The UK's cosmetics industry strongly supports the need for a UK REACH system to protect the environment and human health. High standards in the industry and in the regulation of chemicals are essential; helping to instill trust in the UK as a leading regulator, promoting consumer confidence in our products and boosting credibility for the responsible actions of business.

We would like to see a UK REACH that achieves these objectives while avoiding the excessive costs and bureaucracy and the unnecessary burdens on business, that could lead to a reduced investment in the UK.

In addition to the positive UK Government action on extending the deadlines for the implementation of full requirements for existing chemicals under UK REACH to 2026, 2028 and 2030, we also welcome the Government's commitment to finding alternative and less burdensome ways of looking at hazard and exposure to chemicals in the UK under UK REACH.

UK INTERNAL MARKET

Ask

 It is vitally important that business regulation affecting the UK's internal market is introduced at the same time and in the same way across the whole of the UK and that differences between the four home nations are avoided and minimised as far as is possible.

Rationale

Differing or diverging rules in each of the devolved nations of the UK, which is starting to emerge in particular on environmental policy, is untenable for companies placing cosmetic products on the UK market. It is simply not feasible to have different products for individual nations within the UK.

RELATIONSHIP WITH THE EU



Ask

 CTPA requests that a formal structure for dialogue and cooperation be set up between the UK and the EU for the cosmetics and personal care industry, similar to the agreed Memorandum of Understanding (MoU) on financial services. In the run up to the five-year review of the Trade and Cooperation Agreement (TCA), there is now a major opportunity to instigate a formal structure of dialogue between the UK and EU in order to help to grow the industry for the benefit of UK jobs, science, innovation and exports.

Rationale

CTPA is asking that the UK Government develops a close relationship with the EU. The setting up of a dedicated Forum will enable:

- the Chemicals Chapter in the UK/EU TCA, which has yet to be utilised, to be explored in order to facilitate trade, reduce barriers and increase investment in the UK;
- Defra, the UK REACH regulators, the European Commission and ECHA to discuss far greater structured regulatory cooperation under UK and EU REACH;
- a more structured and regular dialogue between the UK and EU to take place on: policy and regulation, additional easements on UK and EU trade, intra-company transfers of people and joint working on science. CTPA is extremely pleased that the UK has re-joined the Horizon Europe programmes;
- the TCA to be reviewed, which is an action that both sides must complete by 2026. There are opportunities for the addition of new provisions and chapters that cover extensive regulatory data sharing on UK/EU REACH and on cosmetic safety and new provisions to enable greater UK/EU trade and investment.

Additionally, under the Northern Ireland Protocol, cosmetic products destined for NI continue to be regulated under EU rules. This adds further complexities in the supply chain. Dialogue needs to be established now in order to reduce later frictions.

Asks

 **There should be faster UK ratification of Free Trade Agreements (FTAs) to put the FTA provisions into effect as soon as possible or that provisional implementation should be allowed prior to ratification, and cosmetic products should be included in discussions for all FTAs – including the possible addition of cosmetics chapters.**

 **We request that the Department for Business and Trade (DBT) market access team and central prioritisation teams maintain close contact with CTPA to resolve key barriers to global trade.**

 **CTPA supports the UK's intention to formalise its membership of the International Cooperation on Cosmetics Regulation (ICCR).**

Rationale

Barriers to trade have a big impact on the ability of businesses to reach new markets and invest towards international recognition of UK products and brands. Promoting and implementing harmonisation around the world is important as a long-term goal to ensure the continued relevance of the UK cosmetics industry. FTAs are one tool to help achieve this.

Cosmetic chapters incorporated into the relevant FTA sections provide a framework under which regulators and industry can find ways to reduce or eliminate barriers. With ambitious provisions, these chapters can provide the UK Government with opportunities for structured dialogue to seek harmonisation; they can support the exchange of information on market surveillance to enhance product safety; they may remove red-tape and administrative burden; and they provide certainty that signatories are working on behalf of the interests of a dynamic industry.

