



## Q&A

**30 March 2022**

### **Exporting Cosmetics to China? Guidance on Cosmetic Ingredient Safety Information Submission Platform.**

#	Questions	Answers
1.	For foreign manufacturers: What exactly is the "main body certification document"?	The documents might be slightly different from embassy to embassy. But the common ones would be business license of the company, applicant's ID document, copy of ID, application form of legalization which can be downloaded from embassy's website, if the company is authorizing someone to do the verification for them, then power of authorization letter and the ID of the authorized person must be provided. NB: if there are any non-official document required, then it need to be notarized first.
2.	Hello, could you please let us know if the ingredient platform is only available in Chinese? do we have to write in Chinese language to register the ingredient?	Yes, the website is only in Chinese, and information should be submitted in Chinese.
3.	Could you please let us know what is the registration process for the Fragrance ingredient? I have heard that it is possible to only submit MSDS and IFRA50 Certificate when we do cosmetic product application. Is that true? or it is mandatory to provide Annex 14 or registration code?	Here are a few combined questions which I will answer one by one. <ol style="list-style-type: none"> <li>1. Registration and Submission are different procedures as required by NMPA regulation. Ingredient submission applied for products composed by existing ingredients, while registration applies for new ingredients.</li> <li>2. Registration procedures are depending on the functions / characters of the product. Here you mentioned it as fragrance ingredient. But according to the requirement, we would need to know the function of the ingredient. For example, if it has any of the following functions, Antiseptic, sunscreen, coloring, hair dyeing, freckle removal and whitening. If yes, then new ingredient registration, if not, then go for record filling. For different cases, the processes are different.</li> <li>3. As for the documents you mentioned here, please be aware that the code is only for product composed by existing substance. You need to identify if your substance is new or</li> </ol>

		existing substance before you start to prepare your document and procedure.
4.	It's not quite clear why the company documents have to be submitted to the country's own foreign ministry.	This is a procedural step required at least by the Chinese embassy in Sweden and India. However, if you are in other countries and wonder the verification procedures, you can go to your country's Chinese embassy to check if the Foreign Affair Ministry verification is required. GPC can also help you to check the requirements from your country's embassy if you are unfamiliar with the communication and procedures with embassies' work.
5.	Concerning submission requirements: Is IFRA an accepted source for restrictions on use of a material in cosmetics?	By IFRA, do you mean the international Fragrance Association? If yes, then it can't be use as an accepted source. The source that is used under NMPA are the 7 lists in Safety and Technical standard.
6.	Can the submission on the submission platform be done in English?	Unfortunately, no. But sometimes, we can use google translate to translate the page.
7.	Is the STSC-2015 the same as IECSC? If not, where can we verify if our raw material is in the IECSC list?	No, it's not the same. IECSC is the short name for Chinese chemical inventory, IECIC is the short name for Chinese Cosmetic inventory. You can always go to GPC's <a href="#">compliance advisor</a> section to do free search regarding your compliance obligation on your ingredient.
8.	Can our Chinese customers verify the registration of our raw material with our reference number? If yes, on which website?	Yes, your Chinese customer can check some basic information of your ingredient with the code you shared. But not all information will be disclosed. Certain information, especially regarding business secrets like the formula of the ingredient, will be shaded when it is published on the website. Once the code is generated, NMPA will announce it at its website. And you can always check your ingredient from the cosmetic section under NMPA website by your code.