

REACH testing requirements and the ban on animal testing for cosmetics

Cosmetic products cannot be placed on the market if the finished product or its ingredients have undergone animal testing, unless the testing was carried out to meet the obligations of other legislation such as the REACH Regulation.

Besides being subject to the EU Cosmetics Regulation, chemicals used in cosmetics and their ingredients are also subject to the REACH Regulation which requires companies who make and supply chemical substances to provide and communicate information about the properties and uses of those substances in order to control the risks those substances may pose. This means collecting existing information or generating data by means of tests on the substances to obtain this information. If there is no other way to obtain this information, these tests may involve animals as a last resort.

In 2013, the Commission published a [Communication](#) on the animal testing and marketing bans under the Cosmetics Regulation, which already referred to the registration requirements under the REACH Regulation, and in October 2014, the European Chemicals Agency (ECHA) published a [factsheet](#) giving more details of the effects of the REACH Regulation.

Essentially, when the chemical substance is used for other purposes in addition to making cosmetics, animal testing may have to be carried out as a last resort under REACH to obtain information about the risks involved in those other uses. Also, the cosmetics legislation does not protect the health and safety of workers handling the substances used to manufacture cosmetics. Worker exposure to ingredients during the manufacturing of cosmetics can be very different to consumer exposure to the final cosmetic product. Workers handle substances in greater quantities, with higher concentrations and more frequently than consumers. Therefore animal testing may be required to protect people working in that industry even for substances that have no other uses than in cosmetics.

It must be stressed that the promotion of alternative methods to animal testing is among the objectives of the REACH Regulation. Animal tests are only acceptable under REACH as a last resort, if no other method can be used to provide the necessary information. The ban on cosmetic products or ingredients that have been tested on animals to meet the health and safety requirements of the Cosmetics Regulation remains in place.

More information:

http://echa.europa.eu/view-article/-/journal_content/title/clarity-on-interface-between-reach-and-the-cosmetics-regulation

http://ec.europa.eu/growth/sectors/cosmetics/animal-testing/index_en.htm