ctfa news

COSMETIC TOILETRY & FRAGRANCE ASSOCIATION OF SOUTH AFRICA

JULY 2020

IN THIS ISSUE:

FROM THE ED'S DESK

Dear CTFA Members

It is now well over the 100-day mark of lockdown and the Coronavirus is still wreaking havoc with the economy and businesses alike. CTFA continues to be available to member companies for advice and dissemination of information. Please feel free to phone and/or email us should you require assistance.

This issue of CTFA News looks at international and local trends in the beauty and personal care industry during COVID-19. We also unpack a short survey done with CTFA member companies on the impact to their businesses during lockdown.

With CTFA's footprint being both international and local, we give you a perspective of our interaction and participation at the International Standards Authority (ISO) meetings in June 2020. We also inform you on African countries that are going through regulatory reform and CTFA's involvement in ensuring trade barriers are kept to a minimum.

Our corporate social responsibility arm, Look Good Feel Better (LGFB), whose mission is to provide cancer patients and survivors with support and hope, is under financial strain due to the lockdown. We give you some details on their plight.

Thank you to all members for your ongoing support. Do keep safe and healthy.

Kind regards.

Adelia Pimentel
Executive Director

INTERNATIONAL TRENDS ON THE BEAUTY AND PERSONAL CARE INDUSTRY DURING COVID-19

The COVID-19 pandemic has brought about an array of challenges for individuals and industries. The crisis has required people and businesses to adapt to a new normal, to remain relevant and sustainable. The post-COVID-19 world will undoubtedly be a changed one, in that many of the resultant adaptations made are here to stay. In the beauty and personal care industry, these adaptations include products such as soaps and hand washes that have been at the forefront of essential products. In fact, in South Africa, on the 25th of March 2020, Amendment of Regulations Issued in Terms of Section 27(2) of the Disaster Management Act of 2002 was published as Government Notice R398, listed soaps as an essential product, within the "cleaning and hygiene products" category (Department of Co-operative Governance and Traditional Affairs, 2020). In contrast, the manufacture and sales of products like color cosmetics or makeup, which were not permitted for manufacture or sale in South Africa during level 5 lockdown, have seen global economic declines, and have even led to store closures worldwide. Overall, this industry, like most industries, will require an evolution to recover from the global crisis.

As a result of various levels of lockdown restricting the products that could be marketed and purchased, together with store closures and the inevitable decision of many consumers to reduce spending on non-essential or luxury items, the cosmetic industry has no doubt seen a decline in sales. In South Africa, Stats SA conducted a series of polls to ascertain the impact of COVID-19 on private businesses, 84.3% of the businesses surveyed reported "that business turnover was below the normal range, while 20.2% indicated temporary closure" (Businesstech.co.za, 2020). Similarly, McKinsey & Company have detailed the economic impact of the cosmetic industry and mentioned in a recent article that China's industry sales in "February fell up to 80 percent compared with 2019". They further estimate that the revenues of the global beauty-industry "could fall 20 to 30 percent in 2020" (McKinsey.com, 2020).

TRENDS IN PURCHASE: E-COMMERCE

McKinsey & Company estimated that globally "in-store shopping accounted for up to 85% of beauty-product purchases prior to the COVID-19 crisis" (McKinsey.com, 2020). This was due to the fact that colour cosmetics were not defined as essential products during the lockdown seen across

many countries and where such products were slowly made available as the lockdown levels eased, the sales decline did not recover. This may be in part due to the fact that consumers preferred to test make-up products at the point of sale or receive advice from the salesperson prior to making a purchase. It is possible that the shift away from consumer product testing and seeking personal advice may develop into a trend that persists post the COVID-19 crisis. This is supported by the consumers' heightened awareness of hygiene and potential sources of contamination, which may persist into the future. This opens the opportunity for e-commerce to likely become the new way of product sale and purchase for the cosmetic industry.

From a regulatory and consumer information perspective, it is imperative that required information on product labelling and packaging is made available at the point of purchase, even on the e-commerce platform. In South Africa, there are minimum requirements that must be met on the labels of the primary and secondary container. This is outlined in the Department of Health's (NDoH) Government Notice R.1469 draft *Regulations relating to Labelling, Advertising and Composition of Cosmetics, 22 December 2017*, as well as SANS 98:2012 Ingredient labelling of cosmetic products and *SANS 289:2016 Labelling requirements for pre-packaged products and general requirements for the sale of goods subject to legal metrology control*. It is vital that regardless of where and how the products are purchased, safety-related information is still made available. In the case where the packaging is too small or has a shape that precludes information, *Regulation 8(2)(a) of the National Department of Health's (NDoH) Government Notice R1469 draft Regulations relating to Labelling, Advertising and Composition of Cosmetics*, states that precautions and warning statements, as well as the list of ingredients according to INCI nomenclature can be mentioned on an "attached leaflet, label, inlay, tape, tag or card" (Department of Health, 2017).

INGREDIENT TRENDS

The cosmetic industry is known for its constant scientific innovation where trends are ever evolving. In the current times that we find ourselves, product trends have become even more dynamic than ever before as consumers may prefer certain ingredients or product descriptors more than others. These may include moisturising hand lotions; preservative- containing cosmetics; cosmetics for 'at-home' use and eye products, to name a few.

Safety and Reliability: A need for an increased adherence to Good Manufacturing Practice (GMP)

COVID-19 has brought about an added awareness and emphasis on health and hygiene. As a result, there has been a "consumer behavioural shift towards safe and reliable products". Safety is a priority when it comes to the regulation of the cosmetic industry, and safety assessments, as well as compliance to Good Manufacturing Practice (GMP). These are required according to *National Department of Health's (NDoH) Government Notice R1469 draft Regulations relating to Labelling, Advertising and Composition of Cosmetics, R.1469, 22 December 2017.* Regulation (4) states:

4. (1) No person may sell, manufacture or import for sale, any cosmetic that may cause damage to human health when used under normal or reasonably foreseeable conditions of use, taking account, in particular, of the following: (a) product presentation; (b) product composition; (c) labelling; (d) instructions for use and disposal; and (e) any other indication or information provided by the responsible person (National Department of Health, 2017).

ISO/ SANS 22716:2011 Cosmetics — Good Manufacturing Practices (GMP) — Guidelines on Good Manufacturing Practices is the international best practice for cosmetic GMP, which has been adopted in South Africa. Principles such as the cleaning and sanitisation of equipment and premises/ facility; quality assurance and quality control testing, as well as all necessary microbiological and safety testing is now seen as more necessary than ever before. It is also vital that appropriate facility and equipment maintenance is performed to reduce any risk of contamination. While adherence to ISO/SANS 22716:2011 has continued to provide important guidelines for the industry, it is imperative that stricter adherence to these principles is enforced during such a crisis. Disaster Management Act, 2002: Amendment of Regulations Issued in Terms of Section 27(2) allowed for the "production and sale" of essential products such as liquid soap, soap bars, hygiene hand washes; bath and shower gels and hair shampoo. Since these products promote health and hygiene, this meant that adherence to GMP principles during the manufacturing of these products, had to be maintained. Furthermore, the Department of Employment and Labour published Government Notice 479 on "Covid-19 Occupational Health and Safety Measures in Workplaces Covid-19 (C19 Oh's), 2020", which includes guidelines for the health and safety and all measures to maintain appropriate practices in the workplace (Department of Employment and Labour, 2020).

