

Brussels, 31st October 2025

Subject: Seizing the opportunity of the Omnibus VI: Safeguarding Europe's leadership in innovation, consumer protection and sustainable growth

Dear [Prime Minister / Head of State / Ambassador],

We, Mr John Chave, Director General of Cosmetics Europe, and Mr. Alexander Mohr, President of the International Fragrance Association (IFRA), representing major companies and a network of more than 9,000 SMEs in Europe, write to express our strong concern regarding the direction of the ongoing Council discussions on the European Commission's **Omnibus VI proposal**.

This letter is co-signed by the Presidents and/or Directors General of our National Associations across the European Union, underscoring the united stance of the European cosmetics and fragrance sectors.

The European cosmetics value chain is valued at over €180 billion with more than 500,000 formulations. The cosmetics sector generates a trade surplus of over €20 billion annually, making it one of the EU's strongest contributors to a positive commercial balance and global competitiveness. Small and medium-sized enterprises (SMEs) are an important part of the industry, being around 9,000 to operate in the beauty and fragrance value chain. These companies form the backbone of local economies and carry Europe's know-how and cultural heritage.

The publication of the Omnibus VI Commission proposal in July 2025 marked a significant advancement in modernising Europe's cosmetics regulatory framework, thereby reinforcing the European cosmetics industry's global leadership in innovation, sustainability, and consumer protection. The proposed changes do not in any way alter the objectives of the cosmetic regulation, whose primary goal is to ensure the protection of consumer health.

However, we are increasingly concerned regarding the ongoing Council discussions. The current debate appears to be heading in a direction that could substantially alter the Commission's original objectives and compromise efforts towards greater clarity and simplification. We see a worrying lack of coherence between the EU's ambitions for enhanced competitiveness and the Council's hesitance to support effective simplification measures that would uphold consumer safety standards.

For decades, **the Cosmetic Products Regulation (CPR)** has set the benchmark for safe and responsible cosmetics legislation, inspiring global standards and reinforcing trust in European cosmetics, which are essential products used by EU consumers for health protection, wellness and daily cleansing. In recent years, however, an increase in hazard-based ingredient classifications has led to automatic restrictions, even for substances with long-standing safe use in cosmetics. This has forced companies to redirect significant scientific and creative energy towards constant reformulation, limiting their capacity to pursue genuine innovation and negatively impacting the global competitiveness of EU-based companies.

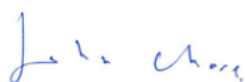
As a result, the European cosmetics sector now sees more than 86% of its products subject to repeated reformulation due to regulatory changes. That includes cases where substances have been independently assessed as being safe for use in cosmetics. This impractical cycle does not necessarily improve consumer safety and diverts focus from the development of innovative and

more sustainable products, falling short of advancing Europe's ambitions in science, creativity, and sustainability. To safeguard Europe's leadership in the global market and preserve SMEs, it is essential to have science-based and stable regulations that support the development of safe and innovative products for consumers. The Omnibus VI Commission proposal directly addresses these challenges by upholding high consumer safety standards as the industry's foundation while delivering the clarity and stability necessary for research and development to focus on genuine innovation.

We therefore urge the Council and governments at national level to ensure that ongoing negotiations uphold the original Commission proposal. We are committed to collaborating with EU institutions and national authorities to secure a proportionate, science-based framework that maintains high consumer safety standards while supporting innovation and competitiveness in Europe's cosmetics and fragrance sectors.

We thank you for your attention and count on your support for this essential proposal.

Yours sincerely,



John Chave,
Director General, Cosmetics Europe



Alexander Mohr,
President, IFRA

This letter is also signed by:

- Christian Gründling, Secretary General, Fachverband der Chemischen Industrie Österreichs – FCIO (Austria)
- Françoise Van Tiggelen, Secretary General, Association for manufacturers and distributors of cosmetics, detergents, cleaning products, adhesives and sealants, biocides, related products and aerosol technology – DETIC (Belgium - Luxembourg)
- Gergana Andreeva, Executive Director, Bulgarian National Association Essential Oils, Perfumery and Cosmetics – BNAEOPC (Bulgaria)
- Gordana Pehnec Pavlović, Executive Secretary, Affiliation for Detergents and Cosmetics (Croatia)
- Lukas Horak, Executive Director, Czech Association for Branded Products – CSZV (Czech Republic)
- Helle Fabiansen, Director General, Kosmetik- og Hygiejnebranchen - K&H (Denmark)
- Kärt Alaküla, National Director, Estonian Chemical Industry Association – ECIA (Estonia)
- Sari Karjomaa, Director, Kosmetiikka- ja hygieniateollisuus ry (Finland)
- Emmanuel Guichard, President, Fédération des Entreprises de la Beauté – FEBEA (France)
- Philippe Massé, President and Director General, Syndicat National des Fabricants de Produits Aromatiques – PRODAROM (France)
- Birgit Huber, Director, Industrieverband Körperpflege- und Waschmittel – IKW (Germany)

- Tobias Koppitz, Managing Director, German Association of Fragrance Manufacturers (DVRH) (Germany)
- Ioanna Valaskopoulou, General Manager, The Hellenic Cosmetic Toiletry and Perfumery Association – PSVAK (Greece)
- Barbara Csécsei, Secretary General, Hungarian Cosmetic and Home Care Association – KOZMOS (Hungary)
- Siobhan Dean, Director, Irish Cosmetics & Detergents Association – ICDA (Ireland)
- Silvia De Dominicis, Director General, Cosmetica Italia (Italy)
- Paolo Merlano, President, Flavours and Fragrances Sector Group - Federchimica Aispec (Italy)
- Zanda Jurjane, Executive Director, The Association of Latvian Chemical and Pharmaceutical Industry – LAKIFA (Latvia)
- Inara Joniskiene, Executive Director, Lithuanian Cosmetics and Household Chemicals Producers Association – LIKOCHEMA (Lithuania)
- Ronald Van Welie, Managing Director, Nederlandse Cosmetica Vereniging – NCV (Netherlands)
- Luc Malfait, President, Association of Fragrance and Flavour Manufacturers (NEA) (Netherlands)
- Lin Grieg Teigland, Managing Director, Kosmetikleverandørenes Forening - KLF
- Anna Oborska, General Director, Polish Association of Cosmetics and Detergent Industry – PACDI (Poland)
- Justyna Żerańska, General Director, The Polish Union of Cosmetics Industry – Kosmetyczni.PL (Poland)
- Ana-Maria Couras, President, Associação dos Industriais de Cosmética, Perfumaria e Higiene Corporal – AIC (Portugal)
- Andra Onas, Director General, Romanian Union of Cosmetics and Detergent Manufacturers – RUCODEM (Romania)
- Lubomir Tuchscher, Executive Director, Slovak Association for Branded Products – SZZV (Slovakia)
- Helena Gombac Rozanec, Secretary General, Association of Cosmetics and Detergents Producers of Slovenia – KPC (Slovenia)
- Val Díez, CEO, Asociación Nacional de Perfumería y Cosmética – STANPA (Spain)
- Germán Castillo, Managing Director, Spanish Association of Fragrances and Food Aromas – AEFAA (Spain)
- Olof Holmer, Director General, Kosmetik- och hygienföretagen – KoHF (Sweden)
- Gordana Pehneć Pavlović, Executive Secretary, Affiliation for Detergents and Cosmetics (Croatia)