

## Call for participation to Cosmetics Europe Impact Assessment on the Chemicals Strategy for Sustainability (IA CSS)

The Board of Directors, further to a recommendation by the Strategic Advisory Group on the European Green Deal, has agreed that Cosmetics Europe carry out a quantitative impact assessment to get an understanding of the potential effect on the cosmetics industry of the measures laid down in the European Commission's Chemicals Strategy for Sustainability (CSS). The output of the Impact Assessment will be used in our stakeholders' outreach at the European and national levels in connection with the legislative measures stemming from the CSS.

To independently establish the socio-economic impact of the CSS, Cosmetics Europe has partnered with Ricardo Energy & Environment, a global consultancy specialising in policy and implementation across a wide range of environmental strategies and topics. Ricardo are working with Cefic and other downstream users to complete their Impact Assessments of the CSS and will follow the same methodology for all sectors, with a view to produce coherent results and gain efficiencies in the project.

### Scope of project

This project will focus on three 'modules', which have been selected for their criticality and to ensure that we understand the impacts to appropriately demonstrate these to our stakeholders as quickly as possible and participate in the relevant ongoing discussions. These modules are:

- Generic Approach to Risk Management;
- Introduction of a Mixture Assessment Factor for chemical safety assessments; and
- Changes in Classification, Labelling and Packaging (CLP) Regulation, incl. new hazard categories

### Process

The project will last from May to November 2021.

To ensure this project is as robust as possible, and that we as an industry can use the Impact Assessment to promote our recommendations and position more effectively, we need your support. Ricardo needs to have accurate information from a sample of Cosmetics Europe and National Association members to allow them to perform an economic analysis of the impacts. This will form two steps:

- Initially, Ricardo and Cosmetics Europe will provide a list of substances contained in cosmetics products to the participating companies. These substances are those which may potentially be impacted by the CSS over time. Members would be asked to effectively declare which of their products contain these substances, their sales volumes (Euros and tonnes), and the use of these products.

- Once this data has been collected, Ricardo will build upon this analysis with a second consultation, which will be shared with a statistically representable sample of members to ensure that the demographics of the industry are represented as far as is possible. This consultation will seek to understand the economic impact of the above modules on each members' operations. This assessment will consider operating and compliance costs, which depending on the module, could include the cost of relabelling, reformulation, withdrawal of products from the market, etc.

This information would be gathered under an NDA between the individual company and Ricardo, and Cosmetics Europe are currently reviewing the NDA to ensure it corresponds to required standards.

Data will be aggregated and reported in such a way that it will not be possible for any third party to 'reverse engineer' the results presented in the report to establish to identify data from any particular organisation. If the number of responses is too low to be able to ensure this, then Ricardo will not be able to include the data in the analysis and this will reduce the accuracy of the assessment.

This will then be finalised into a report outlining the impact on our industry of these three modules of the CSS, which Cosmetics Europe will use for future advocacy on the CSS and its implementing measures, including in the frame of the Cosmetics Products Regulation.

A core group composed of CE members who have been closely working on the preparation of the IA has been constituted at the level of Cosmetics Europe to help advising and facilitating the process and make the link with Ricardo.

## Immediate tasks

- We are organising together with Ricardo and the other downstream users two Webinars to enable companies to understand the details of the project and ask questions. The first Webinar takes place on **10th May 2021 from 15h00 – 16h30**. A second date is proposed on **17 May at 15h00 -16h30**. The Sessions will also be recorded for those who cannot attend. Recordings will be available upon request.
- We strongly recommend disseminating this information broadly through the network of the National Associations to encourage member companies to participate.
- Companies interested in participating in the Impact assessment shall signal their interest to participate to Cosmetics Europe by 20 May 2021 to Gabriella Vydeelingum (gvydeelingum@cosmeticseurope.eu) together with the name of the single point contact for the process. The companies will be asked to sign the above-mentioned NDA.
- The main contact at Cosmetics Europe for questions related to the impact assessment process is Florian Schellauf (fschellauf@cosmeticseurope.eu).

Thank you very much for your commitment in taking part in this important project.