

Cosmetics testing

Requirements for cosmetic products in the global marketplace



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White paper

Abstract

The global market for cosmetic products continues to grow, particularly in new emerging economies in Asia and the Pacific Region. Rigorous material selection and testing is appropriate so that products perform as expected and consumers are protected. In general, national and regional cosmetic product regulatory schemes are moving away from mandatory pre-market approval to post-market surveillance and enforcement efforts, but complex compliance requirements still exist in China and other countries. This white paper provides an overview of the various types of tests required for cosmetic products, and a summary of the approval requirements for cosmetic products in selected countries around the world.

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Yuan has been instrumental in the development of several advanced testing methods for cosmetic products, including methods for evaluating pesticide residues and the presence of parabens. These advances have contributed to significant improvements in the efficiency of the cosmetic testing process, while also helping cosmetic manufacturers better address long-standing challenges regarding cosmetic purity.

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Introduction

The use of cosmetics reportedly dates back to ancient times, when natural products such as olive oil and castor oil were applied as a protective skin balm. Today, cosmetic products, from makeup, skin creams and lotions to perfumes, colognes and other scents, are used for their reported health and appearance benefits by billions of women and men around the world. Indeed, according to global market research firm IBISWorld, cosmetics and personal care products represent a huge global industry, generating approximately \$330 billion (USD) in annual retail sales worldwide in 2018 and employing over a million workers ^[1].

Because applied cosmetic products come in direct contact with the human body, they are subject to a

range of testing to protect users from microbiological and chemical contamination and from other possible toxic effects. Cosmetic products are also evaluated for their stability after manufacturing, including the effectiveness of preservative agents. In addition, cosmetic product testing procedures have undergone changes in recent years, as regulators in some jurisdictions now prohibit the use of animal testing to assess the safety of cosmetic products.

This white paper provides an overview of the various types of tests required for cosmetic products, and a summary of the approval requirements for cosmetic products in selected countries around the world. The white paper is intended for cosmetic

product manufacturers, including product development specialists and regulatory compliance professionals, as well as retail organisations and the general public.

Because applied cosmetic products come in direct contact with the human body, they are subject to a range of testing to protect users from microbiological and chemical contamination and from other possible toxic effects.

What constitutes a “cosmetic” product

In everyday use, the term “cosmetics” usually applies to a wide variety of personal care products intended to beautify or cleanse the body or parts of the body. Specific types of cosmetic products include facial makeup and perfumes, nail polishes, and skin moisturising products. Cosmetic products can also include hair shampoos and coloring agents, toothpastes and other dental care products, and body deodorants depending on different definitions by countries and regions.

In addition to improving one’s appearance, some cosmetic products may also provide health benefits. For example, skin makeup and moisturisers with sun-blocking properties can decrease the risk of skin cancers by minimising the UV-induced mutation risks. Shampoos with certain added ingredients can reduce the incidence of dry scalp that leads to dandruff, while toothpaste with fluoride can strengthen teeth and reduce tooth decay. In such cases, cosmetic products with documented health benefits may also be classified and marketed as a drug.

The variety and use of products classified as cosmetics are reflected in part in the definitions used by regulatory authorities around the world. For example, under the U.S. Federal Food, Drug and Cosmetic Act, cosmetics are “articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body... for cleansing, beautifying, promoting attractiveness, or altering the appearance.” [2] The European Union

(EU) defines a cosmetic product even more broadly as:

“any substance or mixture intended to be placed in contact with the extended parts of the human body (epidermis, hair system, nails, lips, external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours.” [3]

China defines a cosmetic product as:

“daily used chemical products applied on the surface of any part of the human body (e.g. skin, hair, nails and lips) for the purpose of cleaning, deodorising, providing skincare, beauty and make-up, by way of smearing, spraying or other similar means.” [4]

However, while these definitions may appear similar in general terms, they are still different in important ways. For example, China excludes from the scope of its definition soap and those products that are applied to the teeth.

