

CTPA Response to the EU Commission Public Consultation

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.

CTPA supports the preservation of the current regulatory framework as an example of effective legislation for consumer protection.

CTPA welcomes the European Commission's overarching objective to streamline procedures and reduce administrative burden, whilst preserving the highest standards of consumer safety. In the call for evidence launched by the EU Commission earlier this year, CTPA highlighted that our organisation has consistently championed the principles contained in the EU CPR towards the UK Government, advocating strongly for the retention of this important legislation for the industry. Widely regarded as a 'gold standard', it continues to effectively provide a route to market for safe products while enabling the industry to meet evolving consumer preferences. For an essential industry that provides consumers with critical products contributing to their health and hygiene, physical and mental wellbeing, and social inclusion, it is crucial to maintain this balance. The EU CPR manages this balance effectively.

Avoiding trade barriers and facilitating the movement of goods between the EU and international markets should remain a cornerstone of EU competitiveness. The cosmetics sector is inherently global, with many SMEs achieving success through international expansion. The UK remains a close trading partner and often serves as a gateway to international markets. With a similar regulatory framework, strong ties through Northern Ireland, and shared language connections to key markets like the US and Australia, it is important to ensure that trade between the EU and UK remains free from unnecessary burdens. A shared product definition is fundamental to minimizing trade barriers. The current cosmetic product definition provides sufficient clarity for accurate classification and is

The Cosmetic Toiletry and Perfumery Association Limited

widely recognized across global markets. The UK industry strongly supports maintaining the current definition in the interest of global regulatory compatibility.

The requirement for a product-specific Safety Assessment has empowered the scientific community to apply their expertise to the safety of consumer products. Safety assessors globally are collaborating to apply the scientific principles upheld in the EU CPR and the ingredient safety evaluations provided by the Scientific Committee on Consumer Safety. This global expertise ensures that safety assessments meet EU CPR requirements regardless of geographical location, reinforcing the importance of science over geography. This approach enhances the EU's competitiveness, keeps it an attractive market, and avoids unnecessary trade barriers, such as the requirement for EU-based assessors, which would contradict the principles of international trade bodies like the World Trade Organization (WTO).

The EU CPR could be further strengthened and enhanced in specific ways.

Industry will always benefit from a greater level of certainty and reduced changes. CTPA and the UK cosmetics industry are also keen to secure integrity of the EU CPR. While there may be areas for further improvement, such changes should be carefully measured and thoroughly considered, with non-regulatory measures explored in the first instance and the changes in legislation used as a last resort.

The EU CPR includes provisions that balance information requirements with the administrative burden on companies. The notification process, tied to in-market control mechanisms, is widely recognized as a balanced approach between administrative efficiency and proportionate safety oversight. The UK's Submit Cosmetic Product Notification portal (SCPN) has been modelled after the EU Cosmetic Product Notification Portal (CPNP), reflecting this successful system. The CPNP plays a key role not only for authorities but also for the industry, supporting effective information sharing across the supply chain and, in some cases, facilitating access to other global markets. In view of this, CTPA and its members welcome the removal of the prenotification requirements under Article 16; the current system of pre-notification of products containing nanomaterials under Article 16 duplicates a similar requirement under Article 13, and therefore work, imposing a significant administrative toil on companies. CTPA supports the streamlining of the process and saving administrative resources whilst meeting the same safety objective.

The Product Information File (PIF) requirements allow companies to improve, adapt, or implement legislative changes in their products while ensuring essential product information is available for market supervision. Consideration should be given to harmonizing the timelines for presenting this information across EU member states, ensuring that industry has adequate time to compile and present data accurately. In an increasingly digital world, maintaining physical folders is no longer reasonable. Legislation or guidance should reflect this shift, considering both digitalisation and the confidentiality of business information.

