

Meeting Between Cropwatch - The Perfume Foundation & the EU Cosmetics Commission Staff, Brussels, July 3rd 2007.

[N.B. The following is Tony Burfield's personal account of the meeting proceedings, and does not represent the agreed minutes, or represent the opinions of the other attendees].

Introduction.

Representatives from Cropwatch and The Perfume Foundation met senior personnel from the EU Cosmetics Commission at their avenue d'auderghem offices in Brussels on the afternoon of Tuesday July 3rd 2007 for a meeting that lasted 1h. 40 mins. .

Tony Burfield, Co-founder Cropwatch
Creezy Courtoy, Chairman, Perfume Foundation
Henke Meijerink, Technical Director, Perfume Foundation
Sabine Lecrenier Head of Unit, Cosmetics Commission
Barbara Mentré, Administrator, Cosmetics Commission
Takis Daskaleros, Senior Administrator, Cosmetics Commission
Annette Orloff, Seconded National Expert, Cosmetics Commission

This cordial and constructive meeting started with individuals from all parties briefly explaining their respective roles, operating briefs & constraints. In what must be at times a difficult & maybe under-resourced position, the Commissioner explained the role of Safety Management & the role of DG Ent (Risk Assessment).

Areas of Improvement.

The Commission staff explained that Cropwatch's opinions had been instrumental into revisions of procedures Areas for improvement include transparency, data-gathering & the recruitment of further expertise e.g. in botany/economic botany. We all welcome attempts to strive for better standards & performance.

Areas of recommendation.

Cropwatch was deeply concerned at the level of reliance & trust placed with industry & its privately funded research organizations, both to provide scientific data to the SCCP, & to source authentic samples of cosmetic ingredients for scientific investigation. The forwarding (say, to the SCCP, by industry) of a careful selection of certain scientific publications on cosmetic ingredients can, of course, provide the potential to generate slanted Opinions & policy, unless balancing data from more comprehensive data-base searching is made available. Further, the opportunity for the continuing development of 'Corporate Science' (as opposed to truly Independent Science) is surely present where so many industry-based toxicologists are busy employed feeding (often unchallenged) data into EU expert committees. There is a need for an

independent assessor as a buffer between industry-generated information & EU scientific administrative staff & lawyers.

An urgent recommendation was also made by Cropwatch to independently establish sample authentication, batch tracking & purity data for proffered commercially sourced samples, & to send back submitted data where these requirements are not satisfactorily established. This will save a considerable amount of time in preventing the adverse reactions of ingredients being wrongfully ascribed to the substance under investigation instead of the synthetic impurities.

Areas of Disagreement

Cropwatch & the Perfume Foundation identified a number of areas where the parties have fundamentally opposing views. .

1. Cropwatch & The Perfume Foundation believe that we need to establish a **Fragrance Commission** which is specifically concerned with the matters concerning fragrance regulation. Fragrance covers not only cosmetics, toiletries & fine fragrances, but air-fresheners, candles & incense, & household & miscellaneous categories also. The alternative can only be that the EU Cosmetics Commission urgently reforms, correct & modify its existing remits & practices.

2. **Risk-benefit analyses** for the evaluation of the safety of fragrance ingredients was ruled out as a possibility by Takis Daskaleros in conversation. This is not acceptable to Cropwatch, who anyway believe that EU staff misunderstands the concept of 'benefit' in this context – but there was not an opportunity at the meeting to explore this point further.

3. Since fragrance is as much a high-art form as much as it is a science, the existing tunnel-visioned approach by the present Commission to perfume safety to **the exclusion of socio-economic, ecological, cultural & heritage matters is simply not acceptable**. Joined-up thinking with regard to consequences of cosmetic policies needs urgent consideration, perhaps in conjunction with other EC or globally-based organizations. At a time when we are all working for a better & greener planet, the Cosmetics Commission cannot excuse from the ecological consequences of its policies just because of its authoritative position.

3. Although the Cosmetics Commission is responsible for seeing that manufacturers place safe cosmetics on the marketplace, the Commission point-blank **refuses to define "safety"**. We believe that this position is untenable. European taxpayers are entitled to a quantification of the relative risks of using cosmetic preparations & ingredients. We further believe that the latest SCCP operating CoP (which maintains that risk assessment quantitation is outside its scope) needs rewriting to justify its policies wrt to perceived risk.

4. Expanding point 3 above, joined-up thinking is especially applicable to the **socio-economic & ecological aspects** associated with banning or restricting cosmetic ingredients, where, as a consequence of natural ingredient usage decline, it causes hardship or threaten survival of the natural resource (cf. Peru Balsam forests in El Salvador). Cropwatch believes that cultivation or processing technical fixes are available for many of the adverse reactions produced by restricted ingredients, and we need to find funding solutions to help those social groups which are directly affected.

Individual Issues.

1. Furanocoumarins. We understand that the RIFM-contracted studies on the individual FCF's bergamottin & isopimpinellin which were undertaken by Prof. David Kirkland of Covance UK, have been forwarded to the SCCP. Cropwatch has asked that these privately submitted studies be made available for public scrutiny in the interests of transparency.

Cropwatch believes that limitation of FCF's to 1 ppm in cosmetic products will be economically divisive and set the stage for violation of Fair Trading Principles [i.e. it will selectively disadvantage SME's and those operating from undeveloped regions in the citrus commodity sector, who cannot afford the investment in technology to reduce FCF levels]. Cropwatch is further asking for a public consultation on the issue.

2. Inhalation toxicity.

Cropwatch-Perfume Foundation representatives were somewhat aghast to learn that inhalation toxicity / allegations of adverse connections between perfume & breathing problems, asthma etc. hardly figured on the Commissions agenda, showing how much, in our opinion, dermatological matters have over-influenced EU cosmetic safety policy, to the detriment of other areas of concern. We were assured that this omission would be put right.

3. The single ingredient approach to toxicology.

The FCF issue is a particular illustrative case where 'laboratory bench' investigations of the alleged toxicity of an isolated single component within a complex biological matrix may be completely misleading. We need protocols that investigate the toxicity of the actual complex ingredients themselves rather than isolated versions of the individual constituents of the ingredients, versions which are often impure (with unspecified impurities), or composed of the wrong isomer(s) compared with the natural isolate.

4. SCCP Reform. Cropwatch has been asking research teams who have submitted data to the SCCP (either indirectly via published papers, or who have submitted data directly to the SCCP), whether they consider that their work has been fairly & correctly expertly assessed & reviewed in an unbiased manner. Although Cropwatch has only carried this out on a very limited scale, the results are alarming. An urgent internal investigation is needed.

Further, Cropwatch & many of its supporters do not consider Ian White as a suitably independent & unbiased chairman of the SCCP. We would like to have certain SCCP Opinions independently re-examined, and we intend to submit or publish evidence, to support this endeavor.

5. Subject areas for safety re-assessment. There is a large group of people with independent scientific opinions who do not necessarily agree with the findings, views and policy of the EU Cosmetics Commission, and most especially with its 'expert' advisers. These issues include the subjects of alleged **methyl eugenol** carcinogenicity, certain banned or restricted materials within the Cosmetics Directive, & the large & controversial subject of **alleged sensitisers** amongst common aroma ingredients.

Conclusions.

Although areas of disagreement are both considerable & deep, this initial meeting was very encouraging and sets an optimistic air for the future. Cropwatch would like to thank the Brussels staff for the valuable opportunity to dialogue and for each party to have an insight into each others' policies.

Tony Burfield
July 9, 2007.