

July 8th, 2025

Open letter to the Danish Presidency of the Council of the European Union

On 1 July 2025, Denmark took over the Presidency of the Council of the European Union from Poland. Hence, the Danish Association of Cosmetics and Detergents, the Polish Union of the Cosmetics Industry and the Polish Association of Cosmetic and Detergent Industry are jointly calling for action on three key priorities for the European cosmetics industry — priorities that were already on the agenda six months ago and remain important today. These areas are critical to ensure that Europe's cosmetics industry remains innovative, competitive and able to deliver safe and sustainable products to consumers across the single market.

The European cosmetics sector is a key contributor to the European economy. It supports more than 3.5 million jobs across the value chain, exports over 29 billion euros annually, and delivers health, hygiene and wellbeing benefits to millions of consumers each day. Yet the sector is increasingly challenged by a fragmented and growing regulatory burden, unfair digital market conditions, and unclear future rules on ingredient use.

We encourage the Danish Presidency to lead the way, building on the momentum set by the Polish Presidency, by driving a decisive simplification of EU regulation, streamlining the single market, strengthening Europe's competitiveness, green transition and consumer protection by focusing on the following priorities:

1. Simplification to strengthen innovation and resilience

The cumulative impact of EU product legislation and regulation under the European Green Deal (CPR, CLP, UWWTD, PPWR, ESPR, GPSR, EUDR e.g.) has created a regulatory environment that is increasingly difficult to navigate. Frequent, overlapping regulation and short compliance deadlines strain the capacity of companies, particularly small and medium-sized enterprises (SMEs), to adapt and innovate.

We call for a renewed commitment to better regulation through:

- Simplifying regulations that place excessive burdens on industry without delivering added value to the environment and the consumers.
- Regulating only when it is necessary.
- Full impact assessments that consider the cumulative effect of both sector-specific and cross-sectoral legislation.
- Ongoing and updated impact assessments throughout the legislative process, ensuring that changes to the legal text made during negotiations are accompanied by revised analyses of economic consequences. This is especially important in the context of the revision of the Urban Wastewater Treatment Directive, where new data presented during the legislative process significantly altered the cost assumptions and shifted the overall basis for the regulation without triggering a corresponding update of the original impact assessment.
- Realistic transition periods that reflect the time needed for reformulation, testing, and stock management.
- Structured involvement of industry stakeholders early in the legislative process to ensure regulation is science-based and enforceable.
- Eliminating regulations that fragment the EU Single Market, in particular the gold-plating of directives by Member States and the introduction of new national regulatory regimes that undermine harmonization.

2. Close the legal loophole on online marketplaces

Today, a significant share of cosmetic products is sold online. However, products from third-country marketplaces often enter the EU market via digital platforms without complying with European safety and labelling requirements. This puts consumers at risk, distorts competition, and favors non-compliant products over those that meet EU standards. Ensuring a level playing field between legitimate EU businesses and third country importers is not only essential for fostering the competitiveness of the EU market but also crucial for achieving robust consumer and environmental protection.

We support decisive EU-level action to:

- Ensure that the key principles of the Digital Service Act (DSA) also apply to online marketplaces.
 - Ensure a “stay down” approach, making sure that illegal products that have been taken down from the market cannot reappear online.
 - Ensure the same level of enforcement for all products available via e-commerce, regarding compliance market checks as it is in place for products sold in physical stores.
 - Clarify and emphasize that the Cosmetics Products Regulation fully applies to all forms of e-commerce, including online marketplaces.
 - Ensure a level playing field by closing the legal loopholes that allow online marketplaces to sell illegal, hazardous, and non-compliant products directly to consumers in the EU
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3. A Chemicals Omnibus that is risk-based, not hazard-driven

The cosmetics industry fully supports the objective of maintaining Europe's high standards of consumer safety. The upcoming Chemicals Omnibus is an important opportunity to improve regulatory clarity and ensure that the rules remain fit for purpose in a changing innovation landscape. To achieve these goals the targeted adjustments proposed by the Commission in the Chemical Omnibus are needed to make the system more predictable, science-based and proportionate.

Key elements include:

- Transition periods that reflect the time needed for reformulation, stock management and relabeling, particularly for SMEs.
- A more nuanced application of hazard-based bans under a revised Article 15.2 of the Cosmetic Products Regulation, ensuring that exemptions are grounded in risk-based assessments by the European Commission's own Scientific Committee on Consumer Safety (SCCS) and reflect actual conditions of cosmetic use.
- The Commission's proposal in the CLP Omnibus to remove the rigid label formatting requirements introduced in the 2024 revision and to reintroduce the general obligation to ensure clear and readable labels.

These changes do not imply any compromise on safety. On the contrary, they make it possible to maintain a high level of consumer protection while ensuring that regulation reflects real-life use and exposure. Allowing continued use of ingredients that are confirmed safe by the SCCS

under intended use helps avoid unnecessary product withdrawals and supports innovation in safer and more sustainable alternatives.

The Danish and Polish organizations together call today for, smart, proportionate and feasible regulations for the cosmetics sector that support innovation and competitiveness. rather than lead to regulatory burnout, to ensure our industry stands strong as a European and global champion.



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