And in Canada, since the regulations do not expressly state that cosmetics are products intended for human use, they may also be applicable to products intended for use on dogs, cats and other domestic animals. Similarly, a product classified as a cosmetic product in most jurisdictions might be classified as a medicine or drug in another.

Finally, the definition of what constitutes a cosmetic product is often limited by the concept of a product’s intended use. Intended use can be established by adding specific types of ingredients to the product’s formula, for example, adding fluoride to toothpaste to help strengthen teeth. But, intended use can also be established through product labeling and packaging, and by statements of the benefits to be derived from the product’s use. Manufacturers must exercise particular care in the labeling of cosmetic products and in the promotion of possible benefits, particularly since potential health-related claims can result in regulatory authorities requiring additional product evaluation and testing.



Safety concerns with cosmetic products



There are more than 3000 known natural and synthetic ingredients currently used in cosmetic products [5]. While many of these ingredients have been found safe for use in cosmetics, there is no mandated testing for the safety of individual cosmetic ingredients themselves. In addition, because cosmetic products are sourced and/or produced throughout the world, small-scale producers may incorporate local ingredients into their products that are not widely used, complicating the task of ensuring product safety.

Even when the source of a cosmetic ingredient is known, safety concerns can persist. For example, some consumers assume that so-called organic cosmetic products provide an increased level of safety since they consist of agriculture ingredients that have been produced without pesticides or other harmful agents.

However, the use of organic ingredients in cosmetic products is not by itself a guarantee of safety, since even organic substances can be toxic or produce an allergic reaction in humans.

As consumer use of cosmetic products increases, the risk of exposure to potentially harmful ingredients escalates. According to one estimate, consumers in the U.S. use about 10 cosmetic products every day, resulting in daily exposure to more than 125 different ingredients [6]. This frequency of exposure, combined with the number of cosmetic ingredients in use, dramatically increases the risk of an adverse reaction to a cosmetic product.

Most adverse effects from exposure to ingredients in cosmetic products are limited to skin or eye irritation or other types of allergic reactions.

These effects usually disappear when use of the product containing the ingredient is discontinued. However, more severe and debilitating reactions can result from prolonged exposure. In addition, there are few studies on the impact of long-term exposure to cosmetic ingredients, meaning that more research is essential.

In some cases, adverse effects are related to the form in which the cosmetic ingredient is used. For example, titanium dioxide in powder form, which is found in makeup powders, has been linked to cancer when inhaled, but is considered safe when used in an emulsion, such as toothpaste or sunscreen [7]. Other ingredients, such as phthalates, may be deemed safe for use in some cosmetic products in low concentrations, but banned in other products.

Safety concerns with cosmetic products

While safety testing of individual cosmetic ingredients is generally not required, most finished cosmetic products are subject to five basic tests, as follows:

MICROBIOLOGICAL TESTING

Microbiological testing assesses the presence of potentially harmful microbial contaminants, including bacteria and fungi. Typically conducted on recently manufactured products, microbiological testing is intended to verify the quality of the ingredients used in production, as well as the sterility of the manufacturing process. To help ensure the quality of the product and the safety of consumers, results of contaminant counts must meet the applicable regulatory requirements or the specifications defined by the manufacturer, whichever is more stringent.

CHEMICAL CONTAMINANT TESTING

Chemical contaminants in cosmetic products that are toxic to humans include heavy metals, dioxane, etc. Like microbiological testing, chemical contaminant testing is typically conducted on finished goods prior to product packaging through the use of advanced chemical analysis techniques, including gas chromatography (GC), high-performance liquid chromatography (HPLC) and inductively coupled plasma (ICP), etc. In cases where testing results identify chemical contamination, further testing of raw materials is recommended.

