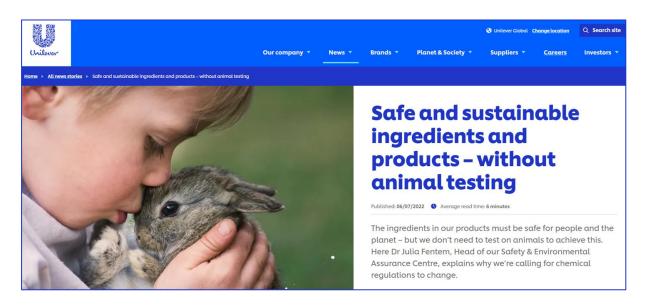
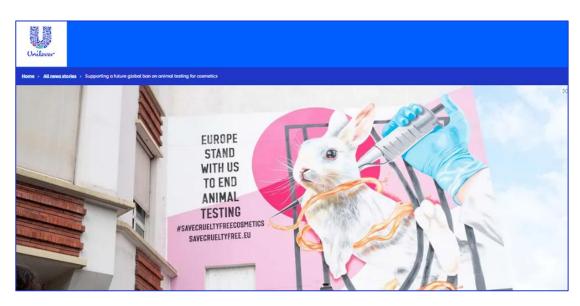
Unilever fully supports this ECI: we are committed to ending animal testing globally for ingredients used in cosmetics & consumer products







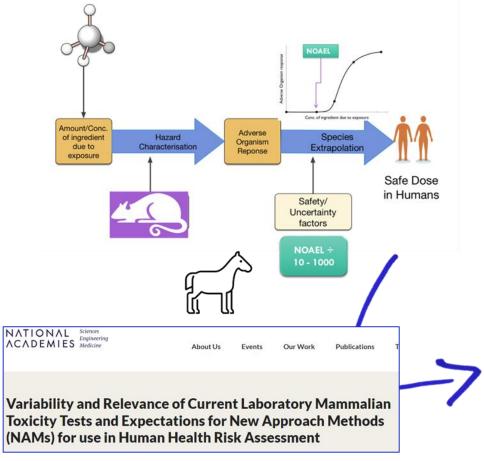
- ✓ Huge progress in non-animal safety science & availability of new approach methods stimulated by 2009 cosmetics testing ban in EU
- Working with partners & stakeholders to advocate for more use of advanced non-animal approaches for regulatory purposes since 2018





Science & Safety: we will better protect consumers, workers and the environment if we use modern non-animal safety science

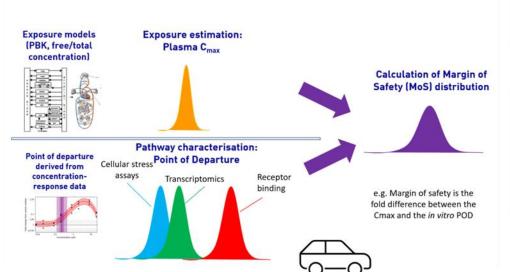
'Traditional' Risk Assessment

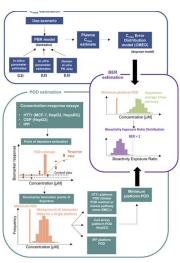






'Next Generation' Risk Assessment







animal tests are not a 'gold standard'

Innovation & Regulations: we must enable use of the best scientific data & methods available to ensure highest level of ingredient & product safety





The European Chemicals Agency (ECHA) can request animal studies even if the substance being studied is foreseen only for cosmetic use (see **Appendix 1**, section 3). The applicant can submit these animal data to ECHA, but cannot use these in the cosmetic product safety report (CPSR) for the product information file (PIF) and cannot submit these to the SCCS for risk assessment of the ingredient under consideration. SCCS can ask ECHA for access to these studies and consider whether the results have an impact on the risk assessment of the substance and change their view.

Upholding the EU's Commitment to 'Animal Testing as a Last Resort' Under REACH Requires a Paradigm Shift in How We Assess Chemical Safety to Close the Gap Between Regulatory Testing and Modern Safety Science

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Julia Fentem, Ian Malcomber, Gavin Maxwell and Carl Westmoreland

So, for the same cosmetic ingredient: **consumers:** use non-animal approaches **workers:** use animal tests (can't justify as "animal testing as a last resort")

Cosmetics & Chemicals: accelerating transition to animal-free regulatory approach has gained widespread support since ECI was initiated







In addition, it was largely assumed, including by the regulatory community, that a full understanding of the underlying toxicological effects is needed to regulate chemicals based solely on mechanistic information from in silico/in vitro systems. This ambition is not achievable in the near future. However, it is possible to develop robust options based on non-animal methods which can provide protection levels comparable or higher than the current ones for many toxicological properties without a full understanding of the underlying toxicological effects. Moreover, it starts to be clear that a single solution that works for all REACH chemicals is not possible, instead multiple solutions able to address different chemistries might be necessary.

animal testing

- ✓ embracing opportunities & changing mindsets
- ✓ pioneering safe & sustainable innovation by design without animal testing in response to EU citizens' wishes
- uphold testing ban by mandating non-animal approaches for cosmetic ingredients (worker & environmental safety)



