CHINA'S NEW COSMETICS REGULATION (CSAR)

Consulting & Compliance Support

China State Council released the final version of the Cosmetics Supervision and Administration Regulation (CSAR) on 29 June 2020. This regulation came into force on 01 January 2021 and replaced the existing Cosmetics Hygiene Supervision Regulations.

Background

CSAR aims to ensure the quality and safety of cosmetics by strengthening industry supervision and management, as well as enforcing stricter controls on production and operations to protect consumer health.

To support the industry in implementing this regulation, guidance documents and supporting rules are being published progressively. Notably, the National Institutes for Food and Drug Control (NIFDC) released technical guidelines in 2024 and 2025 for the implementation of the new full version of the Cosmetic Product Safety Report (CPSR), outlining safety assessment and testing strategies.

Regulation Changes

China's new cosmetics regulation addresses compliance requirements, and many of the key changes and updates are as follows:

- New cosmetic definitions, scope and classifications
  - The classification of "special cosmetic products" (cosmetics with special purpose or function) has been updated to include hair dyeing, hair perming, spot removing and whitening, anti-hair loss and any new function (as determined by the National Medical Products Administration [NMPA]).
  - General cosmetic products" are classified as other cosmetics, which excludes special cosmetic products.
  - Toothpaste is not considered a cosmetic product; however, a notification must be completed before entering the market.
- Management of new cosmetic ingredients
  - Registration will be required for new cosmetic ingredients with higher risk, including preservatives, sunscreens, colorants, hair dyes, spot removing and whitening agents.
  - Notifications are required for other new cosmetic ingredients.
  - After new ingredients are placed on the Chinese market, annual safety and usage reports must be submitted to NMPA for a period of 3 consecutive years. After 3 years, the new ingredients will be included in the Inventory of Existing Cosmetic Ingredients in China (IECIC) if no safety concerns arise.
- Management of existing ingredients
- Existing ingredients or raw materials should have a unique submission code or safety information document (Annex 14) for cosmetic product registration and notification.
- Addition of efficacy claims requirements
  - The applicant is required to submit sufficient scientific evidence (literature, research data or product efficacy evaluation data) on the NMPA's website for claim substantiation.
- Information on the safety assessment report and requirements for safety assessors
  - A specific toxicological assessment is now required to determine whether data are needed to demonstrate the safety of ingredients and raw materials.
  - A safety assessment report is required before placing cosmetic products on the Chinese market (the full report version will be mandatory after 01 May 2025).
  - Safety assessors must have professional knowledge of cosmetics quality and safety and have more than 5 years of relevant work experience in production or quality safety management.
  - General cosmetics can be exempted from animal testing if the safety and quality requirements (GMP/ISO issued by government) are met/proven. Safety assessments will be accepted in place of animal testing, with certain restrictions.

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- Management of children's cosmetics
  - Stricter requirements on ingredients and finished products.
  - Special labelling requirements
- Management of toothpaste products
  - Notification must be completed before entering the market.
  - A Toothpaste Product Safety Report is mandatory.
  - New toothpaste ingredients need to be notified or registered.

Responsible Person & Implications for Industry

Registrants or notifiers based overseas can authorize a Chinese entity as their Chinese Responsible Person (CRP). The CRP is responsible for the quality, safety, and efficacy of cosmetic products. The CRP is responsible for:

1. Registration/Notification of the product in the name of the overseas registrant/ notifier.
2. Carrying out adverse reaction monitoring, product recalls, new cosmetic ingredients monitoring reports.
3. Cooperating with supervision and inspection under the local regulatory authorities

Cosmetics businesses must be aware of the new regulatory requirements because as of 01 January 2021, the penalties for non-compliance have increased significantly. Failure to comply with CSAR may result in the responsible person facing a lifetime ban for the production and operation of cosmetics in China.

Intertek Solutions

Intertek provides a comprehensive range of services for beauty and personal care products to ensure quality, safety, efficacy, and regulatory compliance. Partnering with Intertek helps brands and producers speed up their international growth, optimize the quality and safety of their supply chain and reduce total costs. We can help you understand your regulatory obligations to achieve compliance.

Our services include:

- Cosmetic Product Safety Report (Full Version)
- Toothpaste Product Safety Report
- Toxicological profiles of substances according to the latest NIFDC guidelines
- Toxicological Risk Assessment
- Registration & Notification of New Cosmetic/Toothpaste Ingredients
- Safety data submission for existing ingredient
- Registration & Notification of Cosmetic Products
- Notification of Toothpaste Products
- Labelling & Formula Review
- Literature Review & Data Collection
- Onsite support
- Training

The Intertek Advantage

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