

6. BfR-Nutzerkonferenz
**European Cosmetic Products
Notification Portal
CPNP**

Erfahrungen mit der europäischen Datenbank
zu Kosmetikmeldungen
*Modell für nationale Datenbank für als gefährlich
eingestufte Gemische?*

Herbert Desel
2015-11-10

Legal Background

European Union Cosmetics Regulation
(No 1223/2009):

- Duty for manufacturers ...
 - “responsible person”

to notify data of all marketed cosmetic products
to a database managed by the European
Commission, i.e. the

**Cosmetic Products Notification
Portal (CPNP).**

Main Purpose of CPNP

- to support poisons centres of European Union Member States (...) in toxicological risk assessment of exposures to cosmetic products
- by providing access to detailed product-related datasets indicating either
 - exact name(s) and a frame formula or
 - exact name(s) and a complete formula of the chemical composition.
 - Product category assignment according to a CPNP category system is mandatory part of notification.

Time Schedule of CPNP Development

- Discussion started in 2009-06:
- Invitation of member state representatives, industry and European Association of Poisons Centres and Clinical Toxicologists (EAPCCT) to contribute to development by European Commission
- Intensive working group activities until 2011

Working Groups Structure

Main Project Group

- Ad-hoc group on frame formulations issues;
- Ad-hoc group on categories of cosmetic product;
- Ad-hoc group on IT-related issues.

Structure of CPNP

- Central database at European Commission
- access via WWW
 - controlled via ECAS
 - for responsible persons (companies)
 - for poisons centres
 - for authorities

Access for Responsible Persons Profile

- Access via ECAS (personal identification)
- to create company profile
- to enter product datasets online
 - preliminary or final
- to view ,own‘ dataset (all datasets)
- to change product datasets
 - versioning concept
- *to establish relation between companies*

Access for Poisons Centres *and Authorities*

- Access via ECAS (personal identification)
- access PC profile after official nomination of poisons centre by Member State in 2011
- nomination of local administrator
- local administrator controls personal access of all staff members
- not allowed to create or change PC profile
- no (*hardly any*) changes to datasets possible
- to view all dataset (*without restrictions*)

Alternative Access – Bulk Download

(Semi-)automatic download of full dataset to be included in PC local database

- or a selected subset

.. was included in the CPNP concept from the beginning.

Download should be available for 2014

Data download for Poisons Centres

- Single product datasets facilitate case documentation (correct hazard identification for agent-specific reporting needs)
- Single or multiple datasets to be included in local database
 - to facilitate product information retrieval
 - to link toxicological information to dataset

CPNP Download Restrictions

At the 2nd CPNP Maintenance Group Meeting in 2013 it was announced by the Commission that **bulk download** of full dataset would **not** be allowed for data protection reasons.

Only single datasets can be downloaded completely (1 by 1)

Data download for Poisons Centres *and Authorities in CPNP*

- Single product datasets can be downloaded **completely** (including formula, label pictures) and stored.
- A report file is created monthly including a **subset** of all data fields
 - to be downloaded
 - for import into local poisons centre database
- Full data bulk download is not possible

Data download for Poisons Centres *and Authorities*

- After import of the subset of data into PC product database (e.g. TDI instance in Germany)
- PC staff
 - can retrieve for cosmetic products locally and do first risk assessment
 - can go online to CPNP (direct link) if more detailed information is needed

CPNP in Force / „in Production“

CPNP is online since January 2012 and can be accessed via World Wide Web

Notification mandatory since 2013-07-10

Until 2015-05,

about 800,000 cosmetic products

(2013: 152,790)

have been notified

CPNP in Force / „in Production“ 2014

Registration:

57 poisons centres (PC)

with 176 individual users

60,000 – 80.000 request/day (minority from PC)

