

CHEMICAL OMNIBUS

CMRs and cosmetics | Three main concerns

1. Longer timelines : from 18 months today to **57 months** including where
 - the SCCS identifies a need for new restrictions (**unsafe uses**)
 - industry decides not to defend a CMR ingredient (**safe use not demonstrated**)
2. New definition of alternatives : **too restrictive** – showing alternatives exist will be near impossible
3. **Burden of proof shifts** towards authorities
 - Unclear what triggers an SCCS assessment i.e. what is a 'potential risk'?
 - Plant based ingredients are complex (e.g. multiple CMR constituents) and politically sensitive
 - No deadlines apply i.e. discussions can go on for years...

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Why this matters for EDCs – and for EDC-Free

Reminder : We want EDCs to be banned in cosmetics (via article 15)

- Need to defend the existing rules (damage control)
- Opportunity to extend article 15 to EDCs (proactive push)



State of Play

- **Council** | Antici group leads = **generalists** not technical experts i.e. simplification politics, difficult to access
 - **Parliament** | ENVI leads on CLP, cosmetics; IMCO on fertilizers
 - But conflict of competences **unresolved** (again, simplification politics)
 - EP majorities are pro-business
- ➔ For now, procedures, timelines and likely positions are **unclear**
- ➔ BUT expect negotiations to **conclude in 2026**