



Targeted revision of the Cosmetic Products Regulation (CPR): Stakeholder workshop* - June 28, 2022

Mathilde Detcheverry (AVICENN) on problem #3 > nanomaterials' definition:

[AVICENN](#) is an NGO dedicated to nano-related issues. We provide a regulatory, media & scientific watch on nano risks and regulations on the website veillenanos.fr. We advocate for more transparency and more vigilance on nanos.

Along with other NGOs we have tested cosmetics, French public authorities too... and all these tests show the [presence of many NP in many cosmetics](#) - not only in UV filters.

We are part of the 15 NGOs who sent an [open letter to the EU Commission](#) back in February, to express our concern and we are today more worried than ever, because the new recommendation of definition is much more narrow and way less protective than the current definition in the Cosmetics regulation.

If this new recommendation were to be taken up without major adjustments in the revised cosmetics regulation, it would exclude many nanoparticles from its scope!

For example, a facial make-up for kids that we have tested this year is made of 42% of TiO₂ nanoparticles and would not qualify as a nanomaterial in the future, and thus would not be regulated as such. This would mean no labelling requirements and no need for authorization!

We thus ask the European Commission to take the appropriate measures to prevent this kind of loopholes from happening.

Some brands have started to withdraw TiO₂ particles from their toothpaste, this is a step in the right direction. Now the European institutions must play their part too and actually ensure consumers information and protection from the risks raised by nanoparticles in cosmetics.

French people have been very lucky so far because [French authorities have been using a 10% threshold](#) and we want them to stick with this threshold. We also know that NGOs and people living in other member states envy us and should benefit from the same level of protection.

Legal consistency and certainty should not be used to impose the 50% threshold of the new recommendation nor to exclude nanocomposite materials: health and safety must prevail.

We are indeed speaking of cosmetics products that many vulnerable people are exposed to:

- the unborn exposed since [nanoparticles can cross the placenta](#)
- children who can ingest toothpaste
- teenagers, some of whom are using cosmetics at a very young age (TikTok app)
- pregnant and nursing women
- the elderly and also younger people who are dying their hair with sprays containing nano-sized pigments
- ill people, with skin or pulmonary disease who could be using powders EVERYDAY without even knowing that they are exposed to nanoparticles of titanium dioxide
- etc.

We really count on you. Thank you for your attention.

* https://ec.europa.eu/growth/events/hybrid-workshop-revision-eu-rules-cosmetic-products-2022-06-28_en