

A missed opportunity for UK leadership

To Rt Hon Priti Patel MP, Secretary of State

The UK was the first country in the world to say no to animal testing for cosmetics and their ingredients when it put in place a policy ban in 1998, implemented in practice by not issuing Home Office project licences for such work under the Animals (Scientific Procedures) Act.

This significant policy change acted both as a stimulus for further investment and innovation in non-animal safety science and assessment approaches and gave significant impetus to European legislation introducing a prohibition on animal testing for finished products from 2004, on testing of ingredients from 2009, and a full marketing ban from 2013, irrespective in each case of the availability of non-animal methods. At all stages of this legislative process, the UK stood out as a pioneer.

The EU Cosmetics Regulation animal testing and marketing bans have since been used as the gold standard around the world – setting the precedent for cosmetics products and ingredients to be used safely without subjecting animals to cruel and unnecessary tests. These bans were dealt a devastating blow following a series of regulatory decisions made by the European Chemicals Agency (ECHA), with support from the European Commission and ECHA's own Board of Appeal.

ECHA is now requiring some widely used cosmetics ingredients (and ingredients used in many other types of consumer products) to be tested on hundreds of thousands of animals under the guise of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation. We have spoken out to say that REACH must not be used to circumvent the Cosmetics Regulation and render the cosmetics testing and marketing bans meaningless.

It would now appear that the UK is choosing to follow this retrograde approach, including for ingredients used solely in cosmetics and with a history of safe use and manufacture. This decision fails to acknowledge the amazing advances in science and technology since 1998 and the fact that industry now has a very different safety science 'toolbox' of non-animal methodologies with which to assess product safety to fully comply with the UK and EU bans on animal testing. It also fails to acknowledge the overwhelming support of the British public for cruelty free cosmetics which has been demonstrated time and again.

We had hoped that the UK – with its proud track record in animal protection and research & innovation, and its substantial cruelty free cosmetics industry – would take an approach based on science not process. We would call for the UK to use its new REACH system to develop a progressive animal-free approach to further protect human health and our environment. We are therefore dismayed that the Home Office has confirmed that it will be issuing guidelines imminently to include – based on the ECHA Board of Appeal decisions in the case of the UV filters from Symrise – animal testing even for sole-use cosmetics ingredients.

Together with Cruelty Free International, as companies involved in the UK cosmetics industry as retailers, manufacturers and suppliers, we want the UK to uphold its 1998 position as intended, with no new tests on animals allowed. We would also request a meeting with you at the earliest possible opportunity to discuss this important matter.

Yours sincerely



Michelle Thew
Chief Executive Officer



Hafiz Khandwala
Aqua Natural Ltd



Rebecca Martin
Conscious Skincare Ltd



Theophile Hakizimana
Asili Natural Oils Ltd



Valdener Pereira Miranda
**Cooperativa dos Pequenos
Produtores Agroextrativistas de
Lago do Junco**



Natalie Deacon
Avon



Firdaous El Honsali
Dove - Unilever



Nadine Anderson
Barefaced Beauty Ltd.



Hannah Whittaker
Faith in Nature



Joanne Chidley
Beauty Kitchen



Liz Needham
FFS Beauty Ltd



Franchine Young
Belleorganics Ltd



Donna Piercy
GHS Direct Ltd



Elizabeth Smith
Bionature Ltd



Greg Adamson
Givaudan



Lisa Sexton
Bolt Beauty Limited



Victoria Carpenter
Happy Carrot Skincare



Sebastian James
Boots UK



Margaret Jeanne Tio
HBF Skincare Ltd



Victoria Brownlie
British Beauty Council



Holly Mantle
Hersheson Products Ltd



Antonia Cadbury
Bulldog



Tim Keaveney
Homethings



Gaston Vizcarra Kennedy
Candela Peru



Jörg von Kruse
i+m Naturkosmetik Berlin GmbH



Loredana De Cecco Spiezia
**Cemon Homeopathics/Inlight
Beauty**



Vicky Charlesworth
JAYA Beauty Ltd



Joanna Jensen
Childs Farm Ltd



Rupa Wincell
Kri Skincare



Philipp Aeschbacher
Liflore AG



Hannah White
Naturally Tribal Skincare



Emma Heathcote-James
Little Soap Company



Amy Spanswick
Neal's Yard Remedies



Ben Snowdon
Lock Stock & Barrel Grooming Co



Nici Burns
Nibu Naturals

LONDON copyright

Lisa Keeling
London Copyright



Michele Riley
Niche and Cult Ltd



Georgia Hyne
Lucy Bee



Mark Winter
No7 Beauty Company



Kirsty-Jo Muddiman
Mallard Consulting Ltd



Thomas Kerfoot
O&3 Ltd



Alex Grogan
ManCave Limited



Sian Colson
Obvs Ltd



Maxine Scanlan
Medichem Manufacturing Ltd.



Sarah Taylor
Pamoja Skincare Ltd



Sally Woods
Mercona (GB) Ltd



Rose Brown
PHB Ethical Beauty



Hayden O'Connell
Mervue Natural Skincare



Daisy Barratt
Phil Smith Be Gorgeous Ltd



Lucia Lao Alcon Trejo
Mexialoe Laboratorios S.A de C.V



Melissa Chartan
Planted



Boris Zatezic
MuLondon



Swapan Kumar Das
Prokritee



Caroline Thomas
Naissance Trading and Innovation Company Ltd



Alina Lucia Imbeth Luna
Pure Chemistry S.A.S.



Joe Mallory-Skinner
Natural Barber Co.



Heiko Hintze
Santaverde GmbH



Daniella McLean
Simple



Robert Mars
The PÜRE Collection



Sarah Rippon
Siskyn Skincare



Fiona Birnie
Top Lip Kit Ltd



James Jardella
Skin Sapiens Ltd



Charlotte Assheton
TRESemmé UK



Amanda Winwood
Spiezia Organics t/a Made for Life Organics



Peter Green
Ultra Glow Cosmetics Ltd



Nick Irani
Subtle Energies



Romi Dasani
UN_DID



Kate Willis
Suma



Sebastian Munden
Unilever UK & Ireland



Peter Macnab
Superdrug PLC



Jessie Matharu
VENIA Cosmetic Ltd



Boris Mueller
Symrise AG



Jessica Guilfoyle
Votary Ltd



Heather Nixon
The Bio-D Company Ltd



Madeleine Wilson
Waitrose & Partners



Emily Gallagher
The Bio-D Company Ltd



Melanie Blane
White Rabbit Skincare



David Philip Boynton
The Body Shop



Paula Ortega
Whitfords



Cathryn Higgs
The Co-operative



Dr Carol Treasure
XCellR8 Ltd



Roseanna Sergeant
The Good Zest Company



Silvia Petkova
Zoya Goes Pretty



Stephen Scarman
The PÜRE Collection