BEUC The European Consumer Organisation

The Consumer Voice in Europe

Use of triclosan needs to be strictly limited in cosmetic products to protect consumers' health – BEUC position

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Summary

BEUC provides in this position paper input to the European Commission's public consultation on the use of triclosan in cosmetic products, which is open until 19 October 2012. We argue that triclosan which is used as an antimicrobial agent in many consumer products such as cosmetics, detergents toys and paints for decades should not be present in most consumer products and in particular not in cosmetic products as these are applied directly to the skin. Our argument is twofold.

First, the substance cannot be considered to be fully safe for human health as triclosan is suspected to lead to the formation of antimicrobial resistances. Moreover, the substance is suspected to disturb the hormonal system.

Second, the use of triclosan is not needed as preservative in cosmetics as there alternatives of lesser concern are available. Comparative product tests of consumer organisations show regularly that there are many products available in each category which do not use triclosan and which are not more expensive than products without triclosan.

Our recommendations:

- We call on the Commission to delete the following product categories from Annex V of the Cosmetics Regulation EC No. 1223/2009 with the aim to prevent the use of triclosan as preservative in cosmetic products in the future: had soaps, bath/ shower products, deodorants, face powders and blemish concealers, nail products.
- For mouthwash and toothpaste we suggest discussing possible additional measures if adequate after the availability of two pending reassessments, the US FDA opinion and the assessment of triclosan under the EU Community Rolling Action Plan (CoRAP) under REACH.
- We call on the Commission to tackle the use of triclosan horizontally in consumer products, not just in cosmetics.

Introduction

BEUC provides in this position paper input to the European Commission's public consultation on the use of triclosan in cosmetic products. The Commission proposes limiting the use of triclosan as a preservative in cosmetic and personal care products to 0.3% maximum concentration in ready for use preparations for:

- toothpastes;
- hand soaps;
- bath and shower products;
- deodorants;
- face powders and blemish concealers;
- nail care products.

A maximum concentration of 0.2% is foreseen for mouthwash.

We give health related as well as economic arguments why a continued use of triclosan should be avoided in most cosmetics but also other consumer products.

Triclosan should not be used in decorative cosmetics, soaps and deodorants as is not safe for human health and could negatively impact the environment

Triclosan is used in many consumer products including cosmetic and personal care products for its antimicrobial properties. It has also been used in clinics as antiseptic, disinfectant and preservative in hospitals and doctor's offices. Triclosan acts as a biocide by inhibiting bacterial fatty acid synthesis and thereby prevents spreading of bacteria and germs. While its medical application may be useful, its added value and efficacy in consumer products cannot always be demonstrated. For example, the use of triclosan in hand washing products and detergents seems to be questionable as bacteria can be removed effectively with non triclosan containing products when following adequate hygiene and cleaning rules.

The Scientific Committee on Consumer Safety (SCCS) concluded that the continued use of triclosan in all cosmetic products is not safe because of the magnitude of the aggregated exposure[1]. The use of triclosan in the above mentioned product groups and concentrations however is considered to be safe by the SCCS.

From a consumer perspective it seems questionable why the use of triclosan should be allowed in stay-on products such as deodorant sticks, face powder, blemish, concealer and nail-polish and in products as those products can be preserved with alternative means that are of lesser concern.

Human health effects caused by exposure to triclosan are still unknown. However, latest scientific findings assume that triclosan impairs muscle functions, including the heart[2]. Researchers in the US exposed mice and fish to triclosan levels comparable to the levels humans are exposed to in daily life and found worrying results. The chemical had severe impact on the functioning of the heart and on other mussels of the mice. Thus, the researchers concluded that triclosan exposure could be worrying in particular for patients suffering from cardiac insufficiency.

The chemical has previously found to possibly have negative effects on the hormonal system such as affecting the functioning of the thyroid and fertility. Triclosan is also suspected to contribute to the formation of allergies. For reasons related to endocrine disruption, the Environment Ministry and the Environmental Protection Agency of Denmark recommends for example to consumers to avoid products with triclosan. This advice is in particular given to pregnant women[3].

Triclosan enters the environment mainly through waste water streams. Environmental exposure to triclosan is also of concern as it seems to negatively impact the aquatic environment[4].

Human bio-monitoring projects detect triclosan in urine samples of humans.

A considerable number of organisations, including national environmental protection agencies, risk assessment institutes, dentist associations, environmental NGOs and consumer organisations recommend to consumers to stay away from products containing triclosan. However, we consider that just informing consumers is not the adequate means of consumer protection in this case as all products on the market need to be safe.

Further measures for oral care products with triclosan should be discussed based on upcoming new assessments

As triclosan may have a benefit for patients suffering from gingivitis, we would not oppose using triclosan in some oral care products based on strict concentration limits at this point of time. However, we ask the Commission to discuss possible additional measures if adequate after the availability of two pending reassessments, the US FDA opinion and the assessment of triclosan under the EU Community Rolling Action Plan (CoRAP) under REACH.

As the SCCS proposed reducing the concentration in mouthwash, which seems to be feasible from a health perspective, we request further information if triclosan would still be effective at such low concentrations.

Products without triclosan can be produced at competitive prices

In its consultation document, the Commission asked in particular for feedback on the economic impact of the proposed measure. We are of the opinion that banning triclosan in most cosmetic products will not have severe economic impacts for the following reasons.

Comparative product tests in consumer magazines show that there are always products at different price ranges available to consumers that do not contain triclosan. It has also to be taken into account that the threshold of 0.3% maximum concentration of triclosan (0.2% for mouthwashes) in ready for use preparations is a small amount compared to the other ingredients in cosmetic products. Hence, it is not likely that requirements on to use alternatives to triclosan would lead to higher prices for these cosmetic products for consumers.

Commission should act on all consumer products containing triclosan

We see a need for the Commission to act horizontally on triclosan, taking action on all consumer products. Several national environmental protection agencies and/ or national risk assessment institutes recommend using no triclosan in consumer products and limiting its use only to applications in the medical environment[5].

We therefore call on the Commission to regulate this substance in consumer articles in general and not only in cosmetics.

Endnotes

[1] Scientific Committee on Consumer Safety (SCCS): Opinion on triclosan, SCCS/1414/11, http://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_054.pdf

[2] See Gennady Cherednichenko et al. (2012): Triclosan impairs excitation–contraction coupling and Ca2+ dynamics in striated muscle, http://www.pnas.org/content/early/2012/08/08/1211314109.abstract

[3] See fact sheet from the Danish Environment Ministry http://klartilstorken.dk/kemi/triclosan

[4] See Cherednichenko et al. (2012) above.

[5] German Federal Institute for Risk Assessment (2006): Triclosan nur im ärztlichen Bereich anwenden, um Resistenzbildungen vorzubeugen, Stellungnahme Nr. 030/2006 http://www.bfr.bund.de/cm/343/triclosan_nur_im_aerztlichen_bereich_anwenden_um_resistenzbildungen_vorzubeugen.pdf For Danish EPA, see reference above.