

BY ELECTRONIC MAIL TO: <http://www.regulations.gov>

David Weiner, Deputy Assistant U.S. Trade Representative for Europe  
Kate Kalutkiewicz, Director for European Affairs  
Office of the United States Trade Representative  
600 17th Street NW.,  
Washington, DC 20508

**Re: Docket** number USTR-2012-0001. “U.S.-EU High Level Working Group”

Dear Mr. Weiner and Ms. Kalutkiewicz:

On behalf of the Personal Care Products Council (“U.S. Council”), we are pleased to submit these comments regarding Regulatory Cooperation Between the United States and the European Union that would help eliminate or reduce unnecessary divergences in regulation and in standards used in regulation that impede U.S. exports.

Trade with the European Union is a strong part of our industry’s success. In 2010, the U.S. exported more than \$2.1 billion worth of personal care products to the EU 27 and imported more than \$4.7 billion. It is a relationship that continues to grow and benefits both countries.

#### The Personal Care Products Council

Based in Washington, DC, the U.S. Council is the leading national trade association representing the \$250 billion global cosmetics and personal care industry. Our Association represents over 600 member companies, including manufacturers and distributors of finished products, as well as suppliers of ingredients, raw materials, packaging and other services used in the production and marketing of finished personal care products.

The U.S. Council is actively engaged in international efforts to align global regulatory standards for consumer products, to eliminate trade barriers, and to ensure a level playing field for member companies while at the same time reinforcing consumer confidence in product safety.

Our member companies continually strive to uphold and surpass the most stringent regulatory and product integrity standards worldwide, and are actively engaged in providing consumers with safe, innovative and high quality cosmetic and personal care products, the ingredients for which are globally sourced.

## Reducing Trade Barriers

International trade is a critical component to the success of our industry, and significantly contributes to our ability to expand manufacturing and employment, as well as to support local ancillary industries such as advertising, packaging, and transportation.

The globalization of our industry also promotes continual technological innovation. A recent study by the firm Price Waterhouse Coopers noted that, since 1997, growth in R&D by U.S. personal care products manufacturers has exceeded that of other manufacturers, and has grown faster than the industry's sales.

For all these reasons, the Personal Care Products Council is actively engaged in international efforts to align global regulatory standards for consumer products, to eliminate trade barriers, and to ensure a level playing field for member companies while at the same time reinforcing consumer confidence in product safety.

The Personal Care Products Council has been an active participant in the International Cooperation on Cosmetics Regulation (ICCR). It has been a beneficial forum for the exchange of information and regulatory alignment for cosmetics and personal care products between the international group of cosmetics regulatory authorities and industry trade associations from the United States, Japan, the European Union, and Canada.

As part of the ICCR mandate, members work towards convergence of regulatory policies and practices. Progress has already been made on a common standard for cosmetic Good Manufacturing Practices (GMPs); a common definition of nanotechnology as it pertains to cosmetic products; and promotion of validated methods for alternatives to animal testing.

The U.S. Personal Care Products Industry and our counterpart association Cosmetics Europe, are strong supporters of the ICCR. We consider that our industry's work in the ICCR, together with our regulators, is essential to creating a multilateral framework that will pave the way for the removal of regulatory obstacles to international trade, while maintaining global consumer protection. The Personal Care Products Council further urges both the United States and the European Union to continue their valued work in the ICCR process and to make every effort to align their regulatory standards according to decisions taken in the ICCR process.

The progress already made on a common standard for cosmetic Good Manufacturing processes; a common definition of nanotechnology as it pertains to cosmetic products, and promotion of validated methods for alternatives to animal testing shows the benefits received from the ICCR which provides a forum for the exchange of information and

regulatory alignment between important markets for cosmetics and personal care products.

As part of the ICCR mandate, members work towards convergence of regulatory policies and practices. The Personal Care Products Council supports this endeavor and further urges both the United States and the European Union to continue their valued work in the ICCR process and make every effort to align their regulatory standards with the results achieved during the ICCR meetings.

### Conclusion

The cosmetics and personal care products industry is a truly global one, dependent on open markets and transparent, consistent regulatory environments around the world. The Personal Care Products Council believes regulatory harmonization promotes trade, enables innovation and protects consumers.

We appreciate the opportunity to provide these comments and would be pleased to provide any additional information or answer any questions raised by this submission.

Respectfully submitted,

A handwritten signature in cursive script that reads "Francine Lamoriello".

Francine Lamoriello, Executive Vice President Global Strategies  
Personal Care Products Council (U.S. Council)