



**CHEMEXCIL**

Basic Chemicals, Cosmetics & Dyes Export Promotion Council  
(Set up by the Ministry of Commerce & Industry Government of India)



**GPC**  
Global Product Compliance

# Export Existing Cosmetic Ingredients to China?

## ---- Ingredients Submission Platform



Zhengmin Li  
Regulatory Manager  
[zhengmin@cn.gpcregulatory.com](mailto:zhengmin@cn.gpcregulatory.com)  
[Compliance@gpcregulatory.com](mailto:Compliance@gpcregulatory.com)

# Summary of Topics

- Introduction of existing cosmetic raw ingredient submission platform
- How to know if your substances need to be submitted?
- Regulatory bodies and who can submit?
- Submission Requirements
- Compliance strategy for oversea companies

# Background

- National Medical and Pharmaceutical Administration of China (NMPA ) launched “the **Ingredient Safety Information Record Filling Platform**” (ingredient submission platform) **on December 31, 2021**, managing **existing cosmetic ingredients**.
- new cosmetic ingredients vs. existing cosmetic ingredients
- As a part of the implementation of the “Administrative Measures on Cosmetics Registration and Notification”
- Manufacturers of Cosmetics Raw Materials or their authorized companies can do the submission
- Every substances will have a unique code, which simply works as its ID. Even for the same ingredient with the same INCI name, as long as their manufactures are different, they will have to do submission and get different code.



# PART I

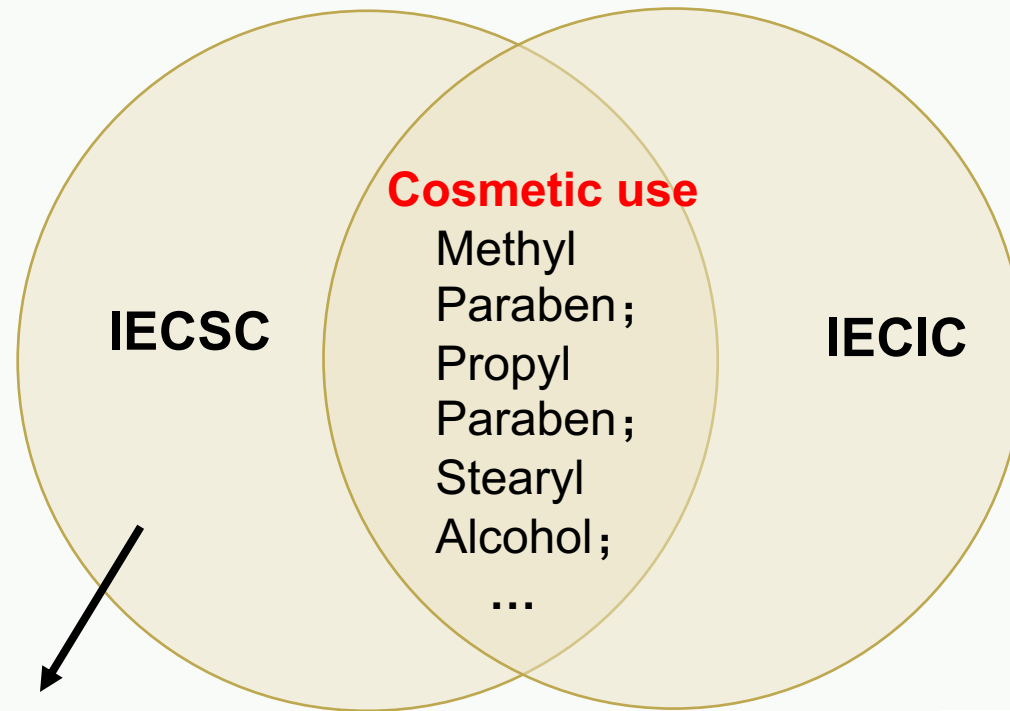
## Pre-assessment

# Preliminary check

Only if you have cosmetic use,  
otherwise comply with REACH  
regulation is enough

