

FROM THE ED'S DESK

Dear CTFA Members

A very happy and prosperous 2020 to all.

CTFA News looks at some highlights from the past year that will be ongoing this year and beyond. "Free-From" claims and "Hypoallergenic" claims will have a direct impact on South African labelling requirements and the adoption of these updates will be effective from 1 September 2021 in the South African cosmetic market.

Do take note of the updates discussed at the International Standards Organisation (ISO) meeting that took place in Switzerland in 2019, specifically with regards to analytical methods and sun protection test methods.

Important developments include the African Organisation for Standardisations (ARSO) ongoing discussions on standards and their impact both locally and globally.

Waste management has been a focal topic for the past couple of years and will be developing momentum this year. The Plastics Colloquium occurred on the 21 and 22 November and with the endorsement of Minister Barbara Creecy, will be an ongoing topic of discussion.

Please do save the date for the Cosmetic Industry Summit: "Breaking Barriers in Africa" which will take place on the 13 and 14 May 2020 at the IDC in Sandton. Make sure you do not miss it and register if you have not done so already.

Thank you to all members for your ongoing support.

Kind regards.



Adelia Pimentel
Executive Director

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"FREE-FROM" CLAIMS AND "HYPOALLERGENIC" CLAIMS

Restriction on "Free form" claims and "Hypoallergenic" claims, effective 1 July 2019 on cosmetic product labels destined for the EU market, has a direct impact on the SA labelling requirements.

The recent publication of the revised version of the EU technical document: Guidelines for the application of the common criteria, published on 3 July 2017, include 2 additional annexes, 'free from' claims (Annex III) and 'hypoallergenic' claim (Annex IV).

This document reflects a common understanding of national competent authorities within the EU member states, several of whom have already indicated their intention to apply the guidance provided in this document.

It is common practice that requisite changes or updates made in the EU have influenced the contents of the CTFA Cosmetic Compendium, which continues to function as a guideline whilst the industry remains self-regulated. As such, industry members have been advised of the imminent adoption of the relevant claims and the transition period that will be imposed in South Africa as mandated by industry, CTFA's position statement has been shared with industry which includes the agreed upon transition period, **effective 1 September 2021**. After which time the Advertising Regulatory Board (ARB) Advertising code of Practice will include updated clauses on "Free-from" claims and "Hypoallergenic" claims.

In summary, these new annexes introduce the following changes in the management of cosmetic claims:

Annex III: 'Free from' claims

TYPE OF 'FREE FROM' CLAIM	STATUS	REASONING
'Free from' + ingredient	Not allowed	E.g. 'Heavy metals free' or 'hydroquinone-free' Claims which convey the idea that a product has a specific benefit when this benefit is mere compliance with minimum legal requirements shall not be allowed.
'Free from' + ingredient or ingredients category that are present in the product	Not allowed	E.g. 'Free from formaldehyde' (if the product contains formaldehyde releasers) or 'allergen-free' (if the product contains fragrance or essential oils) If it is claimed on the product that it [does not] contain[s] a specific ingredient, the ingredient shall be deliberately [absent] present.
'Free from' + ingredient not supposed to be present in the product	Not allowed	E.g. 'Preservative free' (if the product is a fine fragrance containing high amounts of alcohol or bath salts, not expected to contain preservatives) Claims shall not attribute to the product concerned specific characteristics if similar products possess the same characteristics.
'Free from allergenic / sensitizing substances'	Not allowed	A complete absence of the risk of an allergic reaction cannot be guaranteed and the product should not give the impression that it does. "Free from" claims or claims with similar meaning should not be allowed when they imply guaranteed properties of the product, based on the absence of (an) ingredient(s), which cannot be given.