PRESERVATIVE EFFECTIVENESS TESTING

Preservatives are usually added to cosmetic preparations to prevent the growth of microbiological contaminants after the product has been first opened by the consumer. In preservative effectiveness testing, samples of cosmetic products are injected with varieties of bacteria, and fungi, and regularly evaluated during the testing period for levels of contamination. Cosmetic products that exhibit the regrowth of microbiological contaminants as a result of this test are typically reformulated. Further, newly developed preservatives intended for use with cosmetic products must be tested to help ensure microbial stability during storage and use.

PRODUCT STABILITY TESTING

Product stability testing is used to assess any chemical or microbiological changes in key characteristics of a cosmetic product that can normally be expected to take place during the product's shelf-life and that would adversely impact consumer use. Key product stability factors could include color, texture and odour of the cosmetic material itself, as well as the compatibility of the cosmetic material and the container in which it is packaged. Product stability testing can be conducted in real-time, which most closely mimics actual use but takes longer, or "accelerated" by exposing products to elevated temperatures for shorter periods of time.

PRODUCT PERFORMANCE TESTING

Product safety testing is the last of the basic cosmetic product tests to be conducted. Ideally, product safety testing measures dermal irritancy (the tendency of a product to irritate the skin), ocular irritancy (the tendency of a product to irritate the eyes), and dermal sensitisation (the tendency of a product to produce skin rashes, swelling or other types of adverse reaction). Product safety testing directly addresses many of the safety concerns associated with the use of cosmetic products by humans.

Depending on specific type of product being produced, manufacturers may elect to conduct additional testing to ensure the safety and usefulness of their cosmetic products. Cosmetic manufacturers may also perform additional tests to meet specific quality or performance requirements of buyers and consumers, including such characteristics as whitening, moisturising or wrinkle resistance.

Cosmetic regulatory requirements in key countries

Although regulations applicable to cosmetic products are increasingly being harmonised to reduce international barriers to trade, there are still important differences to take into account when marketing or selling cosmetics in major markets around the world. The following sections discuss specific regulatory requirements in key countries and economic regions.

A. United States

Cosmetic products available for sale in the U.S. are regulated by the U.S. Food and Drug Administration (FDA), under the provisions of the Federal Food, Drug and Cosmetic Act and the Fair Packaging and Labeling Act. Unlike other products regulated by the FDA, cosmetic products and ingredients are not subject to pre-market review and approval. Instead, manufacturers are responsible for substantiating the safety of their products and ingredients, and for

providing consumers with complete and accurate information regarding a product's ingredients. The sole exception to this approach involves the use of color additives, which are subject to separate FDA requirements.

To enforce its regulations, the FDA collects samples of cosmetic products for examination and analysis through routine inspections of manufacturing facilities, as well as of imported products. The FDA

may pursue enforcement action against a cosmetic manufacturer of any product found to be improperly labelled or deceptively packaged (i.e., "misbranding"), or if the product composition has been "adulterated," either in its composition or as a result of the manufacturing process. Enforcement actions can include the seizure of non-compliant products, and the initiation of criminal actions against anyone found violating the law.

B. Canada

In Canada, the manufacture, marketing and management of cosmetics is governed under that country's Food and Drugs Act^[8], which was first drafted in 1985 and most recently revised in 2018. Based on that legislation, Canada's Cosmetic

Regulations provide additional details on requirements regarding the safety of cosmetic products, as well requirements on the inspection, packaging, labelling and marketing of cosmetic products sold in Canada. In addition, there are a number of

additional guidelines and standards pertinent to cosmetic products published by the government and related organisations that address labelling, advertising and banned or regulated substances.

C. European Union

As of 2013, cosmetics marketed or sold within the EU are subject to the requirements of Regulation No. 1223/2009,^[9] which replaces the EU's original 1976 Cosmetic Directive. As in the U.S., cosmetic products are not subject to pre-market approval. Instead, market surveillance by enforcement authorities is the primary mechanism for identifying cosmetic products that do not comply with EU requirements. Toward this end, manufacturers are responsible for identifying a "responsible person" who can address issues of non-compliance identified by authorities.

