

Cosmetic Product Safety Report Submission Process

This guide is to explain the process that needs to be undertaken to obtain a Cosmetic Product Safety Report (CPSR) which is one of the requirements under the Cosmetic Regulation 1223/2009 in order to sell cosmetics within the UK / EU. Please note that Brexit will have no effect on these legal requirements.

What is a CPSR?

A Cosmetic Product Safety Report is a legal document certifying that a suitably qualified chemist with relevant experience has reviewed your formulations and deemed them (after making a number of calculations for each ingredient and exposure levels) safe for use by the general public. Please note that there are some prohibitions with the cosmetic products created with these reports – they cannot imitate food (eg cupcakes), they cannot make health claims even if herbal based (eg will cure acne or relieve the pain of a headache) and they cannot be used to target specific population groups (eg children or pregnant women).

Soaposh partners with Cosmetic Safety Consultants Ltd to provide these fully compliant CPSRs. Scott Grainger has years of experience within the cosmetic regulatory field and is a fully qualified and registered chartered chemist.

Can I get advice on obtaining a CPSR?

Soaposh offers free advice at all stages of preparing your formulations. We have a dedicated email address and Safety Assessment Coordinator on staff: soaposh.assessments@gmail.com

What is a base recipe and variations?

Our assessment packages allow for ONE anhydrous base recipe that can include up to ten ingredients. Please see below for formulations that contain water (not including CP/HP/Liquid Soap) or perfume products.

Each base recipe must be used for all variations / end products. The base recipe should be at least 90% of the final product to ensure that the product type remains the same – for example, we cannot turn a solid lotion bar into a soft balm just by adding lots more liquid oil to the base recipe.

Each variation / end product can include a further five ingredients. These would usually consist of things such as fragrance, colour(s), a sparkling ingredient, botanicals, essential oils (a three oil blend is considered to be three separate ingredients) or, water substitutions where cold process soap is concerned.

When you have established your range of products, we would need you to send us the base recipe and the variations / end products with the list for each one of the five additional ingredients.

Do I have to send anything else?

Some ingredients do require additional information or supporting documentation before they can be processed. This can also vary between different product types but we will advise you of this as we prepare your file for the chemist.

This list covers some essential information for all assessment types:

- Product type
- Product Description
- Packaging type
- Supplier, IFRA statement and allergen certificate for all fragrance oils that are not from Soaposh
- Supplier and full CI / inci for all colours, glitters and micas – these must be written on the submission form
- Supplier for clays and charcoal
- Brand name for food ingredients such as Oats purchased from a supermarket
- Ingredients / composition or MSDS for some food based ingredients such as sugar sprinkles
- The inci for some essential oils but you would be advised once your recipes have been reviewed – examples might be “Peppermint Essential Oil” and we would need to know if it was Mentha Piperita or Arvensis, Jasmine Grandiflorum or Sambac

An example melt and pour soap might be:

Base recipe

98g SLS Free Clear base

2g Apricot Kernel Oil

Variation 1

Product Name: Lavender Field Bar

Product Description: A solid, soap with purple colour and mica scented with Lavender Fragrance

Product Packaging: Shrink wrap and cardboard cigar wrap

1g Lavender Fragrance – Soaposh

0.5g Amethyst colour CI Number: 45100 /42090 - Soaposh

0.25g Reflections Eco Spark – Fluorhlogopite, CI77891, CI77861 – Soaposh

This can seem quite an overwhelming process but please be assured that Soaposh will be readily available to offer advice and help guide you through this process at all steps.

What format can I use for my ingredients?

When you write your recipes out, by far the most reliable and easiest method for reproduction and recipe scaling is to use gram weight for all ingredients. Jewellery scales are useful for measuring small quantities of less than 1g. We can, however, accept the following units of measurement and our chemist will undertake the necessary conversions:

- Grams (g)
- Millilitres (ml) – 1ml is 0.9g
- Drops (for essential oils) – 20 drops are deemed equivalent to 1ml. 1ml is approximately equivalent to 0.9g. Measurements of drop quantities greater than 30 will have to be provided by weight

We cannot accept the following:

- Pinches
- Cups
- Tea spoons, table spoons

What happens after I have sent my recipes?

