B. Illustrative List

18. What is the Illustrative List? Is this a restricted list?

A. The Illustrative List of Cosmetics By Categories identifies common product categories that are classified as cosmetics in ASEAN. It is NOT a restricted list and product forms and types currently not in the list should be considered against the definition of a cosmetic and not the list.

19. Is the Illustrative List my basis for determining whether my product is cosmetic or not?

A. The Illustrative List is one of the basis for determining whether the product is classified as cosmetic. However, it is not the sole basis. Together with the illustrative List, you would need to refer to the ASEAN Cosmetic Definition, the ASEAN Cosmetic Ingredient Listings and the ASEAN Cosmetic Claims Guidelines to fully assess whether your product will be classified as cosmetic.

C. Cosmetic Ingredient Lists

20. What are the ASEAN Ingredient Listings? How do I use them? What is a Restricted List? What is a Negative List? What is a Positive List?

A. The ASEAN Ingredient Listings would be the reference document of all ASEAN Member Countries in the review of formulations of cosmetic products. It will provide the list of ingredients that are banned or restricted for use, the positive list of colorants, preservatives and UV filters that are allowed for use in cosmetic products marketed in ASEAN. Refer to these listings during product formulation to ensure your products comply with the ASEAN Ingredient Requirements.

The Restricted List will indicate ingredients that are allowed for use in cosmetic products but subject to restrictions and conditions. It will define the restrictions on the field of application and/or use, the maximum authorised concentration in the finished product, other limitations and requirements and conditions of use and warning, which must be printed on the labels.

The Negative List indicates ingredients that are NOT allowed for use in cosmetic products. It is usually referred to as the Banned List or defined as the List of Ingredients which must NOT form part of the cosmetic products. The Positive List will indicate ingredients that are allowed for use in cosmetic products. Ingredients outside this list will not be allowed. For ASEAN, we have the positive lists for colorants, preservatives and UV filters for cosmetic products.

21. What is the ASEAN Handbook of Cosmetic Ingredients?

A. The ASEAN Handbook of Cosmetic Ingredients captures ingredients currently regulated differently from the ASEAN Common Ingredient Listings. The ASEAN Cosmetic Committee (ACC) created the ACSB (ASEAN Cosmetic Scientific Body) with the primary task to review each ingredient in the Handbook and check whether the current status of the ingredient in the country/ies should be rejected or adopted by ASEAN. Until such assessment is made, the countries are allowed to continue implementing the local regulations on the ingredients.

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22. What do I need to follow if my country has existing local Cosmetic Ingredient Listings?

A. When the country starts implementing the ASEAN Cosmetic Ingredient Listings, these will supersede the local ingredient listings. The ASEAN Handbook of Cosmetic Ingredients will be superseded by the recommendations of the ACSB adopted by the ASEAN Cosmetics Committee.

23. What if my Ingredient is not found in any of the ASEAN Ingredient Listings?

A. If the ingredient is not in the Banned List or Restricted List, the ingredient is allowed for use without any restrictions or special conditions. However, if the ingredient is functioning as a colorant or preservative or UV filter and is not in the ASEAN List of allowed Colorants, Preservatives or UV filters, the ingredient will not be allowed for use.

24. What if my ingredient exceeds the allowable maximum level in the ASEAN Ingredient Listings and I have extensive safety data to support my ingredient level?

A. The ingredient is not allowed beyond the maximum limit. The safety data can be presented to the ACSB through the ACC for modification of the limit. Until a positive recommendation is made by the ACSB and adopted by the ACC, the limit is to be complied with.

25. What is the ASEAN Cosmetic Scientific Body (ACSB)? How does it work?

A. The ACSB has been established to assist ACC in reviewing the safety and technical data of ingredients and making recommendations on other technical and safety issues for adoption by the ACC. The ACSB consists of representatives from the regulatory authorities, the industry and the academe. At present, the ACSB is reviewing the ASEAN Handbook of Cosmetic Ingredients as well as additions to the annexes of the Directive.

26. Who do I contact if I have queries/concerns on Ingredient Listings?

A. You can contact your local cosmetic regulatory authorities or industry associations. You can also access the following websites: (ASEAN website: www.aseansec.org, ACA website: www.ASEANcosmetics.org (Please refer to Appendix 2).

D. Good Manufacturing Practice (GMP)

27. What is the ASEAN Cosmetic GMP?

A. The ASEAN Cosmetic GMP is a set of guidelines published in accordance with the ASEAN Cosmetic Directive to facilitate the development of a quality management system by manufacturers producing cosmetic products that are intended for the ASEAN market.

28. What will happen if I am a small company and I can't comply with GMP?

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A. The Directive does not make any distinction between small, medium or big companies. All cosmetic products put on the ASEAN market must be manufactured according to the ASEAN GMP Guidelines.

29. How can I comply with the ASEAN Cosmetic GMP? What Should I do?

A. With the joint effort of the regulatory authority and the industry,13 training modules on the ASEAN cosmetic GMP have been developed to provide a consistent interpretation and implementation of the GMP Guidelines in ASEAN. It contains minimum requirements to ensure safe and quality products. You may obtain this information from your local regulatory authority and the following websites, www.aseansec.org/4951.htm, and www.aca.org. You may also contact your local cosmetic association for information on the training of the 13 modules. (Please refer to Appendix 2).

E. Labeling

- 30. What are the ASEAN Cosmetic Labeling Requirements? What do I need to do to comply with the requirements and when?
- A. The ASEAN Cosmetic Labeling Requirements define the information that has to appear on the label. Please see the ASEAN Cosmetic Labeling Requirements Technical Document for detailed requirements.

All cosmetic products marketed in the ASEAN must comply with the ASEAN Cosmetic Labeling Requirements by January 2008, when the ASEAN Cosmetic Directive is implemented. The industry should therefore start revising the labels in accordance to the ASEAN requirements and work on the transition so existing inventory can be exhausted and all labels on marketed products can be compliant by year 2008.

If an ASEAN member country chooses to implement the ASEAN Cosmetic Labeling Requirements before January 2008, the cosmetic product marketed in this country should comply with the requirements by the date stipulated by the regulatory authority.

31. Does ASEAN Cosmetic Labeling Requirements require ingredients to be reflected on the packaging?

A. Yes. Full Ingredient Listing using International Nomenclature of Cosmetic Ingredients (INCI) names needs to be reflected in packaging/label of cosmetic products under the ASEAN Cosmetic Product Labeling Requirements. However, botanicals and extracts of botanicals should be identified by genus and species as specified by the INCI lists. The genus may be abbreviated.

32. Is the Expiry Date a mandatory labeling requirement under the ASEAN Cosmetic Labeling Requirements?

A. The cosmetic product can reflect either the Expiry Date or the Manufacturing Date on the label under the ASEAN Cosmetic Labeling Requirements.

33. Is there a standard format to be followed for the labeling of the Expiry Date or the Manufacturing Date?

A. No, the common technical document does not dictate any standard format for Exp Date or Mfg Date. Any format can be used (e.g. month/year), provided it is presented clearlyand legibly, without causing any confusion among consumer.

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