**IECSC** (Chemical) – Inventory of  
**Existing Chemical Substances**  
Produced or Imported in China

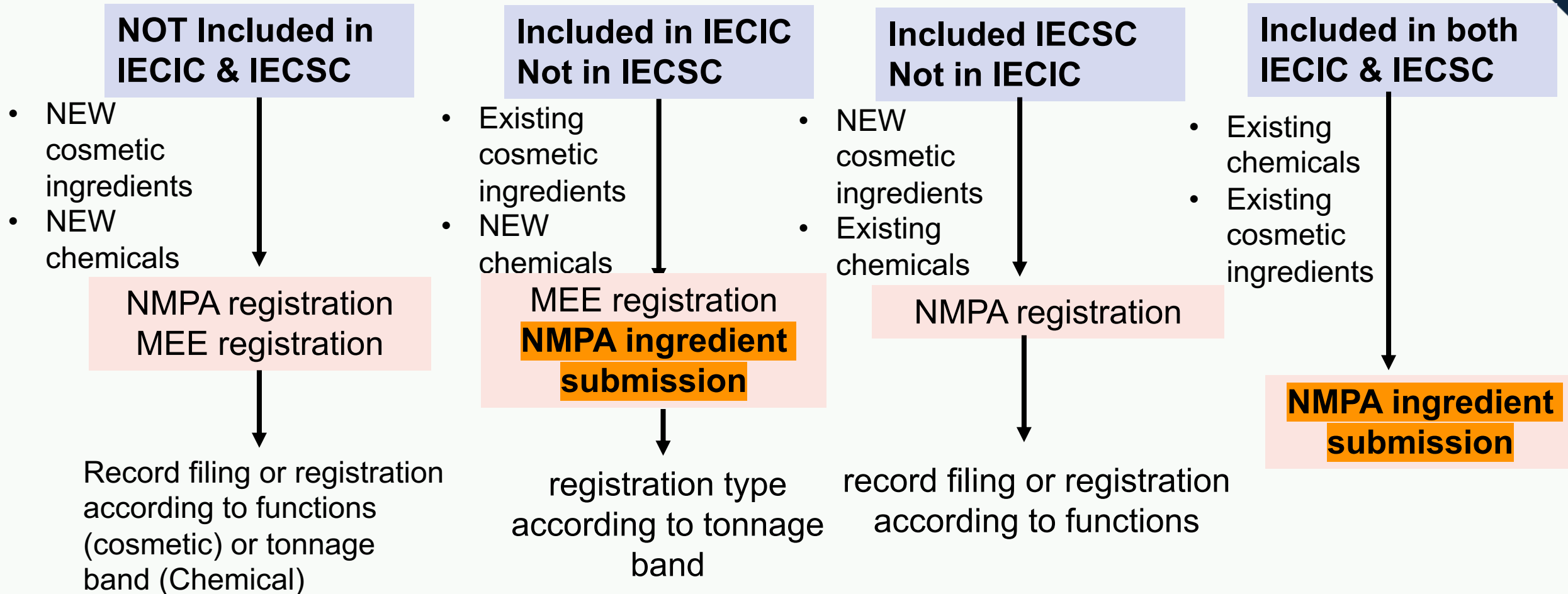
**IECIC** (Cosmetic Ingredients) –  
Inventory of Existing **Cosmetic**  
**Ingredients** Produced or  
Imported in China



