



Foto: © mnebaek, istockphoto

FAQ – Cosmetics Testing

Our experts have answered the most important questions on the subject of **cosmetic tests** for you in our FAQ. Would you like to know more? **Then contact us!**

1. WHAT DO OUR COSMETICS TESTS INCLUDE?

Our service consists of comprehensive testing to prove the chemical and microbiological harmlessness of your cosmetics and their packaging. In addition, we carry out challenge tests and storage stability tests, notify products in CPNP and prepare product safety assessments. Our experts are happy to assist you with the review or preparing the declaration. We can also provide support with numerous services for the successful export of your cosmetic products.

2. WHAT REGULATIONS AND STANDARDS DO WE USE FOR OUR TESTING?

- German Food, commodities, and feed regulations (Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch, LFGB)
- Cosmetics Regulation (EC) No. 1223/2009

- Cosmetic Products Regulation (2014)
- Regulation (EC) No 655/2013 (advertising claims)
- Regulation of the Federal Department of Home Affairs on Cosmetic Products (VKos) (2016)

3. LEGAL REQUIREMENTS FOR THE SALE OF COSMETIC PRODUCTS IN THE EU

A cosmetic product must be safe for human health under normal or foreseeable conditions of use and must not mislead the consumer. Regardless of whether a cosmetic product is imported into the European Community from a third country or is placed on the market for the first time, the responsible person or company name and address within the EU must be displayed on the product. This person or company is responsible for ensuring that the product complies with the Cosmetics Ordinance (EC) No. 1223/2009 and the German Cosmetic Regulation.

Requirements affecting composition, labeling, notification and good manufacturing practice requirements must be met at the time of marketing. Comprehensive documentation about each product is to be provided along with the so-called product information file containing knowledge of the complete composition of the product.

The responsible person must also inform the competent surveillance authority that he is placing cosmetic products into market.



4. WHAT IS A CPNP NOTIFICATION?

All cosmetic products placed on the European market must be notified in the Cosmetic Product Notification Portal (CPNP). This notification shall include information on the layout and composition.

We are happy to make a notification in CPNP for you, on your responsibility. It is necessary, however, that you register yourself on the ECAS database.

5. WHAT DOES A PRODUCT INFORMATION FILE CONTAIN?

The product information file must contain the following items:

- Product description
- Formulation / composition
- Product layout
- Description of the manufacturing method and declaration of compliance with good manufacturing practice
- Safety evaluation including, if necessary, challenge test and evaluation of storage stability
- Dermatological report
- CPNP notification
- Reports of (serious) adverse reactions
- Efficacy proofs

We can offer you the following services:

- Preparation of the safety assessment in the German language
- Challenge test
- Notification of the formulation / composition in the CPNP database, on your responsibility
- Labelling check / creation
- Chemical and microbiological analysis of critical parameters

- Dermatological report
- Storage stability test depending on the desired shelf life
- Declaration of compliance with Good Manufacturing Practice (GMP)

6. WHAT IS REQUIRED TO PREPARE A SAFETY ASSESSMENT?

- Label / photo and / or the original product
- Quantitative and qualitative composition of the product
- Further information about the raw materials:
 - Material Safety Data Sheets with NOAEL and toxicological profiles
 - Perfume: Information on 26 allergenic fragrances, Safety assessment (IFRA), safety data sheet
 - Specifications (origin) raw materials and end product
 - Manufacturer's data for the manufacturing of extracts if available
- Physical / chemical properties of the cosmetic product as well as of the individual raw materials, if applicable
- Microbiological quality of raw materials and end product
- Stability of the cosmetic product (storage tests)
- Challenge test
- Dermatological report / compatibility test
- Information on the packaging material
- Adverse effects and serious adverse effects
- Impurities, traces (raw materials, packaging material) e.g. residual monomer, catalyst, heavy metals, PAH, CMR
- Further information about the cosmetic product depending on the claim or formulation e.g. sun protection factor, protection against cavities

We can offer you, among others, the following services:

- Challenge test
- Chemical and microbiological testing of critical parameter
- Dermatological report
- Storage stability test depending on the desired durability
- Conformity assessment of the packaging material
- Notification of the formulation / composition in the CPNP database on your responsibility

In particular, if storage tests, challenge tests and dermatological reports are not yet available, a lead time of at least 5 months must be planned for a safety assessment.

