

INTERTEK ASSURIS

**CHINA:
SAFETY DATA
SUBMISSION FOR
COSMETIC RAW
MATERIALS**

China: Safety Data Submission for Cosmetic Raw Materials

On 01 May 2021, one of the supporting documents of China's new cosmetics regulation (CSAR), the Administrative Provisions for Cosmetic Registration and Notification Documentation, came into force.

Appendix XII of the Administrative Provisions for Cosmetic Registration and Notification Documentation serves as a guideline for cosmetic raw material safety data submissions. It provides an outline of the regulatory provisions for safety data submissions applicable to all raw materials used in cosmetic products in China.

Two other supporting documents of CSAR, the Technical Guidelines for Cosmetic Raw Material Safety Data Submission and the Cosmetic Raw Material Safety Data Submission Platform User Manual, were released along with the launch of the Raw Material Safety Data Submission Platform on 31 December 2021.

Who Is Impacted?

According to CSAR and the Administrative Provisions for Cosmetic Registration and Notification Documentation, manufacturers must submit a raw material submission code to the National Medical Products Administration (NMPA) for all raw materials used in their cosmetic products intended to be sold in China. The required data include, but are not limited to, the product's trade name and composition, recommended concentration in cosmetic products, physical-chemical properties, production process, quality control specifications, etc.

Raw material manufacturers can submit the data on their own or appoint another legal entity to submit the data and conduct routine maintenance on their behalf. Chinese companies can access the data submission module directly via the NMPA Online Service Hall (<https://zwfw.nmpa.gov.cn>), and non-Chinese companies can access the data submission module by creating an account from this designated link (<http://ciip.nifdc.org.cn>).

What Are the Deadlines?

For raw materials functioning as preservatives, sunscreen agents, colorants, hair dyes, dark spot-removing agents, and whitening agents, the safety data shall be submitted starting from 01 January 2022. For other raw materials, the safety data shall be submitted starting from 01 January 2023.

Any delay in data collection could prevent cosmetic products containing those raw materials from being successfully notified or registered in China. It is important to prepare the required data in advance to enable timely submission.

The Intertek Advantage

Intertek can help cosmetics manufacturers understand the detailed requirements of the cosmetic raw material safety data submission process and can provide support with the preparation of safety data for raw materials.

Intertek helps local and international companies ensure that their products meet quality, safety, hygiene, regulatory compliance, and social and environmental responsibility standards around the world. We provide a comprehensive range of services for beauty and personal care products to ensure quality, safety, and efficacy.

Our services include:

- Toxicological Safety Assessments
- Toxicological Profiles of Ingredients
- Registration & Notification of New Cosmetic Ingredients
- Registration & Notification of Domestic/Imported Cosmetic Products
- Labelling Reviews
- Literature Review & Data Collection
- Regulatory Dossiers
- Microbiology & Stability Testing
- Cosmetic Packaging Analysis
- Causality Assessment
- Regulatory and Compliance Support
- Proposition 65 Compliance for Cosmetics Products
- Sustainability Solutions

A top-down photograph of various cosmetic ingredients on a rustic wooden surface. In the upper left, there is a white mesh bag filled with small, light-colored granules. Next to it is a rectangular block of light beige solid material. In the center, a small round wooden dish holds a dollop of thick, pale cream. To the right of the dish is a clear, cylindrical glass bottle containing a golden-brown liquid. Further right is another rectangular block, this one white. The background shows the natural grain and texture of the wood.

FREQUENTLY ASKED QUESTIONS

How is “Cosmetic Raw Material Safety Data Submission” different from “Cosmetic New Ingredient Notification/Registration”?

The Cosmetic Raw Material Safety Data Submission is applicable to existing cosmetic ingredients, i.e., those included in the IECIC (Inventory of Existing Cosmetic Ingredient in China 2021). The Cosmetic New Ingredient Notification / Registration is applicable to an ingredient not included in the IECIC and which, as a result, needs to be notified or registered before it can be used in China

Can the same INCI be linked to multiple submission codes?

Yes. The Safety Data Submission Code is uniquely attributed to a specific cosmetic raw material manufactured by a specific manufacturer.

What happens after the submission is completed?

A submission code for the raw material will be generated and can be provided to any downstream cosmetic companies who purchase the raw material and use it in their product formula. They will include the code in the product dossier when notifying or registering their cosmetic products in China.

Who shall prepare the submission?

Chinese or non-Chinese cosmetic raw material manufacturers. They can submit the data by themselves or authorize other Chinese or non-Chinese legal entities to perform data submission and routine maintenance on their behalf.

What is the “Authorized Party”?

The Authorized Party is the legal entity that performs data submission and routine data maintenance of a raw material on behalf of the manufacturer of this raw material, upon receiving a formal authorization from the manufacturer.

Can one Raw Material Manufacturer appoint several companies as their Authorized Parties?

Yes, provided that one raw material is linked to one Authorized Party only.

What are the different transitional periods for the submission?

Starting from 01 January 2022, submission is mandatory for raw materials that function as preservatives, UV filters, colorants, hair dyes, dark spot-removing agents, and whitening agents. Starting from 01 January 2023, submission is mandatory for all other raw materials. Any data gap for all raw materials, including those used in cosmetic products notified or registered prior to CSAR, shall be filled before 01 May 2023..

Is Safety Data Submission required for all cosmetic ingredients used in a formula, including fragrance?

Yes, except for water/aqua. However, submission will be required if the water is from a special source.



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