

CTPA Statement on the Legal Status of Titanium Dioxide According to the UK Cosmetics Regulation

1 October 2021

From 1 October 2021, Specific grades of titanium dioxide are classified as a Carcinogenic, Mutagenic or Reprotoxic (CMR) category 2 substance under the EU and GB Classification, Labelling and Packaging (CLP) Regulations. This classification only applies to specific grades of titanium dioxide, and only if they present the possibility of being inhaled. This classification concerns mixtures in powder form containing 1% or more titanium dioxide which is in the form of, or incorporated in, particles with aerodynamic diameter $\leq 10 \mu\text{m}$.

Article 15 of the UK and EU Cosmetics Regulations state that a substance classified as CMR 2 must undergo a safety assessment by an independent scientific panel for continued use in cosmetics. In the EU, this panel is the Scientific Committee on Consumer Safety (SCCS) and in the UK, this panel is the Scientific Advisory Committee on Chemical Safety in Consumer Products (SAG-CS).

The SCCS issued an [opinion](#) confirming the safety of titanium dioxide in October 2020. Based on this opinion, the EU Commission has drafted [amendments](#) to the existing EU Cosmetics Regulation, setting new Annex III, IV and VI entries for titanium dioxide, and these amended Annex entries enter into force in the EU on 1 October 2021.

In the UK, the SAG-CS review to confirm the safety of titanium dioxide in cosmetic products is currently underway. This review is independent of the SCCS safety review. Until the SAG-CS review and the following legislative process have been completed under the UK Cosmetics Regulation, no amendments will be made to how titanium dioxide can be used in cosmetic products on the GB market.

Therefore, the new EU provisions for titanium dioxide do not apply in GB and GB is still bound by the [previous restrictions](#) and conditions for use of titanium dioxide in cosmetic products, which are:

For use as a colorant: Adherence to purity criteria for E171, with no other restrictions

For use as a UV filter: Maximum concentration of 25%. Nano form not to be used in applications leading to lung exposure of the consumer, and with physico-chemical specifications for the nanomaterial.

For all other uses: No restrictions