

CTPA COVID-19 Guidance on In-store Testers and Cosmetic Counters

Beauty – Safe in Store

January 2022

Legal Background

Strict UK cosmetics legislation equally applies to testers of cosmetic products. Manufacturers would be wise to design their testers so that product contamination is avoided under multi-use retail conditions. Sprays and 'single-dose' containers are often used for this purpose. For reasons of commercial security it is customary to mark the container of a tester with 'tester - not for sale' (or similar wording) in indelible, easily legible and visible lettering.

Customer Charter

CTPA has created a Customer Charter, which provides a pledge to customers on the safety considerations and processes in place when shopping for beauty in-store. The Charter is available at www.thefactsabout.co.uk/covid19advice

Acknowledgements

The Cosmetic, Toiletry and Perfumery Association ([CTPA](http://www.ctpa.org.uk)) wishes to thank the members of the CTPA Testers and Counter Staff Guidelines Working Group for their time, advice and support in the preparation of this document, and the British Beauty Council, British Retail Consortium and COPRA for their comments.

The CTPA would also like to thank Caroline Rainsford, Head of Scientific Services, and Christine Lawson, Sustainability Affairs Manager, at CTPA, for the compilation of this document and their input.

The guidelines will be reviewed and updated as Government advice changes. However, CTPA welcomes comments, questions or suggestions for improvements to this guideline. These should be addressed to Dr Emma Meredith, Director-General, at the CTPA Secretariat or sent via email to: info@ctpa.org.uk.

The CTPA is the trade association for the UK cosmetics and personal care industry.

The Association's role is to advise manufacturers, distributors and suppliers about the strict legal framework for cosmetics, to represent industry views to UK Government and external stakeholders and help promote information to the media on issues relating to the safety of cosmetic products. The CTPA acts as the voice of the UK industry and provides the most up-to-date interpretation of, and guidance on, regulatory matters affecting cosmetic products in the United Kingdom, the European Union and internationally.

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Transmission of COVID-19

According to the World Health Organisation ([WHO](#)), COVID-19 spreads primarily from person to person through small droplets from the nose or mouth, which are passed on when an infected person coughs, sneezes or speaks. People can catch COVID-19 if they breathe in these droplets from a person infected with the virus. This is the basis of the advice to employ social distancing and wear face coverings where appropriate.

The infected droplets can also land on objects and surfaces such as tables, doorknobs and handrails. People can become infected by touching these objects or surfaces, then touching their eyes, nose or mouth.

Although it is now understood that surfaces are not a major transmission source of COVID-19 ([Nature 2021](#)), it is still vital to regularly clean surfaces at risk of contamination by the droplets containing COVID-19 with common disinfectants that will kill the virus.

To minimise the risk of infection, the [WHO](#) advises to maintain social distancing, wear a face covering indoors or in poorly-ventilated spaces and wash your hands frequently with soap and water. If handwashing facilities are not available nearby, clean hands regularly with an alcohol-based hand sanitiser. Avoid touching your eyes, mouth or nose. Wipe surfaces down regularly with an appropriate sanitiser or cleaner.

The German Federal Institute for Risk Assessment ([BfR](#)) considers that transmission of COVID-19 through cosmetic products is unlikely. However, it is important not to share cosmetic products.

General Considerations for Testers

Terminology

Self-select tester

A tester available for customers to try in an unsupervised self-select environment, such as a gondola display of cosmetics, including make-up, skincare or fragrance, in a customer retail store.

Controlled tester

A tester administered in a controlled environment by a consultant or other member of staff; for example, single-shot samples or product samples provided via a disposable applicator by a consultant or other member of store staff. Can also include fragrance testers in an area monitored and managed by store staff.

Display product

A product that is available to view, but access is controlled; for example, through screened display sections. Display products are not available to purchase.

The Responsible Person manufacturing a cosmetic product must ensure GMP (Good Manufacturing Practice) is complied with throughout manufacture, which helps ensure product, and so consumer, safety. This also applies to testers available in-store for customer use. GMP should form part of the defined procedures made available in the legally required Product Information File.