Contamination: Preservative Use

More than ever before, consumers want to know that their cosmetics will not pose an additional risk to their health, including any risk that may come from contamination. Where there was previously a significant shift away from substances that preserve shelf-life, i.e. preservatives, consumers may likely change their perspective on this.

Many product labels rushed to advertise "preservative- free" and "paraben-free", which served as a way for consumers to view the products as superior and "healthier" or more "natural". In the recent years, controversy surrounded these statements, as such claims were not reserved for banned ingredients, restricted ingredients or ingredients that had been not been proven to be unsafe.

In fact, the European Union (EU) published a Technical Document on Cosmetic Product Claims which became effective 1 July 2019. The document is an update of the *Guidelines to Commission Regulations (EU) No. 655/2013 laying down common criteria for the justification of claims used in relation to cosmetic products*, published in 2013. This includes guidance on claims of the 'free from' type and disallows claims of this nature for products destined for sale in the EU. Since South Africa's cosmetic industry standards on advertising within the self-regulated environment are informed by that of the EU, CTFA has allowed a transition period until 1 September 2021, following which the relevant amendments will be effected in the CTFA Cosmetic Compendium and the Advertising Regulatory Board's Code of Advertising Practice – Appendix B (Cosmetics). CTFA will continue to inform the industry of the upcoming changes and advise that labels be amended accordingly to meet the requirements of the transition period.

PRODUCT TRENDS

The COVID-19 world is one in which many will continue to work from home wherever possible for the foreseeable future. It is also one in which masks will be worn in public places. As a result, the product category trends have shifted away from colour cosmetics such as lipsticks and instead become focussed on products that have become more important to use daily:

1. Eye Products

Due to the limitations of colour cosmetics that can be seen when wearing a mask, in China it was reported that eye-cosmetic sales increased 150% in February 2020. This is likely to occur in many countries.

There should be an added emphasis on the safety of these products. Ingredients used in eye products must be intended for use around the eye area and not defy maximum allowed limits for use, or associated warning statements that should accompany such products. CTFA's Cosmetic Compendium provides these ingredient guidelines.

2. Self- care Products

The focus away from colour cosmetics has also led to an emphasis of products that are used on the skin, the hair, the body and the nails. Importance is placed on the well-being of these by an increase in the use of moisturising and enriching ingredients, and to promote relaxation and pampering that comes from self-care. Amazon reported sales increases of 218% for nail care, 172% for hair colouring and 65% of bath and body products. In the absence of salon services, DIY products are increasingly becoming relevant but at the same time it begs the question: are these products safe for at-home usage? The dilemma for certain 'at-home' products that would ordinarily be used at a salon, is that the brand-owner has an increased responsibility to provide clear directions for use, and include warning statements where required by regulations and best practice. Salons offering their house-brand cosmetic products also carry the same responsibility, as many products intended for in salon-use do not necessarily include the labelling requirements as stipulated by regulations and guidelines.

3. Functional Cosmetics: To counteract the Increased Use of Hand Sanitisers

In taking necessary precautions to stop the spread of COVID-19, hand washing and sanitising (in the absence of water), is imperative and has become commonplace. This increased use of hand sanitisers has detrimental side effects to the skin barrier and has caused many people to experience drying of the skin, possible contact dermatitis (which is non-cosmetic), allergic reactions and damage to skin barrier function. As a result, there has been a return to "functional cosmetics" to restore moisture and further protect the skin. One such example is moisturising hand lotions and creams. These products, which may have been previously thought of as 'pampering', are now being used functionally- to replace moisture caused through the dehydrating effect of alcohol present in hand sanitisers.

In terms of claims, manufacturers and brand owners of these products should still be mindful of the Cosmetic Advertising Code of Practice, which outlines that all claims must be made in a cosmetic sense, and should be scientifically substantiated (Advertising Regulatory Board, 2019). Furthermore, product claims should not refer to medical conditions (such as contact dermatitis or allergic reactions).

A second example of a cosmetic, one that has long been seen as "functional" due it's protective function, is sunscreens. The trend of this cosmetic use is largely due to the fact that the weakened skin barrier and skin dehydration from constant hand sanitiser use, requires additional protection exposed to UV rays. Sunscreen manufacturers and brand owners should however still be mindful of the relevant regulatory guidelines, including SANS 1557:2018 Sunscreen Products. This standard provides a guideline to SPF claims and UVA and UVB claims and their respective scientific substantiation methods.

COVID-19 has inevitably brought about a number of different developments in the cosmetic industry. Many of them may change the way the consumer views cosmetics, and the purchasing trends overall. Despite the evident shift towards certain products, CTFA continues to highlight the importance of product safety and adherence to the regulatory guidelines currently available. We endeavour to provide regular updates and continue in our advisory capacity during these unprecedented times. We encourage you to contact our regulatory experts regarding any cosmetic-related queries you may have, in this time.

REFERENCES

Advertising Regulatory Board (2019). Cosmetic Advertising Code of Practice.

Businesstech.co.za. 2020. These Graphs Show How Businesses Have Suffered During Lockdown in South Africa. [online] Available at: <https://businesstech.co.za/news/business/411789/these-graphs-show-how-businesses-have-suffered-during-lockdown-in-south-africa-including-layoffs-and-possible-closures/>

cosmeticsdesign-asia.com. 2020. Back to Science: Will COVID-19 Encourage Consumers to Change Their Tune About Parabens? [online] Available at: <https://www.cosmeticsdesign-asia.com/Article/2020/05/13/Will-COVID-19-encourage-consumers-to-change-their-tune-about-parabens?utm_source=copyright&utm_medium=OnSite&utm_campaign=copyright>

cosmeticsdesign-asia.com. 2020. Taking On COVID-19: Kao Working To 'Drastically Ramp Up' Production of Hygiene-Related Products. [online] Available at: https://www.cosmeticsdesign-asia.com/Article/2020/05/04/Taking-on-COVID-19-Kao-working-to-drastically-ramp-up-production-of-hygiene-related-products?utm_source=copyright&utm_medium=OnSite&utm_campaign=copyright

Department of Co-operative Governance and Traditional Affairs (2020). Government Notice R398 Amendment of Regulations Issued in Terms of Section 27(2) of the Disaster Management Act of 2002

Department of Health (2017). Government Notice R 1469 draft Regulations Relating to Labelling, Advertising and Composition of Cosmetics.

