

**To:** David Maria Sassoli, President, European Parliament  
Charles Michel, President, European Council  
Ursula von der Leyen, President, European Commission

## **Cosmetics Animal Testing Ban Effectively Shredded**

The EU Cosmetics Regulation animal testing and marketing bans have been used as the gold standard around the world – setting the precedent for cosmetics products and ingredients to be used safely without subjecting animals to cruel and unnecessary tests. These bans have now been dealt a devastating blow following a series of regulatory decisions made by the European Chemicals Agency (ECHA), with support from the European Commission and ECHA's own Board of Appeal.

ECHA is now requiring some widely used cosmetics ingredients (and ingredients used in many other types of consumer products) to be tested on thousands of animals under the guise of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation. As a direct result of these decisions, the use of thousands of rats and rabbits in tests is required, some of whom will be force-fed a cosmetics ingredient throughout pregnancy before they and their unborn offspring are killed and dissected. REACH must not be used to circumvent the Cosmetics Regulation and render the cosmetics testing and marketing bans meaningless.

The approach of ECHA and the Commission is at odds with the European Parliament's call in May 2018 for a worldwide ban on testing cosmetics on animals by 2023. It undermines the purpose and value of the Cosmetics Regulation, which many of us have worked determinedly over many years to shape, implement, and leverage with non-EU countries in developing their own cosmetics legislation. The approach also has consequences for citizens around the globe who want to purchase cruelty-free products: 84% of respondents to a recent global survey said they would not buy a cosmetics product if they knew it (or one of its ingredients) had been tested on animals.<sup>1</sup>

The bans are further threatened by the Commission's future policy for chemicals regulation – the Chemicals Strategy for Sustainability – which is set to expand testing requirements for substances including cosmetics ingredients, at the cost of potentially thousands of animals' lives.

One of the principal objectives of the Cosmetics Regulation is the protection of human health, with the intention that this be safeguarded in *all* situations. The ingredients at the centre of ECHA's decisions have a long history of safe use by consumers and have been handled safely in factories for many years. It is perfectly possible to use exposure-based weight-of-evidence assessments, using a variety of non-animal data, to fill any perceived critical information gaps in order to be assured of the safety of these ingredients.

Indeed, as clarified by the Court of Justice of the European Union in the 2016 European Federation for Cosmetics Ingredients case, new safety-assessment data for cosmetics substances imported into the EU must rely *only* on non-animal assessment methods. Logically, precisely the same approach must be adopted for testing within the EU, whether under REACH or any other EU legislation.

We, the undersigned, call for the EU cosmetics animal testing ban to be upheld as intended, with no new tests on animals allowed.

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<sup>1</sup> Frame. Fact or fiction? Mapping perceptions of animal testing. [https://frame.org.uk/wp-content/uploads/2020/06/FRAME-report\\_final.pdf](https://frame.org.uk/wp-content/uploads/2020/06/FRAME-report_final.pdf). Published June 2020. Accessed 13 November 2020.

24K Cosmetics  
28 Litsea  
4organic  
Abela  
Above Beyond Group Ltd  
actiMare natural cosmetics  
AD skin synergy  
Adesse New York  
Aesop  
Agilise Cosméticos  
All About Good Vibes  
Alter-Native  
Alucia Organics  
Alvend Laboratoire  
Amanda Murray NYC  
Aqua Natural  
Aqua Natural Ltd.  
Arctic Fox  
AREU AREU  
Argital  
ARTONIT Cosmetics  
Assured Products Ltd.  
Astonish  
Aurelia Probiotic Skincare  
Aurelia Skincare Ltd  
Ava May Aromas  
Avon  
Awake Organics Ltd.  
Ayumi  
B4U Laboratories  
Baby Mantra  
Bacana Skincare  
Bara Cosmetics  
BareFaced Beauty Ltd.  
Barr Cosmetics  
Bashia Cosmetics  
Beauty Disrupted  
Beauty Kitchen UK Ltd  
Beauty Magic  
Beauty Without Cruelty  
beBIO  
Bee Good Enterprises Ltd.  
Bellapierre Cosmetics Ltd.  
Bellati Naturals  
Better Health Ltd.  
BH Cosmetics  
Biocosmetics  
Biotakara  
BIW BIW  
Black Dahlia Lacquer  
Black Sheep Organics  
Blaq  
Bliss Delights

