

01 October 2008

**Public consultation regarding  
New labelling and warnings on oxidative (permanent) hair dye products**

Response by The European Society of Contact Dermatitis (ESCD), a non-profit organisation, whose purpose is to promote interest, stimulate research, and disseminate information on all aspects of contact dermatitis and other environmental and occupational skin diseases ([www.escd.org](http://www.escd.org)):

A harmonisation of the labelling practice of permanent hair dyes and clearer messages and warnings is welcomed and is needed to address the current problems with severe allergic reactions to hair dyes in consumers and especially in young persons (children).

The placing and visibility of the instructions and warnings is crucial, as otherwise it will be ineffective. The front of packaging is the most visible. Therefore, all important messages, including advice on when not to colour hair (i.e., use the product) and not to be used on persons under the age of 16, should be on the front of all packaging material. This may be the only part of the product a person sees or inspects prior to purchase. It is a concern that these important warnings otherwise will function as disclaimers for the producers rather than essential information for consumers.

It is noted that the 'sensitivity test' is mentioned. This test is not validated as indicated, but may also in itself cause induction of allergy and damage. There is no standardisation of the test and no safety evaluation. From experiments it is known that it is the dose of an allergen per unit area of skin that is important for induction of contact allergy and not the total dose. This means that the application of hair colour with a potent allergen such as p-phenylenediamine (PPD) to a small area in a high concentration may significantly increase the risk of allergy developing, especially if applied repeatedly as is intended with the sensitivity test. It is, therefore, of considerable concern that it is allowed to recommend this test to the consumer.

The use of PPD and related compounds should not be allowed on the eyelashes and eyebrows, including professional use. Blindness has resulted from contact allergy at this site (ref. Teixeira M et al. Contact Dermatitis 2006;55: 92-94)

The primary prevention of contact allergy to hair dye ingredients requires consideration of the permitted concentrations of strong sensitizers such as PPD and p-toluenediamine (PTD) in finished products. Risk assessments should be performed which take into account the allergenic properties of these substances in order to fully address the problem and concerns in the context of consumer health.

Yours sincerely,



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