Department of Employment and Labour (2020). Government Notice 479: Covid-19 Occupational Health and Safety Measures in Workplaces Covid-19 (C19 OHS)

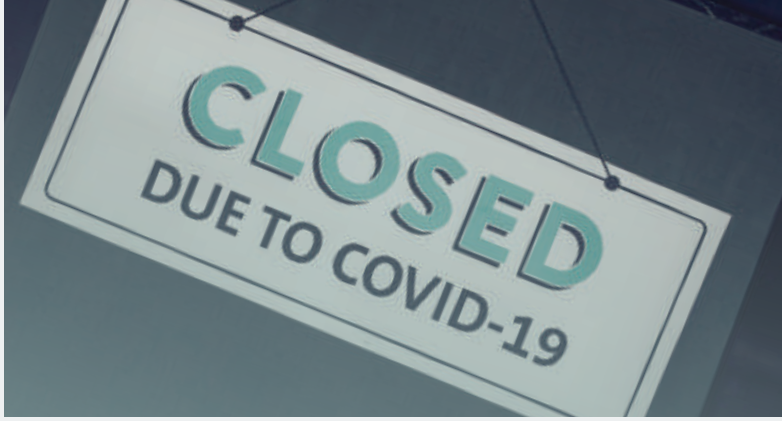
McKinsey.com. 2020. How COVID-19 Is Changing the World of Beauty. [online] Available at: https://www.mckinsey.com/industries/consumer-packaged-goods/our-insights/how-covid-19-is-changing-the-world-of-beauty

South African Bureau of Standards (2019). SANS 1557: Sunscreen Products.

South African Bureau of Standards (2011). SANS 22716: Cosmetics — Good Manufacturing Practices (GMP) — Guidelines on Good Manufacturing Practices.

South African Bureau of Standards (2016). SANS 289: Labelling Requirements for Pre-packaged Products (pre-packages) and General Requirements for the Sale of Good subject to Legal Metrology Control.

IMPACT OF COVID-19 ON THE COSMETIC INDUSTRY



CTFA conducted a member industry survey on the impact of COVID-19 on businesses during level 5 to level 3 lockdown. Approximate percentages of turnover affected by the lockdown ranged from 100% to a gradual 30% from level 5 to level 3 respectively. The category of operators along the value chain that were most affected in the cosmetic industry included raw material and packaging material suppliers, which in turn impacted distributors.

The biggest challenges identified overall from level 5 to level 3 ranged from no sales or product development, to packaging and raw materials in short supply inclusive of escalated pricing.

Areas that are still a challenge include companies taking relevant measures to keep staff safe, weak sales due to devastated economy and consumers' lack of disposable income.

Most companies referred to unbudgeted costs for safety measures, which included Personal Protective Equipment (PPE) costs. Another area of concern was the incurred losses due to the export/import ban/ restrictions which in some companies amounted to 45% of income.

Although most companies are now working at 100% capacity, with logistics showing a hybrid of staff working-from-home and essential staff at work premises, the losses suffered in this ongoing lockdown will only be truly known in months to come. It is safe to assume that retrenchments and possible closure are a real threat to many.

During this unprecedented time of uncertainty, the CTFA has continued to provide a full basket of services to our member companies. Although circumstances have dictated that all our interactions remain virtual for meetings, training, updates, etc, we are, and have been available to members throughout lockdown.

Staff are working from home until further notice, but logistics are in place for servicing our membership base uninterrupted. Please do not hesitate to contact us on our landline or on info@cta.co.za for assistance.

OVERALL BUSINESS IMPACT IN SOUTH AFRICA

Stats SA conducted a series of polls to ascertain the impact of COVID-19 on private businesses in South Africa (1 to 30 May 2020). Unsurprisingly majority of responding businesses (84.3%) reported that business turnover was below the normal range, while 20.2% indicated temporary closure or paused trading activity. Around half said they continued to trade partially during level 4, while a quarter (25.8%) reported the laying off of staff in the short term. A similar number of respondents (26.8%) said they expected their workforce size to decrease during the level 3 lockdown period.

Of particular concern is that, 36% of businesses indicated that they are not confident that their business has the financial resources to continue operating throughout the Covid-19 pandemic.

Many companies took steps to mitigate and reduce the impact of the Covid-19 pandemic on operations. In terms of the number of businesses, the top three measures were "increased use of virtual connections internally", "increased use of virtual connections externally" and "added new ways to interact with or sell to customers".

BUSINESS ADAPTION TO THE LEVEL 4/3 LOCKDOWN PERIOD

Measures Implemented	Number Of Businesses
Altered methods of production	160
Altered goods or services offered to customers	165
Discontinued a good or service	156
Added .new ways to interact with or sell to customers	285
Increased use of virtual connections internally	348
Increased use of virtual connections externally	320
Increased use of e-commerce	126
Invested in equipment to produce new products or expand existing .product lines	25
Altered research and development projects	42
tncreased maintenance costs	60
Decreased maintenance costs	177
None of the above	182
Do not know	32
Other	115

REFERENCE:

Businesstech.co.za. 2020. These Graphs Show How Businesses Have Suffered During Lockdown in South Africa. [online] Available at: <https://businesstech.co.za/news/business/411789/these-graphs-show-how-businesses-have-suffered-during-lockdown-in-south-africa-including-layoffs-and-possible-closures/>

NATIONAL DEPARTMENT OF HEALTH (NDOH)

The lack of progress on the impending draft Legislation relating to the Labelling, Advertising and Composition of cosmetics in terms of the Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972 from the Department of Health (NDoH) is foremost on industry's mind.

The Cosmetic Toiletry & Fragrance Association of South Africa (CTFA) has been keeping track of developments on potential promulgation in order to keep industry informed. The latest intervention between the CTFA and the National Department of Health (NDoH) occurred on the 3 July 2020.

The meeting held was attended by Dr Anban Pillay, Acting Deputy Director General, National Department of Health; Ms Momeena Omarjee, Names & Scheduling – Inspectorate & Law Enforcement SAHPRA, the CTFA Chairman, Mr Gilles Antoine and two CTFA Executive Council members, Mr Nizam Kalla and Mr John Knowlton. The CTFA was represented by the Executive Director, Ms Adelia Pimentel and the Head: Regulatory & Policy Analysis, Ms Dershana Jackison.

The CTFA team reviewed and positioned the current regulatory framework and raised concerns on the loss of momentum since the industry saw the draft and redraft of the cosmetic regulations in 2016 and 2017, respectively. It was also iterated that the lack of a dedicated Cosmetic Directorate together with the delay in promulgation pose certain risks to industry. Acknowledgement regarding

the hard work from the National Department of Health (NDoH) in publishing the draft regulations, whilst proposing that promulgation would assist in levelling the playing fields for all companies in this industry with regards to compliance was emphasised.

The SAHPRA official confirmed and acknowledged that the draft regulations that were published and acknowledged in 2017 have been commented on, but progress has been brought to a standstill due to SAHPRA officially moving away from the National Department of Health (NDoH), thus delaying the decision on how to progress with the promulgation of the regulations. There is an awareness that although much work has been done in updating the draft, many more updates are still required prior to promulgation. There was acknowledgment of a resource constraint within the National Department of Health (NDoH) and for this reason the regulator has relied on active self-regulation through the CTFA.

Before regulations can be promulgated some introspection at the National Department of Health (NDoH) is required and various questions need to be interrogated;

- Who will be the responsible entity for the regulations?
- Does the department have the financial means to support these regulations?
- Are the regulations capable of being implemented?
- Who will police them?

