

## **PUBLIC CONSULTATION ON THE SIMPLIFICATION OF THE COSMETICS DIRECTIVE**

### **RESPONSE BY KLF, the Norwegian Association of Cosmetics, Toiletries and Fragrance Suppliers**

#### **GENERAL REMARKS**

Kosmetikkleverandørenes forening (KLF) is the trade association representing the cosmetic industry in Norway. KLF has 21 member companies covering approximately 80% of the Norwegian cosmetic market by value. Only one member company is manufacturing cosmetic products. 20 of the 21 member companies are importers of ready made products.

Often cosmetic products on the Norwegian market are delivered directly to the consumer sales outlets from a central stock in another country than Norway.

*The structure of the Norwegian suppliers underlines the importance of common legal provisions without additional national requirements. It is vital that the person placing a cosmetic product on the EU market is responsible for the compliance with the provisions of the Cosmetics Directive (eventually a new regulation).*

The Norwegian importer usually has no technical expertise available, and rely on the European marketer to fulfil legal obligations regarding content and labelling. Normally, the Norwegian importer does not himself control the content and labelling of the products he offers to the market other than in special cases.

Since our member companies deal only with well established manufacturers being members of COLIPA, the European Cosmetic Industry Association, this fact in general does not create problems. However, there are many smaller companies on the Norwegian market outside our association that may not be as familiar with the legislative framework as our member companies are, and that may put on the market products that do not comply with legal provisions.

A simplified regulation placing the responsibility for compliance with the person placing a cosmetic product on the the EU market is desirable and could serve two purposes:

- 1) Securing legal compliance of all cosmetic products marketed in Europe
- 2) Reducing administrative costs.

## **SPECIFIC ITEMS**

The above general comments cover our major viewpoints in relation to **Item 1**. Regarding the definition of a cosmetic product, we find the existing definition sufficient and therefore would like to keep it also in the future.

**Item 3:** We would like the Cosmetics Directive with its enclosures made into a regulation: this would secure a high level of consumer protection and be a more efficient tool in the international trade.

**Item 4:** “Placing on the market” must be defined, meaning “for the first time put into the stocks for sale on the Community market”.

**Item 9:** It must be made clear how to establish the safety of a product before marketing.

**Item 11:** National activities in the area of “cosmetovigilance” should be coordinated across the EU/EEA.

## **CONCLUSIONS**

KLF, representing the cosmetic industry in Norway, welcomes the proposal to simplify the Cosmetics Directive.

Our association is at all times cooperating closely with COLIPA, the European Cosmetic Industry Association. For items not covered particularly in the above comments we support comments given by COLIPA.

Oslo, March 16, 2007  
Ingrid Standal, KLF President