



To the attention of Commissioner
Mrs. Elżbieta Bieńkowska
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Wetstraat 200/ Rue de la Loi
1049 Brussels

Gent, 14th September 2016.

Subject: Self-testing for contact sensitization to hair dyes

Dear Commissioner,

COIFFURE EU, the European Association of Employers' Organisations in Hairdressing, and UNI Europa, Hair & Beauty, representing trade unions in Hair & Beauty – both partners in Social Dialogue (Sector Social Dialogue Committee on Personal Services) would like to draw your attention to the problem of self-testing for contact sensitization to hair dyes which represent a big concern for the whole professional category.

When dyeing hair, both hairdressers and customers come into contact with certain dye and colouring substances. In order to find out whether consumers are allergic to the product, manufacturers of oxidative hair dyes recommend that a self-test is carried out on the skin, before their products are used.

Since 1992 different views have been voiced on the skin testing method.

In 2007 the use of the self-test and the differences between the test methods recommended by the industry were also questioned by the then Scientific Committee on Consumer Products (SCCP, now SCCS).¹ In their report they write:²*The “self-test” gives extremely large and uncontrolled variation in dose, duration of exposure and other factors crucial for the outcome. The validity as a relevant test for contact allergy to hair dye substances is considered very low by the SCCP.*

...False negative, but also false-positive results are expected, and sensitisation may occur as a result of repeated application of high concentrations of hair dyes which are potent skin sensitizers. False negative results from “self-testing” are considered to be the largest problem...

¹ Scientific Committee on Consumer Products. Preliminary Opinion on Sensitivity to Hair Dyes – Consumer Self Testing, European Commission 19 June 2007, 14p.

² Scientific Committee on Consumer Products. Preliminary Opinion on Sensitivity to Hair Dyes – Consumer Self Testing, European Commission 19 June 2007, p. 8, p. 11.

They refer to an opinion SPC/54/92 (p. 4) of the Scientific Committee of Cosmetology (SCC) of 10 February 1992³: “...There is no published evidence of how helpful such non-standardised tests are in detecting PPD⁴ sensitivity. There are numerous anecdotal reports of individuals who claim to have been tested with a hair dye as recommended by manufactures but who develop an allergic contact reaction when their hair is dyed. There are medico-legal implications in suggesting a test with an unknown sensitivity for detection and with poor standardisation. Further, such tests may be performed before a first hair dye, when allergy to PPD should not be present (no previous exposure) but not before subsequent colourings when allergy may have been acquired (because of ignorance)”.

On the basis of the SCCP report it was decided in 2011 that the cosmetics industry should submit a new concept for the self-test method, addressing the need for a better harmonized and standardized method. The new concept should aim at answering questions raised by the SCCP in 2007.

In 2013 (15 October 2013) the Cosmetic industry started the research. The results of the project shall be available by the end of 2017.

With regard to this ongoing research and the results which may be expected, hairdressers, both employers and employees, wish to express their deep concern to the Commission.

The preliminary results of this ongoing research which we read in a PowerPoint presentation communicated by Cosmetic Europe, give rise to some very serious objections and further questions: the subjects of the research are once more PPD allergic patients, the tests are again interpreted by dermatologists. What about a sufficient number of participants (only 8 persons have finished the test)? Is this double blind research? Is there information about reproducibility? Is there information on side effects?

The reason why the skin testing method is so topical at the moment among hairdressers is above all due to problems in Ireland and the UK. We have observed that some people, who know that they are allergic, continue going to the hairdresser to have their hair dyed. After they develop an allergy, they go to court to claim damages. Several hairdressing salons have already been obliged to fire employees or have even been forced to close down.

There is no standardized testing procedure; there is a lot of confusion and contradictions. There is no information provided about unwelcome side-effects, such as active sensitization and there is no back-up system available.

Besides, it seems that more than 1 out of every 2 hairdressers is unable to interpret the leaflet which is a prerequisite to performing the skin test correctly. Within the scope of the EU-SafeHair project (2010-2012) 213 questionnaires were analysed in Croatia. This research showed that 57% of the hairdressers needed assistance with interpreting information about products, laws and regulations.

Moreover, hairdressers are not trained to interpret the tests accurately.

³ Scientific Committee on Consumer Products. Preliminary Opinion on Sensitivity to Hair Dyes – Consumer Self Testing, European Commission 19 June 2007, p. 5.

⁴ p-Phenylenediamine

The tests are not practical either. Customers have to come along 48 hours before hand and can only go back to the hairdresser's to have their hair dyed two days later. Customers do not want that and prefer to go to other hairdressers who do not comply with the rules.

In their quest for social responsibility and sustainable enterprise, hairdressers want to work with products that are healthy for themselves and for their customers.

Hairdressers do not want to be responsible if a client develops an allergic reaction if no skin test has been carried out or if it has been wrongly interpreted.

The self-test method is not effective. Nearly all tests may result in false-positive and false-negative results. Irish research (2001)⁵ showed that 30% of the results were false-positive. The disadvantages include unnecessary investigations and treatments. The absence of reaction to this test is no guarantee that an allergic reaction may not occur as a result of a future hair colouring process. The reading time is up to 48 hours. This is known to be too short as patch test reactions may develop up to 7 days after application, and allergy may be missed. This results in a false sense of security.⁶

According to the national Austrian law, hairdressers are prohibited to carry out the test.

When we look at the economic consequences for hairdressers⁷, we see the following: if hairdressers follow the instructions of manufacturers, they may lose clients. In the case of a positive skin test reaction, the hairdresser has to send the client away. Such a test doesn't prevent clients from dyeing their hair; they simply go to another salon where no test is carried out. This stimulates the black economy. Furthermore, this may lead to the sector's marginalization.

