Director-General

Cosmetics Europe
the personal care association

Mr. Andy Hunder
President
American Chamber of Commerce in Ukraine
Horizon Park Business Center
Kyiv 03680
Ukraine

Brussels, 25 May 2016

Dear Mr Hunder,

Subject: Concern regarding the Recommendation of the Ministry of Economic Development and Trade of Ukraine on usage of Chemical Composition Description in Ukrainian Language in products labelling.

Cosmetics Europe - The Personal Care Association is the trade association representing the interests of the European cosmetics, toiletry and perfumery industry. The Cosmetics Europe membership consists of international companies and national trade associations representing the interests of companies active at national level, in total more than 4000 companies. Many of our members are operating in markets outside of the EU, including Ukraine. International regulatory convergence and global harmonisation are key priorities for our members.

Cosmetics Europe is very concerned about the potential requirement to show cosmetic product ingredient labelling in Ukrainian given the possible impact which such requirement would have on consumers, regulators and industry, both local and international.

INCI is the international nomenclature for each ingredient used in a cosmetic product. Based on scientific international names, it is known and used by consumers, health professionals and scientists worldwide including in the European Union (EU). Regardless of 23 different national languages and three diverse national alphabets, it has been adopted within the 28 Member States of the European Union and the 3 European Economic Area countries (the European Union list of common cosmetic ingredient names is based on the INCI nomenclature) in order to provide regulators, consumers and industry with a uniform international ingredient labelling system.

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Moreover, the INCI nomenclature system has been used in the United States for about 40 years and has been implemented in many other countries and regions including Australia and New Zealand, the 10 ASEAN countries, Switzerland, Russia and other Customs Union countries, Saudi Arabia and Gulf countries, East African Community countries, Morocco, South Africa, UEMOA countries, and most Latin American countries.

Ingredient listing is above all a safety measure. This is precisely why INCI names are not seen as "words" but as technical "codes" incorporating scientific and Latin pharmacopeia names understood by scientists and health professionals worldwide. The use of an international nomenclature also guarantees a more dynamic updating of the available scientific knowledge given that English is generally considered to be the *lingua franca* of the scientific community. Today, most international peer-reviewed scientific journals are published in English.
It can be reasonably expected that medical and pharmaceutical experts in Ukraine are perfectly able to work with the INCI system.
As well, once dermatologists have identified an individual allergen, they can inform their patients. This allows the latter to recognise ingredients internationally when purchasing a cosmetic and avoid the use of products containing that substance. Due to the technical dimension of the denomination, translation into national language has no added value and will not help the Ukrainian consumer better understanding the meaning of the INCI name nor will it help the Health Authority.

It is clear that INCI, which is a truly international nomenclature for cosmetic ingredients, offers many benefits:

- Cosmetic ingredient labelling is simplified – one system for all countries no matter what language or what alphabet
- Whereas some cosmetic ingredients have many trade names, or even different chemical descriptions, there is only one INCI name
- Wherever consumers may travel, they will be able to recognise the INCI name and, if necessary, avoid cosmetic products containing specific ingredients. Clearly, this is not possible if ingredient labelling is in a national language
- Using an agreed and familiar nomenclature facilitates the work of pharmacists and medical practitioners, particularly dermatologists and allergologists who may need to advise consumers or wish to communicate at international level
- A harmonised system also eases the work of regulators who will only have to recognise one name for each ingredient

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- One ingredient label is essential for today's increasingly global market. Trade between all countries using INCI will be more straightforward. Costs, not only for industry but also for the consumer, will be reduced.

Cosmetics Europe strongly supports the position and comments of the American Chamber of Commerce in Ukraine in regards of INCI support in describing the Chemical Composition in the Label of Personal Hygiene Products, Cosmetics and Perfumes. We hope that these comments can be considered in the finalization of the draft and we stand ready to answer any question you may have.

Sincerely yours,

John Chave

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