TYPE OF 'FREE FROM' CLAIM	STATUS	REASONING
'Free from' + ingredients category (e.g. fragrance, preservative, colorant)	Allowed / not allowed	<p>E.g. 'Preservative free' is wrong if the product contains an ingredient, not in the official list of preservatives (Annex V) but having antimicrobial properties.</p> <p>E.g. 'Fragrance free' is wrong if the product contains an ingredient that exerts a perfuming function, regardless of its other possible functions in the product.</p> <p><i>This claim is acceptable except if the product contains an ingredient having properties of this ingredient's family as a side function.</i></p> <p>E.g. '0% soap' claimed in a product like Micellar water</p> <p><i>The claim is not allowed if it refers to an ingredient not typically found in this particular cosmetic category.</i></p>
'Free from' + an ingredient or an ingredient family that is legally used	Not allowed	<p>E.g. 'Parabens free' or '100% natural preservative-free' (as there are recognised natural preservatives in the market)</p> <p><i>Claims for cosmetic products shall be objective and shall not denigrate the competitors, nor shall they denigrate ingredients legally used.</i></p>
'Free from' claims that allow an informed choice to a specific target group or groups of end users	Allowed	<p>E.g. 'Free from alcohol' in a mouthwash intended as a family product.</p> <p>E.g. 'Free from animal-derived ingredients' in Vegan products.</p> <p><i>Claims are an integral part of products and shall contain information allowing the average end user to make an informed choice.</i></p> <p><i>(knowledge.ulprospector.com, cosmeservice)</i></p>

Other examples of claims that will not be allowed include but are not limited to:

"No animal testing" or "cruelty free" claims – as this is a legal compliance matter in the EU;

"Chemicals free" – as all compounds are made up of chemicals

Exceptions

A claim may allow an informed choice to a specific target group or groups of end users and should be permitted when all other common criteria are met, for example, where the claim's justification is linked to considerations such as family use (e.g. mouthwash with no alcohol); lifestyle (e.g. product intended for vegans with no animal-derived ingredients); olfactive characteristics (e.g. nail polish without acetone), etc. (CE communication, October 2017)

"Annex IV: 'Hypoallergenic' claim

"The claim "hypoallergenic" can only be used in cases, where the cosmetic product has been designed to minimize its allergenic potential. Evidence to support the claim must be available by verifying and confirming a very low allergenic potential of the product through scientifically robust and statistically reliable data (for example reviewing post-marketing surveillance data, etc.). A product claiming to be 'hypoallergenic' will not contain known allergens or allergen precursors."

(knowledge.ulprospector.com)



ISO - WINTERTHUR, SWITZERLAND

CTFA participated in the 18th International Standards Organisation (ISO) bi-annual meeting held in Winterthur, Switzerland from 4 November to 8 November 2019. Dershana Valla, 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, as mandated at several of the working group meetings. Details of the recommendations concluded after extensive discussions held within each work group and consensus reached on the best way forward for the global industry are provided below.

COSMETICS ANALYTICAL METHODS

Working Group 3

The topic of discussion over the last year has revolved around the analysis of Mercury in cosmetic products. There is a huge drive locally and internationally to control the safety of cosmetic products by providing scientifically validated and sensitive test methods for the quantitative analysis of heavy metals in cosmetic products. In South Africa, the Department of Health, recognises the presence of heavy metals as trace substances present by virtue of clause 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)".

The discussions at this working group concluded the following recommendations:

1. Cosmetics – Analytical methods - Measurement of traces of heavy metals in cosmetic finished product using ICP/MS technique to advance to Draft international standard.
2. Ring tests will be launched to determine the comparison between Analytical methods
 - determination of traces of mercury in cosmetics by integrated analytical systems (the draft standard of which will be updated and circulated) and atomic absorption spectrometry (AAS) cold vapour technology after pressure digestion.
 - a. Each of these test methods will be performed via a ring test before the comparison can be made. South Africa has recommended laboratories with confirmed capabilities to participate in the ring trial that will be controlled through a central organising laboratory in Europe.



TERMINOLOGY (NATURAL AND ORGANIC STANDARDS)

Working Group 4



In 2019 South African Bureau of Standards (SABS) adopted the following standards: ISO 16128-1:2018 - Cosmetics Guideline on technical definitions and criteria for natural and organic cosmetic ingredients and products and ISO 16128-2:2018 Cosmetics -Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients.

The international working group realised that there was a requirement for further interpretation of these standards in the form of a Technical Report. This report was manufactured by various experts from around the world and then discussed at the meeting held in Winterthur, Switzerland. This report was finalised and discussions culminated in the finalisation of the amendments in preparation for submission to ISO for publishing. This marked the end of the project undertaken and there will be no future meetings on these standards.