CTPA is grateful for support to-date from the DBT Trade Sector Manager. However, in order to continue to develop the UK's competitiveness in global markets, more resource is required. CTPA is asking for a well-funded, centralised team dedicated to cosmetics and personal care products to be formalised, looking at domestic and international policy, to grow business, enhance competitiveness, support companies in their exports and encourage the use of existing FTAs, especially by SMEs.

A SCIENCE-LED AND RISK-BASED APPROACH



Asks

 CTPA is asking that any decisions being made on the safe use of cosmetic ingredients and finished cosmetics and personal care products follow a robust science-led and risk-based approach.

 We require a long-term commitment to transparent, risk-based and independent scientific advice to inform the regulation of cosmetics under the UK Cosmetics Regulation⁴ (UKCR).

Rationale

Cosmetics and personal care products are fundamentally based on science. The UK is renowned for its risk-based approach. The UKCR has consumer safety at its core and it requires that an in-depth risk assessment be carried out on each cosmetic product before it is made available for use by the consumer.

We welcome that the governance and transparency arrangements for the Office of Product Safety and Standards (OPSS), as they relate to cosmetic products, are now being formalised and published in order to enable OPSS to develop a strong reputation for transparency, openness and independence.

The UKCR controls what may or may not be put into a cosmetic product. There are lists of substances that must not be present and lists of substances that may be used as ingredients subject to particular restrictions. In addition, certain classes of ingredients (colours, preservatives and UV filters) are part of positive lists, so only those individual ingredients pre-approved and listed in the UKCR are allowed for these purposes. It is imperative that the process for ingredient scrutiny is transparent, consistent and based on sound science in order to provide a stable, consistent and predictable regulatory framework.

CTPA would be happy to engage in conversations should the Government ever consider transforming the OPSS into an independent regulator.

ADVANCING ANIMAL-FREE SCIENCE

Asks

 **All future UK Governments must rigorously uphold the ban on the testing of cosmetic products and their ingredients on animals under the UKCR.**

 **We ask that Government publishes a strategy that establishes a commitment to integrate the use of animal-free methods into the safety assessment of chemicals. This will promote and streamline the use and regulatory acceptance of these methods in the UK, helping the UK to become a world leader in modern, animal-free scientific methods.**

Rationale

We would like to see the Government prioritise collaboration to identify industry's needs and challenges with the development and adoption of animal-free test methods for chemicals safety, and for occupational health and safety and environmental assessment. Implementing a strategy to encourage the promotion, dissemination, education and implementation of non-animal New Approach Methodologies (NAMs) in chemicals testing and safety assessment will prioritise this important work across all sectors and Government departments.

Our industry is already a pioneer in this field, having had an animal testing ban in place in the UK since the late 1990s. This is a genuine area of UK global leadership and a major opportunity for the UK to help to reduce animal testing globally.

EXTENDED PRODUCER RESPONSIBILITY

Asks

 CTPA is asking that the Extended Producer Responsibility (EPR) consultation process has direct participation and involvement from the industry.

 In addition, industry asks that detailed information on the EPR requirements, not broad intentions, are communicated as a matter of urgency in order for companies to have sufficient time to prepare.

 Discounts on modulated fees must be extended to all companies who operate Take-Back Schemes and who are therefore recycling theirs and other companies' waste packaging. We request that companies who have Take-Back Schemes and/or promote Take-Back Schemes to their consumers can label their products as recyclable ('via take-back schemes').

 Monies raised from EPR must be used to improve a harmonised infrastructure for recycling across the UK.

 Equally important is investment in the infrastructure required to increase the percentage of collected plastic that is recycled and in improving the quality of recycle.

Rationale

Sustainability is vitally important to us all, to our planet and to our industry. There are numerous challenges the environment is facing (climate change, biodiversity, impact of packaging, etc.). The cosmetics and personal care industry is committed to acting within the planet's limit, and the industry is also actively contributing to solving the challenges of the world. CTPA developed a Sustainability Strategy – Driving Towards a Net Positive Cosmetics Industry: <https://www.ctpa.org.uk/sustainability-matters>, in partnership with Forum for the Future, and the Association has been implementing this in partnership with its members since 2018.