This will form the legal mandate and will provide insight into the future structure that will become the owner of the regulations and hold the necessary prosecuting authority.

The status quo of self-regulation will remain for the foreseeable future. The industry will need to wait until the relevant internal engagement at the Department of Health (NDoH) is finalised and will then be communicated regarding the operational elements of regulations.

The interaction was beneficial in cementing partnerships with the relevant stakeholders at the Department of Health (NDoH) and in keeping the "doors open" for future debate.

INTERNATIONAL OUTLOOK

International Association Committee (IAC)

CTFA is a member of the International Association Committee (IAC) whose membership consists of cosmetic industry associations from around the globe. The IAC functions to create a platform for its members to raise any pertinent matters that may be developing in their specific regions, which may impact trade or regulations in other regions. CTFA has participated in several such interventions and has contributed by making submissions and supporting proposals in the interest of international trade for the South African cosmetic industry.

This year CTFA supported the IAC's project to comment on the Russian Federation Government's draft Government Resolution on the *'Approval of the Rules for the Labelling of Perfumes and Eau De Toilette by Identification Means and the special aspects of the introducing of the State Information System for Monitoring the Circulation of Goods Subject to Mandatory Labelling by Identification Means for Perfumes and Eau De Toilette.'*

The Department of Government of the Russian Federation Government House's draft regulations for the cosmetic industry posed as a trade barrier for many countries including South Africa. Our submission, which was made via the Russian cosmetic association, included the following concerns:

1. Transition period to be extended to 1 October 2021.
2. Label identification marking by Importers after customs clearance.

International Standards Authority (ISO)

CTFA participated in the 21st International Standards Organisation bi-annual meeting via the Zoom meeting platform from 15 June to 18 June 2020. Dershana Jackison, Head: Policy and Regulatory Affairs was nominated by the South African Bureau of Standards (SABS) Cosmetic Technical Committee (TC217) to participate and represent the industry as an expert at Work Group (WG) 3 Analytical Methods. Below are some of the recommendations concluded after extensive discussions held within the Work Group (WG) and consensus reached on the best way forward for the global industry.

ISO/TC 217 Work Group 3 – Cosmetics Analytical Methods

The topic of discussion since 2018 has been the quantitative analysis of mercury in cosmetic products. There is a huge drive both locally and internationally to control the safety of cosmetic products by providing a scientifically validated and sensitive test method for the quantitative analysis of heavy metals in cosmetic products. In South Africa, the National Department of Health recognises the presence of heavy metals as trace substances present by virtue of Regulation 7(3) of Regulation no. R.1469 published on 22 December 2017, "the non-intended presence of a small quantity of a prohibited substance, stemming from impurities of natural or synthetic ingredients, the manufacturing process, storage, migration from packaging, which is technically unavoidable in good manufacturing practice, shall be permitted provided that such presence is in conformity with Regulation 4(1)." (Safety).

In 2019, two ring tests were conducted using volunteer laboratories from around the globe. The two test methods involved were:

1. *ISO 23821 Cosmetics – Analytical methods – Determination of traces of mercury in cosmetics by atomic absorption spectrometry (AAS) cold vapour technology after pressure digestion.*
1. *ISO 23674 Cosmetics – Analytical methods – Determination of traces of mercury in cosmetics by integrated mercury analytical systems nine laboratories participated.*

The ring test concluded that both these test methods are similar in their performance level. The next steps includes voting by WG experts to progress these standards as committee draft documents.

ISO 15819:2014 Cosmetics -Analytical methods – Nitrosamines: Detection and determination of nitroso diethanolamine (NDELA) in cosmetics by HPLC MS

The abovementioned standard was up for systematic review, however some experts thought that it was necessary to revise the standard based on the SCCS 2012 report to include other nitrosamines unique to cosmetics and this standard (NBHPA CAS 53609-64-6, NDMA).

It was recommended that this standard will be added as an agenda items for further discussion at the next ISO meeting.

AN AFRICAN PERSPECTIVE ON COSMETIC REGULATIONS

RWANDA

Early this year, the cosmetic industry learnt that the Rwanda Food and Drug Authority (RFDA) had published two regulatory documents which have commenced in February 2020. These regulations have imposed new requirements to cosmetic products exported from South Africa:

1. *Rwanda FDA Law No 003/2018 of 09/02/2018, Article 8 - Regulations No. CBD/TRG/011 Rev_0 Governing Control of Medicated Cosmetics* that came into effect on 20 February 2020 per the implementation notice on page 2.

2. *Guidelines on Submission of Documentation for Registration of Medicated Cosmetic Products* that became effective 27/02/2020 per the footnote on the document.

To our knowledge, the Rwandan authorities have not notified the international community through the World Trade Organisation and thus South Africa, like many other countries, did not receive prior notification of the proposed changes. An opportunity was therefore missed to study the content of the said regulations and make a submission representative of concerns of the South African cosmetic industry. CTFA subscribes to regular notifications from the World Trade Organisation (WTO) and have in the past responded by often submitting commentary to the relevant authorities where concerns of trade barriers are presented by proposed regulations. In this case, it appears that the notification protocols were possibly not adhered to, resulting in trade repercussions for exporters without time to prepare or comply. CTFA, with the assistance of the South Africa International Trade and Economic Desk, the Department of Trade and Industry (DTI) and the office of the High Commission in Kigali, reached out to the authorities and submitted a letter of our concerns regarding the above, as well as the trade barriers that have been introduced as a result of this oversight. The formal submission was made via e-mail on 24 April 2020. We received an immediate acknowledgment of our letter and confirmation that a response will be received in due course.

On 15 July, CTFA together with the South African Government stakeholders held a meeting with the RFDA to discuss our concerns and to find a way forward to ensure free trade between the two countries. The engagement was successful and we were given the opportunity to submit specific comments, which were completed on 28 July 2020. A further engagement with the RFDA has been requested.

The CTFA submissions are available on **www.ctfa.co.za.**

CTFA has also requested support from the International Association Committee (IAC) for further support on the matter. CTFA will continue engaging with the Rwandan authorities to secure an opportunity to comment on the regulations within a reasonable period.

BOTSWANA

In December 2019 and this year, the Botswana Medical Regulatory Authority (BoMRA) published the following regulations:

A. Document number: BOMRA/ER/CM/P03/G01 - Guideline on application for registration of complementary medicines in Botswana - effective date 15 April 2020

B. BoMRA fees 2019: C. Medicines and Related substances Act (Cap 63:04) Medicines and related substances regulations, 2019 (27 December 2019).

Though the first document is specifically relevant to complementary medicines, it is the “fees document” (B. Above) that raised concerns within the cosmetic industry.

Next, the December 2019 regulations included regulations pertaining to cosmetics and the requirement for registration as well as the introduction of "cosmeceuticals".

CTFA, with the assistance of the International Trade and Economic Desk in Pretoria, contacted the authorities and submitted a letter of our concerns on 30 April 2020. Our concerns were twofold:

1. The inclusion of registration costs for cosmetics, which would impact cosmetics exported from SA.

2. The department within BoMRA, responsible for the complementary medicines is also responsible for cosmetic product regulations. Which could imply a possible risk of similar regulations for very different product types.