SUN PROTECTION TEST METHODS

Working Group 7



CTFA suncare work group convened prior to the attendance of our expert Ms. Marlice Lategan from the Safakgo Magato University, to provide an industry mandate for her delivery at the ISO meeting. The expert is satisfied with the outcome of her representation and discussions over the last year as it pertains to the required test methods for suncare products in South Africa. The following are the recommendations reached:

1. Sun protection test methods – Determination of percentage of water resistance be advanced to the Final Draft Standard stage.
2. Sun protection test methods – Determination of sunscreen UVA photoprotection in vitro be advanced to Committee Draft ballot stage.
3. Sun protection test methods – In Vitro determination of sun protection factor - working draft, is planned for further discussion and assessment to determine its readiness for the draft for Committee Draft ballot. The comments on the CD will be discussed at the next ISO meeting planned for June 2020.
4. Sun protection methods – Measurement of sunscreen efficacy by diffuse reflectance spectroscopy – detailed data required for further calculations.
5. Sun protection methods – Measurement of sunscreen efficacy by diffuse reflectance spectroscopy on UVA protection factor – it was recommended that the UVA PF be reinstated in the scope of the project and that the new working draft be circulated for comments.

At the conclusion of the ISO meeting programme, a plenary meeting was held on 8 November 2019, where the recommendations and reports presented by the convenor of each working group including that of Working Group 1, Microbiological test methods, were approved. The 19th ISO meeting is scheduled to take place in Paris in June 2020. CTFA will once again endeavour to participate and represent the local industry's interest and mandate at this meetings.

REGULATORY ALERTS 2019

Highlights

DATE OF WTO ALERT	WTO REGULATORY ALERT	PROPOSED DATE OF ADOPTION	IMPACT FOR SOUTH AFRICAN INDUSTRY
3 April 2019	The European Union (European Commission) notified of the Draft Commission Regulation amending Annex VI, authorizing the use of additional coating materials for the UV filter Titanium dioxide (nano) in cosmetic products.	Fourth quarter of 2019	Relevant for those exporting cosmetic products to Europe. Impact may include: 1. Reformulation of exiting products
3 September 2019	The Republic of Korea (Ministry of Food and Drug Safety) proposed amendments to "Regulation of Safety Standards etc. of Cosmetics" to prohibit the use of " <i>Tagetes erecta</i> flower extract or oil" in cosmetics; and restrict the use of ingredients in cosmetics	3 September 2019	Relevant for those exporting cosmetic products to Korea. Impact may include: 1. Reformulation of exiting products
18 September 2019	The European Union (European Commission) notified of an amendment to Annex II to Regulation No. 1907/200, regarding requirements for safety data sheets . These changes include: <ul style="list-style-type: none"> • Alignment with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), particularly with regards to physical and chemical properties and transport • Alignment with the provisions for emergency health response on classification, labeling and packaging • Alignment with new provisions for nanoform substances 	First quarter of 2020	Relevant for those exporting cosmetic products to Europe. Impact may include: 1. Reformulation of exiting products – sourcing and purchase of alternative raw ingredients 2. Transition from banned material 3. Redesign of label for ingredient labelling changes