The EU CPR has evolved through regular updates to the ingredient annexes and the introduction of new requirements. The cosmetics industry is committed to ensuring product safety and compliance with these evolving restrictions. However, companies, particularly those with global formulations, face challenges in tracking and implementing these changes. Increased communication regarding restrictions and bans, clearer timelines in available guidance, and broader engagement with

The Cosmetic Toiletry and Perfumery Association Limited

industry stakeholders would greatly enhance predictability and facilitate compliance. On this aspect, CTPA strongly support the provisions to streamline the Article 15 requirements as per the recently published Simplification Omnibus, helping to provide greater transparency and legal certainty to the industry, as well as significantly reducing the unnecessary administrative burden and the risk of withdrawing products from the market and destroying them. Additionally, in line with WTO obligations, ingredient restrictions should continue to be shared as potential Technical Barriers to Trade.

As an industry rooted in science and technology, it is essential that the EU CPR continues to foster avenues for innovation. The cosmetics industry has long been a pioneer and champion of non-animal New Approach Methodologies (NAMs) and Next Generation Risk Assessment (NGRA) in safety decision-making. The industry as a whole not only supports the animal testing ban in the EU CPR, which is also upheld in the UK, but has also dedicated significant resources to the development, acceptance, and validation of these methods. While challenges remain, particularly due to the requirements of methods' validation and the need to move towards adoption of scientifically valid methods for complex safety endpoints, the global scientific community continues to collaborate in addressing these issues. Regulatory authorities play a vital role in reviewing, accepting, and making policy decisions based on these methods. However, this challenge extends beyond the EU CPR alone and requires cross-regulation compatibility. Current regulatory inconsistencies can create barriers to the application of non-animal science and, consequently, limit innovation within the cosmetics industry that seeks to uphold the EU CPR animal testing ban.

CTPA supports the regulation's recognition of the digital transformation and the importance of enabling industry to utilise digital consumer communication, both at the point of sale and on product labels. Current labelling provisions are generally sufficient for online sales but are applied inconsistently. The EU CPR should accommodate digital labelling options that align with safety and sustainability principles. Additionally, inconsistencies remain between the EU CPR and environmental legislation regarding packaging definitions and small packaging exemptions. While this may not necessitate immediate change, it requires companies to find practical solutions to comply with both sets of requirements. As companies expand sustainability initiatives, including refill and reuse models, bulk product labelling will become more prominent. Refill products, often decanted from larger containers in-store, require appropriate labelling focused on safe handling within the retail environment rather than consumer-facing information on the bulk container.

The complexity of modern supply chains is not always adequately reflected in the EU CPR. Currently, all importers are automatically designated as the Responsible Person, which can be effective but also introduces complications. Importers, often retailers or distributors, typically prefer to remain in that capacity. They must therefore mandate another party as the Responsible Person, which can become administratively burdensome, especially when a company uses multiple importers or distributors across the EU. UK companies report maintaining extensive networks of mandates to ensure they do not unfairly burden importers and distributors while retaining accountability for their products. Allowing non-EU companies to mandate a Responsible Person directly, while maintaining records of authorised importers and distributors, would reduce this burden and help enforcement authorities locate responsible parties more efficiently.

Harmonisation across EU member states is essential for effective implementation and competitiveness. While the EU CPR supports the free movement of goods, practical experience shows that the EU is not always perceived as a single market due to varying interpretations and national requirements. This creates uneven trading experiences and artificial distinctions in international trade relationships. Consistent cooperation and harmonisation among member state authorities will continue to be key to the EU CPR achieving its full potential.

International cooperation on policy, safety, and enforcement is strongly welcomed by the UK industry. The UK internal market still requires the application of EU rules in relation to Northern Ireland, and many products available in the UK are also available in the EU. The Trade and Cooperation Agreement (TCA) between the EU and the UK includes provisions for cooperation and information exchange on market surveillance. Cosmetic products are regularly scrutinised by authorities across all EU member states, as reflected in the EU Safety Gate therefore it must remain a priority to ensure dialogue between both jurisdictions.

CTPA remains a member of Cosmetics Europe and represents many companies originating from or located in the EU. CTPA formally supports and endorses the response to the public consultation submitted by Cosmetics Europe and encourages the EU Commission to consider the perspectives of the European cosmetics industry.

CTPA and the UK cosmetics industry remain committed to engaging with the EU CPR evaluation process and support the European Commission's goal of ensuring the regulation remains fit for purpose and continues to achieve its objectives. CTPA remains available to discuss any element of this consultation response.

28 July 2025