However, unlike the U.S. requirements, EU cosmetic regulations expressly prohibit the use of any substances determined to be carcinogenic, mutagenic, or toxic to reproductive systems. The EU's Cosmetic Regulation also specifies those colorants, preservatives and UV-filters that are approved for use in cosmetic products. Details on prohibited, restricted and approved ingredients are found in the Annexes of the Regulation.

Most important, the EU Cosmetic Regulation prohibits the performance of animal testing in the evaluation

of finished cosmetic products or ingredients or combinations of ingredients use in cosmetic products. The ban against animal testing extends to all cosmetic products placed on the EU market, regardless of the place of origin or manufacturer. Exceptions to this requirement may be granted by the EU Commission only in those cases where a cosmetic ingredient in wide use cannot effectively be replaced with an ingredient not based on animal testing.

D. BREXIT

As of this writing (March 2019), the United Kingdom (UK) remains committed to its intention to withdraw from the EU on 30 March 2019.^[10] Should the withdrawal occur on that date as scheduled, the UK would then become a "third country," and

cosmetic products entering the EU market from the UK would be subject to the requirements applicable to cosmetic products imported from any country outside of the EU. In addition, it is unclear what regulations would be applicable to cosmetic products

placed on the market in the UK. Negotiations between the EU and the UK are ongoing, and may result in a compromise that lessens the regulatory burden on cosmetic products imported either into the EU or the UK.

E. Japan

Beauty products market or sold in Japan are subject to regulations promulgated by that country's Ministry of Health, Labor and Welfare (MHLW), under the scope of the Pharmaceutical Affairs Law (now known as the Pharmaceutical and Medical Devices Law, or PMDL). The law classifies beauty products into one of two categories. The first category, cosmetics, includes perfumes, makeup, skin and hair care products and soaps. The second category, "quasi-drugs", includes deodorants, depilatories, hair dyes and hair growth treatments, as well as "medicated products" like acne treatments, anti-aging creams and lotions and whitening products [10].

Notification No. 331 of 2000, "Standards for Cosmetics," [11] mandates that "ingredients of cosmetics...shall not contain anything that may cause infection or that otherwise makes the use of the cosmetics a potential health hazard." Further, Japan's requirements prohibit or limit "the inclusion of ingredients other than preservatives, UV absorbers and tar colors." Preservatives, UV absorbers and tar colors approved for use, and limits on other cosmetic ingredients, are listed in the Appendices to the Standards document.

Japanese law now requires that any party engaged in the importation

of cosmetic products into Japan obtain a primary distributor's license. Further any party engaged in the final packaging, storage or labelling in Japanese of a cosmetic product must also hold a primary distributor license. License holders are fully responsible for ensuring the safety of their cosmetic products and for conducting whatever testing is necessary to demonstrate compliance with specific safety and hygiene requirements under Japanese law. While submission of pre-market testing results is not a requirement, enforcement of cosmetic regulations is supported by a rigorous post-market surveillance programme.

F. China

The second largest market for cosmetic products in the world, China has recently undertaken significant efforts to reform its regulatory scheme applicable to cosmetic products. In 2018, China's State Food and Drug Administration (SFDA), which formerly regulated the cosmetic industry in China, was merged into a new state agency, the State Administration for Market Regulation (SMRA) along with the General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) and the State Administration for Industry and Commerce (SAIC). The new agency now has sweeping regulatory authority over issues related to the safety, certification and testing of cosmetics as well as a broad range of consumer and industrial products.

The SMRA is reportedly in the final stages of developing a new regulatory framework for the regulation of cosmetic products in China. The new framework is intended to address or clarify a number of key issues, including:

- Replacing mandatory testing and registration of raw materials with manufacturer declarations based on their own risk assessment;
- Clarification of the accountability for cosmetic quality and safety; Modifications to the categorization of "special use cosmetics";
- "Social supervision" of claims of cosmetic efficacy instead of administrative approval; and
- Clarification of legal responsibilities as well as increase penalties for regulatory violations [12].

