



# Exporting Cosmetic Ingredients to China?

## ---- ingredients Submission Platform



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## About GPC

*"Our capacity has gone from local to global."*



We were founded in 2008, Lund Sweden.



We offer excellent representative and compliance management services globally.



8 offices worldwide & 2 laboratories



Today, we have more than 1500 happy clients worldwide, 99% retention rate.

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## Services



We have an elaborate portfolio of 15,000+ substances.



Authoring a large portfolio of 5,000+ REACH and 500+ CLP compliant SDS and e-SDSs in 30+ languages.



750+ Lead registration & consortia management.

“

*We have followed our clients to new countries and markets which has made us expand our business and knowledge capacity worldwide.*

”

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## 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

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## Background

- National Medical and Pharmaceutical Administration of China (NMPA ) launched “the **Ingredient Safety Information Record Filing 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.

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## PART I Pre-assessment

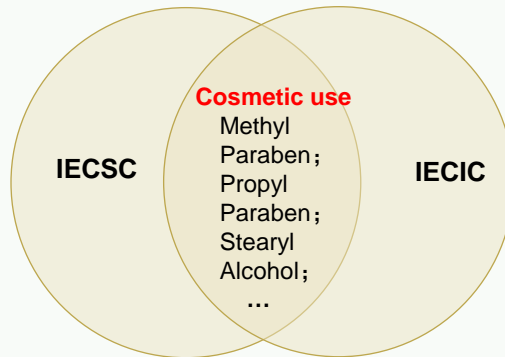
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# Preliminary check

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

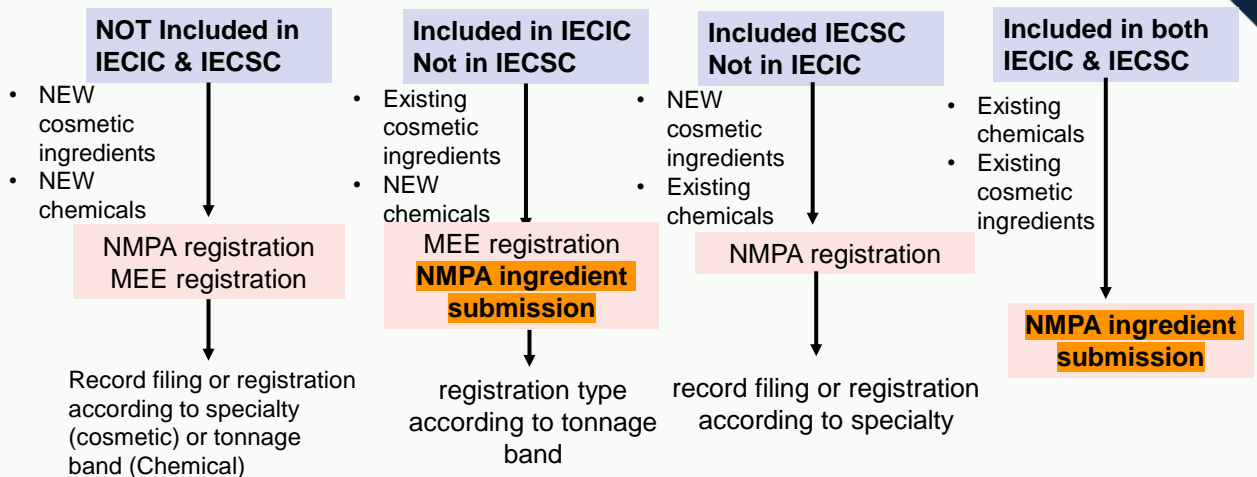
**IECIC** (Cosmetic Ingredients) – Inventory of Existing **Cosmetic Ingredients** Produced or Imported in China



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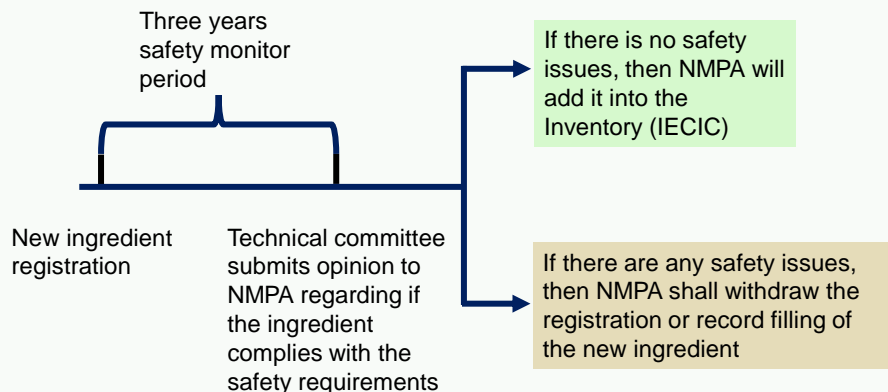
# Conclusion for pre-assessment

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



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## IECIC Inclusion (cosmetic Ingredients inventory)



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## 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

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## PART II

### Submission Body

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## 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.

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# 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.