7. CAN A PRODUCT BE CONSIDERED BOTH A COSMETIC AND A TOY?

Toys and joke articles are classified as consumer goods in accordance with the Foodstuffs, Consumer Goods and Feedstuffs Code (LFGB). Cosmetic products and consumer goods are not mutually exclusive. A combination is possible, so that the requirements result both from the LFGB and the EU Cosmetics Regulation. An affected product must have a play value, to be classified as a toy. For example, a children's soap is not necessarily a toy, but painting soap or a doll's make-up head is.

Please also inform yourself about our service around the topic [toy testing](#)!

8. WHAT OBLIGATION DO I HAVE IF THE PRODUCT IS ALREADY ON THE MARKET IN THE EU UNDER ANOTHER RESPONSIBLE PERSON?

Irrespective of whether another company has already placed this cosmetic product on the European market, you are obliged, if your address is mentioned on the label, to fulfill all European requirements of cosmetics law if you, as the responsible person, offer the product on the European market. This is mandatory for both the sale and complimentary distribution of the product. In addition, you are obliged to maintain a product information file and to submit the CPNP notification.

9. EXPORT OF COSMETIC PRODUCTS

If cosmetic products are lawfully marketed in Germany, they may also be marketed in other EU member states. It should be noted here that product labeling is also carried out in the respective national languages. For exports to a third country, we are happy to offer you our services. Please [contact us](#) with your particular inquiry.

With the enforcement of the EDI Regulation on Cosmetic Products (VKos) on 01.05.2017, the Swiss Cosmetic Regulation has come closer to the EU Cosmetic Regulation. Requirements affecting safety assessment, the maintenance of a product information file and advertising statements have now also been defined for Switzerland. If a product information file according to Cosmetics Reg (EC)

1223/2009 is available, it will also be acknowledged for the Swiss area. Do you have more questions? [Ask us!](#)

10. IMPORTING COSMETIC PRODUCTS TO THE EUROPEAN COMMUNITY

If cosmetic products are imported from a third country, i.e. a country outside the European Community, the responsible person named on the product label must be established in the European Community. The responsible person may be the importer or another person with headquarter in the EU who accepts the mandate in writing. It should be noted that the country of origin is indicated on the product label.

11. IS A PRODUCT CERTIFICATION REQUIRED IN ORDER TO BRING A COSMETIC PRODUCT ONTO THE EUROPEAN MARKET?

Certification is not legally required for placing cosmetic products on the European market. However, being assessed by an independent, internationally recognized testing laboratory does provide the opportunity to gain competitive advantage over non-certified competitors. Certification also strengthens confidence in the quality of your products and protects you within the scope of your own risk of liability.

12. WHICH DOCUMENTS ARE REQUIRED FOR A CALCULATION FOR A NON-BINDING OFFER?

In order for us to be able to make you an offer for testing services, please send us a layout or a draft as well as, a photo and / or a description of the cosmetic article. Also provide us with comprehensive information on the formulation / composition of the product.

13. IS IT POSSIBLE TO OBTAIN A CE-CONFORMITY CONFIRMATION OF A COSMETIC PRODUCT?

A CE mark confirms that the product complies with the applicable European directives and is not a seal of quality. Cosmetic products being offered in the European Community must comply with the EU Cosmetics Regulation. Because EU directives do not apply, CE marking is not possible.

14. CAN A PRODUCT BE PUBLICLY ADVERTISED AS HAVING BEEN TESTED BY TÜV RHEINLAND EXPERTS?

After successful TÜV Rheinland certification, you may advertise with our internationally [recognized test mark](#). This only applies if a test was carried out as part of our [certification](#).

15. ARE TRAINING COURSES ON THE SUBJECT OF COSMETICS TESTING ALSO OFFERED?

Yes. There is an annual cosmetics conference and individualized (in-house) training courses are also available on request.

Subscribe to our [newsletter](#) and receive regular information about upcoming events!

OUR EXPERTS ARE ON HAND FOR A COMPLIMENTARY, NON-BINDING INFORMATIONAL TALK. PLEASE DO NOT HESITATE TO CONTACT US!

[ONLINE CONTACT](#)

TÜV Rheinland
LGA Products GmbH
Tillystraße 2
90431 Nürnberg
Tel.: +49 911 655 5225
Fax: +49 911 655 5226
service@de.tuv.com



 **TÜVRheinland**[®]
Precisely Right.