Under GMP and quality controls, possible product contamination should have been addressed and therefore there would be no concern regarding products on shelf. However, once opened the products will be exposed

to possible contacts and contamination. Under any circumstance, this carries a risk of disease transmission, and the COVID-19 situation, while alarming, does not change this fact.

In addition to the actual product, contact of people with the packaging, where viable microorganisms might also survive, should be taken into account by the manufacturer.

While the use of in-store testers is a commercial practice and is not covered under the scope of the legislation, best practice and risk minimising strategies should be put in place. For each individual business the risk assessment, and subsequent practices, are likely to differ owing to different circumstances and operating models.

A procedure should be in place to review or replace testers giving consideration to the [PAO](#) (Period After Opening) or Best Before Date, and estimated exposure to air, environment and people. The use of disposable applicators will protect against further microbial transmission.

Finally, it is important to adhere to any differing devolved Government rules in [England](#), [Scotland](#), [Wales](#) and [Northern Ireland](#), or if counters are located in sites with specific measures in place, such as airports. Differing advice may be in operation on matters including the use of face coverings.

General Hygiene Considerations

Considerations for the Brand

- The length of time for which the tester has been open needs to be considered as well as the product format, for example, fragrances or products in sealed pump containers that can be easily sanitised. If a PAO or Best Before Date is present on the product, it must be adhered to.
- Consultant and staff safety must be ensured at all times in all aspects of the work including work rotas.
- Companies should consider staff uniforms or other work clothes. In particular, aspects such as washability, washing instructions and frequency, whether staff will travel to work in their uniforms, and changing facilities available at work if this is not the case.
- Face coverings must be worn if required by current legislation. Companies may wish to consider the use of gloves, either disposable or cotton. In this case, consideration should be given to possible allergies, environmental impact and procedures for safe removal and disposal where applicable.
- Good hand hygiene **must** be maintained at all times through regular hand washing and/or the use of alcoholic hand sanitiser. If staff wear gloves, the gloves must be changed between each customer and product contact, removed without the contaminated part touching the skin, and disposed of appropriately.
- Consultants and staff members should maintain the appropriate distance, according to Government instructions, from customers whenever possible.
- All counter and display surfaces must be disinfected thoroughly and regularly.

It is important to understand the customer mindset in relation to the availability of testers and to provide an environment which makes the customer feel safe and comfortable.

Considerations for the Retailer

- Thorough hygiene and sanitisation processes should be in place.
- The retailer may consider introducing plastic screens where appropriate between staff and customers as a barrier against airborne droplets.
- Distance markings should be available where practical, to help all staff and visitors maintain the correct social distance, if required.
- The store layout should be carefully considered, to avoid over-exposure of certain areas of the store to high customer traffic.

Roadmap to Reintroducing Testers

The UK Health Security Agency ([UKHSA](#)) has developed alert levels for the risk presented by the circulation of COVID-19 in the UK. The alert levels are as follows:

- Level 1: COVID-19 is not known to be present in the UK
- Level 2: COVID-19 is present in UK, but the number of cases and transmission is low
- Level 3: a COVID-19 epidemic is in general circulation
- Level 4: a COVID-19 epidemic is in general circulation; transmission is high and direct COVID-19 pressure on healthcare services is widespread and substantial or rising
- Level 5: as level 4 and there is a material risk of healthcare services being directly overwhelmed by COVID-19

As the risk presented by COVID-19 to the UK population fluctuates, this guidance has been updated to align with the changing risk levels established by the UKHSA.

However, it is important to note that the following phases provide only a guide to the stages in which cosmetic testers can be reintroduced. Each company, retail outlet and salon or spa will have different procedures and operating models which mean that it may be appropriate to reintroduce testers more quickly or more slowly, and in different ways.

Alert level 5 / Alert level 4

'Touch Free' Phase

Non-essential retail stores and personal care services may be severely restricted at alert level 5. However, if they are able to operate, the following guidance is proposed. If there is significant concern about the growth of the epidemic at alert level 4, it may also be appropriate to implement this phase.