1,000 new product data sets every day

CPNP in Force / „in Production“

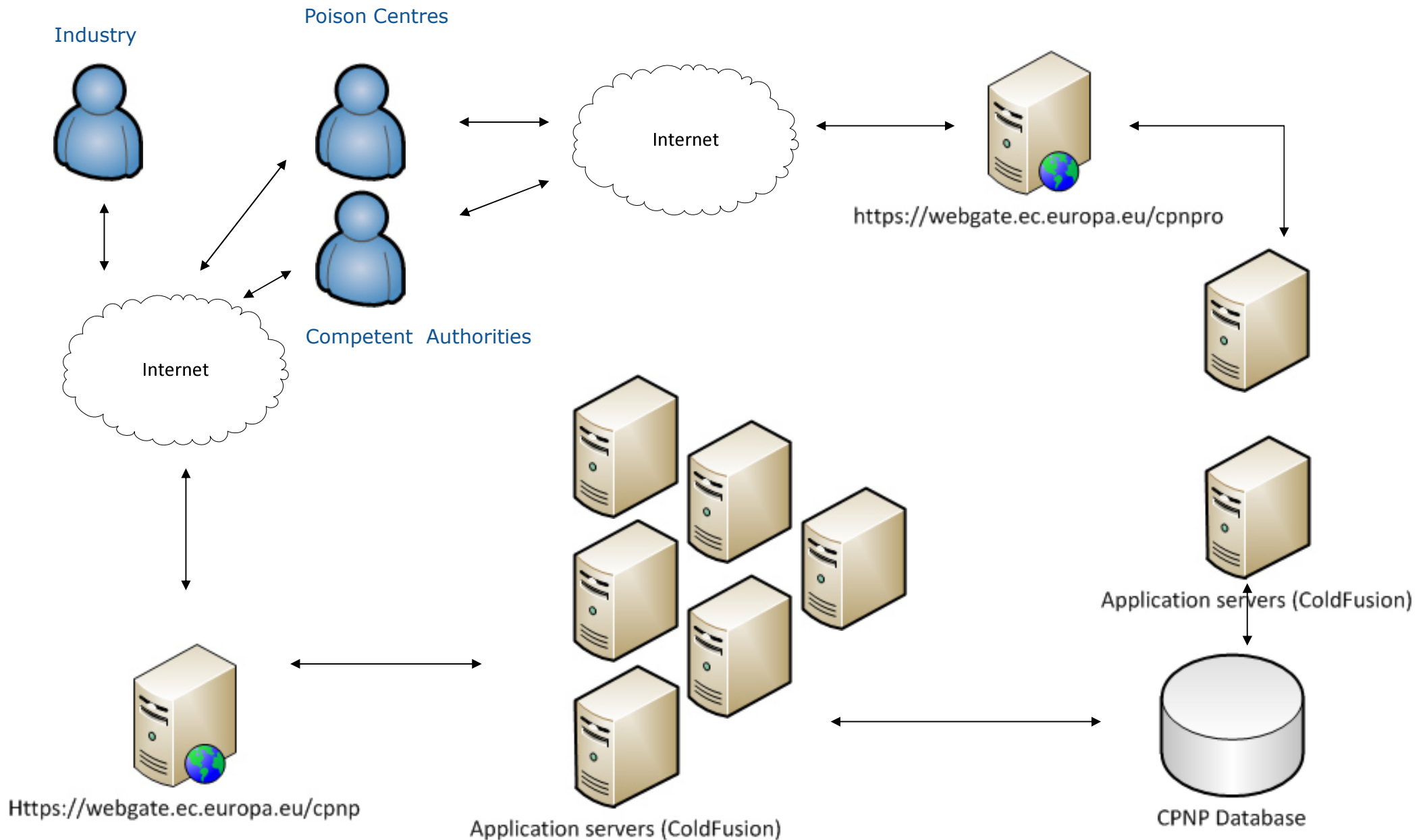
CPNP Maintenance Group with members from poison centres, member state authorities and industry meets twice a year

- feedback of users to Commission Service
- discuss further developments
- update of frame formulations

Experience

- Access to CPNP works
- Online access is used rarely due to time consuming login procedure
 - changes made in October 2015

New Server Structure 2014 (from COM service)



CPNP in 2014/2015

With new European Commission formed, CPNP has moved to a different Direction General (DG GROW)

New personell

Summary & Conclusion

- ◆ CPNP has proven to be a useful system for PC ...
- ◆ ... for a product group with some concern for PC, but limited concern
- ◆ ... serves as a pilot system for product data exchange for other product groups in the future (e.g. CLP national databases)
 - ◆ Role of EC
 - ◆ Role of PC
 - ◆ Role of industry
 - ◆ Role of national authorities



DANKE FÜR IHRE AUFMERKSAMKEIT

Bundesinstitut für Risikobewertung
Max-Dohrn-Str. 8-10 • 10589 Berlin
Tel. 0 30 - 184 12 - 0 • Fax 0 30 - 184 12 - 47 41
bfr@bfr.bund.de • www.bfr.bund.de

CPNP in Force / „in Production“ 2014

By predefined frame formulations 42 %

By concentration ranges 27 %

By exact concentrations 31 %