In a separate action, China's National Medical Product Administration (NMPA) has modified its requirements to allow manufacturers to formally notify the NMPA prior to placing non-special purpose cosmetics on the market, rather than requiring pre-market review and approval by regulatory authorities. Although imported cosmetic products are still required to meet relevant requirements regarding toxicity testing, the changes should significantly reduce the length of time required for market entry [13].

G. ASEAN

Member countries of the Association of Southeast Asian Nations (ASEAN) are signatories to the ASEAN Harmonised Cosmetic Regulatory Scheme. ASEAN countries, which include Singapore, the Philippines, Thailand, Indonesia, Malaysia, Myanmar, Cambodia, Viet Nam, Lao PDR and Darussalam, are reportedly experiencing significant growth in the sale of cosmetic products. The goal

of the ASEAN Scheme is to remove barriers to trade between member countries by reducing the use of pre-market approval requirements and focusing instead on post-market surveillance activities to ensure the safety of cosmetics. However, companies in an individual ASEAN member country seeking to place a cosmetic product on the market in another ASEAN member country are

still required to notify the relevant regulatory authority of that country and receive acknowledgment of receipt of that notice before placing their cosmetic product on that market.

H. India

In India, cosmetic products are primarily regulated by the Drugs and Cosmetics Act 1940 and Rules 1945 (D&CA), and subsequent amendments. Under the D&CA, domestic producers must build cosmetic manufacturing facilities

in compliance with specific requirements. In addition, as of 2011, all cosmetic products imported into India must be pre-registered with that country's Central Drug Standards Control Organisation. The registration process requires manufacturers

to declare the ingredients and raw materials used in production as well as the chemical composition of the finished product. India is also reportedly considering a ban on animal testing similar to that in place in the EU.

I. Brazil

Brazil regulates cosmetic products through its Agencia Nacional de Vigilancia Sanitaria (ANVISA). Companies that manufacture cosmetics for sale in Brazil must be compliant with ANVISA requirements. As in China, non-domestic cosmetic manufacturers or importers must also appoint an authorised agent based in Brazil who is responsible for product registration.

In Brazil, individual cosmetic products must be either notified or registered before their legal entry to market, depending on the degree of risk they present to a user. Manufacturers or

importers of cosmetics classified as Product Risk Degree 1 products, including simple shampoos, shaving foams, body lotions and creams and make-up products, must “notify” ANVISA through the online submission of a dossier with basic product data, but can begin marketing such products immediately thereafter. Product Risk Degree 2 products, which include anti-aging products, sunscreen creams, hair coloring agents and other products with specific indications for their use, must first be registered with ANVISA and cannot be marketed until a registration number has been

issued for that product (typically 60-90 days after submission of the required registration information).

As of July 2013, ANVISA regulations restrict the use of pyrogallol (a form of benzene commonly used in hair color), formaldehyde and paraformaldehyde in cosmetic product formulations, and ban altogether the use of lead acetate.

