

COMMENT NUMBER	LINE NUMBER	COMMENT AND RATIONALE	PROPOSED REVISED TEXT
1		<p>First of all, The Swedish Fund for Research without Animal Experiments believes that it is important to extend the marketing ban and animal testing ban to include all testing of ingredients on animals, at the 2013 deadline as planned. We believe that the complete ban on animal testing for cosmetic purposes will have a significant and positive effect on the development of new, better and more ethically sound testing methods.</p> <p>We agree with the conclusions in the five reports, i.e. at alternative methods is not available today for skin sensitization, repeated dose toxicity, carcinogenicity, toxicokinetics and reproductive toxicity and, that methods for full animal replacement of the latter four end-points will probably not will be available in 2013. For skin sensitization testing, on the other hand, we believe that there is a possibility to have validated alternative methods ready before the ban in 2013.</p> <p>We are of the opinion that due to the existence of thousands of substances already approved as safe for use as cosmetics ingredients, no significant negative consequences to European industry or the European public will arise from retention of the deadline.</p> <p>Furthermore, the deadlines of the Directive have accelerated the research and development of alternative methods at different levels, with positive effects on reduction of animal use for cosmetics and other safety testing, but it has also lead to the development of scientifically better and more reliable test methods. If the 2013 deadline is postponed, the motivation to develop alternative tests will be significantly reduced.</p> <p>In addition, from the Report on the Development, Validation and Legal</p>	

		<p>Acceptance of Alternative Methods to Animal Tests in the Field of Cosmetics (2008) from the Commission to the European Parliament and the Council it can be concluded that no reproductive toxicity, carcinogenicity, toxicokinetic or repeated dose toxicity testing of cosmetic ingredients have been performed in Europe during 2007 and 2008. For skin sensitization, 1154 animals were used in testing of cosmetic ingredients during 2007. In 2008 the number was 1283 animals. These figures also indicate that the development and use of new cosmetic ingredients is not so extensive, which adding further support to our statement that no significant negative consequences to European industry or the European public will arise from retention of the deadline of 2013. And for skin sensitization, where animal testing was performed during 2007 and 2008, we believe that there are a great potential for alternative methods have been developed and validated before 2013.</p>	
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