2020-08-31

# ECHA public consultation on the draft opinion of the Committee of Socio-Economic Analysis (SEAC)

## Section I and II

The Swedish Cosmetics, Toiletries and Detergents Association, KoHF, and The Swedish Association of Professional Hygiene & Cleaning, BPHR

Industry Association

Public answer

## Section III

We support that proportionate and science-based action is taken to decrease microplastics in the environment. Cosmetic products and detergents are not the main contributors to the release of microplastics in the environment, why it is even more important that regulatory actions are thoroughly motivated.

Many thousands of products will need reformulation if the proposed regulation is implemented. The most important aspect is to give enough time for development of alternative raw materials and ingredients to fulfill the same function as the previous ingredients.

KoHF and BPHR support the socio-economic analyses provided by AISE and Cosmetics Europe. The information contained therein is in accordance with the situation in Sweden. KoHF and BPHR therefor support and refer to comments presented by AISE and Cosmetics Europe to the *Consultation on the draft opinion of the Committee of Socio-economic Analysis (SEAC)*.

Although presented in the mentioned comments on cosmetic products (Cosmetics Europe) specifically KoHF would like to highlight our position for a proportionate and effective restriction on these products to address the concerns around the emissions of microplastics in the environment from leave-on cosmetics products:

*1. A derogation for make-up, including lip and nail products, on the basis that these products are predominantly disposed of in the trash, not the water system, yet the cost-effectiveness for the restriction on make-up is extremely high. To avoid any residual emissions, clear instructions for use and disposal of these products could be provided.*

*2. An eight-year transition period for sunscreen products.*

*3. A twelve-year transition period for skin care products.*

*4. A ten-year transition period for other leave-on products. The transition period extensions are required for technical reasons and will also improve the proportionality of the restriction.*

Regarding detergents and cleaning products, KoHF and BPHR would like to stress the importance to give enough time to develop alternatives to encapsulated perfumes. Encapsulated perfumes are important ingredients to the detergent industry since they enable the use of less perfumes in the washing process. A transition period of 8 years in the proposed regulation is the absolute minimum for encapsulated perfumes.

KoHF support the overall initiative by the EU legislators to propose the regulation of microplastics at an EU level, thereby respecting the Single Market’s principles.

## Specific Information Requests

### 4. Encapsulated perfumes

We support a transition period of 8 years for encapsulated perfumes. There are no alternatives available in the Swedish market. We understand it will take several years before alternatives have been developed and are put on the market as raw material. New raw materials need to be tested and evaluated before they can be included in final cosmetic product or detergent. We support the socio-economic analysis done by AISE and CosmeticsEurope and the comments they have put forward in the consultation process.

### 6. Report information on uses and releases

We support the increase in transition period for the reporting obligation. However, we believe that there are more efficient ways to get information on microplastics in the environment and potential releases in certain situations than to set up a database, for instance screening tests. To decrease the administrative burden a minimum reporting threshold should be introduced in the regulation. It would also decrease the administrative burden to only report the amount of polymer and not the specific polymer type. We support the comments made by the Swedish Paint and Adhesives Association, SVEFF.