

CTPA Response to the EU Commission Call for Evidence

CTPA: The Voice of the UK Cosmetics and Personal Care Industry

CTPA (the Cosmetic, Toiletry and Perfumery Association) is the UK trade association for the cosmetics and personal care industry. Representing over 225 members, including multinational corporations and SMEs, the Association covers more than 85% of the UK industry. In 2023, the sector was valued at £9.5 billion in retail sales, marking a 9.7% growth from 2022. The industry supports employment across multiple disciplines, including manufacturing, design, R&D, marketing, sales, export/import, and retail, as well as services such as hair and beauty salons and spas. In 2023, the personal care sector contributed £27.2 billion to the UK's GDP.

Following the UK's departure from the European Union, the UK and EU have maintained a robust trade relationship. In 2024, 67% (£2.7bn) of UK exports and 64% (£3.4bn) of UK imports were directed to and from the EU, reinforcing the significance of this partnership. This mutually beneficial trade underscores consumer demand in both markets for access to safe, innovative products that enhance choice.

This relationship is further strengthened by political agreements linking our territories. Under the Windsor Framework (which replaced the Northern Ireland Protocol), Northern Ireland (NI) continues to participate in the EU Single Market and remains subject to EU legislation, including the EU Cosmetics Products Regulation (EU CPR). Consequently, changes to the EU CPR concerning ingredients directly affect businesses operating in NI, and any change to the overall framework is likely to change the way in which UK companies operate.

Strong Regulatory Principles and the Single Market Support an Innovative Industry

The EU CPR is widely regarded as the global 'gold standard' in cosmetic product regulation. It establishes a rigorous, science-based approach to safety assessment, risk evaluation, and in-market product control. The regulation continues to effectively safeguard consumers while enabling industry agility and innovation to meet evolving consumer preferences.

CTPA has consistently championed these principles in discussions with the UK Government, advocating for their retention in post-Brexit regulatory reviews. The EU CPR's framework not only ensures consumer protection but also fosters market competitiveness, making the EU an attractive destination for global cosmetic brands. Moreover, CTPA members operating in both the EU and UK highlight that the regulation facilitates market entry into other global regions. The adoption of the principles contained within the EU CPR in countries seeking to transition to an in-market control supervision of cosmetic products ensures clarity of entry requirements and enables a reduction in the need to introduce changes to products destined for export.

Sector-specific regulation provides businesses with a clear understanding of compliance requirements, ensuring accessibility for SMEs and micro-businesses. While interactions with other regulatory frameworks—such as those governing medicines, chemicals, packaging and environmental safety—are inevitable, simplification of their relationship and maintaining a specific commitment to consumer safety is essential to preserving the EU CPR's effectiveness.

Scientific expertise is another pillar of the EU CPR. The requirement for a product-specific safety assessment has fostered a highly specialised scientific community with deep understanding of our industry's products, their mechanisms of action, and their safe use. Maintaining stringent qualification requirements for safety assessors will ensure continued consumer protection and regulatory compatibility with other markets where safety assessments are also mandated. Consideration should be given to the fact that scientific expertise remains a global skillset, and qualified safety assessors may be located anywhere in the world, including the UK.

The UK has maintained the ban on animal testing established in the EU CPR, and CTPA continues to support efforts to accelerate the development, uptake and regulatory acceptance of new approach methodologies (NAMs) and next generation risk assessment (NGRA) approaches to enable innovation for the industry. We continue to work with UK and EU stakeholders to expedite the move to animal-free safety science.

Considerations for Current and Future Challenges

The UK now participates in the EU Single Market through the NI arrangements; however, for all practical purposes, it remains a third country. This situation has highlighted that, while the EU CPR's harmonisation across Member States is a significant advantage, certain aspects are subject to national interpretation in implementation. This can lead to inconsistencies, creating regulatory divergences that pose challenges for businesses trading with the EU.

Evolving consumer behaviour, technological advancements, and an increasingly complex supply chain will continue to test the limits of the EU CPR. As the UK continues to work through the implementation of the UK Cosmetics Regulation, derived directly from EU legislation, into the national context, CTPA and its members are working to identify future challenges and areas of improvement and to prevent inefficiencies and undue burden. The UK cosmetics industry would be grateful for the opportunity to share some of these conclusions through the EU CPR revision process, and we encourage the EU Commission to engage with UK regulators.

The rapid expansion of digital markets and e-commerce has transformed consumer access to products. While the EU CPR ensures product safety, it does not always afford businesses the flexibility to adapt their consumer engagement and communication strategies. Increased mandatory obligations for transparency and correct disposal information will present a very real challenge to companies with small products or seeking to adopt sustainable design practices such as reducing or eliminating unnecessary packaging. The current process of development of international considerations for digital labelling under the International Cooperation on Cosmetic Regulation (ICCR) offer an opportunity to harness progress for adoption of globally compatible approaches to the provision of consumer information. Additionally, the rise of online retail and marketplaces presents challenges in preventing consumer access to unsafe products. Non-regulatory approaches such as coordinated enforcement and cross-sector engagement, adequately underpinned, could increase consumer protection and ensure safe access to a globalised trade landscape.

Global supply chain diversification, driven by political developments, natural disasters, and shifting trade routes, affects the sourcing and trade of cosmetic ingredients. Companies increasingly require multiple suppliers for the same raw materials, and diversified commercial routes mean that exports

to the EU often involve multiple distribution channels. While the EU CPR establishes clear roles and responsibilities, it does not yet account for the complexities of modern supply chains and the expanding mandates required to uphold the central role of the Responsible Person.

The growing number of EU regulations has increased reporting and compliance obligations for businesses. However, the Cosmetic Product Notification Portal (CPNP) remains a streamlined, proportionate approach to market entry. CTPA supports the need to maintain the portal's simplicity, ensuring it remains user-friendly and only requires information that serves its intended function.

Safeguarding the ability for the cosmetics industry to remain innovative should remain a key priority in maintaining a competitive industry, not just at the EU but globally. The cosmetics industry is a key player in the development of new ideas, technologies and scientific research. Innovation reaches all aspects of our products: in finished products through new formats, such as personalised or refillable products; in the manufacturing process, with more efficient methods and equipment; in the development of ingredients, researching new effective and efficient ingredients; and in ensuring that products remain accessible and inclusive.

The UK Industry's Ongoing Commitment to Supporting the EU CPR Review

CTPA and the UK cosmetics industry remain committed to engaging with the EU CPR revision process and support the European Commission's goal of ensuring the regulation remains fit for purpose. As outlined, the EU CPR continues to exemplify best regulatory practices. Making targeted adjustments, in combination with other non-regulatory initiatives, will enable industry to address emerging challenges without hindering innovation. By fostering a regulatory environment that balances consumer protection with business agility and ensuring effective uniformity and coordination across the different member states, the EU can ensure that cosmetic products continue to meet the highest standards while reaching consumers worldwide.