



The Consumer Voice in Europe

Regulating the use of parabens in cosmetic products – BEUC reply to the public consultation on butyl- and propylparabens

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Ref.: X/2013/069 - 24/10/2013

Summary

The European Commission, DG SANCO, is consulting the public regarding regulating the use of parabens in cosmetic products.

In this position paper BEUC replies to the consultation which is open before 1 November 2013. We suggest certain changes regarding butyl- and propylparabens which would lead to a higher level of safety for children.

Introduction

The safety of parabens has been in the focus of consumer organisations for several years due to some concerns regarding their possible negative effects on the hormonal system.

In this respect we very much welcome a recent decision of the European regulatory committee on cosmetics to ban 5 parabensⁱ from use in cosmetic products as the industry could not provide convincing evidence regarding their safety. We are convinced that this measure is very important to keep consumers safe and hope it will be formally adopted and implemented in the coming months.

We also welcome that the European Commission is considering further regulatory measures concerning butyl- and propylparabens.

In this paper we give input to the European Commission public consultationⁱⁱ regarding methyl and ethylparabens as well as butyl- and propylparabens which is open until 1 November 2013.

Comments on Ethyl- and Methylparabens

The Commission is suggesting a maximum concentration limit for Methyl- and Ethylparabens of 0.4% for a single ester and 0.8% for mixtures of esters based on the latest opinion of the Scientific Committee on Consumer Safety (SCCS).

While we accept this limit value for the time being, we highlight – as in previous comments – that consumers are exposed to harmful chemicals from many different sources. The combination effects of chemicals which may be more harmful than of the single substance alone are still not taken systematically into account when assessing the safety of chemicals. Moreover, the possible harmful effects of chemicals which may negatively interfere with the hormonal system - in particular of vulnerable groups of consumers such as pregnant women, unborn babies and small children - are not yet fully understood. Hence, we recommend to the European Commission to re-think the approach to parabens (ethyl-, methyl, butyl- and propylparabens) in cosmetics in the next 5 years taking into account possible combination effects as well as possible safer alternatives to parabens which will be likewise suitable to preserve cosmetic products.

BEUC Recommendations regarding butyl- and propylparabens

The latest proposal foresees setting a maximum concentration for butyl- and propylparabens of 0.14% for the sum of the individual concentrations of butyl- and propylparabens. We welcome that:

- The maximum concentration in ready for use preparations will be lowered to 0.14% for all cosmetic products;
- Butyl- and propylparabens will not be allowed in leave-on products intended to be used in the nappy area of children under three years of age. However, this measure is insufficient to effectively protect the health and safety of children.

We ask the Commission to ensure that:

- Propyl- and butylparabens will not be allowed in cosmetics for children no matter if these substances are present in leave-on or rinse-off products and irrespective of the area of application.
- If propyl- and butylparabens would be banned from all children's cosmetics the warning "Do not use on the nappy area" would become obsolete on the packaging of cosmetic products for children. We recommend however indicating a warning on cosmetic products for adults "do not use for small children" to ensure safe use.
- As several studiesⁱⁱⁱ suggest that hormone disrupting chemicals may in particular be harmful for small children when the central body systems are still under development and that even low doses^{iv} could have a negative impact, we recommend these modifications to the Commission based on the precautionary principle.

ENDNOTES

ⁱ Isopropyl-, isobutyl-, phenyl-, benzyl-, and pentylparabens.

ⁱⁱ Public consultation on butyl- and propylparabens in the framework of Regulation (EC) 123/2009 of the European Parliament and the Council on cosmetic products which is open before 1 November 2013, http://ec.europa.eu/consumers/sectors/cosmetics/files/pdf/parabens/parabens_pc_en.pdf

ⁱⁱⁱ Women's Reproductive Health and the Environment Workshop report: Girl disrupted, Hormone Disruptors and Women's Reproductive Health, January 6-9, 2008, Bolinas, CA.

^{iv} Vandenberg, Hormones and Endocrine-Disrupting Chemicals: Low-Dose Effects and Nonmonotonic Dose Responses, Endocrine Reviews, March 2012, doi:10.1210/er2011-1050.

WHO /UNEP Report: State of science of endocrine disrupting chemicals, 2013, <http://www.who.int/ceh/publications/endocrine/en/>.