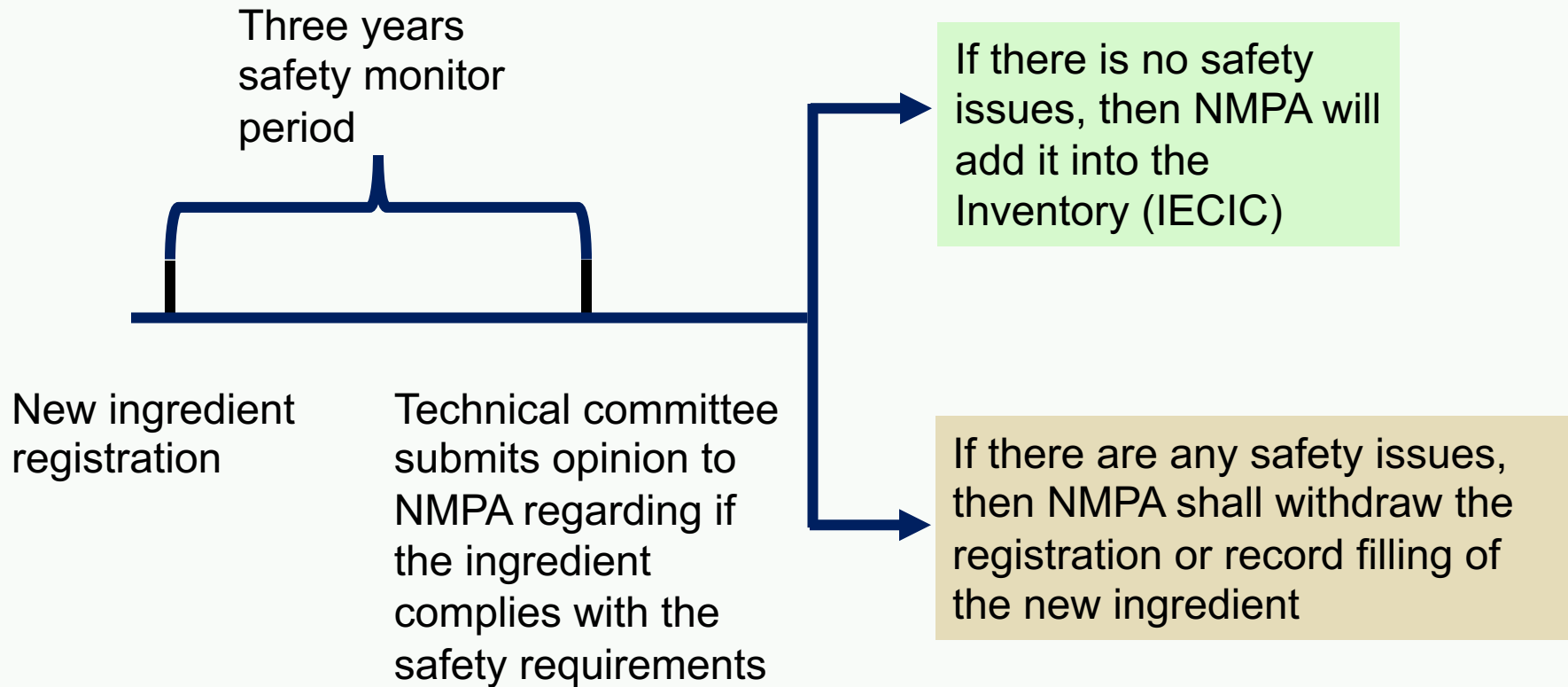
No compliance obligations

# Conclusion for pre-assessment

*If the ingredient has cosmetic use, then four situations apply:*



# IECIC Inclusion (cosmetic Ingredients inventory)





# Safety and Technical Standards

List	Definition
List 1: banned ingredients in cosmetics	Ingredients under this list are banned for cosmetic use
List 2: banned plant (animal) ingredients in cosmetics	Plant (animal) ingredients under this list are banned
List3: restricted substances in cosmetics	The use of the ingredients in this catalogue must meet the corresponding restriction requirements, such as the application scope, the maximum allowable concentration in cosmetics, impurities, the users, and the labeling requirements.
List 4: preservatives allowed in cosmetics	Ingredients in this list are allowed for cosmetic use, but certain restrictions are applied
List 5: sunscreen agents allowed in cosmetics	See above
List 6: colorants allowed in cosmetics	See above
List 7: hair dyes allowed in cosmetics	See above





