

Comments on TRIS notification from Poland, dated 30 April 2018, 2018/186/PL on Act on cosmetic products

We have serious concerns about the proposed act on cosmetic products, because

Related to article 4.1 :

Art. 4. 1. Produkty kosmetyczne udostępniane na terytorium Rzeczypospolitej Polskiej znakują się w języku polskim zgodnie z wymaganiami, o których mowa w art. 19 rozporządzenia nr 1223/2009.

As per article 4.1 cosmetic products shall be labelled in Polish in accordance with the requirements from article 19 of regulation 1223/2009.

We welcome the decision of aligning the labelling with the article 19 of EU cosmetic regulation.

Nevertheless we suggest to specify that Polish is required in accordance to article 19-5 for reason below:

Article 19 of cosmetic regulation prescribes the label requirements, the position and exemptions and article 19-5 prescribes the element which are subject to the law of member states in term of language (b,c,d and f) . Referring to article 19 obviously covers article 19-5 but to avoid any misunderstanding and unclarity in the interpretation we suggest to refer to article 19-5.

This is to avoid any trade barrier as cosmetic are small products, translation shall only be required for elements covered by article 19-5 of EU cosmetic regulation.
