

Cosmetic Safety Assessment Guidance

The manufacture and sale of cosmetic products within the UK and Europe is governed by EU Regulation 1223/2009. This has been converted into UK law with minor changes due to Brexit so there are no changes in the need for a CPSR. This regulation covers everything we need to follow to legally sell cosmetic products where a cosmetic product *“shall mean any substance or mixture intended to be placed in contact with the various external parts of the human body (epidermis, hair system, nails, lips and 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 and/or correcting body odours and/or protecting them or keeping them in good condition.”* So soaps, bath bombs, moisturisers, shampoo, eye shadow are all considered to be cosmetics.

The Regulation has a list of requirements that **MUST** be met in order for a cosmetic product to be legal for sale purposes:

- A named Responsible Person who has legal responsibility for each product
- Cosmetic Product Safety Report
- Product Information File
- Suitable labelling of ingredients
- Suitable packaging information
- Notification of all cosmetic products that will be ‘brought to market’ on the Cosmetic Product Notification Portal (You will either use the UK or EU versions depending on your location)

This guidance will concentrate on the Cosmetic Product Safety Report.

What is a CPSR?

A CPSR is a legal document generated and signed by an appropriately qualified and experienced chemist who undertakes that they have reviewed your cosmetic product formulations and determined that they are safe for use by the public.

Who is your chemist?

Soaposh partners with Cosmetic Safety Consultants Ltd. This company is owned by chartered chemist Scott Grainger MSc, CSci, CChem, MRSC; who has years of experience within the cosmetic industry and particularly within the craft manufacturer community. The company has a solid reputation for providing and supporting CPSRs for crafters.

What is in a CPSR?

To create a CPSR, the chemist has to make a wide variety of scientific calculations across the ingredients, their chemical interaction, end product stability, preservation, exposure to the human body, and ultimately, the safety of the end product when used by a human consumer.

Why do we need all the rest if the CPSR proves the products are safe?

While a CPSR determines that the product recipe, as assessed, is safe to use; it does not guarantee safe manufacturing nor does it have any relevance to any accidental contamination of ingredients (we have all seen 'batch recalls' on the news for contaminated food products), nor does it provide consumer knowledge required to make considered purchases. The contents of the PIF, labelling and packaging together with the CPSR all come together to prove the safety of a cosmetic that is available for sale.

Are there different types of CPSR?

Yes, there are currently two types of CPSR readily available that a crafter can purchase in order to legally sell a cosmetic – so long as the other requirements are also met. In addition, anyone can also request a quotation for a report that would cover a very complex or one off formulation. Soaposh caters to all three of these types of assessments by offering the opportunity to purchase two types of assessment via the website or a quotation service. The 'ready to purchase' options include a range of restricted assessments which are called the Flexi Assessments and a range of regular assessment packages. Please note, the range of Flexi Assessments are Soaposh products. Some other suppliers offer similar style products with different naming systems.

Soaposh Flexi Assessments

This type of budget priced assessment is the perfect choice for the more novice cosmetic crafter who wishes to skip the recipe development phase of creating their own products. It is also a great option for established crafters who wish to extend existing ranges with minimal outlay in time and cost.

For a Flexi Assessment to become available; Soaposh invests the time in developing a recipe, choosing the optional ingredients, submits it all to be assessed by Cosmetic Safety Consultants Ltd and then offers it for sale upon it being approved. These assessments are restricted in that fundamentally you can have eight pre set fragrances to make eight products of the same type (ie bath bomb) that can all vary substantially in aesthetic appearance (use of shape, colour, glitters etc).

In order for the recipe and potential products to be assessed, some of the ingredients have to be specified by supplier (this also happens with regular assessment packages) and, as they have been developed and are provided by, Soaposh; that supplier will be Soaposh. Upon purchase of a Flexi Assessment, any included ingredients such as clays, charcoal, colours, glitters and fragrance oils will

have to be purchased from Soaposh to create products included in the CPSR for it to be, and remain, valid. Soaposh uses the terms Flexi Style 1 and Flexi Style 2 etc to indicate the fragrance ranges included in each so that Flexi 1 in a bath bomb will match Flexi 1 in a whipped soap.

When a new Flexi Assessment is released, the required and optional ingredients are included on the website in the product description page. Should an individual purchase a Flexi Assessment, the required recipe will be emailed to them within a week or two (as a courtesy for practice purposes) and the completed CPSR will then be forwarded in PDF format approximately four weeks after purchase. The customer will be the named Responsible Person on the CPSR and will have legal responsibility for all products that will be placed on the market and the other legal requirements.

With Flexi Assessments, nothing can be changed, altered, added to or tweaked in any way after purchase.

Regular Assessment Packages

These types of assessments require the client to develop their own recipes which can take a lot of time and financial investment. They are free to choose any type of ingredients and use any suppliers in order to create their end product. As with the Flexi Assessments, there are eight variations / end products that can be created using one base recipe with an allowance for extra ingredients in each of the variations unless you purchase a 16 or 24 variation package.

The regular assessment packages are perfect for crafters who prefer the control of their own formulations and who may wish to have quite diverse end products ie glitters in one with fragrance from supplier X, botanicals in another with essential oils. There is more diversity of ingredients allowed with the regular assessment packages but the end results are more fixed than the Flexi Assessments. You can't mix and match colours for example at whim or have the optional ingredient allowances in these types of assessment but you can access a far more diverse range of ingredients across any supplier of your choosing to create your favoured end products. Similarly to Flexi Assessments; the suppliers for fragrances, colours and a few other ingredients do have to be specified for the CPSR and some must be restricted to that supplier ie Sugar Plum fragrance from Supplier X may be totally different composition wise to Sugar Plum from Supplier Y so if you have specified Supplier X; that is who you have to purchase your Sugar Plum from.

With regular assessment packages you can purchase in both 8 and 16 variations and add to it with additional variations at a later date providing they still use the same base recipe. Because each of these assessments have to be undertaken on an individual basis and include a huge diversity of potential ingredients and formulations; these packages are more expensive than the flexi style.

Which is the best type of assessment for me?

There is no set answer to this question. It really will depend on how confident you feel in developing a recipe you will be happy to work with for a long period (assessments are a substantial financial assessment) or whether you would prefer to have things pre decided for you. Are you happy to take

the time to create your own designs or would you prefer to be up and running with a range of safe products more quickly? What is your budget?

These are all very individual, personal questions and decisions with no generalised right answer for all. Take some time, think about what will suit you best. Think about the restrictions and freedoms of both types of assessment before you decide ie Soaposh bubblegum fragrance in flexi 1 bubble bar can be pink or blue or both or even bright yellow on a Tuesday with or without mica. A variation including a bubblegum fragrance in a regular assessment package will have specified colour/finish that must be adhered to but you can get your bubblegum from any supplier.

Finally 😊

Don't forget to use the search function in the Soaposh Chat facebook group and also check the files and the blog on the website. There are a lot of photographs, tutorials, information and support provided by Soaposh and the group members that can help guide you to making the best choice for your personal or business use.

Remember, the manufacture of any new type of product can take time to master and get to the point where you can regularly replicate a product and be comfortable with the end results. This is the same whether you are starting to make bath bombs or paella 😊 Give yourself plenty of practice time.