- Self-select testers should not be available during this phase.
- The use of controlled testers during this phase is unlikely to be appropriate unless specific protocols have been fully considered and agreed within the company.
- Display products, which are not accessible to the public, may be on view during this phase, for example, behind a Perspex screen.
- Novel ways to convey the product ethos and characteristics to the customer could be used; for example, digital images and explainers, or touch-free methods to allow the customer to smell a fragrance.
- It is very important that this phase is 'touch free', with no physical contact between customers and staff.
- Training should be provided to store staff on how to engage with customers, reassuring them on the safety processes in place.

Alert level 4/Alert level 3

'Controlled Testers' Phase

If the circulation of the epidemic amongst the general population in either level 3 or level 4 means that the reintroduction of controlled testers is unlikely to risk COVID-19 transmission, the controlled testers phase may be appropriate.

- Self-select testers should not be available during this phase. Self-select testers are handled by many different people and there is a risk of contamination of the product surface and subsequent transfer of COVID-19.
- It is important to discourage customers from opening or testing products at self-select counters. For example, through the use of communication, tamper-proof seals or intervention by store staff.
- Controlled testers may be reintroduced if the risk of contamination and transmission of COVID-19 is low.
- Store staff should be fully trained on all procedures relating to controlled testers, especially hygiene procedures.
- Controlled testers should not be handled by the customers unless specific processes are in place to minimise contamination of the product surface.
- Controlled testers should be handled by trained staff in a way that minimises surface contamination.
- Companies could consider making gloves available for staff and/or customers.
- Wherever possible, controlled testers should still operate under a 'touch-free' system. Ideally, companies may show the product to the customer using a white tile or similar item. However, if the customer wishes to apply the tester to their skin, this must take place via a disposable applicator controlled by counter staff, or a single-use product.

- Controlled testers in the form of single-use products can be distributed to customers upon request. Hand sanitiser or hand washing must be employed after each customer interaction.
- Any activity which involves close contact between customers and colleagues should be carried out in line with the [guidance](#) on keeping workers and clients safe during COVID-19 in close contact services.

Companies should also consider the environmental impact of the materials that are selected for this purpose.

Example controlled tester procedures for different product formats

Products should be decanted and demonstrated as below, available for the customer to use at the counter:

Creams or Liquids

place on a sanitised tile or decant using a disposable spatula or pump into a disposable pot.

Powders

take a swipe of the powder using a disposable sponge applicator and place applicator onto a sanitised tile or into a disposable pot.

Lipsticks

take a small slice from the top of lipstick using a disposable spatula, and place onto a sanitised tile or into a disposable pot.

Fragrance

spray onto fragrance blotter.

Mascara

use a disposable applicator and place into a disposable pot.

Alert level 3/Alert level 2/Alert level 1 'Self-select' Phase

A decision may be taken to implement this phase at alert level 3 if the COVID-19 epidemic in general circulation is not a significant cause for concern. For example, if it only results in mild illness. For phases 1 and 2, the reintroduction of self-select testers is unlikely to risk COVID-19 transmission.

- Self-select testers should be reintroduced when this is deemed to pose a low risk because the environment is hygienic and well-controlled.
- The procedures outlined in the 'controlled testers' phase for controlled testers also represent good practice in normal circumstances and should still be followed.
- Both the brand and retailer are responsible for employing the most hygienic practices possible when making self-select testers available to the customer; for example, regular cleaning of high touch stock.

Why join the CTPA?

CTPA membership gives companies access to experienced regulatory, scientific and technical staff to help them market safe, effective products that provide a wide range of consumer choice both in the UK and overseas.

Membership provides companies with peace of mind with easy access to:

- up-to-date legislative references;
- guidance on compliance;
- confidential one-to-one advice;
- advice on regulatory and sustainability best practice;
- advance knowledge of upcoming changes;
- global updates on key issues;
- media and consumer information; and
- 24/7 online resources accessible worldwide.

To find out more and to enquire about membership see the CTPA [website](#).



