

UK cosmetics industry is ready to meet the requirements for animal testing exemptions in China.

The ban on animal testing of cosmetic products in the United Kingdom (UK) and European Union (EU) has been in effect since 2004. In the UK, this followed an industry-led voluntary initiative to phase out animal testing. Globally, the UK and EU cosmetics industry have jointly contributed to the development of alternative non-animal methodologies and seek to promote their regulatory acceptance. While many countries continue to introduce bans on animal testing with full support of the industry, some countries may still legally require these tests which they perceive as a way of ensuring the safety and quality of products on the market. China has historically been one of such countries but has invested heavily in infrastructure and training which will allow the move to the use of these non-animal alternative techniques.

The entry into force of new Chinese laws for cosmetics on 1 January 2021 has opened an opportunity to work with the Chinese Government to end the requirement to test general cosmetic products on animals in China. The UK cosmetics industry, represented by CTPA and several individual companies, worked collaboratively with the UK Government to ensure the UK cosmetics industry can benefit from this important exemption, effective on 1 May 2021.

Brands and companies manufacturing in the UK may obtain a certificate of Good Manufacturing Practice (GMP) from the UK Government. Applications for the certificate will be handled by the Import Licensing Branch (ILB) of the Department for International Trade (DIT), mandated and supported by the Office for Product Safety and Standards (OPSS) - the national regulator for all consumer products, except for vehicles, medicines and food - as part of the Department for Business, Energy and Industrial Strategy (BEIS).

The National Medical Products Administration (NMPA), the Chinese regulator, have not issued a formal acceptance of the UK approach and will not be pre-approving the UK GMP certification; instead, they have indicated a list of criteria required for the certification to be accepted. The UK GMP certification process meets these requirements in full, and it is anticipated that any such submissions to the Chinese regulators will therefore be accepted.

UK Certificates of Good Manufacturing Practices for Export.

The NMPA have published further detail around its cosmetics laws (the Cosmetic Supervision and Administration Regulation - CSAR), clarifying that imported goods classed as 'general cosmetics' do not need to be tested on animals as long as they have been made according to GMP, together with a full Safety Assessment report. Companies will need a GMP certificate issued by the Government in the country where the products are made. These changes enter into force on 1 May 2021.

CTPA, representing the UK cosmetics industry, worked with BEIS and DIT to ensure that UK companies can obtain the required certificates to export general cosmetic products to China without the need for animal testing.

To obtain the certificates, companies must be able to show the UK Government that they are manufacturing cosmetic products according to recognised GMP guidelines and standards. Therefore, a third-party certificate from a recognised source should be presented covering:

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- adherence to ISO 22716:2007, Cosmetics – GMP – Guidelines on Good Manufacturing Practices. The company issuing the GMP certifications should be accredited to standards ISO 17021 or ISO 17065 by an accreditation body member of the International Accreditation Forum (IAF), such as the United Kingdom Accreditation Service (UKAS); or
- a Brand Reputation Compliance Global Standards (BRCGS) certification for Consumer Products covering the manufacturing of cosmetic products.

The GMP certificate from the UK Government will be valid for three years from the date of issue. Detailed information on the process and how to apply has been made available to companies through UK Government.

Quotes:

In support, the following was said:

International Trade Minister, Ranil Jayawardena said:

“This is great news, both for our iconic British cosmetics brands who are renowned globally for their high standards and ethical production methods, and for global brands manufactured in the United Kingdom.”

“The new certification system will enable British manufacturers and exporters to create jobs and take advantage of one of the world’s fastest-growing cosmetics markets, which is forecast to be worth approximately £50 billion in 2021, while maintaining our clear position and domestic ban on animal testing in cosmetics.”

Dr Emma Meredith, Director-General of CTPA said:

“The cosmetics industry has had a dedicated strategy for replacing animal testing for over 25 years, investing in the development of alternative test methods which assess safety from a modern perspective. The UK industry recognises the significance of the move from the Chinese authorities to allow safe and effective products which have not been tested on animals to reach consumers. Also, the support from the UK Government will allow British brands to promote their products in China and thereby continue to support alternatives to animal testing.”

Michelle Thew, CEO of Cruelty Free International, said:

“Cruelty Free International has been working closely with authorities and experts in China for a number of years to secure cruelty free routes to market for our Leaping Bunny brands. We’re delighted that the collective efforts of UK stakeholders will mean that the UK cosmetics industry will be amongst the first to demonstrate to Chinese consumers that animal testing is not necessary for great quality, safe cosmetics.”

Millie Kendall MBE, Chief Executive of British Beauty Council said:

“The ending of mandatory animal testing of imported ‘general’ cosmetics into China is a welcome step in the right direction. It is a huge opportunity for British beauty brands to trade with a country otherwise off-limits in any full capacity. To make acceptable changes to testing, we need to be in the market not outside looking in – and this also gives us the opportunity to work with Chinese to further develop best practices.”

Acknowledgements:

The development of this process has been the result of years of collaborative work. On behalf of the UK cosmetics industry, CTPA would like to express its gratitude to the UK Government, other key stakeholders and member companies for their active engagement and input into the discussions.

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