Major international regulations and standards

COUNTRIES / REGULATIONS	COSMETICS & PERSONAL CARE PRODUCTS	COSMETICS INGREDIENTS / CHEMICALS	PRODUCT SAFETY	LABELLING REQUIREMENTS
ASEAN	<ul style="list-style-type: none"> ▪ Cosmetic Directive 	<ul style="list-style-type: none"> ▪ Cosmetic Directive - Annexes II, III, IV, VI, VII 	<ul style="list-style-type: none"> ▪ Cosmetic Directive - Article 3 & 8 	<ul style="list-style-type: none"> ▪ Cosmetic Directive - Article 6
Australia	<ul style="list-style-type: none"> ▪ Therapeutic Goods Act – for cosmetics with therapeutic claim ▪ Cosmetics Standard 2007 	<ul style="list-style-type: none"> ▪ The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) ▪ The Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP), Poison Standard ▪ Industrial Chemicals (Notification and Assessment) Act 1989 	<ul style="list-style-type: none"> ▪ Therapeutic Goods Act – for cosmetics with therapeutic claim ▪ Cosmetics Standard 2007 	<ul style="list-style-type: none"> ▪ The Trade Practices - Consumer Product Information Standards ▪ Cosmetics regulations 199
Brazil	<ul style="list-style-type: none"> ▪ The board of Directors of the ANVISA – RDC n°07, of 14 February, 2015 – Technical requirements of regularization of personal care & cosmetics ▪ The board of Directors of the ANVISA – RDC n°211, of 14 July, 2005 - Definition and classification of cosmetic & personal care 	<ul style="list-style-type: none"> ▪ International Nomenclature of Cosmetic Ingredients (INCI) 	<ul style="list-style-type: none"> ▪ ANVISA – Resolution n° 29, of 1 June, 1999 - list of substances of preservative effect. ▪ ANVISA – Resolution n° 481, of 23 September, 1999 – parameters of microbiological control. ▪ The board of Directors of the ANVISA – RDC n°211, of 14 July, 2005 - Definition and classification of cosmetics & personal care 	<ul style="list-style-type: none"> ▪ The board of Directors of the ANVISA – RDC n°211, of 14 July, 2005 – Annex IV
Canada	<ul style="list-style-type: none"> ▪ Food and Drugs Act, Cosmetic Regulations (C.R.C., c.869) 	<ul style="list-style-type: none"> ▪ Cosmetic Ingredient Hotlist: List of Prohibited and Restricted Ingredients 	<ul style="list-style-type: none"> ▪ Food and Drugs Act, Cosmetic Regulations – section 29 & 30 	<ul style="list-style-type: none"> ▪ Food and Drugs Act, Cosmetic Regulations – section 17 ▪ Consumer Packaging & Labelling Act, CRC c869 ▪ Labelling Requirements for Cosmetics in Pressurized Containers
China	<ul style="list-style-type: none"> ▪ Safety and Technical Standards for Cosmetic 2015 ▪ Cosmetics Hygiene Supervision regulation 1989 	<ul style="list-style-type: none"> ▪ Safety and Technical Standards for Cosmetic 2015 	<ul style="list-style-type: none"> ▪ Safety and Technical Standards for Cosmetic 2015 	<ul style="list-style-type: none"> ▪ Cosmetic labelling GB 5296.3 ▪ Cosmetic labeling management rule 2008
EU	<ul style="list-style-type: none"> ▪ Cosmetic Regulation EC 1223/2009 	<ul style="list-style-type: none"> ▪ Cosmetic Regulation EC 1223/2009 - Annexes II, III, IV, V & VI 	<ul style="list-style-type: none"> ▪ Cosmetic Regulation EC 1223/2009 – Annexes I, Articles 3, 10, 11 	<ul style="list-style-type: none"> ▪ Cosmetic Regulation EC 1223/2009 – Annexes VII, Article 19
New Zealand	<ul style="list-style-type: none"> ▪ Cosmetic Products Group Standard 2017 ▪ Hazardous Substances and New Organisms Act 1996 	<ul style="list-style-type: none"> ▪ Cosmetic Products Group Standard 2017 - Schedule 4, 5, 6, 7 & 8 	<ul style="list-style-type: none"> ▪ Cosmetic Products Group Standard 2017 ▪ Hazardous Substances and New Organisms Act 1996 	<ul style="list-style-type: none"> ▪ Cosmetic Products Group Standard 2017 - Schedule 1, Part 2
Saudi Arabia	<ul style="list-style-type: none"> ▪ SASO 1953/2005 ▪ Cosmetic Product (Safety) Regulations 			
USA	<ul style="list-style-type: none"> ▪ Federal Food, Drug and Cosmetics Act (FD&C Act) Chapter VI ▪ FDA CFR Title 21 	<ul style="list-style-type: none"> ▪ FDA CFR Title 21 - Sections 73, 74,81,82, 250, 700 	<ul style="list-style-type: none"> ▪ FD&C Act - section 210,601, 602 & 603 ▪ FDA CFR Title 21 - Sections 700-740 	<ul style="list-style-type: none"> ▪ FDA CFR Title 21 - Sections 701 & 740 ▪ Federal Fair Packaging & Label Act ▪ FDA CFR Title 16 - Section 500 ▪ 19 CFR Part 134

