

JAPAN COSMETIC INDUSTRY ASSOCIATION

February 23, 2017

To: Microbeads Consultation, Ministry for the Environment
PO Box 10362, Wellington 6143, New Zealand

Comments on *Managing microbeads in personal care products: Consultation document*

On behalf of Japan Cosmetic Industry Association representing cosmetic industries of Japan, I would like to submit the following comments regarding the consultation document on managing microbeads in personal care products.

We understand that the new regulation is aimed to prohibit manufacture and sale of personal care products containing microbeads to reduce their potential impacts on environment and human health. In this context we would like to propose terminology consistent with microbeads regulations of other countries in order to prevent any unnecessary confusion as follows:

1. Microbeads should be defined as “any solid plastic particle that is less than five millimeters in size and is intended to be used to exfoliate or cleanse the human body or any part thereof”
2. The term “designed as rinse-off cosmetic (including toothpaste)” is preferable to other terms such as “designed to be rinsed off and washed straight down the drain.” or “designed to be washed down the drain”.

In addition, we would like to request to establish an adequate grace period for companies to adapt this regulation.

We appreciate the opportunity to provide our views on the proposed regulation and sincerely hopes taking into consideration those comments.

Respectfully yours,



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Senior Managing Director
Japan Cosmetic Industry Association

