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Claims on Cosmetic Products – new rules applying as per July 1st 2019

Dear Sir / Madam

Würth must comply with the new rules within the European Union regarding claims on cosmetic products (Technical document on cosmetic claims annex III and IV) from July 1st 2019.

- Free from claim
- Hypoallergenic claim

Are we ready for that on our web shops and labels and what do we need to do in order to be compliant? Yes we are, if we stick to the following rules:

- The claim "hypoallergenic" can only be used in cases, where the cosmetic product has been designed to minimize its allergenic potential.
- The responsible person should have evidence to support the claim by verifying and confirming a very low allergenic potential of the product through scientifically robust and statistically reliable data (for example reviewing post-marketing surveillance data, etc.). This assessment should be updated continuously in light of new data.

- If a cosmetic product claims to be hypoallergenic, the presence of known allergens or allergen precursors should be totally avoided, in particular of substances or mixtures:
 - identified as sensitizers by the SCCS or former committees assessing the safety of cosmetic ingredients
 - identified as skin sensitizers by other official risk assessment committees
 - falling under the classification of skin sensitizers of category 1, sub-category 1A or sub-category 1B, on the basis of new criteria set by the CLP Regulation
 - identified by the company on the basis of the assessment of consumer complaints
 - generally recognized as sensitizers in scientific literature; or
 - for which relevant data on their sensitizing potential are missing.

- The use of the claim "hypoallergenic" does not guarantee a complete absence of risk of an allergic reaction and the product should not give the impression that it does.

- Regarding the use of human data in risk assessment of skin sensitization, including ethical aspects, reference should be made to the SCCS "Memorandum on use of Human Data in risk assessment of skin sensitization", SCCS/1567/15, 15 December 2015.

- The companies should consider whether consumers, in the respective country, understand the claim "hypoallergenic". If necessary, further information or clarification regarding its meaning should be made available

The Product Managers of AW KG and Würth International will make sure the group products have the correct claims on labels and other marketing material.

We kindly ask you to make sure your local products have the correct statements as well.

Your support on this matter is highly appreciated.

If you have questions, please do not hesitate to contact us at any time.

Kind regards

Würth International AG



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