It is our aim to ensure that BoMra does not institute regulations that are hugely misaligned to that of South Africa, and which would ultimately pose a technical barrier to trade. We thus drew their attention to SA’s current regulatory situation for the cosmetic industry, which could be referenced whilst considering a reform for the industry in Botswana.

CTFA has received a prompt acknowledgement of its letter including a response that assures the South African industry that the registration requirements for complementary medicines and cosmetics are different and hence their registration requirements and fees will be different. Furthermore, they mentioned that currently BoMRA has not shared any registration requirements for Cosmetics.

CTFA held a meeting with the BoMRA on 30 July and discussed the concerns previously raised. A second formal submission was made highlighting specific concerns post the meeting discussions and a further engagement was encouraged.

The CTFA submissions are available on **www.ctfa.co.za.**

CTFA will continue to engage with the authorities and keep the industry informed of new developments.

KENYA

Update on Draft guideline for regulation of cosmetic products

Due to the Covid-19 pandemic and the subsequent imposition of a national lockdown in Kenya, the follow up from the discussions between the Kenyan Manufacturer’s association (KAM) and Kenya Ministry of Health (MOH) have not been possible. Included in the initial discussions held with the MOH are the following points:

1. The focus of the regulations is on medicated cosmetics and will not be applicable to all cosmetics. However, a definition of medicated cosmetics and a list is required from the authorities.

2. Clarity is sought in terms of the regulatory framework which currently also includes KEBS compulsory standards and what the functions of KEBS and MOH will be.

3. The request by KAM that a Technical committee be established that will review regulatory updates as required.

CTFA is engaging with counterparts and industry members in Kenya to keep our members updated as developments unfold.

Standards Act

On 25 May 2019, Kenyan Bureau of Standards (KEBS) notified of amendments to their Standards Act.

Many companies who operate in Kenya may already be aware of the Diamond mark scheme and the changes that have been imposed around this in recent times. After suspending the scheme, the Cabinet Secretary announced a reinstatement in late 2019. Any company planning to export to Kenya will require to apply the Diamond mark on all products and to do this the following is required:

KEBS officials will visit the site of manufacture for an inspection; once they are satisfied with your operation as per

their specific requirements a Certificate of conformity will be issued, which is valid for 3 years. During this period, the company must ensure that the Diamond mark appears on every unit before it enters the Kenyan Port. If the certificate expires the inspection process is repeated and a renewal of the COC is granted.

The following challenges have been communicated to KEBS on 8 July 2020:

1. The amended Standards Act now calls for an interim inspection halfway through the validity period i.e. at 1.5 years. This will mean that the company concerned will have to incur additional costs in terms of flights etc. for the KEBS inspectors to accommodate this additional requirement. Furthermore, since the Covid-19 pandemic travel bans have been imposed which will prevent the 1.5 yearly inspection and thus compromise the validity of the COC which should be valid for 3 years. This additional requirement imposes complexity to an already burdensome process. Also, there are other means by which the inspectors can carry out the surveillance inspection at the specified period through inspection of Certificate of Analysis, for example, so that the cumbersome and costly physical inspection is avoided.

2. The requirement to place the Diamond mark stickers on each unit poses risks especially under the current Covid-19 conditions where product safety and integrity must be ensuring and maintained. The opening of shippers to expose products to apply these stickers will hamper this effort.

3. If a detailed audit process is followed by the issue of a COC, why is the Diamond mark sticker still a necessary requirement? Furthermore, the authenticity and integrity of these stickers is no longer controlled as KEBS is no longer supplying them, therefore its intended purpose is flawed. COC should be used for inspection of imported products and not the sticker system.

4. The Standards Act refers to an Inspection agency list that will be issued by KEBS upon request by an importer. This can easily be added as an addendum to the Act for quick and easy access to this information. The request to KEBS will place additional strain on their resources and may result in delay being experienced by importers in receiving this information which will delay the export of their products.

ETHIOPIA

In March 2020, the Ethiopia Food and Drug Authority (EFDA) published Cosmetics Import Export and Wholesale Control Directive No. 48/2020.

Ethiopia provides a very clear regulatory document in that there is no grey area between cosmetics and medicated products as we have seen with Kenya and Rwanda regulations. There is also clarity provided on the compliance of products in terms of GMP; expiry date of product; PIF; storage conditions; etc. They have also made available an online platform for application of a Certificate of Competence which will replace the cumbersome manual application process especially during the Covid-19 pandemic where online options facilitate social distancing and provide alternate and more advanced ways of doing business.

However, the following challenges have been identified and are under discussion by CTFA's Technical committee experts:

1. A category of "special cosmetics" has been defined in the regulation which will require to be registered with the EFDA. The EFDA has only recently been established and the concern is that they may not have the resources to support this registration process thus resulting in delays, which will directly impact trade.

2. Currently, there is a Directive in place that has not been consistently implemented and enforced and the introduction of the regulations now adds complexity to the regulatory framework in Ethiopia. Clarity will be sought in this regard.

3. The regulation also requires that importers present a COFS – which for many Africa countries is a challenge as there is a lack of a defined and competent authority or organisation that issues these. Though this is not specifically relevant to SA, as CTFA issues these with endorsement from the Dti, this poses as a trade barrier to other African countries and we will support them on this in our submission.

4. Even though their provision for an online application portal for a Certificate of Competence will solve many issues there is no clarity provided in terms of the response time from the authority.

5. Even though the expiry date stipulation for acceptance of products is defined, there is a lack of clarity on the process or avenues available to companies to discard expired or con-compliant products. In other African countries the authorities are clear on the process involved and the company responsible for the products carries the destruction cost even though the destruction is done by the country's authorities.

6. The regulation's reference list of annexes is aligned to that of the EU regulations 1223/2009 and CTFA Cosmetic Compendium but does not include "List of permitted UV filters". It may be that sunscreen products are considered as drugs by the EFDA. Clarity will be sought on this.

CTFA plans to engage with the Ethiopian authorities to discuss these concerns.

CTFA BRIDGING THE GAP COMPENDIUM - 2020

CTFA's Cosmetic Compendium remains the cosmetic industry's reference within a self-regulated environment. In order to ensure that an up-to-date and relevant guideline document is available, CTFA updates the Compendium on an annual basis. This year's update was completed in April 2020, and is available on CTFA's website.

The regulatory landscape in South Africa is still undergoing reform from a self-regulatory environment to one that will be regulated by the National Department of Health (NDoH). The draft regulations were published on the 22nd of December 2017: Government notice R.1469 Regulations relating to Advertising, Labelling and Composition of Cosmetics (redraft), which is reflected in the CTFA Bridging-the-Gap Compendium.

While the industry awaits promulgation of the draft regulations, CTFA continues to guide the industry based on the SABS standards; NRCS standards; Advertising code of practice; the European Legislation (EC Regulations 1223/2009); international guidelines and industry best practice.

