

August 2, 1995

John Bailey, Ph.D.
Director
Office of Cosmetics and Colors
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

E. EDWARD KAVANAUGH
P R E S I D E N T

Re: Proposed International Harmonization for Cosmetic Ingredient Labeling

Dear John:

An issue regarding ingredient declarations on cosmetic products has been raised with CTFA by the European Cosmetic, Toiletry and Perfumery Association (COLIPA). This regards the use of the term "may contain," to provide for unitary labeling of shaded products (the listing of multiple colorants which may be in various shades of a product; where all other ingredients are the same).

Because the Europeans are searching for a nomenclature system that relies as little as possible on any particular national language, they are proposing to their governments that the symbol (+/-) be used to replace "may contain." They are confident that this internationally understood symbol will convey the necessary information to their consumers.

Because CTFA agrees with COLIPA that the consumer will understand the use of the symbol (+/-) to mean that the following ingredients may or may not be present, and in the spirit of international cooperation and harmonization, we would like to ask that FDA not object to the use of (+/-) in place of "may contain." This would greatly facilitate the marketing of products intended for sale both in the U.S. and in Europe.

As always, I would appreciate your prompt response, and will be available to address any questions you might have at your convenience.

Best Regards,



G.N. McEwen, Jr., Ph.D., J.D.
Vice President - Science

GNM/pcl