The cosmetics industry is supportive of a world-class producer-led EPR scheme for packaging. CTPA is pleased that Dr Margaret Bates, Managing Director of the On-Pack Recycling Label (OPRL), has been appointed to the role of Head of the UK EPR for Packaging Scheme Administrator.

We believe that producers must be central to the operation and design of the scheme in order to achieve efficiency and deliver the desired environmental outcomes. However, with regard to EPR labelling requirements, the industry needs three years' notice of the details to implement any changes. Over-stickering should be allowed for new labelling requirements in order to avoid unnecessary destruction of products.

CTPA would fully support all efforts to increase the quality of recycle collected and in steps taken to allow more chemical recycling.



Asks

 CTPA is requesting the return of tax-free shopping in the UK to boost tourism spending in stores and at airports.

 The industry asks that UK Government takes into account global supply chains and seeks close collaboration on packaging and labelling requirements, in terms of design and implementation date.

Long lead-in to labelling and formulation changes are requested where action is not linked to safety provisions, in order to avoid costly and unsustainable destruction of unsold durable cosmetic products.

Rationale

This will attract shoppers to the UK. It will encourage brands to do business and invest in the UK. It will also help UK companies and retailers at a time when they are still feeling the pressures and impacts of Brexit, COVID and the cost-of-living crisis. Long-term, it will increase sales in the UK and could ultimately benefit the Exchequer through higher business sales, higher employment and higher corporation tax.

It is important that regulators understand how the industry works and the timelines involved. When regulatory changes are made, industry must be given sufficient time to make the changes and adjust. Business needs details and certainty, not broad intentions, in order to prepare in time. For example, re-formulation of a cosmetic product takes at least three years, if there are suitable alternative ingredients available. New labelling requirements can also take at least three years to implement. In particular, consideration must be made for the sell-through of existing products to avoid unnecessary waste.

It is also imperative that consumer choice is not eroded due to a reluctance by European companies to trade with the UK (or set up UK subsidiaries) because of the complications and potential duplications of safety legislation and labelling, including the need to have both EU and UK Responsible Person details on their packaging, or having to radically alter how that business is done.