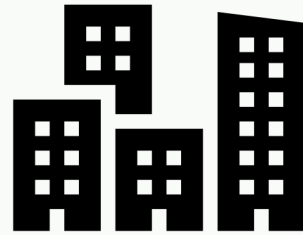
## PART II

# Submission Body

# Submission Body



Representatives



Importers

1. The substance will be registered under the Agent's name
2. Authorization letter need to be provided, including full names in Chinese and English of both parties, addresses, authorization scope, authorization period, etc.

# Submit by foreign manufactures

For manufactures, domestic or overseas, it is possible to submit information under your company's name.

**Ingredient manufacture** *refers to “an enterprise that is responsible for the safety of the ingredient(s)”*. It can be:

- Actual production company of the ingredients;
- An affiliated company that belongs to the same group of company as the actual production company of the ingredients;
- The entrusted enterprise in the act of entrusting the production of the ingredients.

The “name of the ingredient manufacturer” needs to be **unique, correct, and consistent** with the content contained in the enterprise's main body certification document.

# Submit by yourself

## • Advantages

- Cost-saving, free of charge or one time payment
- Time-saving, you will have the opportunity to manage your own account, to check the substance information, and to **add** ingredients at anytime.
- The substance is registered under your own name

## • But, enterprise verification is required

- Application form for legalization
- Original version and copy of notarized documents
- Copy of passport of the applicant
- Authorization letter and ID of authorized person

- Apply for an account at '**Cosmetic Ingredients Safety Information Registration Platform**'

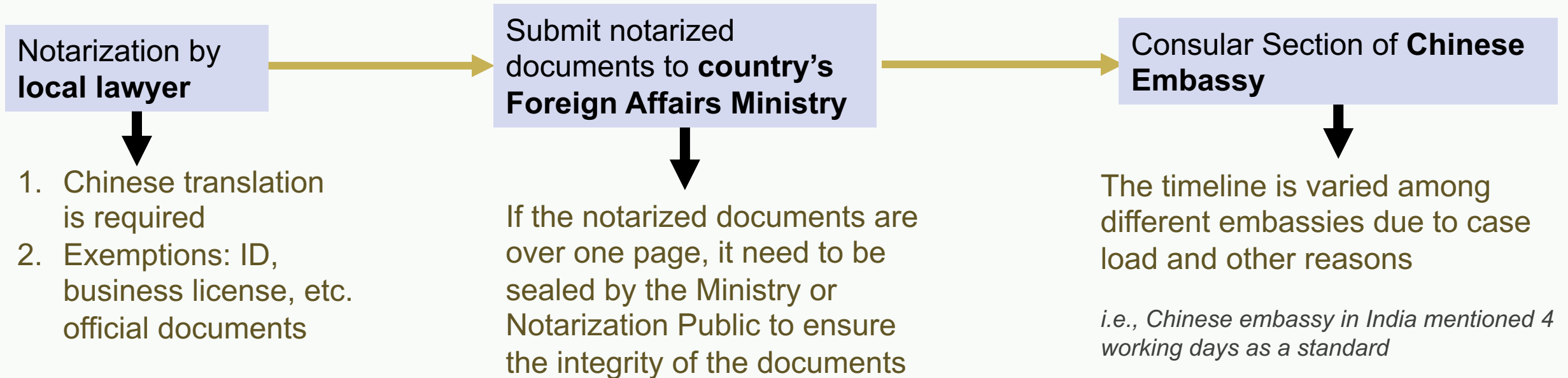
## 中华人民共和国驻外使领馆领事认证申请表 Application Form of Consular Legalization of the Embassy/Consulate of the People's Republic of China

★申请人须如实、完整、清楚地填写本表格，请逐项在空白处用中文或英文大写字母打印体填写，或在□内打✓选择。The applicant should fill in this form truthfully, completely and clearly. Please type the answer in capital English letters in the space provided or tick (✓) the relevant box to select.

