

Cosmetics Europe contribution to the EC roadmap public consultation on “Sustainable products initiative”

Cosmetics Europe represents the cosmetics and personal care industry in Europe. The vast majority of Europe’s 500 million consumers use cosmetic and personal care products on a daily basis to protect their health, enhance their well-being and boost their self-esteem. Ranging from antiperspirants, dermo-cosmetics, fragrances, make-up and shampoos, to soaps, sunscreens and toothpastes, cosmetics and personal care products play an essential role in all stages of our life.

Cosmetics Europe welcomes the opportunity to engage with the European Commission. We consider the following aspects are critical elements for the upcoming European Commission policy discussion on the **Sustainable Products Policy Framework**:

- Overarching product sustainability principles should be clear, objective and adaptable to the wide variety of product categories. This set of principles need to ensure the nature of the products is taken into consideration, as not all methods and criteria that apply to articles for continued use, are equally relevant for consumables
- As the cosmetics industry is investing significantly in the development of more sustainable products, these principles should enable companies, including SMEs, to voluntarily implement and communicate those improvements to consumers and value chains with the necessary agility. It would also be essential for maintaining the incentive to innovate in this fast-moving domain, both at the product and at the methodology level.
- Regarding the objective to increase recycling and recycled content, and before setting any threshold the availability of recycled content, supply of sufficient quality and quantity must be secured and specificities of the different product categories must be considered. The European Union must also ensure that there are no discrepancies at Member State level and that harmonisation in the internal market is guaranteed.
- With regard to mandatory product-related sustainability information, a tailored approach is needed for the various sectors, based on the relevant environmental characteristics of their products, to provide meaningful information to consumers – and support their informed choice - as well as to relevant actors along value chains.
 - The use of digital information channels should be encouraged. Digital provision of information has the potential to communicate to consumers more information, more efficiently, and in an adapted way. It can also, for example, contribute to reducing packaging waste.
 - In our view it is unlikely that one method alone (such as the Product Environmental Footprint – PEF) could be used for all the sectors concerned to reduce the environmental impacts of goods and services taking into account supply chain activities. Rather than a mandatory implementation of the PEF tool across all products and sectors, alternative and complementary sectorial approaches based on various robust and science-based methodologies should be allowed in order to accurately address the diversity of environmental features that could be communicated to consumers.
- The cosmetics and personal care sector is keen to avoid as much as possible the destruction of unsold products that are suitable for consumption and its potential negative impact on the environment.

- There are already many industry-led initiatives conducted to improve recycling, reuse and donation of cosmetics and personal care products. These industry initiatives should be promoted and supported.
- Depending on the nature and characteristics of their unsold products, and to take into account the technical challenges associated the recycling of certain materials and the legal and business risks associated with the donation of certain products, manufacturers and distributors should be free to decide whether and how to recycle, reuse and/or donate their unsold products.
- In particular, donations may present the risk of supplying parallel markets for products operating through selective distribution channels. These parallel markets themselves create major risks of counterfeiting and not meeting cosmetic products' safety standards. Therefore, manufacturers should be free to donate their unsold products when they can do it in a safe and legal way for themselves, beneficiaries and distributors.

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