

Inspection System for Import and Export Cosmetics of China

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Verification of Labels

The distributor of import and export cosmetics or its agent must make an application for verification of labeling to an inspection organization designated by SAEIQ 90 days before submission for inspection. In applying for verification of cosmetic labeling, the following information and documents (in triplicate) must be presented:

1) Application form; 2) effects of the cosmetics and related evidence and inspection methods; 3) product formula; 4) quality standards of the manufacturer; 5) documents supporting the manufacture and sale of the product in its country/region of production; 6) six samples of the label; 7) in the case of export cosmetics, the relevant regulations on cosmetic labeling of the importing country/region; 8) other relevant information.

Along with the application, an appropriate amount of samples must be provided for verification purpose. For cosmetic products with the same composition and production method but different specifications, same composition and production methods but different packaging, and same composition, production method, specifications and packaging but different design, a combined application for labeling verification may be made.

Labeling Verification Organs

The SAEIQ is responsible for approving verification of import and export cosmetics labeling. The entry-exit inspection and quarantine bureaus in Beijing, Shanghai, Guangdong, Xiamen and Hubei and the China Inspection Co Ltd (Hong Kong) are responsible for initial verification of the cosmetics labeling. Results of the initial verification will be submitted to the China Import and Export Commodity Inspection Technology Research Institute for final verification and serial numbering, which must be completed within 10 working days. Upon approval by SAEIQ, a verification certificate will be issued by the Institute to the applicant.

Categorization of Cosmetics

Import and export cosmetics are categorized into:

- 1) Skin care, e.g. face powder, bath lotion;
- 2) Hair care, e.g. shampoo, conditioner;
- 3) Beauty products, e.g. rouge, lipsticks, nail polish;
- 4) Fragrances, e.g. perfumes, cologne, toilet water;

5) Oral hygiene products, e.g. toothpaste, mouthwash;

6) Beauty products with special functions, e.g. preparations for anti-wrinkle, spot removal, sunscreen, hair removal, hair restoration and hair dye; beauty lotion; health products; disinfectants; deodorants, etc.

Inspection of Import and Export Cosmetics

1) Quality inspection: sensory indices, e.g. colour, smell, appearance and form; physical and chemical indices, e.g. PH value, viscosity, degree of foaming, heat resistance, cold resistance, clarity, effective ingredients, centrifugal testing;

2) Health inspection: lead, mercury, arsenic, cadmium, methanol, thioglycolic acid, phenol, hydroquinol, hormones, ultra violet absorbents, preservatives, oxidant hair dye, á-hydroxy acid, nitrogen mustards, cantharides and pigments.

3) Microorganism inspection: bacterial count, coliform bacteria, pseudomonas aeruginosa, staphylococcus aureus.

Content of Label Verification

1) Whether the information on health, quality, effectiveness and ingredients shown on the labeling is accurate; 2) whether the specifications, layout, description and design of the label conform to relevant regulations; 3) whether import cosmetics use correct Chinese language labeling; 4) whether the labeling of export cosmetics conforms with requirements of the importing country.

Import cosmetics labeling will undergo verification in accordance with the relevant laws, regulations and standards of China. Export cosmetics will undergo verification subject to the relevant laws, regulations and standards of the importing country. The SAEIQ will issue a verification certificate to cosmetics that meet requirements.

Classification of Cosmetics

Expert teams are organized by SAEIQ regularly to assess import and export cosmetics, which are classified into "liberalized" and "general" according to the product type and brand name for inspection purpose. Results of the assessment are announced on a regular basis. Cosmetic products are assessed based on the following: 1) information supplied by the production or trading enterprise; 2) evidence proving that the product has undergone labeling verification by SAEIQ; 3) information on pigments and safety standards; 4) evidence proving that the manufacturer has obtained approval by international organizations; 5) evidence proving that the manufacturer has obtained an official health license from its resident country/region; 6) evidence proving that the trading enterprise has obtained certification such as GMP, HACCP, ISO9000 and ISO4000; 7) evidence

proving that not less than four batches of cosmetics of the same brand or type have achieved a 100% pass rate for import or export inspection in the previous six months.

After assessment by the expert team, cosmetics with complete, accurate and reliable information, stable quality, and meeting safety and health standards will be classified as liberalized; the rest will be classified as general.

Administration of Inspection

Export cosmetics are inspected by inspection and quarantine authorities in the place of production, and are examined and released by the inspection and quarantine authorities in the port of exit. Import cosmetics are inspected by the inspection and quarantine authorities in the port of entry. Application for inspection of import or export cosmetics must follow the requirements set out in the Regulations on Application for Entry-Exit Inspection and Quarantine. Inspection carried out by the authorities will cover: labeling, quantity, weight, specifications, packaging, marking, quality and health standards.

For cosmetics classified as liberalized, only one out of ten of the batches submitted for inspection will be inspected item-by-item, the remaining batches will only undergo inspection on labeling, quantity, weight, specifications, packaging and marking. As for general cosmetics, all batches will be subject to item-by-item inspection.

Import and export cosmetics that pass inspection will be issued a certificate of qualification, and an inspection and quarantine label will be affixed to import cosmetics. For products that do not pass inspection, a certificate of non-qualification will be issued. As for inspection of cosmetic raw materials and semi-finished products, the same procedures will apply.