If hairdressers don't follow the instructions of manufacturers, they may be sentenced by court. The findings of a report issued by the Irish Business and Employers Confederation (1999)⁸ shows a cost of 21 000 pound and recent findings show that it still raising.

Regarding the skin testing method, Coiffure EU and UNI Europa have always shared the same position as the European Society of Contact Dermatitis and continue to share it. The European Society of Contact Dermatitis (ESCD) formulated several scientific considerations and clinical concerns of an industry-led screening programme for self-testing for contact sensitization to hair dyes. The organisation criticizes the lack of correct requirements for correct validation of screening tests and concludes that, in its present form, the hair dye self-test has severe limitations. To underpin their opinion, they introduce the following arguments:⁹

⁵ Gerrard. P. Hynes. Issues that arise from the use of Haircare products in salons 2001, 8p.

⁶ Scientific Committee on Consumer Products. Preliminary Opinion on Sensitivity to Hair Dyes – Consumer Self Testing, European Commission 19 June 2007, p. 5.

⁷ Gerrard. P. Hynes. Issues that arise from the use of Haircare products in salons.2001, 8p.

⁸ IBEC guidelines on liability management employer and public liability claims.1999

⁹ Jacob P Thyssen, Heidi Søsted, Wolfgang Uter, Axel Schnuch, Ana M Giménez-Arnau, Martine Vigan, Thomas Rustemeyer, Berit Granum, John McFadden, Jonathan M White, Ian R White, Ann Goossens, Torkil Menné, Carola Lidén, Jeanne Duus. Self-testing for contact sensitization to hair dyes – scientific considerations on clinical concerns of an industry-led screening programme - Contact Dermatitis, 66, 15 febr. 2012, p. 300 – 311.

- 1) *it is not a screening test, but a diagnostic test*; it should be remembered that the test had been carried out on dermatitis patients and not on consumers without symptoms.
- 2) *the test has not been validated according to basic criteria defined by scientists*; the test had critical limitations, including lack of: controls; an appropriate spectrum of participants; blinding; information on reproducibility; information on adverse effects.
- 3) *the test has been evaluated in the wrong population group*; the test should be validated in the target population, in this case, individuals from the general population who intend to dye their hair, and not PPD-allergic patients. Proper validation in the target population should lead to other results.
- 4) *skin reactions have been read by dermatologists and not by the targeted group*; the intention behind the self-test is that the hairdresser or consumer should read and interpret the reaction. No study has yet evaluated how well this group performs, which, again, is a prerequisite in the validation process.
- 5) *hair dyes contain strong and extreme sensitizers that are left on the skin in high concentrations, potentially resulting in active sensitization*; there is a risk of developing a skin reaction and thus an allergy. A contact allergy to hair dyes can also cause swelling of the neck and face, as well as obstruction of the respiratory tract.
- 6) *the recommendations and instructions on how to perform the hair dye self-test vary greatly even among products from the same company*.

For all these reasons, Coiffure EU and and UNI Europa strongly favour the abolishment of the self-testing method. In consultation with different scientists we wish to replace the self-test with a scientifically based questionnaire. In case of further doubt, a dermatologist should be consulted.

The following scientific bodies are of the same opinion:

- Swedish Medical Products Agency recommends that consumers do not carry out the test (unreliable, may cause sensitization/an allergy) ¹⁰
- COST Action StanDerm¹¹ (150 scientific experts from 30 European countries and Turkey) Prof. Swen Malte John: *"All scientific findings point in the same direction - the self-test is a tremendous and completely unrectified action leading consumers towards avoidable risks"*
- Scientific Committee on Consumer Safety (SCCS) and the former European Commission's Scientific Committee on Consumer Products (SCCP) share the opinion of the former Scientific Committee on Cosmetic Products and Non-food products intended for Consumers (SCCNFP): *"Predictive tests of potentially cutaneous sensitizing cosmetic ingredients or mixtures of ingredients should not be undertaken."* *"Repeated hair dye application on the skin with the self-test could, in its current form, be compared with experimental human sensitization tests"*¹²

¹⁰the link to the Swedish Läkemedelsverkets information on skin-colors: <https://lakemedelsverket.se/english/>

¹¹ Webpage: standerm.eu

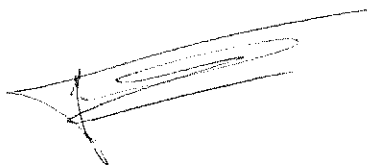
¹² See Jacob P Thyssen, Heidi Søsted, Wolfgang Uter, Axel Schnuch, Ana M Giménez-Arnau, Martine Vigan, Thomas Rustemeyer, Berit Granum, John McFadden, Jonathan M White, Ian R White, Ann Goossens, Torkil Menné, Carola Lidén, Jeanne Duus. Self-testing for contact sensitization to hair dyes – scientific considerations on clinical concerns of an industry-led screening programme - Contact Dermatitis, 66, 15 febr. 2012, p. 308.

Finally, Coiffure EU and UNI Europa

- 1) kindly request the Commission to communicate the point of view of the hairdressing social partners concerning skin testing to the Member States which are members of the sub-group 'skin allergens' and the Working Group on Cosmetic Products;
- 2) kindly request the Commission to provide us with an update of the report of the Scientific Committee on Consumer Safety (SCCS) from 2007 concerning Sensitivity to Hair Dyes - Consumer Self Testing, taking into account the results of the ongoing research commissioned by the cosmetics industry.

We look forward to hearing back from you on these important matters for the sector.

Sincerely,



Jef Vermeulen

President Coiffure EU



Oliver Roethig

Regional Secretary UNI Europa