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## 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

### • Enterprise verification

- 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，并在□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)			
企业名称或其他组织名称 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件证明的事项 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"/> 收养 Adoption; <input type="checkbox"/> 继承 Inheritance; <input type="checkbox"/> 房产 Real estate; <input type="checkbox"/> 诉讼 Litigation; <input type="checkbox"/> 签证 Visa; <input type="checkbox"/> 领事 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:			

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# Enterprise verification procedures

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



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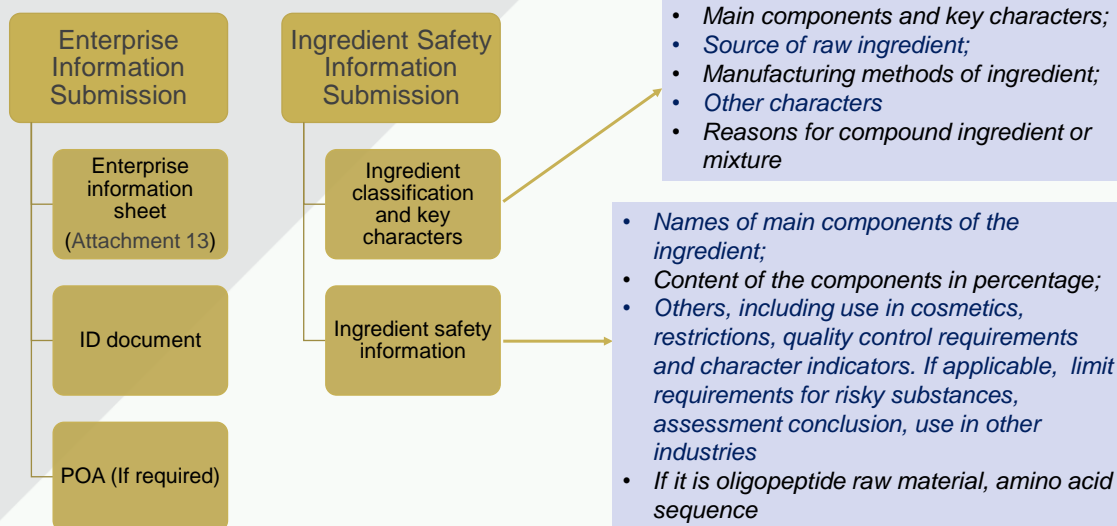
## PART III Submission Requirements

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# Submission requirements

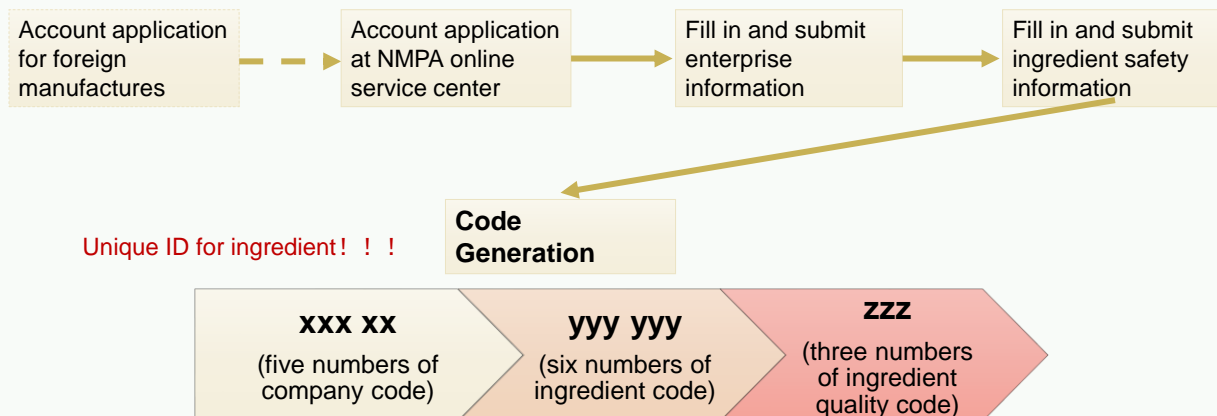


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# Submission

**No tonnage band distinction!**

## Procedures



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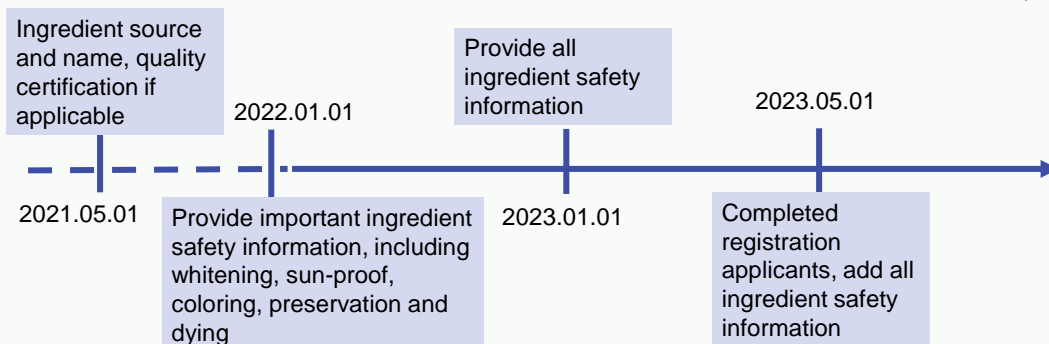


## PART IV Summary

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## Why submission code is important?



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

**Your business secrets can be protected!**

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## 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

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## 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



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# Thank You.

Contact us for global regulatory services



<https://gpcgateway.com/>



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