Once we receive your recipes, we will check through everything to identify any supporting documentation that may be required, calculations, levels of fragrance / essential oils, any applicable restrictions on some essential oils and other queries that may be highlighted by the chemist. The premise is to minimise the risk of delays due to queries once the submission has been made. We are not, however, qualified chemists so there is always the chance we might miss something that the chemist will require clarification on.

The chemist will undertake the writing of the cosmetic report and the necessary calculations needed for toxicology assessment and stability of the product. Once that very complex procedure is completed, it will be second checked for quality control, accuracy and verification purposes before the report is finally signed off. At that point it will be returned to our Safety Assessment Coordinator who will forward it to you.

Will you change my formulas?

Absolutely not! Very occasionally the chemist may, for example, request that a particular essential oil be reduced in quantity in which case he would contact our Safety Assessment Co Ordinator who would immediately forward that information to you. You can then decide whether to agree

to the specified reduction or make a substitution. As stated above, we do try to minimise these queries but, they can happen.

Do I need to send product samples?

No, the whole process is undertaken electronically.

Do I have to purchase my ingredients from Soaposh?

No, with your own recipe products you can choose your ingredients from any supplier of your preference. The only difference it makes is that we will require the IFRA statements for fragrance oils and, if your supplier is not a known cosmetic supplier, we may require MSDS for some ingredients to ensure they do not have additional ingredients – examples might be coatings or anti clumping agents for free flowing products.

Do I have to use the supplier name for the fragrance?

No, you can change the name to whatever you think best matches your range and style of products. However, you MUST match the supplier fragrance oil to your chosen name in your product information file.

I've seen the same fragrance oil at a different supplier and I want to use that

You can change your supplier at any point prior to the CPSR being issued. The supplier for fragrance oils is named on the CPSR and unfortunately, that fragrance oil must always be purchased from that named supplier. A same named fragrance oil from a different supplier may be a completely different oil and will not be covered under your CPSR. If your named supplier drops that fragrance oil, we can alter your CPSR for a small admin fee to include a new choice.

Can I fill the variations on my CPSR gradually if I have not completed my range?

Ideally, we would hope to forward all of your variations at the same time. However, we understand that is not always possible. We can revisit an issued CPSR to complete empty variations within the first six months but this does incur an administration charge of £30 plus VAT for each revisit irrespective of the number of variations that are completed. After six months, it is £30 plus VAT per variation.

What about European clients on the EU mainland or the Republic of Ireland?

The chemist that Soaposh partners with is highly experienced and provides cosmetic reports that are fully valid across all areas of Europe. However, those countries outside of the UK do have additional information added to the reports as required by or as an aide to varying local agencies across different countries. There is an administration charge of £55 plus VAT for this*.

Can I extend my CPSR with more variations?

The 'package type' assessment options on the website include your base plus eight variations with options in each assessment description to increase this number to sixteen (or more on some product types) at a substantially discounted option.

We can also include 'Add On' variations to an existing CPSR at the cost of £40 plus VAT per variation. This cost allows the inclusion of an additional variation that uses the same base recipe and an extra five ingredients per Add on Variation purchased*.

What about Brexit?

Brexit will have no immediate effect for purposes of selling cosmetics within your defined area. Those residents of the EU will continue to use the EU Cosmetic Product Notification Portal and can sell across all member states. Those who reside in the UK will still be expected to abide by the EU Cosmetic Regulation 1223/2009 as Amended for Brexit purposes and will continue to notify products but on a UK based cosmetic portal. UK residents will not be able to export to EU member states without a Responsible Person resident in a member state who can use the EU CPNP.

