



Subject: EFEO Call for Interest to Defend Natural Complex Substances containing Acetophenone

Dear stakeholders and colleagues,

We would like to inform you that EFEO is facilitating the formation of a consortium to prepare a SCCS dossier to defend the continued use of Natural Complex Substances (NCS) containing acetophenone (CAS 98-86-2) in cosmetic products.

It appears lately that acetophenone can be found at different levels in several botanical families of NCS, especially in Cistus oils and extracts.

Background

Acetophenone is going through the harmonised classification process under the EU Classification, Labelling and Packaging Regulation (CLP / Regulation (EC) n° 1272/2008). ECHA RAC published in March 2025 its opinion concerning acetophenone (CAS 98-86-2) with a Reprotoxic 1B classification.

Article 15 of the EU Cosmetic Products Regulation (CPR / Regulation (EC) n° 1223/2009) lays down that substances which have been classified as carcinogenic, mutagenic, or toxic for the reproduction (CMR) listed on Annex VI to the CLP Regulation shall be prohibited for use in cosmetic products, unless an exemption has been granted by the EU Commission.

The exemption can be possibly granted only when industry has applied for an exemption and where the criteria for an exemption are fulfilled. This exemption application includes the preparation of a safety dossier to be submitted to the European Commission and a positive assessment on the safe use by the Scientific Committee on Consumer Safety (SCCS) for CMRs category 1.

Moreover, the Commission estimates that industry must submit the SCCS dossier no later than six months after the ECHA RAC Opinion is published on the ECHA website, which means no later than September 10th, 2025.

Therefore, in order to continue using NCS containing acetophenone in cosmetic products, industry has to apply for an exemption by demonstrating safety as per the requirements of the EU Cosmetic Products Regulation.

Consortium formation

Below is an estimation of the costs:

- SCCS dossier preparation according to CPR article 31: 50,000 – 65,000 €
- Admin costs (project management by CEHTRA): 30,000 €

Please note that the Consortium will be fully self-financed, therefore, these costs will be split between the Consortium members.

We would like to invite expressions of interest from members who are willing to join the consortium for the preparation of the SCCS dossier. Companies interested shall contact Véronique ERNOULT (veronique.ernoult@biolandes.com) **by 31 July 2025**.

Thank you very much.

Best regards,
EFEO Secretariat