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Sector-wide statement ahead of the publication of the Commission's Omnibus proposal on Chemicals

Brussels, 3 July 2025

Championing Smart Simplification: Prioritising safety, innovation and competitiveness in the EU's cosmetic and fragrance sectors

The European cosmetics, fragrance, and essential oils industries welcome the European Commission's continued efforts to streamline and modernise cornerstone sectoral legislation, including the Classification, Labelling and Packaging (CLP) Regulation and the Cosmetic Products Regulation (CPR) whilst maintaining a clear focus on consumer safety.

Our safety-first commitment

Our sectors are unwavering in their commitment to consumer safety. This commitment is supported by rigorous scientific research, continuous innovation, and adherence to the highest standards of operational excellence. We uphold these standards by engaging with stakeholders, including regulatory bodies, to ensure that consumer safety remains at the forefront of our industries' operations.

Fostering innovation and competitiveness

While prioritising safety, we nevertheless recognise the urgent need to reduce unnecessary administrative burdens, improve legal clarity, and introduce proportionate regulatory measures – particularly to foster innovation, support the vitality of our industries and ensure the viability of SMEs. These shared objectives, which we hope will be fully reflected in the forthcoming Omnibus proposal, are vital to sustaining Europe's global leadership in the creation and manufacture of safe, sustainable, and high-quality products.

Smart simplification, with safety as the priority

Simplification is about streamlining processes. Simplification does not undermine consumer safety. On the contrary, a smarter and more proportionate regulatory approach is essential to preserving the EU's high standards of protection while enhancing industrial resilience and competitiveness. This includes aligning regulatory measures with actual conditions of use, ensuring clarity in implementation, and avoiding duplication or unintended consequences.

One key example can be found in the interplay between the CLP and CPR. In its current form, this interaction can lead to the automatic bans of cosmetic ingredients based solely on *hazard* classifications. This can happen without practical consideration of actual *risk* under conditions of intended cosmetic use. As a result, demonstrably safe ingredients, including those of natural origin – many even allowed in food - or with a long history of safe use, may be removed from the cosmetics market. These unintended consequences risk undermining existing products, future product development, personal choice, and the viability of EU-based manufacturing without necessarily delivering improvements to consumer safety outcomes.

A call for proportionate, workable solutions

We look forward to a forthcoming Omnibus proposal that addresses these challenges with concrete and science-based solutions for the CPR, including:

- **A revised Article 15.2 of the Cosmetic Products Regulation**, strengthening a risk-based exemption pathway grounded in assessments by the European Commission's own Scientific Committee on Consumer Safety (SCCS) and based on actual conditions of cosmetic use.
- **Realistic and workable reformulation timelines**, particularly for complex cosmetic and fragrance formulations, and **transitional periods** for compliance with new bans or restrictions.
- **Recognition and protection of natural ingredients and essential oils**, which are sought after by consumers and are integral to Europe's cultural heritage, bio-economic fabric, and international reputation.

A unified call

We call on EU decision-makers to stay the course toward a more balanced and proportionate regulatory environment. Our industries' value chains, spanning farmers, ingredient manufacturers, compounders, traders and suppliers, fragrance houses, SMEs and global brands are fully mobilised to support this effort with science-based input, usage data, and constructive dialogue.

Together, we can secure Europe's role as a global reference for safety, excellence, innovation and manufacturing in cosmetics and fragrances, without compromising on consumer protection, regulatory effectiveness or competitiveness.

Co-signatories (*alphabetical order*)

- Cosmetics Europe
- European Federation for Cosmetic Ingredients (EFfCI)
- European Federation of Essential Oils (EFEO)
- International Federation of Essential Oils and Aroma Trades (IFEAT)
- International Fragrance Association (IFRA)
- International Natural and Organic Cosmetics Association (NATRUE)
- SMEunited

About the signatory associations (*with contacts*)

About Cosmetics Europe

Cosmetics Europe is the European trade association for the cosmetics and personal care industry. Our members include cosmetics and personal care manufacturers, as well as associations representing our industry at national level across Europe.

-Malgorzata Miazek, mmiazek@cosmeticseurope.eu

About EFEO

The European Federation of Essential Oils (EFEO) is committed to raising awareness among policymakers, regulators, and authorities regarding essential oils and their derivatives. EFEO advocates for a comprehensive understanding of their uses, cultural and economic importance, and the potential impact of legislative and regulatory measures on the sector.

-Rebecca Lentini, rebecca.lentini@nove.eu

About EFfCI

EFfCI is the European Federation for Cosmetic Ingredients, a trade association that brings together European manufacturers of synthetic and natural ingredients for the cosmetics and personal care industry.

-Andrea Maltagliati, secretariat@effci.com

About IFEAT

The International Federation of Essential Oils and Aroma Trades (IFEAT) is a trade association founded in 1977. It represents the interests of companies involved in the production, processing, trading, and manufacturing of the many thousands of ingredients used in flavours, fragrances, and aromatherapy. Among its activities, IFEAT aims to raise awareness among political stakeholders regarding the nature, applications, and cultural and economic significance of essential oils and their derivatives.

-Rebecca Lentini, rebecca.lentini@nove.eu

About the signatory associations *(continued)*

About IFRA

The International Fragrance Association (IFRA) is the global voice of the fragrance industry. Since its creation in 1973, IFRA has brought together global fragrance houses companies, national associations, and regional fragrance ingredient manufacturers or compounders committed to ensuring the safe use of fragrance ingredients, grounded in science and responsibility. IFRA represents fragrance producers, works with regulators and international partners, and supports sustainability and innovation across the value chain.

-Charles de Lusignan, cdelusignan@ifrafragrance.org

About NATRUE

NATRUE is a Brussels-based international non-profit association committed to promoting and protecting Natural and Organic Cosmetics worldwide. Founded in 2007 by European pioneers from the sector, the association now represents companies producing natural and organic cosmetic products from around the world.

-Mark Smith, msmith@natrue.eu

About SMEunited

SMEunited, formerly known as UEAPME, is the association of crafts and SMEs in Europe with around 65 member organisations from over 30 European countries. SMEunited is a recognised employers' organisation and European Social Partner and acts on behalf of crafts and SMEs in the European Social Dialogue and in discussions with the EU institutions.

We represent national cross-sectoral Craft and SME federations, European SME branch organisations and associate members. We speak on behalf of the 25,8 million SMEs in Europe which employ almost 88,7 million people. We are a non-profit seeking and non-partisan organisation.

-Caroline Bassoni, c.bassoni@cosmed.fr

