

# **GUIDANCE FOR NEW IMPORTERS OF COSMETIC PRODUCTS**

## **1. INTRODUCTION**

### **1.1 Purpose**

This document is to provide general guidance to new importers of cosmetic products on the key aspects that they should pay attention to, when assessing the product's safety and quality.

### **1.2 Importer's Responsibility**

As the person introducing the product into the local market, importers are responsible to ensure that the products imported for local supply are safe, of appropriate quality for use as cosmetic products, and meet all regulatory requirements before supply. The details of regulatory requirements are available on our website at [www.hsa.gov.sg/cosmetic](http://www.hsa.gov.sg/cosmetic)

## **2. GENERAL GUIDES**

Below are the key aspects that importers should pay attention to, when assessing the product's safety and quality. However, as this is not an exhaustive list of pointers, importers have to include any other areas where appropriate.

Generally, importers should first check media reports, as well as the product alerts posted on the HSA website so that you do not unwittingly bring in products that have reported safety and quality issues such as product adulteration and product defects.

To avoid dealing with counterfeit products, importers are advised to:

- be cautious with solicitations from unknown distributors who advertise via email blasts or online platforms;
- be wary if the pricing of the products sounds too good to be true; and
- carefully inspect all products and packaging to look out for dubious signs such as differences in packaging from what we usually see, and unfamiliar instructions for use.

### **2.1 Manufacturers / Suppliers**

It is important to work with reputable and reliable suppliers so that they will not supply to you products of dubious quality. Unscrupulous suppliers and manufacturers may also sell to you products that have been added with undeclared substances that are harmful to human health.

Importers may look into the following aspects to help assess the reliability of suppliers/manufacturers:

- Suppliers / manufacturers who operate their business activities legitimately in countries where they are located;
- They have been audited and certified by the relevant authority or 3<sup>rd</sup> party certification bodies and possess valid certificates e.g. Good Distribution Practice certificate or ISO Good Manufacturing Practice certificate, where applicable;
- Suppliers have checks in place to ensure that the product meets the expected standards; and/or
- Positive reviews on the supplier/ manufacturer, if available.

In addition, it will also be useful to visit the supplier's warehouse and if possible, the manufacturer's facilities to establish if there are proper systems and facilities available in handling the products. You may consider engaging a competent consultant to assist in the assessment.

## **2.2 Product Safety**

### **2.2.1 Product Formulation**

Cosmetic products supplied in the market are required to use only ingredients that have established safety as cosmetic ingredients. Importers also have to ensure that ingredients contained in the products are not those prohibited for use in cosmetics.

There are also specific ingredients that can only be used under certain restricted conditions. Hence, importers have to ensure that if such ingredients are used in the products, they must comply with the conditions specified under the following lists of ingredients that are published on the HSA website ([www.hsa.gov.sg/cosmetic](http://www.hsa.gov.sg/cosmetic)):

- a) List of substances which must not form part of the composition of cosmetic products
- b) List of substances which cosmetic products must not contain except subject to restrictions and conditions laid down
- c) List of colouring agents allowed for use in cosmetic products
- d) List of preservatives allowed
- e) List of permitted UV filters which cosmetic products may contain

Importers have to check the full product formula to ensure that the ingredients used in the products are safe and meet the requirements as published on the HSA website.

## 2.2.2 Product Testing

On top of the test reports that may be provided by your supplier, importers should institute checks to confirm the product's quality as added assurance. Importers are encouraged to conduct your own product testing at accredited laboratories. In particular, importers should test the products for heavy metals and microbiological content, as well as for common adulterants to ensure absence of some of the more frequently encountered adulterants in cosmetic products.

Please refer to the website of the Singapore Accreditation Council (SAC) for the list of local laboratories accredited to conduct testing of cosmetic products.

Importers should note that cosmetic products are not intended for treating any medical conditions. If your supplier is making such claims for the products, be cautious that they may be adulterated with prohibited ingredients. Apart from checking the product formulation, you are advised to send the products for testing to confirm that there are no adulterants in your products.

There are certain types of cosmetic products that may be associated with specific adulterants. If you are dealing in these types of products, you may want to consider the following tests, such as:

a) Toothpastes

To test for the presence of diethylene glycol – a poisonous ingredient which presents as an impurity in glycerol and polyethylene glycols, which are common ingredients in oral care products.

b) Teeth whitening products

To test the concentration of hydrogen peroxide. Hydrogen peroxide, when in high concentrations, is corrosive and may cause irritation to the eyes, mucous membranes and skin. Only products with hydrogen peroxide of concentration up to 0.1% can be allowed for supply to consumers directly.

c) Lipsticks

To test for the presence of any non-permitted colourants e.g. Rhodamine-B, which is a carcinogenic dye that is prohibited in cosmetics.

d) Skin Whitening creams

To test for the presence of adulterants e.g. Hydroquinone, tretinoin and mercury. Hydroquinone and tretinoin are potent ingredients that are not suitable for use in skincare cosmetic products. The inappropriate use of hydroquinone could result in changes in skin colour and hypersensitivity reactions such as rashes, redness, tingling and burning of skin. Tretinoin could lead to redness and peeling of the skin and should only be used under medical supervision.

Mercury is a toxic substance and is prohibited for use as an ingredient in cosmetic products. It can be absorbed through the skin. Chronic exposure to very high levels of mercury in cosmetic products may also cause toxic effects to the kidneys, digestive and nervous system and this could lead to organ damage.

As the above is not an exhaustive list of ingredients to be tested, importers may seek assistance from contract laboratories on the appropriate tests to be conducted, based on the product uses and formulation.

Importers are also advised to discuss with your contract laboratories and request them to highlight to you if there are anomalies observed from the testing outcome, even if they fall outside the targeted scope. For example, any unusual peaks found in the chromatogram that may potential indicate the presence of other contaminants/adulterants should be further investigated.

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## CHECK LIST FOR IMPORTERS TO ENSURE COMPLIANCE OF IMPORTED COSMETIC PRODUCTS