ADDA, Spain  
ANIMAL, Portugal  
Animalia, Finland  
Animals Without Boards, Croatia  
Cruelty Free Europe  
Cruelty Free International  
Diervriendelijk Nederland  
EcoVegAnimals, Bosnia  
Eurogroup for Animals  
GAIA, Belgium  
Humane Society International  
LAV, Italy  
Menschen für Tierrechte – Bundesverband der -  
Tierversuchsgegner e.V.\*  
(\*People for Animal Rights – German Association -  
Against Vivisection)  
PETA Australia  
PETA Deutschland e.V.  
PETA France  
PETA Nederland  
PETA UK  
PETA US  
SARFIreland  
Stichting Proefdiervrij  
Svoboda Zvířat, Czech Republic

Bluebird Skincare  
blum organics  
Body & Face St Cyrus  
Body & Face St Cyrus Ltd  
Bolt Beauty Limited  
Bo-Po Nailpolish (Worx Toys)  
Botanico Vida  
Botanics  
bPerfect Cosmetics  
Bramley Products Ltd.  
Brooks-Hill Limited  
BrushBox  
Buff Efforts  
buScreen  
Butterwhips Ltd  
Cafuné  
Capure Goat Milk Soap  
Cemon Homeopathics Ltd  
CHEMEXC S de RL Dermacare  
Chemical Manufacturing and Exporting Company S de RL  
Chez Lapin Goods  
Childs Farm Ltd  
Chistaya Linia  
Christiane Heyn  
Christine Valmy  
Clean Beauty Distribution  
CocoMak  
Cocunat  
COLORISI  
Coloured Raine  
Comette Cosmetics  
Conscious Skincare  
Cool & Nature M32 SL  
Copaibe  
Corinne Taylor Holistic Therapy  
Coruscare  
Cosmondial  
Crane + Wilton Ltd  
Crowd Culture  
Crystal Spring Consumer Division Ltd  
Cultivator Natural Products Private Ltd.  
Day Lily Paris  
Della e Delle  
Dermalogica  
Desert Pea  
Designer Lashes UK  
Doers of London  
Doers Skincare Limited  
Dove  
Dr Jackson Limited  
Dr. Jacobs Naturals  
Dr. Perry's  
DrTung's

E Beauty Ltd.  
Earth Conscious Ltd  
Earth Sense  
Eco Chic Chick  
Ecoleaf  
Ecotech  
Eleni & Chris  
Elidor  
Elixir Treatments  
Elizabeth Mott  
ELLIS FAAS Cosmetics  
Eloise Hall Ltd.  
Emeis Holdings Pty Ltd  
Emerge  
Emma Hardie Ltd  
Endemic Biotech S.L.  
Enviro-works  
epic beauty  
EQ France  
Equus Mare  
Era Organics  
Erui Cosmetics  
Essante Organics  
EXQUISITE Luxury Ltd  
Extraordinarios Luxo Natural  
Face Cult  
Fair Squared  
Faith in Nature Ltd.  
Farryn Amber  
FATFACE  
FatFace UK Ltd  
FFS Beauty Ltd.  
FINE Deodorant  
Floral Street Fragrance  
FLOSLEK  
Folly Fire  
For Your Nails Only  
Forest Herbs Research  
Fragile Cosmetics  
Frances Prescott  
Franline Ltd  
Friendly Soap Ltd.  
Fuchsia Brands Pty Ltd  
Fudco  
Funky Soap Shop Ltd  
Fushi Wellbeing Ltd  
Fusion Body Art  
Fysha  
Gaia Skincare Limited  
GEL.IT.UP by GIUP®  
Gel.IT.UP Greece  
Gelstory  
Gestion Comercial Integral Navalon SL