You can expect the following updates in the 2020 CTFA Bridging-the-Gap Compendium update:

- Annex updates to include all updates of EC regulations 1223/2009 up until December 2019. New entries and changes have been included with "*" and a footnote has been included, which explains the compliance period for such changes. Please take note of these updates and prepare accordingly when developing or launching new products.
- Advertising Regulatory Board (ARB) code annual update for 2020 will be updated in due course. Please refer to www.ctfa.co.za
- Section 3: Secondary antibacterial claims - has been amended.
- Section 4: Hand sanitiser - has been included.
- Section 10: 'Fragrance Ingredient Standards' has been included as a subsection to provide information on fragrance ingredients that are prohibited, restricted or specified according to the International Fragrance Association (IFRA) Standards.

Please refer to the CTFA website (www.ctfa.co.za) for the 2020 update of CTFA Bridging-the-Gap Compendium.

CTFA MEMBERSHIP PROCESS

Becoming a CTFA member is via an annual membership. To ascertain that potential members' receive the best return on their membership status, the CTFA Team has recently made changes to the membership onboarding process.

The process includes:

1. Potential members being required to complete a "Technical Requirements Document" to establish whether a company qualifies for membership based on their knowledge of industry regulations. This step in the process informs the CTFA at what level the potential member is with the South African regulatory framework and in tandem assures the company that the CTFA will only accept members that are "ready" for our benefit baskets.
2. Companies that qualify need to complete a membership application form depending on the membership category they fall under (Full, Retail, Manufacturing and Associate membership).
3. Once this step is done, an invoice is sent to the member company and a login and relevant password to the CTFA website is sent shortly after payment is received.
4. CTFA Membership includes automatic access to the CTFA website (Compendium, historic regulations, industry updates, SABS standards, etc.).
5. New members also receive an electronic guide called the "CTFA Toolkit" containing useful websites, draft regulation and SABS' links. This toolkit enables the new member with information that will assist with future interaction with CTFA.

The personal care business sector is an innovative, vibrant and competitive industry that is coupled with a rapidly moving regulatory environment. For this reason it is essential that manufacturers, brand owners, retailers and raw material suppliers are kept abreast of the latest changes and developments. CTFA's role includes advising, informing and lobbying on behalf of member companies to ensure a thriving industry.

REGULATORY ALERTS

Summary of Regulatory Alerts & Notifications for Quarter 2 of 2020

The following provides a summary of some of the global regulatory alerts and notifications that CTFA shared with members in Q2 of 2020:

REGULATORY ALERTS AND NOTIFICATIONS:

DATE OF ALERT	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
9 April 2020	Food and Drug Administration Ministry of Health and Welfare (the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu) notified of an amendment to the List of Colorants in Cosmetic Products.	Final date for comments: 29 May 2020 Adoption date: TBD Proposed date of entry into force: 1 July 2021	In order to ensure the safety of cosmetic ingredient for human health and to comply with global cosmetic trends, the proposal is to amend the regulatory requirements for the use of limited dosage of ingredient for cosmetics. Relevant for those companies exporting products to the relevant countries. These changes may require amendments to product formulations.
17 April 2020	The Ministry of Food and Drug Safety (MFDS) (Republic of Korea) notified of an amendment to the 'Labelling Standards for Cleansing & Hygiene Products'.	Final date for comments: 29 May 2020 Adoption date: TBD Proposed date of entry into force: TBD	Amendments include: 1. Stickers, labels, or tags may be used in the labelling of minor information irrelevant to the safety of the products, except for the date of manufacture and the expiration date, which are approved by the competent authority. 2. The net quantity of contents statement may be expressed in weight, length, numeric count, etc. 3. Maximum Allowable Variations will be expanded for toilet paper and tissue packages labelled by length. 4. If it is difficult to indicate the manufacture date or the expiration date on the main display surface or information display surface, the location of the manufacture date or the expiration date shall be specified. 5. If cleansing and hygiene Products use fragrances containing the raw materials that the Minister of Food and Drug Safety identifies and publicly notifies as allergens, the name of such raw materials shall appear on the product label. When importing products without any indication of the manufacture date from countries where the labelling of manufacture date is not mandatory, the importer shall indicate the manufacture date in Korean based on the evidence data on the manufacture date received from the manufacturing company of the exporting country. Relevant for those companies exporting products to Korea.
6 May 2020	The Environmental Protection Agency (EPA) (USA) notified of a 'Draft Scopes of the Risk Evaluations to Be Conducted for Thirteen Chemical Substances Under the Toxic Substances Control Act'.	Adoption date: To be determined Proposed date of entry into force: To be determined Final date for comments: 26 May 2020	The notice, as required by the Toxic Substances Control Act (TSCA), which was amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act in June 2016, EPA is announcing the availability of the draft scope documents for the risk evaluations to be conducted for 13 of 20 High-Priority Substances designated in December 2019. The draft scope document for each chemical substance includes the conditions of use, hazards, exposures, and the potentially exposed or susceptible subpopulations the EPA plans to consider in conducting the risk evaluation for that chemical substance. EPA is also opening a 45-calendar day comment period on these draft scope documents to allow for the public to provide additional data or information that could be useful to the Agency in finalizing the scope of the risk evaluations; comments may be submitted to this docket and the individual dockets for each of the chemical substances. Relevant for those companies exporting products to the United States of America. The changes to these regulations may require amendments to product formulations, test methods, labelling, etc.
25 May 2020	The Kenya Bureau of Standards (Kenya) notified of Legal Notice No. 78 of 28th April 2020, The Standards (Verification of Conformity to Standards and Other Applicable Regulations).	Adoption date: Immediately Proposed date of entry into force: 2 June 2020	This regulation lays down the provisions of verification of conformity to standards and other regulations whereas it shall apply to all products imported into Kenya. Relevant for those companies exporting products to Kenya. These changes may require amendments to product formulations.