What else is needed to sell my products once I have my CPSR

In addition to a CPSR, you also need to adhere to other aspects of the Cosmetic Regulation. These include specified information to be present on a label, the maintenance of a Product Information File and for cosmetic products to be notified on the Cosmetic Product Notification Portal (see above) which is searchable by Trading Standards or other local enforcement agencies across the EU; health care providers and poison centres in the event of an accident with a cosmetic product. The current CPNP is Europe wide but the UK will have its own after Brexit. We have guides and information on these regulatory requirements on the Soaposh website blog and in the Soaposh Chat Facebook group for clients. It is also strictly advisable to have suitable insurance.

Who regulates cosmetic manufacturers in the UK?

The enforcement agency for UK cosmetics is the Trading Standards Service

Can I make CBD Products?

CBD oil is a restricted ingredient under COSING and as such, we cannot currently process any recipes which include it as an ingredient.

We can process cosmetic reports that include CBD isolate as an ingredient but the client must provide a cosmetic function for it. We must also remember that no health claims can

be made on cosmetic products so inclusion of CBD cannot be for any purported physiological, preventative or treatment effects either in the product name or description.

How long does the process take?

Once you have purchased a safety assessment our Assessment Co-ordinator, Ann-Marie, will be in touch to send a submission form for you to complete – this must be completed and returned in an editable format accessible on a Windows system eg Word. Apple files such as Pages will need to be converted. This ensures uniformity for all clients and assists us and the chemist in reviewing your recipes. Ann-Marie will check your form to ensure the included fragrance oils or essential oils are at suitable levels, that a CP/HP soap formulation is not lye heavy, IFRA and allergen documents for fragrance suitability, CI numbers and INCI for glitter products are included and that necessary paperwork has been collated in the file. It is the client's responsibility to fully complete the submission form and forward any necessary supporting paperwork in an electronic document format eg PDF. Images, screen shots, links etc cannot be accepted and we are not able to copy information (eg CI numbers) from documents into your submission form.

Once this initial review is undertaken and any communication completed to confirm final accuracy; the file is forwarded to the chemist. Within a week or so of receipt, the chemist will undertake a formal review – at this point, if he has any queries or requires any adjustments from a safety perspective (eg a restricted essential oil), these will be forwarded to you for your consideration and authorisation to proceed or make suitable alterations of your choosing. Once the chemist's formal review is complete; your file will enter the queue to be written up as a legal document. We usually say that clients should allow five weeks from the formal review date for the CPSR to be returned. Often this can be much quicker or, during particularly busy times or where seasonal staff breaks are involved (Christmas / summer leave etc), then it can take a little longer. So please expect your report to be with the chemist for six weeks.

For time sensitive reports there is the option of the Fast Track* service which will reduce the time to a week after the chemist has reviewed and ok'd the formulations. These assessments proceed through a different submission process which also shortens the formal review times. There is a fee for this service and it can only be applied to one report where the product type is standard. Particularly complex formulations will not be able to proceed through the fast track service.

Admin Fees

Admin fees may be levied by the chemist in instances such as inclusion of a second soap base in melt and pour assessments, combining fragrance and essential oils or blending fragrance oils, excessive numbers of ingredients in the base or variations. This list is not exhaustive and any admin fees will be confirmed prior to the assessment being ok'd by the chemist together with any changes that could be undertaken to remove the requirement for admin fees.

Emulsion / Perfume Products

Please note that any emulsion (home produced cream or lotion containing water) or any EDT / Perfume product will need a bespoke quotation and, in the case of an emulsion, a Preservation Efficacy Test for the approved formulation at a laboratory.

Prohibited Ingredients

If you have not already done so; please check that the allergen documents for your fragrance oils do not contain Lyrall, Oakmoss or Treemoss in the listed allergens. Lyrall may have a number of names but they all contain 'carboxaldehyde'. Oakmoss (Atranol) and Treemoss (Chloratratnol) may be those names or Evernia Prunastri or Evernia Furfuracea - these are all prohibited from use in new products from August 2019!

Lilial (Butylphenyl Methylpropional) will be prohibited from 1 March 2022. Please check with your supplier that any oils containing this ingredient will be reformulated before that date.

*Available to purchase on the website