GHS Direct Ltd  
Girls with Attitude  
Good3  
Green Beauty Cosmetics  
Green Beaver Company  
HAER Limited  
HAKA Kunz  
Hanaei Beauty Company  
Happy Carrot Skincare Ltd  
Hashtag Brothers  
Here We Flo  
Heroine  
Hibisco cosmetica natural  
Home and Body Company  
Homethings  
Hourglass Cosmetics  
HOWND  
I AM Cosmetic  
i+m NATURKOSMETIK BERLIN  
IC Scandinavia AS  
Ihana Skincare  
Ikeda Group Pte Ltd  
iLevel Lab  
Imperial Bioscience Ltd  
Inari Skincare Ltd.  
Inlight Beauty & Wellness  
InnoNature  
InovAir Ltd ("Pairfum")  
Inspy  
Institut Claude Bell  
Internet Café-BG Ltd.  
IRÉN  
J Bloom Cosmetics  
Java Cosmetics  
Jax Wax  
Jessica Laura Organics Ltd.  
JL Cosmetica Natural  
Jolie Vegan  
Julie Clarke Candles  
Kaia Naturals  
Kalentin  
Kama Soap  
Karma Organic Spa  
Kate Somerville  
Kativa  
Katmandu  
Kiss the Moon Ltd  
Kit and Kin  
Koh Australia Pty Ltd  
Kokoro Beauty and Lashes  
Korah Tools  
Kri Skincare Ltd  
KUXTAL

Kylies  
La petite main  
Lab Phyto  
Laber Organic Cosmetics  
Laboratoire Hippocrate  
La-Eva  
Lano  
Lanolips  
Lanolips Pty Ltd  
Laura Sanchez Makeup  
Laviish  
Leac de un Veac  
Les Happy Curiennes  
Li Cosmetic AG  
LI Pigments  
Lipstains Gold  
Lisa Nail Lacquer  
Lissea Limited  
Little Danube Limited  
Little Soap Company  
Living Proof  
LivOliv Cosmetics  
Liz Earle  
LLB Skin  
Lock Stock & Barrel Grooming Co Ltd  
London Copywright  
Look Fabulous Forever  
Loopy Products Limited  
Love Beauty & Planet  
Love Henri Ltd  
Love Home & Planet  
Lovely Pop  
Lucy Bee Ltd  
Lukasz Romuk Wodoracki t/a 1stDrop  
Luna Bronze  
Luna Nectar  
M32 Natural  
Ma Sista Stuff  
Made for Life Organics  
Made in Youthland  
Magic Lips  
Maison de Navar  
Mama Zebra Cosmetics  
ManCave Ltd.  
Marie Hunter Beauty  
Mark Birch Trichlogist  
Marks & Spencer PLC  
Mary Jean Limited  
Matana Skincare  
Mawena  
Maysama Ltd  
Medeau  
Mediterranean Tan

Melchior & Balthazar  
Mervue Natural Skincare  
Milton Keynes Products Limited  
Minoris Organik  
MOB Beauty  
Modern Botany  
Molton Brown Limited  
Mommy Makeup  
Moss & Adams  
Motherlylove Limited  
MuLondon Ltd  
Murad LLC  
Myrtle & Maude Ltd.  
Naissance  
Nakin Skincare  
Naroma  
Natroma & The Natural Soapworks  
Natura  
Natura &Co  
Natura Cosméticos S/A  
Natural by Nature Oils Ltd  
Naturally Tribal Skincare Ltd  
Nature Knows Best  
Nazan Schnapp GmbH  
Neal's Yard (Natural Remedies) Ltd  
Neat Wholesale  
Neo Make Up  
NeoHair Ltd  
New Look Cosmetics  
Nomad Cosmetics  
Nubian Heritage  
NurseM  
Oceane  
October Fields  
Ofra Cosmetics  
Om Oils  
One Chem  
Orbit Pad  
Organic and Nature  
ORGANii  
Ouidad  
Pachamamai  
Pai Skincare Ltd.  
Paima Beauty  
Pamoja Skincare Ltd  
Passion Cosmetics Paris  
Patricia Deleon Cosmetics  
Paula's Choice  
Paws Beauty  
Pee Safe  
Perfect Girl  
Persona Cosmetics  
Pet Revolution Ltd

