

European Commission's Roadmap to phase out animal testing in chemical safety assessments- Call for Evidence

CTPA Response

The Cosmetic, Toiletry and Perfumery Association (CTPA) is the UK trade association representing all types of companies involved in making, supplying and selling cosmetics and personal care products. CTPA promotes best practices and advises companies about the strict legal framework for cosmetics and personal care products, as well as representing industry views to the UK Government and external stakeholders. Advancing regulatory acceptance and promoting education of NAMs for chemical safety assessment are key priorities for CTPA's work.

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 £9.5 billion at retail sales value in 2023, growing 9.7% over 2022. Our sector employs people across manufacturing, design, R&D, marketing, sales, export/import, retail and services, including hair and beauty salons and spas. In 2023, the personal care industry supported a total GDP contribution of £27.2 billion.

CTPA supports the commitment of the EU Commission to create a roadmap outlining key steps and actions to promote the reduction of animal testing for chemicals and ultimately transition to an animal-free safety assessment for chemicals. CTPA members have been performing non-animal safety assessments for many years, and non-animal methods and approaches exist which mean that animal testing is not needed to demonstrate that cosmetic ingredients are safe for workers in factories or for the environment. The transition towards animal-free safety assessment for chemicals should occur in a way that ensures all stakeholders build confidence in using and accepting the methods.

There are some key elements that it will be important for the roadmap to include.

- Collaboration between all stakeholders is vital; for example, industry, NGOs, regulators, CROs, trade associations and other organisations active in this field. This allows the sharing of expertise and knowledge, as well as alignment of best practices and standardisation on the use of non-animal New Approach Methodologies (NAMs) and Next Generation Risk Assessment (NGRA).
- However, when there are many stakeholders involved, it is important that the roadmap is further structured into clear objectives, actionable steps and timelines to be taken to reach each objective. Furthermore, the stakeholders responsible for delivering each objective shall be identified to ensure accountability and promote participation as one of the ways to ensure success.
- Animal welfare remains a priority for many countries, which means collaboration with stakeholders should also consider interactions at a global level. It is important that non-animal NAMs and NGRA approaches are standardised and accepted worldwide, in order to promote their use and acceptance globally, share best practice scientific policy development, avoid trade barriers, and/or risk duplicating testing or assessments, and/or risk having different requirements for animal testing in different markets.
- The roadmap should include consideration on the need to update EU chemicals and sectorial legislation, if required, to introduce flexibility to incorporate the use of non-animal NAMs and NGRA approaches to meet regulatory requirements. Furthermore, regulatory updates across sectors may also consider focusing on exposure and exposure-led approaches, in order to unlock the full potential of NAMs and NGRA approaches.
- In order to achieve regulatory acceptance of non-animal NAMs and NGRA approaches, key focus should be given to confidence-building amongst all stakeholders. Whilst there are a number of

experts in these methods across industry and regulators, it is important that all those involved into chemicals risk assessment are trained and build confidence in the use and application of these methods. This can be achieved through education programmes, as well as proactive dialogue between industry experts and regulators to provide the opportunity for discussion and feedback on the new methods.

- The roadmap should also consider a mode to make the deployment of existing and new NAMs and NGRA methods accessible to the whole industry, including SMEs. It is important to consider that SMEs may not have significant resources to invest into the uptake of the non-animal NAMs and NGRA approaches, further highlighting the need for Contract Research Organisations (CROs) and consultants to adopt new tools and ensure appropriate training in their application.