Challenges in meeting diverse regulations

As the previous section illustrates, individual countries and regions have diverse requirements and standards applicable to cosmetic products, from safety evaluations and banned or restricted ingredients lists to labelling requirements and other administrative matters. For example, when it comes to permitted and restricted ingredients used in cosmetic products, the EU, China, Japan and Korea, as well as ASEAN member countries maintain lists of both banned or restricted ingredients as well as permitted colorants, preservatives and UV filters. On the other hand, the regulators in the U.S. and Canada maintain lists of banned or restricted ingredients but does not have lists for permitted preservatives and UV filters for cosmetic products (although the U.S. does maintain a list of permitted colorants).

On the issue of pre-market requirements, most jurisdictions

require pre-market notification to regulatory authorities, but the U.S. FDA does not. Similarly, most jurisdictions require the listing of all ingredients on labelling applied to cosmetic products. But some jurisdictions permit the exclusion of proprietary ingredients or formulas from product labelling and information with prior approval from authorities.

Finally, in most jurisdictions, the manufacturer has full responsibility for the safety of the cosmetic products they produce. In China, however, inspection institutes can also be held liable for product safety issues associated with cosmetic products that they test and evaluate. As part of their effort to better align their requirements with international standards, Chinese authorities are updating their regulations to more clearly place with the manufacturer the responsibility for the quality and safety of their cosmetic products.

There are some efforts underway to harmonise regulations applicable to cosmetic products. Perhaps the best known is the International Cooperation on Cosmetics Regulation (ICCR), a partnership among regulators in the U.S. the EU, Canada and Japan. The ICCR works to align cosmetic product regulations in the four-member jurisdictions, thereby helping to ensure consumer safety while minimising barriers to international trade. But the efforts of the ICCR and others have not yet fully resolved the complex, and frequently contradictory, landscape of regulatory requirements affecting producers of cosmetic products seeking global distribution opportunities.

Summary and conclusion

The market for cosmetic products continues to grow, particularly in new emerging economies in Asia and the Pacific Region. Although most cosmetic products are safe when used as directed, rigorous material selection and testing is appropriate so that products perform as expected and consumers are protected. Global cosmetic product regulatory schemes are generally moving away from mandatory pre-market approval to post-market surveillance

and enforcement efforts, but many challenges to international market access remain. For cosmetic manufacturers seeking international distribution of their products, advanced planning remain essential.

TÜV SÜD is an internationally recognised testing, inspection and certification organisation, with hundreds of technical experts in more than 30 countries around the world.

This extensive network makes TÜV SÜD an effective single source for organisations seeking expertise in the evaluation and testing of a wide range of food, health and beauty products, including cosmetics.

GLOSSARY OF ACRONYMS

ANVISA – agencia nacional de vigilancia sanitaria
ASEAN – association of southeast asian nations
CFR – code of federal regulations
CRC – consolidated regulations canada
D&CA – drugs and cosmetics act 1940
EC – european commission
EU – european union

FDA – u.s. food and drug administration
ICCR – international cooperation on cosmetics regulation
INCI – international nomenclature of cosmetic ingredients
SFDA – china's state food and drug administration
MOH – ministry of health
CFDA/SFDA – chinese state food and drug administration
NMPA – china national medical product administration

FOOTNOTES

[1] "Global Cosmetics Manufacturing Industry: Industry Market Research Report," research report by IBISWorld, July 2018. <https://www.ibisworld.com/industry-trends/global-industry-reports/manufacturing/cosmetics-manufacturing.html>. Accessed on 26 February 2019.
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