1、个人申请 Applicant (For Individual Use Only)					
姓名 Name			性别 Gender		出生地点 Place of birth
出生日期 Date of birth (yyyy-mm-dd)			国籍 Nationality		职业 Occupation
身份证件种类 Type of ID			身份证件号码 Number of ID		
工作机构或学校名称 Name of employer/school			工作机构或学校地址 Address of employer/school		
家庭住址 Home address				电子邮箱 E-mail address	
住宅电话 Home phone number			手机 Mobile phone number		
2、企业及其他组织申请 Applicant (For Company/Organization Use Only)					
企业或其他组织名称 Name of company/organization					
联系地址 Address				电话 Phone Number	
法定代表人信息 Legal Representative of company/organization	姓名 Name			出生日期 Date of birth(yyyy-mm-dd)	
	证件种类 Type of ID			证件号码 Number of ID	
3、公证书或其他证明文书证明的事项 Matters certified by the notarial deeds or other certificates					
<input type="checkbox"/> 出生证 Birth certificate; <input type="checkbox"/> 结婚证 Marriage certificate; <input type="checkbox"/> 无犯罪记录证明 Certificate of non-criminal record; <input type="checkbox"/> 健康证明 Health certificate; <input type="checkbox"/> 学历证明 Diploma; <input type="checkbox"/> 委托书 Authorization letter; <input type="checkbox"/> 声明书 Statement; <input type="checkbox"/> 商业文件 Business documents; <input type="checkbox"/> 其他(请注明) Other (please specify): _____					
4、认证办理目的和文书使用地点 Purpose and Destination of Legalization					
办理目的 Purpose of legalization: <input type="checkbox"/> 婚姻 Marriage; <input type="checkbox"/> 寄养 Fosterage; <input type="checkbox"/> 房产 Real estate; <input type="checkbox"/> 诉讼 Litigation; <input type="checkbox"/> 签证 Visa; <input type="checkbox"/> 领养 Adoption; <input type="checkbox"/> 商务贸易 Business and trade; <input type="checkbox"/> 其他(请注明) Others(please specify): _____					
文书使用地 Destination of legalization: _____					

# Enterprise verification procedures

*All verification documents need to be notarized by notary public and the notarized documents need to be translated into Chinese*







# **PART III**

## **Submission Requirements**

# Submission requirements

## Enterprise Information Submission

Enterprise information sheet  
(Attachment 13)

ID document

POA (If required)

## Ingredient Safety Information Submission

Ingredient classification and key characters

Ingredient safety information

- *Main components and key characters;*
- *Source of raw ingredient;*
- *Manufacturing methods of ingredient;*
- *Other characters*
- *Reasons for compound ingredient or mixture*

- *Names of main components of the ingredient;*
- *Content of the components in percentage;*
- *Others, including use in cosmetics, restrictions, quality control requirements and character indicators. If applicable, limit requirements for risky substances, assessment conclusion, use in other industries*
- *If it is oligopeptide raw material, amino acid sequence*