DATE OF ALERT	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
5 June 2020	CTFA (South Africa) notified its members of Government Gazette 43258, issued by the Department of Environment, Forestry and Fisheries. The purpose of the directions of this gazette is to: a. ensures fair processes relating to permits, registrations, and Certificates during Alert Level 3; and b. provide direction in respect of the carrying out of certain activities by the biodiversity sector in terms of the National Environmental Management Biodiversity Act, the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) and any applicable provincial conservation legislation during Alert Level 3.		Permits expired under Level 4 will be extended for a period of 30 working days from date of publication of the directions i.e. 5 June 2020. Applications to be submitted within 10 working days of publication of the directions. Permits expired under Alert level 3 will be extended for a period of 30 working days after the end of the Alert level 3. Applications to be submitted within 10 working days after the end of Alert level 3.
8 June 2020	Environmental Protection Authority (EPA) (New Zealand) notified of a proposal to update the current hazard classification system for hazardous substances to Revision 7 (2017) of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS 7).	Proposed date of adoption: The EPA is intending to make the new and amended EPA Notices and the new set of group standards available on the EPA website in October 2020. Proposed date of entry into force: The proposal is for the new Hazard Classification Notice, the six amended notices, and the new set of group standards to come into force in April 2021. A four-year transitional period is proposed for the Labelling Notice, Safety Data Sheets Notice and Packaging Notice meaning that compliance with these three notices will not be mandatory for existing hazardous substance approvals or group standards until April 2025.	Relevant for those companies exporting products to New Zealand. These changes may require amendments to product labelling, MSDS and packaging notice. This would be achieved by issuing a new Hazard Classification Notice and would also require several other EPA notices to be amended, including those which set requirements for labelling, safety data sheets, and packaging of chemical substances. The EPA's second proposal related to updating the current hazard classification system to GHS 7 intends to: 1. update existing individual hazardous substance approvals to convert their current HSNO hazard classifications to GHS hazard classifications 2. update group standards to convert their current HSNO hazard classifications to GHS hazard classifications, and also to make some minor changes to a small number of group standards (note group standards are approvals for a
26 June 2020	The Department of Environment, Forestry and Fisheries (South Africa) published a draft as per the Government Gazette: Consultation on the proposed extended producer responsibility scheme for paper, packaging and some single use products" under the National Environmental Management: Waste Act, 2008 (ACT NO. 59 OF 2008)	Commentary deadline: 30 days of notification	The document provided guidance on the implementation of an extended producer responsibility scheme.

DATE OF ALERT	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
29 June 2020	The Chinese State Council (China) notified of the updated cosmetic legislation, 'Cosmetic Supervision and Administration Regulation (CSAR).' The Regulations on the Supervision and Administration of Cosmetics were adopted by the 77th Executive Meeting of the State Council on January 3, 2020, and are now promulgated.	Date of entry into force: 1 January 2021.	Relevant for those companies exporting products to China. The update makes provisions for ingredient management, safety assessment and efficacy claims. Changes may include: 1. Changes in formulations 2. Amendments to product labelling and MSDS

RELATED ALERTS & NOTIFICATIONS:

The following table provides a summary of the 2020 2nd quarter regulatory alerts and notifications, which are related to the cosmetic industry. Please be reminded that sanitiser products are not categorised cosmetic products, however have been included due to the involvement of our members with products of this nature.

DATE OF ALERT	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
7 April 2020	The European Commission (European Union) notified of a draft regulation relating to a new entry of Annex XVII to Regulation (EC) No. 1907/2006.	Final date for comments: 30 May 2020 Adoption date: Second half of 2020 Proposed date of entry into force: 20 days from publication in the Official Journal of the EU (the restriction will begin to apply one year after the date of entry into force)	The regulation would restrict the placing on the market and the use of substances in mixtures for use for tattooing purposes. These substances are: substances classified as carcinogenic, mutagenic or toxic to reproduction, skin sensitisation, skin corrosion or irritation and serious eye damage or irritation; substances prohibited by the Cosmetic Products Regulation, Regulation (EC) No 1223/2009 Annex II and Annex IV under specific conditions as listed in its columns g, h and i and impurities exceeding the concentration limits as listed in the Appendix to the draft Commission Regulation. Application of the restriction is deferred for 1 year to allow sufficient time to adapt and achieve compliance with the Regulation. Relevant for those companies exporting products to the EU. The changes to these regulations may require amendments to product formulations.
30 April 2020	Bureau of Standards Jamaica (Jamaica) notified of a 'Standard Specification for Instant hand sanitizers.	Adoption date: 5 May 2020 Proposed date of entry into force: 5 May 2020	This Jamaican Standard prescribes the requirements for alcohol based instant hand sanitizers. The standard does not cover non-alcohol-based hand sanitizers. Specifically, the alcohol contained within hand sanitizers, when rubbed on the surface of skin is effective in killing 99.9% of dangerous germs on the skin. A concentration of 60% to 80% alcohol in a hand sanitizing product is recommended. This standard ensures that there are some minimum criteria for judging the performance of instant hand sanitizers thus ensuring that the consumer gets a product that can destroy micro-organisms which are potentially harmful to health. Relevant for those companies exporting products to Jamaica. These changes may require amendments to product formulations.
4 May 2020	The Thai Food and Drug Administration (Thailand) notified of the establishment of temporary criteria and procedures for market authorization of imported pharmaceuticals, medical devices (surgical mask, N95 mask, Personal Protective Equipment: PPE, in vitro diagnostic test kits), hazardous substances used in households (70 percent w/w ethyl alcohol and sodium hypochlorite) and hand sanitizers during the epidemic of the new coronavirus (COVID-19).	Adoption date: 27 March 2020 Proposed date of entry into force: 27 March 2020	Relevant for those companies exporting products to Thailand. These changes may require amendments to product formulations.
7 May 2020	The Thai Food and Drug Administration (Thailand) notified of determination factors of the characteristics of cosmetic products containing alcohol for hand sanitization that are not allowed to produce, import or sale.	Adoption date: 9 March 2020 Proposed date of entry into force: 10 March 2020	Relevant for those companies exporting products to Thailand. These changes may require amendments to product formulations, test methods or labelling, etc.

DATE OF ALERT	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
7 May 2020	The Bureau of Standards Jamaica (Jamaica) notified of a Standard that prescribes the requirements for alcohol based instant hand sanitizers. The standard does not cover non-alcohol-based hand sanitizers.	Adoption date: 5 May 2020 Proposed date of entry into force: 5 May 2020	Relevant for those companies exporting alcohol-based hand sanitiser products to Jamaica. The changes to these regulations may require amendments to product formulations, test methods, labelling, etc.
12 May 2020	The Pakistan Standards & Quality Control Authority (Pakistan) notified of the adoption of a Standard, which was adopted on 05 May 2020 after the draft was finalized by the Fine Chemical Technical Committee had been approved by the National Standard Committee for Chemical.	Adoption date: 90 days after circulation by the WTO Secretariat (12 August 2020) Proposed date of entry into force: 90 days after circulation by the WTO Secretariat (12 August 2020)	This Pakistan Standard prescribes the requirements and methods of test for alcohol based instant hand sanitizers. The Standard does not cover non-alcohol-based hand sanitizers; Protection of human health or safety Relevant for those companies exporting products to Pakistan. These changes may require amendments to product formulations.

If there are any further questions pertaining to the above listed alerts, please forward the questions to info@ctfa.co.za.

WE'RE CELEBRATING 16 YEARS OF HOPE
- BUT WE NEED YOUR HELP....

"Why do some people find hope despite facing severe illness, while others do not? Can hope actually change the course of a malady, helping patients to prevail?

I looked for the answers in the lives of several extraordinary patients I cared for over the past thirty years. They led me on a journey of discovery from a point where hope was absent to a place where it could not be lost. Along the way, I learned the difference between true hope and false hope and describe times when I foolishly thought the latter was justified. There were also instances when patients asserted their right to hope and I wrongly believed they had no reason to do so. Because they held on to hope even when I could not, they survived. And one woman of deep faith showed me that even when there is no longer hope for the body, there is always hope for the soul. Each person helped me see another dimension of the anatomy of hope". Dr. Gerome Groopman from his book The Anatomy of Hope.

