

JAPAN COSMETIC INDUSTRY ASSOCIATION

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European Commission
Unit ENTR F/3, Cosmetics and Medical Devices

Subject: Public Consultation on the Simplification of the Cosmetic Directive

Dear Sirs,

In connection to the Public Consultation on the Simplification of the Cosmetics Directive 76/768/EC, Japan Cosmetic Industry Association (abbrev: JCIA) which represents 930 members, established in 1959 is pleased to provide its comments.

JCIA appreciates the proposal of the EU Commission to simplify the current Cosmetic Directive but would like to remind that the main principles and the structure of the Cosmetic Directive have influenced a number of cosmetic regulations worldwide.

In reference to Item 2, JCIA considers that the following three policies of the Cosmetic Directive, i.e. the responsibility of the person placing the product for regulatory compliance (including the safety aspect), the regulation of specific substances through separate negative lists (forbidden & restricted substances) and positive lists (coloring agents, UV filters, preservatives) and the in-market control are now common cosmetic principles in a large number of countries.

We would like to point out the EU current approach through negative lists (forbidden & restricted substances) and positive lists (coloring agents, UV filters, preservatives) is clear and usable. One of the outcomes of the cosmetic regulation reform in 2001 in Japan is the adaptation of the negative list and positive lists, similar to EU Cosmetic Directive. Therefore, JCIA is strongly in favor of keeping the current approach through separate negative lists and positive lists in the Annexes, which are the universally recognized regulation for cosmetic ingredients.

The Commission makes several suggestions regarding the product safety by the simplification of cosmetic regulation. But JCIA considers that the current Directive already provides sufficient requirements and tools to ensure the safety.

JCIA hopes that these comments will be taken into consideration in the process of the simplification of the Cosmetic Directive.

Yours sincerely



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