# 原料安全相关信息备案企业信息表

原料生产商名称	(中文, 境内企业填写) (英文, 境外企业填写)	
所在国	<input type="checkbox"/> 境外 <input type="checkbox"/> 境内	
原料生产商地址		
被授权企业名称	(存在授权情况时填写, 并附授权书)	
被授权企业住所地址	(存在授权情况时填写, 并附授权书)	
联系人信息 (存在授权情况时, 填写 被授权企业信息)	联系人	
	联系电话(手机)	
	联系电话(座机)	
	电子邮箱	
	实际办公地址	
	邮政编码	
<b>承诺书</b>		
<p>1. 本企业生产的化妆品原料, 符合《化妆品监督管理条例》《化妆品注册备案管理办法》《化妆品安全技术规范》及其他中华人民共和国化妆品监管相关法规要求和技术要求。</p> <p>2. 本企业提供的所有化妆品原料安全资料均真实合法。本企业对资料内容负责, 并承担相应的法律责任。</p> <p>3. 本企业授权其他企业报送的指定化妆品原料安全信息, 内容均源于本企业, 获取渠道双方无争议。指定化妆品原料参见授权书。</p> <p>4. 本企业将妥善保管用户密码, 通过该用户进行的化妆品原料安全资料备案相关行为均代表本企业行为, 因密码丢失或泄密造成的损失将由本企业自行承担。</p>		
(填写此表的原料生产商或者被授权企业签章)		
年 月 日		

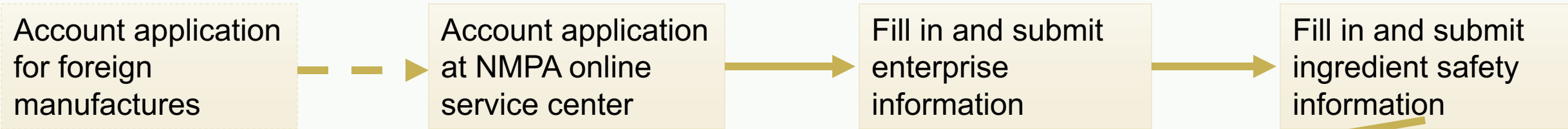
# Raw material safety related information filing enterprise information form

Raw material manufacturer name	(Chinese, filled in by domestic enterprises) (English, filled in by overseas enterprises)	
Country	<input type="checkbox"/> Overseas <input type="checkbox"/> Domestic	
Raw material manufacturer's address		
Authorized company name	(Fill in when there is authorization, and attach the authorization letter)	
Authorized business address	(Fill in when there is authorization, and attach the authorization letter)	
contact information (If there is authorization, fill in the authorized enterprise information)	contact	
	Contact number (mobile phone)	
	Contact number (landline)	
	E-mail	
	Actual office address	
	zip code	
<b>Commitment</b>		
<p>1. The cosmetic raw materials produced by this enterprise comply with the "Regulations on the Supervision and Administration of Cosmetics", "Administrative Measures for Cosmetics Registration and Filing", "Cosmetics Safety Technical Specifications" and other relevant regulations and technical requirements of the People's Republic of China on cosmetics supervision.</p> <p>2. All cosmetic raw material safety information provided by the company is true and legal. The company is responsible for the content of the information and bears corresponding legal responsibilities.</p> <p>3. The safety information of the designated cosmetic raw materials submitted by other companies authorized by the company comes from the company, and there is no dispute between the two parties in the acquisition channel. Refer to the authorization letter for the specified cosmetic raw materials.</p> <p>4. The company will properly keep the user's password, and the related behaviors related to the filing of cosmetic raw material safety data through the user represent the behavior of the company, and the loss caused by the loss or leakage of the password will be borne by the company itself.</p>		
(Signature and seal of the raw material manufacturer or authorized company who filled out this form)		
year month day		

# Submission

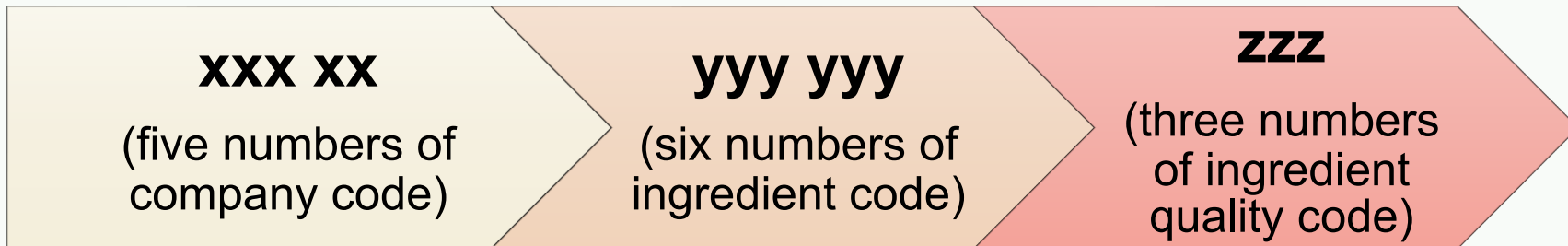
*No tonnage band distinction!*

## Procedures



Unique ID for ingredient! ! !