The emotional hurdles of losing hair, eyelashes, and eyebrows and the toll medical treatments take on a person's skin aren't struggles that one should have to go through alone. At LGFB, the mission is to provide cancer patients and survivors with a sense of community, support and HOPE.

Courage, confidence, control, and community are all words used by cancer survivors to describe their experience with Look Good

Feel Better, a free, nationwide cancer patient support program for women and men, offered in 37 hospitals and cancer centres nationwide. To the women who participate, the benefits are significant. Sitting around a table with others in the same situation, they laugh, cry, share stories, and discuss their appearance concerns and favourite beauty secrets.

Volunteer beauty professionals lead the discussion, offering practical tips about skin care, makeup techniques, and guidance for coping with hair loss. In the process, fears are diminished, friendships are formed, and self-esteem and a sense of normalcy begin to re-emerge.

For the past 16 years, Look Good Feel Better has transformed the lives of more than 45 000 women and men of all ages and ethnicities, and with all forms of cancer. Through the program, patients have learned to mitigate the changes treatments have on their appearance that can affect their quality of life, confidence, and ability to cope with the disease.

When Look Good Feel Better was started sixteen years ago it enjoyed tremendous support from the cosmetic industry who could identify with the needs of cancer patients. The support, through no fault of their own, but rather economic pressures, have dwindled over the years.

We, however, live in hope in Dr Groopman's words even to a point where hope is so absent that it cannot be lost. We will keep working hard in hope that our fundraising efforts can continue soon. We will not stop hosting one-on-one workshops during the pandemic until suspended workshops at hospitals can resume.

We are all in the same storm, but our boats are entirely different, because our circumstances are different. Some boats are still luxury yachts, others are dinghies, canoe's and some are small lifeboats, rafts or even just branches. We are fighting our own fights.

At LOOK GOOD FEEL BETTER we will fight with hope. Hope that we will continue to make a difference in the lives of cancer patients, because in the words of Colonel Gonin, "sometimes, the difference between heaven and hell, may be a bit of lipstick".

Look Good Feel Better (LGFB) is CTFA's social programme and provides unique support to cancer patients at a time when they need it the most. The COVID-19 pandemic has made the continuity of this worthwhile programme very difficult and support from the cosmetic industry is required to ensure its longevity.

If you would like to know more about this programme and how you can support it, please contact Christie Fraser, Programme Director - christie@lgfb.co.za.

CHRISTIE FRASER
Programme Director

LABELLING, CLAIMS AND SUBSTANTIATION TRAINING

As an industry association, CTFA strives to ensure that members of the industry are aware of regulatory guidelines, and how best to comply with them. In keeping with this role, CTFA's most recent virtual training session aimed to assist brand owners, manufacturers, raw material suppliers and companies in understanding the South African regulatory requirements relating to "Product labelling, claims and substantiation". Training sessions, which were conducted on the 7th and 16th of July 2020, were previously scheduled for earlier this year and had to be postponed due to the COVID-19 pandemic crisis. 93 people attended the training from various companies from the cosmetic industry with small, medium and large multinationals companies being represented.

PRODUCT LABELLING

CTFA's Head: Policy and Regulatory Affairs, Dershana Jackison, provided a detailed training on the topic of 'Product Labelling'. In this session, the current framework for labelling was covered, including unpacking the contents of:

- SANS 289: Labelling Requirements for Prepackaged Products (prepackages) and General Requirements for the Sale of Good subject to Legal Metrology Control
- SANS 98: Ingredient labelling of cosmetic products
- Draft regulations relating to labelling, advertising and composition of cosmetics, R. 1469, 22 December 2017

The objective of the session was to encourage compliance by providing a useful summary of the various requirements for product labelling. Labelling in many cases informs purchase decision, and thus information presented on the label should be accurate and clear. This session ended with questions from the participants.

PRODUCT CLAIMS

In the second session, CTFA's Regulatory Affairs Officer, Yashmay Gordhon, expanded upon and provided clarity on the specific requirements of 'Product Claims', in the current regulatory environment. In particular, guidance was provided on claims that are prohibited on cosmetic products, as well as how to identify borderline claims, and the reference documents guiding these principles, including:

- Draft regulations relating to labelling, advertising and composition of cosmetics, R. 1469, 22 December 2017
- Cosmetic Advertising Code of Practice
- MCC 2.45 Borderline products – February 2017

Various relevant product claims were discussed thus providing clarity on which claims are considered as acceptable, and which are unacceptable within the definition of a cosmetic product. The question and answer session concluded this part of the training programme providing further clarity to individual concerns on product claims.

SCIENTIFIC SUBSTANTIATION

The final session of the programme was conducted by a guest speaker, who is an expert on the scientific substantiation of products: Marlize Lategan from Sefako Makgatho Health Sciences University is responsible for the Photobiology Laboratory at the institution. Marlize navigated

the participants through the session by providing details of how to go substantiating a product claim. Further emphasis was placed on compliance to:

- Draft regulations relating to labelling, advertising and composition of cosmetics, R. 1469, 22 December 2017
- ARB's Advertising Code of Practice

Ms Lategan assisted the group in understanding the important aspects surrounding scientific methods used for substantiation, that are internationally accepted and reproducible. A variety of specific claim testing methods were expanded upon.

The training programme was concluded by our Executive Director, Adelia Pimentel who thanked the attendees for availing themselves for CTFA's first virtual training and invited both the members and non-members attending to reach out to CTFA for further support and clarity on the topics covered in the session.

Please refer to CTFA's website and other communication platforms for updates on our exciting interventions for 2020.

2020 CTFA TRAINING - SAVE THE DATES

CTFA Industry Update:
27 August 2020

Responsible Person & Components of Product Information Files:
7 October

2020 - At a Glance:
Nov/Dec 2020 (TBC)

GMP Traning:
Nov 2020 (TBC)

Visit our website at **www.ctfa.co.za**

CTFA CALENDAR – 2020

DUE TO THE CURRENT COVID-19 PANDEMIC, DATES HAVE BEEN REVISED AS REQUIRED

AUGUST 2020
27/08/2020 – Industry Updates

SEPTEMBER 2020
10/09/2020 – Technical Committee Meeting
17/09/2020 – Executive Committee Meeting

OCTOBER 2020
02/10/2020 – Department of Trade and Industry Meeting
07/10/2020 - Product Information File Training
14/10/2020 – Induction Training for New Members

NOVEMBER 2020
13/11/2020 – CTFA Member Breakfast
19/11/2020 – Executive Committee Meeting
27/11/2020 – Department of Trade and Industry

DECEMBER 2020
03/12/2020 – Technical Committee Meeting

ctfa
COSMETIC TOILETRY & FRAGRANCE ASSOCIATION OF SOUTH AFRICA

news
JULY 2020

T: +27 11 795 4272 | **E:** info@ctfa.co.za
www.ctfa.co.za

POSTAL ADDRESS
P.O. Box 721, Randpark Ridge, 2056

PHYSICAL ADDRESS
59 Woodlands Avenue, Hurlingham Office Park, Block B, Ground Floor, Suite 2 & 3, Hurlingham, Sandton