INGREDIENTS UNDER PRESSURE

- CMRs, ED, Nanos...
- Regulations
- Technical sheets

THE INGREDIENTS COLLECTION

LES ÉDITIONS DE
L'OBSERVATOIRE DES COSMÉTIQUES

They are already condemned and in the process of being banned…
New threats arise to their future use…
They will be subject to new restrictions that are currently being finalised…
Day by day, the (already large) pool of raw materials “under pressure” is growing.

Among them:
• Ingredients recently classified as CMR under the CLP Regulation and which will be banned
• Others, sometimes also classified as CMR and/or evaluated by the SCCS (European Scientific Committee on Consumer Safety) for their potential endocrine disruptors properties which will, surely or very probably, be subject to new restrictions on use
• Several substances in the form of nanomaterials, for which the SCCS has concluded that there is insufficient data to establish their safety
• Some whose safety is being re-evaluated by the CSSC and whose future is uncertain
• And finally, others threatened within the framework of regulations other than the Cosmetics Regulation, for example through REACH…

All of them deserve increased monitoring and, for many of them, the taking of measures to adapt the formulas of the products that contain them, taking into account the deadlines already defined or likely to be set.

CosmeticOBS has put together this Ebook of the main ingredients that are currently in the spotlight.
An “Alert” Ebook to give all industry players the information and dates to prepare themselves as well as possible, and with complete peace of mind, for the upcoming obligations.

Recently banned or regulated ingredients

For them, the case is already closed. After having been the subject of alerts and concerns about their safety, having gone through the long process of collecting scientific data and assessing their safety, having had their case decided by the SCCS and the Opinion of the Scientific Committee incorporated into the regulations, they are now banned or subject to new restrictions on use.
For some, the new provisions have already come into force. For others, the deadline is still to come, but within a fairly tight timeframe. As far as the latter are concerned, we are still only at the stage of the notification of a forthcoming measure… but that won't be long in coming.

REMINDER: 2-CHLORO-P-PHENYLENEDIAMINE TOTALLY BANNED SINCE 22 FEBRUARY 2020

Previously permitted in hair dye products, including eyebrow dye products, and eyelash dye products at a concentration of 4.6%, 2-Chloro-p-phenylenediamine and its sulfate and dihydrochloride salts are now completely banned for use in cosmetic products. This ban follows the publication of the Regulation 2019/681 of 30 April 2019.

This measure is the consequence of the **Opinion of the SCCS (European Scientific Committee for Consumer Safety) of 19 September 2013** which concluded that no sufficient margin of safety could be deduced for the use of 2-Chloro-p-Phenylenediamine in oxidative hair dye formulations for eyebrows and eyelashes in a concentration of maximum 4.6%.
The SCCS further indicated that it was not possible to give a conclusion on the genotoxic potential of 2-Chloro-p-Phenylenediamine and that sulfate and dihydrochloride salts of 2-Chloro-p-Phenylenediamine should be handled with the same caution as 2-Chloro-p-Phenylenediamine.

This Opinion was formalised by Regulation 2019/681 which added these substances to Annex II (prohibited substances) of the Cosmetics Regulation 1223/2009, a provision applicable since 22 November 2019 for products placed on the market, and 22 February 2020 for products made available on the market.
They are therefore henceforth totally banned.

It is the responsibility of manufacturers and Responsible Persons to take all appropriate measures to meet these dates, by ensuring the conformity of their new formulas, by checking the state of stocks of products available on the market and by informing distributors of the deadline for withdrawing non-compliant products from the market.

Sources

- **SCCS: Henna OK, 2-Chloro-p-phenylenediamine refused**, CosmeticOBS, 7 October 2013
- **SCCS (Scientific Committee on Consumer Safety), Opinion on 2-Chloro-p-phenylenediamine, SCCS/1510/13**, 19 September 2013
- **Regulation 2019/681: 2-Chloro-p-phenylenediamine prohibited**, CosmeticOBS, 7 May 2019
- **Commission Regulation (EU) 2019/681 of 30 April 2019 amending Annex II to Regulation (EC) No.1223/2009 of the European Parliament and of the Council on cosmetic products**, *Officiel Journal of European Union*, 2 May 2019