

Comments for EU Flower requirement on Titaniumdioxide

Many products and specially cosmetic products have an EU flower certification and more than 4 out of 10 Danes know the EU Flower. The EU Flower is acknowledged to sets strict environmental and chemical requirements in order to protect the environment.

One of their criteria is that substances classified as CMR are banned in products certified with the EU Flower. The automatic ban of CMR substances is good and in accordance with the with the Cosmetic Product Regulation.

Now that TiO₂ has been classified Carc. 2 by inhalation it will no longer be possible to use this ingredient in products certified with the EU Flower, which unfairly will leave out perfectly safe products that could otherwise get the certification when adding leave on products to the scope of the criteria.

The EU Flower ban as it is now does not take into account that it is only due to the exposure route of TiO₂ that makes it carcinogenic. The classification of the carcinogenic properties is related solely to the inhalation of TiO₂ particles, which is why the classification is limited to the particulate matter (powder form) only under the CLP Regulation. TiO₂ in solid or liquid form is considered harmless. The classification of TiO₂ will primarily have an effect in the working environment, where the substance is handled in powder form as raw a material or when using powdered products.

By not making an exemption for TiO₂ it will mean that an important and commonly used UV filter will not be allowed in EU Flower products. TiO₂ is used for sunscreen for children and hence these products cannot carry the EU Flower. This could mean that the consumers will buy and use sunscreen for adults on their children. Also, sunscreens for adults will be affected by this ban.

The industry has tried to find suitable alternatives to TiO₂ due to the negative attention from the media, but it has not been possible to find a substitute that has the same function.

Since it is only the dust particles of TiO₂ that is the reason behind the classification it will be problematic to exclude this ingredient from products, which will never reach the lung tissue of the consumers. Therefore, a suggestion is to allow TiO₂ in EU Flower products if there is no risk of exposure for the consumers. Hence, no TiO₂ in spray products or other «dusty» products or aerosols.

Products containing TiO₂ when applied to the skin does not pose any risk to the consumer because the substance are in liquid phase¹.

The Danish Association of Cosmetics and Detergents strongly recommend a exemption from the CMR criteria regarding TiO₂. The consequence of complying with the present criteria is that most sunscreens cannot be certified with an EU Flower.

¹ Danish EPA, (2019); RAMMENOTAT TIL EU-MILJØSPECIALUDVALGET, M 175-19;
<https://www.ft.dk/samling/20191/almdel/EUU/bilag/85/2094981/index.htm>



In the future, if the EU Flower does not distinguish between the different modes of action for carcinogens it might exclude a long range of products as one can imagine that similar harmonised classifications will see the light of day.

Best regards,

Mie Ostenfeldt
The Danish Association of Cosmetics and Detergents

