

C T F A

THE COSMETIC, TOILETRY, AND FRAGRANCE ASSOCIATION

FAX 202-205-5098

May 24, 1995

John E. Bailey Ph.D. HFS-100
Director
Office of Cosmetics and Colors
Food and Drug Administration
200 C Street S.W.
Washington, DC 20204

E. EDWARD KAVANAUGH
PRESIDENT

Re: International Harmonization
Cosmetic Ingredient Labeling Names
Plant Extracts

Dear Dr. Bailey:

This is a follow up to our letter of March 14, 1995 regarding use of revised labeling names for plant extracts. In that letter, CTFA requested that FDA permit labelers to use revised International Nomenclature Cosmetic Ingredient (INCI) names after they are published. It was proposed that the Linné system for naming Plant Extracts be used in which the Latin genus/species names would replace the common or usual English name for plants. For example:

Current English INCI Name -- Orange Peel Extract

Proposed Linné INCI Name -- Citrus Sinensis Peel Extract

To achieve an orderly conversion to the new labeling names, CTFA further proposes that a transition period be established to educate the public to the new names for plant extracts. This process will be a joint FDA/CTFA voluntary program that includes the following elements:

1. Use of Dual Labeling Names: Cosmetic firms would be permitted to voluntarily list plant extracts by their proposed Linné INCI name followed by the current English plant name in parentheses. Using the above example the listing in the ingredient statement would appear as follows:

Citrus Sinensis (Orange) Peel Extract

2. FDA Permission to Use Dual Names: During the transition period, FDA would permit the use of the dual name declarations. The transition period would be in effect until such time as the changes are recognized by FDA.

1101 17TH ST., N.W., SUITE 300 WASHINGTON, D.C. 20036-4702

202.331.1770 FAX 202.331.1969

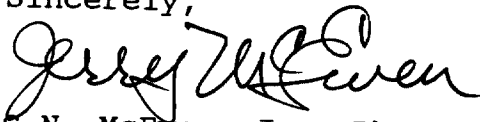
SECURING THE INDUSTRY'S FUTURE SINCE 1894

3. Joint CTFA/FDA Consumer Educational Program: CTFA and FDA would jointly develop and distribute consumer informational materials which would cross reference the current English INCI names and the proposed Linné INCI Name and otherwise contain pertinent information for the consumer.

Harmonization of labeling names is critically important to U.S. cosmetic firms to ensure that they can compete in international markets.

We trust that the above approach will meet with your approval and look forward to hearing from you in the near future.

Sincerely,

A handwritten signature in cursive script, appearing to read "G.N. McEwen, Jr.", written in dark ink.

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