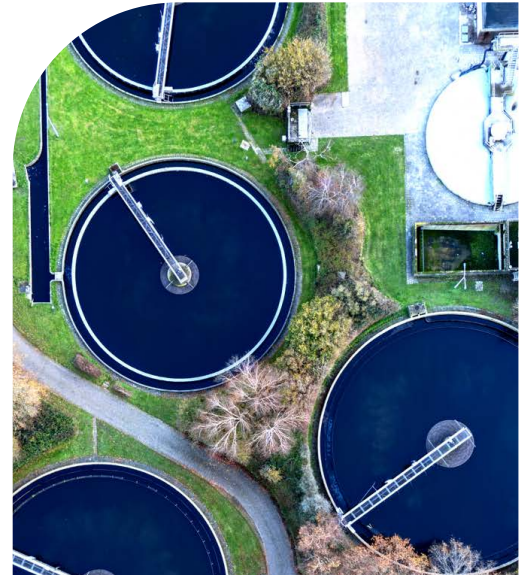


How much do cosmetics contribute to urban wastewater micropollution?

The European Commission's Impact Assessment suggested a 26% contribution. But the calculation attributed substances solely to cosmetics that also come from other sources – and even included substances not used in cosmetics at all.

Independent expert analyses correcting these allocations indicate the actual contribution is much lower – around 1-2% or less.



The original estimate

26%

Original figure from the 2022 Feasibility Study, part of the European Commission's Impact Assessment. Now understood to be a significant overestimation.

VS

The corrected picture

~1-2% or less

15x
lower

What inflated the estimate?

The original estimate included substances incorrectly attributed solely to cosmetics, including:



Banned substances



Substances not used in cosmetics
(e.g. insecticide Permethrin)



Common dietary fats
(e.g. Palmitic Acid)

The scale of the difference

26%



Original estimate (European Commission, 2022)

1.5%



Realistic 'main or exclusive use' assumptions
(Cosmetics Europe, 2025)

1.4%



Peer-reviewed reassessment of substance allocation
(Duis, K., Junker, T., Coors, A. et al. Environmental Sciences Europe, 2026)

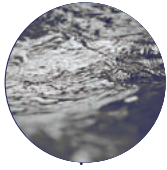
1.1%



Real-world market data analysis, or Market-based
assessment of contribution (DHI, 2025)

DIFFERENT METHODS, SAME CONCLUSION

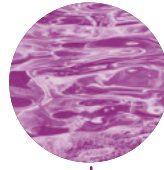
Independent analyses using different approaches put cosmetics' contribution in the low single digits – with most evidence pointing to around 1-2% or less.



Peer-reviewed reassessment of substance allocation (Duis, K., Junker, T., Coors, A. et al. Environmental Sciences Europe, 2026)

Peer-reviewed study using realistic substance allocation, refining simpler scoring models.

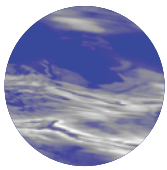
1.4–2.7%



Market-based assessment of contribution (DHI, 2025)

Used actual market data on cosmetics and manufacturer-reported compositions for a more realistic attribution of toxicity impacts to the cosmetics sector.

1.1%



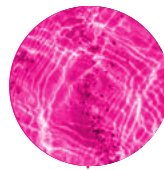
Conservative scoring for substances (Ricardo, 2026)

Assessed 23 substances identified as primary contributors to the cosmetics sector's toxic load. Only five were clearly attributable to cosmetics; 10 had multiple potential contributing sectors and eight came from non-cosmetic sources.

Conservative scoring model: attributes 50% of the impact of the 10 multi-use substances to cosmetics.

4.29%

● conservative upper bound



Attribution assessment of key substances (ECT, 2025)

Reviewed the 20 highest-impact substances originally allocated to cosmetics; only three could be justified as cosmetic sources.

0.2%

Realistic 'main or exclusive use' assumptions (Cosmetics Europe, 2025)

Own analysis of substance allocation also confirmed a contribution of around:

1.5%

So, what does this mean?

Cosmetics are a minor contributor to urban wastewater micropollution. Around 1-2% or less.

Even under highly cautious assumptions, the conservative upper bound remains just 4.29%.



Our industry acknowledges the importance of urban wastewater management and is ready to contribute its fair share, but we cannot be incentivised to reduce emissions of substances we do not emit. EPR contributions should be substance-based and sector-agnostic – not built on flawed allocation.

John Chave
Director General,
Cosmetics Europe



**Find out more:
Unpacking Flawed Data
behind UWWTD**