Annel

EU COSMETICS COMPLIANCE BRIEF 2025

This briefing provides a detailed analysis of the **EU cosmetic regulations** entering into force on **1 November 2025.**

It summarises the restrictions, bans and new labelling requirements introduced by:

- **Commission Regulation** (EU) **2024/996** – Vitamin A & endocrine disruptors
- **Commission Regulation** (EU) **2024/858** – Nanomaterials
- **Commission Regulation** (EU) **2025/877** – CMR substances

These represent the most comprehensive update to the EU Cosmetics Regulation since 2013.

Key Compliance Deadlines

Date	Regulatory Action	Substances Affected
1 February 2025	End of placing non-compliant products on the market	Alpha-Arbutin, Kojic Acid, Genistein, Nanomaterials
1 September 2025	Full prohibition (placing & sale)	Dimethyltolylamine, TPO
31 October 2025	End of sell-off period	Triclosan, Triclocarban
1 November 2025	Enforcement date	Retinoids, EDs, Nanomaterials
1 May 2026	End of sale	4-Methylbenzylidene Camphor
1 May 2027	Final withdrawal	Retinoids exceeding limits

Retinoids – New Limits and Labelling

From **1 November 2025**, the following limits apply (as Retinol Equivalents – RE):

- **0.05 % RE** – body lotions
- **0.3 % RE** – other cosmetics (face creams, serums, rinse-off)

Mandatory label statement:

"Contains vitamin A. Consider total daily intake before use."

Scientific rationale:
The **SCCS** (**Opinion SCCS/1576/16**) found that while Vitamin A is safe at these concentrations, cumulative exposure from food, supplements and cosmetics may approach the **Tolerable Upper Intake Level** (**UL**) of 1500 µg RE/day (≈ 5000 IU).
Toxicological endpoints include *teratogenicity* and *hepatotoxicity*.

Endocrine Disruptors – New Restrictions

Regulation (EU) 2024/996 introduces maximum concentrations for several substances with potential endocrine activity:

Substance	Max. Concentration	Comment
Alpha-Arbutin	2 % (face); 0.5 % (body)	Releases hydroquinone – trace only
Arbutin	7 % (face)	Hydroquinone release risk
Kojic Acid	1 % (face & hands)	Potential ED properties
Genistein	0.007 %	Hormonal effect
Daidzein	0.02 %	Hormonal effect

Nanomaterials – Risk-Based Prohibitions

Regulation (EU) 2024/858 bans or limits specific nanomaterials due to uncertain toxicological profiles:

Banned nanomaterials (Annex II):

- Styrene/Acrylates Copolymer (nano)
- Colloidal metals (Cu, Ag, Au, Pt)

Restricted (Annex III):

- Hydroxyapatite (nano): ≤ 10 % in toothpaste; ≤ 0.465 % in mouthwash

Preservatives and CMR Substances

Triclosan & Triclocarban

- Full withdrawal by **1 November 2025**
- New bans in oral-care products for children (< 3 yrs / < 6 yrs)
- **Reference:** SCCS/1643/22 – low margins of safety identified at previous levels

CMR Substances

From **1 September 2025**, total ban on:

- **Dimethyltolylamine**
- **Trimethylbenzoyl Diphenylphosphine Oxide (TPO)**

Reference: Commission Regulation (EU) 2025/877.

UV Filter Ban

4-Methylbenzylidene Camphor (**4-MBC**) – prohibited due to endocrine disruption.

Action	Effective Date
Placing on the market banned	1 May 2025
End of sale	1 May 2026

Industry Implications

This set of changes marks the **largest regulatory tightening since 2013**. Companies are urged to:

- Audit formulations and raw materials
- Update **PIF** and **CPSR** documentation
- Reformulate products above new limits
- Check **labelling and claims**
- Align online listings with **GPSR Article 19** requirements

Contact:

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References:

1. Commission Regulation (EU) 2024/996 – OJ L 2024/996 (3 April 2024)
2. Commission Regulation (EU) 2024/858 – OJ L 2024/858 (14 March 2024)
3. Commission Regulation (EU) 2025/877 – OJ L 2025/877 (12 May 2025)
4. SCCS Opinion on Vitamin A – SCCS/1576/16 (6 October 2016)
5. SCCS Opinion on Triclosan & Triclocarban – SCCS/1643/22 (2022)