**Code Generation**

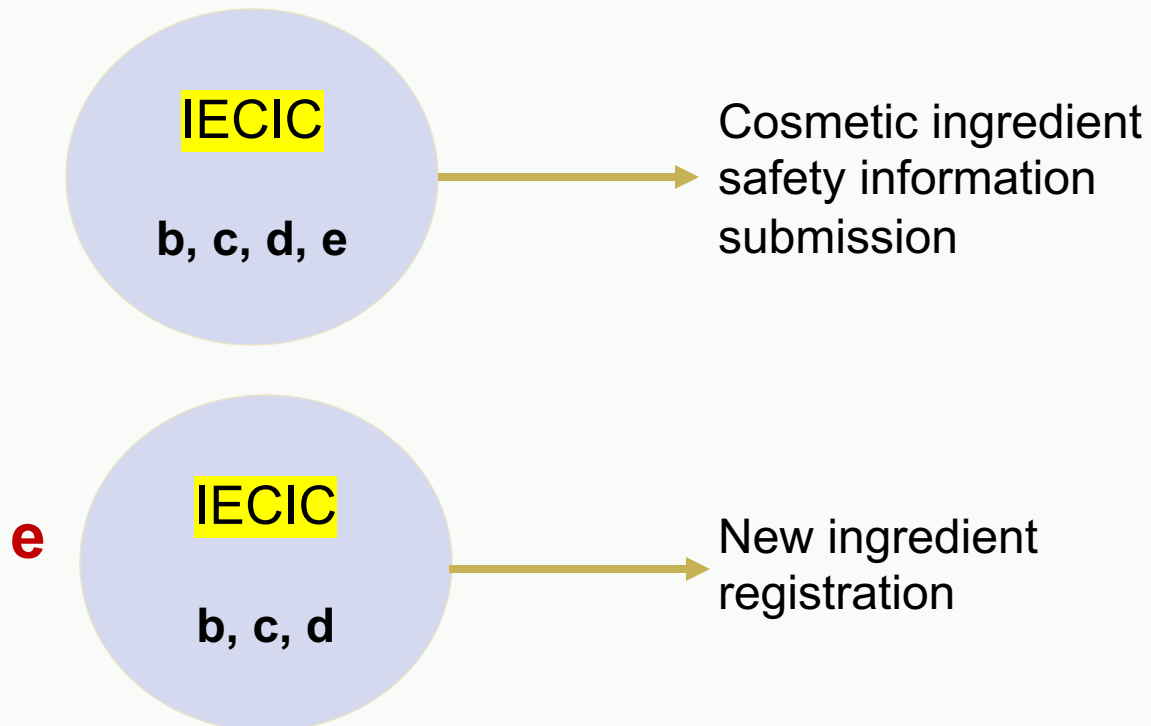




# PART IV Summary

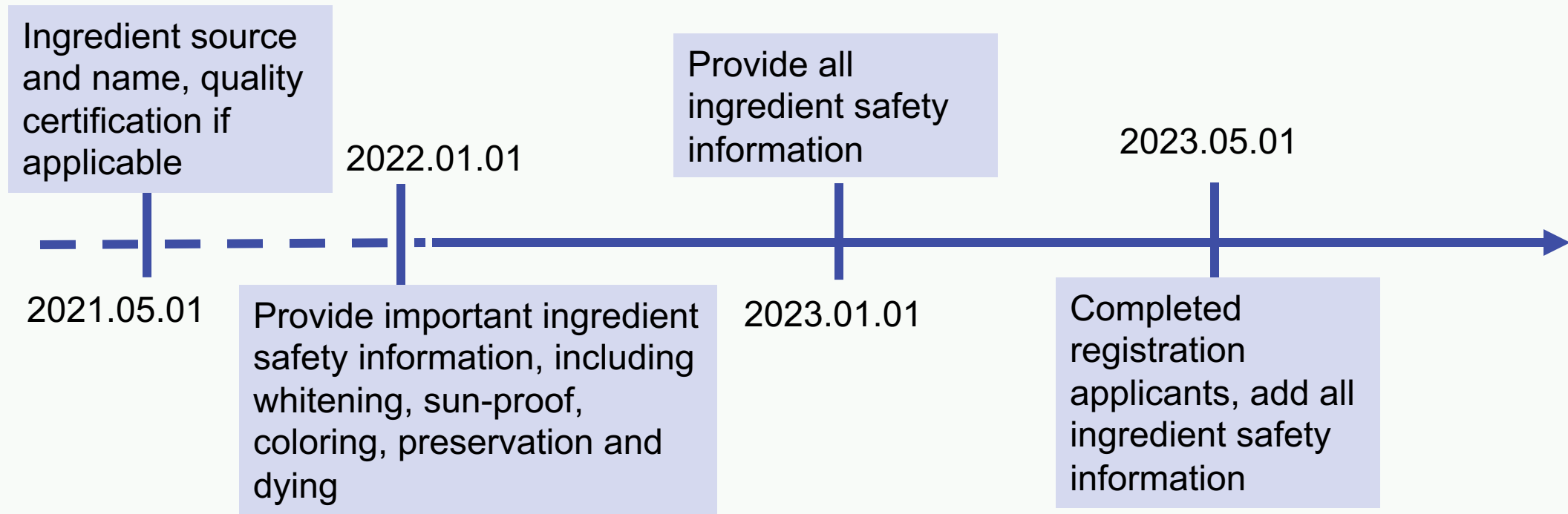
# Case study

If you are manufacturing a **product A** which is composed by the **ingredients of b, c, d, e**. Now you want to export it to China.



Assessment is done on ingredients, but finally it is the product which will be registered and get the code

# Why submission code is important?



For those raw ingredient manufactures who has already done the ingredient submission, they only need to share the ingredient code to the importers / upstream users!

**Your business secretes can be protected!**

# Take home message

- Check if your substances is used as raw materials to Cosmetic products in China
- Know your compliance obligations
- Create your own account on the platform or appoint an authorized agent
- Preparing relevant documents and have a compliance schedule



# GPC's Solutions for You

- **Option 1: GPC can be your agent in China**

- GPC's affiliates
- GPC Sweden has already done enterprise verification from Chinese Embassy in Sweden
- *GPC Sweden can do Ingredients submission on your behalf*

- **Option 2: GPC can help you to submit in your own name**

- GPC is familiar with enterprise verification application
- Language help in Chinese
- Prepare required information and relevant documents
- Translate company's name in Chinese
- Communicate with officials from NMPA

- Cost-effective
- Your access to the account – update or add new sub.
- Language support
- Secure your position in the supply chain



# Thank You.

Contact us for global regulatory services



<https://gpcgateway.com/>



Global Product Compliance (GPC)



[compliance@gpcregulatory.com](mailto:compliance@gpcregulatory.com)



+46 46 2114615

Email: [compliance@gpcregulatory.cn](mailto:compliance@gpcregulatory.cn)

Tel:  
+86 18751900856

WeChat:  
0708381983 (GPC China)

WeChat official account:  
全球产品合规GPC



IDEON, Beta 5, Scheelevägen 17, 22363  
LUND, SWEDEN