111Skin • 5 Squirrels • A & E Connock (Perfumery & Cosmetics) • A-Path Solutions • ADA Cosmetics International Adina Chemicals Ltd t/a Adina Cosmetic Ingredients • Advanced Development & Safety Laboratories • Avena • Aesop Albion Cosmetics (UK) • Alfa Chemicals • Alliance Pharmaceuticals • Allingham Beck Associates • ALS Laboratories (UK) Amber House • Amelia Knight • Angel Consulting London • Anglo European Trading • Arcania Apothecary • Argentum Apothecary Arxada • Ashland • Aspects Beauty Company • Aston Chemicals • Avlon Europe • Avon Cosmetics • Ayton Global Research Azelis UK • Barry M Cosmetics • Bath Potions T/A Dr Sara Robb • Bayer • BE For Beauty • Beiersdorf UK • BeLab Services Blink Brow Bar • Bloom Regulatory • CBEE (Europe) • CE.way Regulatory Consultants UK • Chanel • Charlotte Tilbury Beauty Chemoxy International Limited (Seqens Custom Specialties) • Christina May • Church & Dwight • Clear RP UK Colart International Holdings • Cole Beauty • Colgate-Palmolive (UK) • Colin's Cosmetic Consultancy • Combe International Complife Group • Connect Compliance • Cornelius Group • COSICHEM UK • Cosmarida • Cosmetic Safety Solutions • Coty UK CPL Aromas • Creightons/Potter & Moore • Croda • Crown Laboratories • Cutest Systems • Delphic HSE Solutions E. T. Browne (UK) • Edgewell Group • EF Chemical Consulting • ELEMIS • Esschem • Europe Estée Lauder Companies Eurofins Product Testing Services • Exponent International • FaceGym • Faith in Nature • FB Beauty • Federici Brands Ferndale Pharmaceuticals t/a Aestheticare • Firmenich UK • Fontaine Group • Freyr Life Sciences • Future Regulatory Services Galderma UK • GCRS Global (Global Compliance and Regulatory Services) • Givaudan UK • Give Back Beauty Global Regulatory Services • GoJo Industries-Europe • Gorilla Glue Europe t/a O'Keeffe's Company • Grafton International Group55 • H&M Hennes & Mauritz GBC AB • Hairburst • Haleon • HCT Europe • Heathcote & Ivory • Henkel Beauty Care • Herb UK Hipp UK • Holland and Barrett • Hoya Co • HSNF • Huda Beauty • Iconic London (Holdings) • IMCD UK • INEOS Hygienics Infotox Lda. Inline Health and Beauty • Innospec • Innovant Research • Inter Scientific • International Cosmetics & Chemical Services • Intertek J Floris • James Robinson Speciality Ingredients • John Gosnell & Company • Kanebo Cosmetics (Europe) • Kao Corporation Karium Ltd • KDC/ONE Swallowfield • Kenneth Green Associates • Kenvue (Johnson & Johnson) • Kerfoot Group/Oleon Kew Health & Beauty • Kimberly-Clark Europe • KMI Brands • Kosé Corporation • L'Oréal UK & Ireland • Laleham Health and Beauty Linco Care • LVMH Perfumes & Cosmetics UK and Ireland • Malibu Health Products • Marks & Spencer • Mary Kay Cosmetics (UK) Mavala (UK) • Medik8 • MEIYUME • Melbec Microbiology • Meller Design Solutions • Mentholatum • Mercona (GB) • Mibelle Group Miller Harris Fragrances • Momentive • Montagne Jeunesse International • Morgan's Pomade Company • MPM Consumer Products MSL Solution Providers • Nailchemy • Nails Inc • Neal's Yard (Natural Remedies) • NEOM Organics • Next Retail Nice-Pak International • NordicReg • Nuriss Skincare and Wellness t/a Decree • Obelis UK • On-Group • Olean Personal Care Oriflame • Original Additions (Beauty Products) • Oxford Biosciences • Pai Skincare • Pelham Group • Per-Scent Percy & Reed Product • Persan • Personal Care Regulatory • Pharmacare Europe • Philip Kingsley Products • Pierre Fabre Power Health Products • Primark Stores • Priston Safety Assessments • Procter & Gamble UK • Professional Beauty Systems • Puig PWC Solutions • PZ Cussons (UK) • PZ Cussons Beauty LLP • Quest Personal Care • Reckitt • REFY Beauty • Rettenmaier UK Revlon International Corporation • Revolution Beauty • Rituals Cosmetics UK • Rodial • Rubicon Technical • SA Designer Parfums Sainsbury's • Sally Salon Services • Salonserve Hair & Beauty Supplies • Samuel Farmer & Co • Sandaig t/a Scotia Beauty SC Johnson UK • Scott Bader • SGS UK • Shiseido Companies • Skin Rocks • Skinovation • SLG Brands • Smink Solent International • Space Brands • Stephenson Group • Superdrug • Surefil Beauty Products • Surfachem • Tangle Teezer Technology Sciences Group Consulting (TSG) • Tesco • The Body Shop International • The Cosmetic Consultancy The Cosmetic Experts • The Gel Company • The Regulatory Company UK • The Soap Story • The Soapery • Theunseen THG Beauty • Thornton & Ross • Tricogen Laboratories • Trinny London • Tropic Skin Care • TTS Pharma • Unilever UK & Ireland Venture Life Group • Vieve • Waitrose/JLP • Wala UK t/a Dr Hauschka • Walgreens Boots Alliance • Warpaint London/Badgequo Water Wipes • Wella • Wisdom Toothbrushes

CTPA members list as of February 2024 - Current members list can be found here: <https://www.ctpa.org.uk/member-list>

The Cosmetic, Toiletry and Perfumery Association Limited, 49 Whitehall, London SW1A 2BX

Tel: +44 (0)20 7491 8891

Web: www.ctpa.org.uk / www.thefactsabout.co.uk

Email: info@ctpa.org.uk