AUGUST COLUMN
Soap, Perfumery and Cosmetics

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Frightening thoughts

Sometimes I wake up in the morning feeling gloomy, and today was such a day. It was not sadness, but a feeling of frustration that enveloped me with its clammy cloak. I don't think that it was the male menopause, because I think I had that last week. This sense of disquiet came from a number of sources.

1. Actual plant content in extracts

There are many formulators who use a plant extract without knowing exactly how much material was used to produce it. In addition, they do not know how much active ingredient it contains, indeed, may not even know whether it has an active ingredient.

2. Ingredient labelling on pack

The ingredient label only requires the Latin name, it does not require the part of the plant to be declared, nor does it require the plant concentration to be precisely defined.

3. The Medicine Control Agency

There is no doubt that botanical products will eventually come under scrutiny, simply because there are licensed products (usually with a pharmaceutical license of right) which exist on the market already. The INCI listing will tell them nothing.

4. The Toxicologists

Information on plant toxicology is hard to find, difficult to interpret and in the most part has not been collected and collated in a structured way.

5. The Dermatologists

A well-known dermatologist is exploring the possibility that all products should follow the yellow card system employed by the pharmaceutical industry to register adverse effects.

6. The Producers of plant extracts

COVREC (Comité de Veille sur la Réglementation Cosmétique) are setting up trade organisations for natural product producers in all of the European countries (initially France, Germany, Italy and Spain). Objective: to establish a centre of excellence for natural materials and to provide an international forum that could address the increasing number of issues that confront our industry in this field.

7. Cosmeceuticals

The debate started at the Advanced Technology Conference and subsequently discussed at the Society of Cosmetic Scientists Conference in Torquay showed quite clearly that there was no place in our industry for this hybrid pretender under the **current** legal framework that exists for pharmaceuticals and personal care products.

8. Physiological action

The personal care industry and the pharmaceutical industry need to agree exactly what this term implies, since without a clear and accepted definition, we are going to go round in circles *ad infinitum*. Classic areas of debate might be wrinkles, cellulite and skin blemishes. At what level does a plant cease to protect, but begin to exert a physiological and possibly medicinal action?

Dry skin is very common and can be treated with a moisturiser, but eczema requires something more. The problem lies in the intermediate state, where a product might protect an eczema-prone skin, by plant action at relatively low concentration. The same might be said of a product that is intended for use on developing spots or pimples and is applied before a medical condition is reached.

9. Vocabulary

Language is a problem. If the skin itches it may be soothed cosmetically, if it is pruritic it might require medical attention. Likewise, if the skin is ‘irritable’ it might be prone to redness, but if it is suffering erythema then it might require a pharmaceutical preparation. The words though clearly similar reflect a degree of severity as yet unspecified.

Possible solutions

It is possible to accept that some products do indeed exert a physiological action on the skin, otherwise they would not be worth buying.

1. We should have a new category of product called “Borderline Skin Care”.

2. This category would be registered with the MCA, together with the formula, plant/active data and test results. For a fee they would issue a number that had to be printed on the pack. This registration though pharmaceutical in nature, would not require full pharmaceutical dossiers.
3. Each product would contain an “adverse event card” that could be sent back to a central office for collation.
4. The active ingredients in these products would be declared by percentage, so that the plant content (fresh or dried) would be seen on the pack.

Conclusion

We would have eliminated any areas of conflict between ourselves and the pharmaceutical industry. The new category might have an additional dictionary of words that could be used for claims, agreed with the MCA for each product based on its merits. Those who want to use plant materials at low levels (limit to be agreed) for their marketing story rather than their effect would be at liberty to continue, but those who wanted to use the plant for its effect would have to register.

As an industry, we spend small fortunes developing products to reduce skin erythema, reduce pruritis, improve skin cell turnover, prevent wrinkles, prevent spots and improve the health of the skin. These products are tested (often clinically) to prove their effect. Expensive pack copywriters then convey these benefits to the consumer without being allowed to tell them exactly how brilliantly effective they really are. Its like being allowed to describe an atomic bomb as going off with ‘quite a large pop”.

It is a controversial idea, it is more bureaucracy, it is painful, but it might be more productive than a war with the Borderline Substances section of the MCA.