PHB Ethical Beauty Ltd  
Phil Smith Be Gorgeous  
Phil Smith Be Gorgeous Ltd  
Planted  
Planted Skincare  
Pluscosmetica Duo  
Poppy's Natural Skincare  
Popwhite  
Power Health Products  
Power Health Products Ltd  
Power Pets Brands  
Previa S.p.A.  
PRIIA Cosmetics  
Primal Essence  
Procarton  
Pure Argan Co Ltd  
Pure Chemistry S.A.S.  
Pure Essence Collection Ltd  
Raen  
Rawgaia  
Releaf  
Ren Clean Skincare  
Rempure  
Reviv Serums  
Rhug Organic & Natural Ltd  
Rhug Wild Beauty  
Romilly Wilde  
Rosenserien  
Royal Tara Giftware Limited  
rue Santé  
Safe Nails  
SAHARA International Group  
Salt of the Earth  
SAMAYA Ayurveda Limited  
Sampure Minerals  
Sana Jardin Limited  
Sanjeevita  
Sanoll Biokosmetik GmbH  
Santaverde GmbH  
Sapunta Malta  
Sasy n Savy  
Saving Face Limited  
Schmidt's Naturals  
Secrets Cosmetiques  
Seda  
Sedal  
Sensori Plus  
Sepai Laboratories  
Seraphine Botanicals  
Seventh Generation  
Shea Moisture  
Shea Shea Bakery  
Shea-Me Ltd



Silvan Skincare  
Simple  
Simple Alchemy  
Siskyn Skincare  
Sister & Co. Skin Food  
six gldn  
Skin Sapiens Ltd.  
Skinny Sprinkles  
SKN-RG Ltd.  
Sky Organics  
Smith England  
Smol Ltd  
Sno Eternelle  
Soaper Delights  
Sonia Orts  
Spiezia Organics Ltd  
Splosh Limited  
St Ives  
Starbrands S.A.C.  
Stereo Color  
Suave  
Suds  
Sue Marsh  
Sugar Coated Ltd  
Sugar StripEase  
Sukrit Ayurveda  
Suma  
Suma Wholefoods  
Sunsilk  
Suntegrity Skincare  
Sweden Eco  
Synergy Biologics  
Tailored Beauty  
Tan Organic  
Tandem Skincare  
Tarsago Ltd  
Tatcha  
Technology  
teethlovers  
The 7 Virtues  
The Aftercare Company  
The Barberia  
The Beauty of Eczema  
The Bio-D Company Ltd  
The Body & Face Place  
The Body Shop  
The Co-Operative Group (CWS) Ltd  
The Dartmoor Skincare Company  
The Good Garden  
The Good Stuff  
The Green People Company  
The Konjac Sponge Company Ltd  
The London Oil Refining Company Ltd

The Naissance Trading & Innovation Co. Ltd.  
The Natural Barber Co.  
The Perfume Laboratory  
The Pure Collection  
The Victorian Garden Organic Skincare  
Thermitek Ltd  
Think Beecause  
Thunderbird Skin  
Tolteca  
Total Solutions Inc  
Trebol Verde  
TRUE Skincare Limited  
Two Orchards Ltd  
Two Plants  
TYH London  
Ultra Glow  
Ultra Glow Cosmetics Ltd  
Unilever  
Urban Veda  
Vegan Beauty Care  
Velveit Cosmetics  
Velvet & Sweet Pea's Purrfumery  
Ville de Fleurs  
Visage Pro  
Watermans  
Wax Melts International Limited  
White Rabbit Skincare Ltd.  
Whitfords  
Wiig  
Wild & Wolf  
Wilde Beauty Limited  
Wildwash  
Yaya Maria's  
Yes Nurse  
Y-Not Natural  
You & Oil  
Young ePure  
Zendium  
Zeva Organics  
Zoya Goes Pretty  
Zyderma