DATE OF WTO ALERT	WTO REGULATORY ALERT	PROPOSED DATE OF ADOPTION	IMPACT FOR SOUTH AFRICAN INDUSTRY
9 October 2019	The Republic of Korea (The Ministry of Food and Drug Safety) notified of an amendment to the "Regulation on the Labelling of Precautions for Use of Cosmetics", regarding the designation of certain ingredients as allergens to be stated on labels . This is if the allergen is present at a concentration higher than 0.01% in a rinse-off product, or higher than 0.001% in a leave-on product.	18 November 2019	Relevant for those exporting cosmetic products to Korea. Impact may include: 1. Redesign of labels 2. Possible reformulation of exiting products to reduce levels or sourcing of alternate ingredient 3. Possible reconsideration of "hypoallergenic" claims if these already exist for products that will now be deemed to contain allergens
18 October 2019	Brazil (Brazilian Health Regulatory Authority) adopted the draft resolution (number 639) which proposed changing the expiration date to 10 years of the market authorization for personal hygiene products, cosmetics and perfumes.	10 October 2019	Relevant for those exporting cosmetic products to Brazil
23 October 2019	The delegation of Uganda notified that the following draft Uganda standards entered into force on 20 September 2019: <ul style="list-style-type: none"> • DUS 875: 2018, Lipstick Specification, 2nd edition • DUS 1887: 2017, Deodorants and antiperspirants • DUS 1921: 2017, Body oils • DUS 1931: 2017, Shea butter for cosmetic industry • DUS 1932: 2017, Lip balm (salve) • DUS 1933: 2017, Lip shine (gloss) • DUS 1934: 2017, aftershave • DUS 1963: 2018, Caustic soda (sodium hydroxide) <p>The draft standards previously published have now been entered into force.</p> <p>These standards are aimed at reducing counterfeit products and to ensure consumer safety.</p>	Entered into force on 20 September 2019	Relevant for those exporting cosmetic products to Uganda Impact may include: 1. Those exporting to Uganda will be required to adhere to the standards listed 2. SA comment on impact of the standards adoption as it is a barrier to trade as well as hamper innovation and more technologically advanced product reaching the market
6 November 2019	Indonesia (Halal Product Assurance Organizing Agency, Ministry of Religious Affairs) notified of a draft technical regulation, which covers the mandatory implementation of halal products assurance in particular products. Products affected include: Food and beverages; traditional medicines and health supplements; medicinal products; cosmetics; chemical products ; genetically engineered products; clothing, headgear and accessories; household appliances; Muslims worship equipment; stationery and office equipment; goods for medical devices risk class A, B, and C.	The proposed date of adoption is to be determined. The suggested transition period for cosmetics is 17 October 2021- 17 October 2026	Relevant for those exporting cosmetic products to Indonesia Impact may include: 1. Exporters must provide marketing authorization, commercial license and or import license 2. Halaal certification of such products will be an additional cost and possibly delay placing products onto the market 3. Halaal logos may need to be included on packaging labelling resulting in an additional cost

ADVOCACY DELEGATION TO KENYA

On October 23-25, CTFA participated in an international industry advocacy delegation to Kenya. The delegation was led by the Personal Care Products Council (PCPC) based in the United States (US).

The delegation met with the Kenyan Bureau of Standards; the Ministry of Industry; Trade & Cooperatives; the Ministry of Health; the EU Representation; the US Commercial Service, and representatives from local industry, as well as other stakeholders. During the visit, delegates discussed current problems faced when placing products on the Kenyan market and advocated for reform of the Kenyan cosmetic regulatory approach. Authorities were receptive to industry's proposals and agreed to establish a Joint Working Group, to include US Embassy officials, to continue cooperation. CTFA member companies participating in the delegation included: Selina Musalia and Emmanuel Capiomont from L'Oréal; Idah Asin of Johnson and Johnson, Mario Lazzaroni of the Estée Lauder Companies and Eric Gautier, Marie Nyaga and Babalwa Mantyi from Colgate Palmolive. Elsa Dietrich, Cosmetics Europe also participated and the international industry advocacy delegation was led by George Bouboulis from PCPC.



Industry delegation meets with the Kenyan Ministry of Industry, Trade & Cooperatives.



Industry delegation meets with the Kenya Association of Manufacturers.



Industry delegation meets with the Kenyan Bureau of Standards.



Industry delegation meets with the European Union Consulate in Kenya

AFRICAN ORGANIZATION FOR STANDARDISATION - HARMONISATION OF STANDARDS

African Organization for Standardisation (ARSO) is an intergovernmental body established by OAU and UNECA in 1977 with the principal mandate to harmonise African Standards and conformity assessment procedures in order to reduce technical barriers to trade and therefore promote intra-African and international trade as well as enhance the industrialization of Africa.

Thus the mandate of ARSO includes the following:

- harmonize national and/or sub-regional standards as African Standards and issue necessary recommendations to member bodies for this purpose;
- initiate and co-ordinate the development of African Standards (ARS) with references to products which are of peculiar interest to Africa;
- encourage and facilitate adoption of international standards by member bodies;
- promote and facilitate exchange of experts, information and co-operation in training of personnel in standardization activities;
- co-ordinate the views of its members at the ISO, IEC: The International Electrotechnical Commission, OIML: International Organisation of Legal Metrology, Codex and other international organisations concerned with standardisation activities;
- create appropriate bodies in addition to the organs of the organisation for the purposes of fulfilling its objectives.

The South African Bureau of Standards (SABS) is a participating member of ARSO and as such was invited to attend a workshop on 25 to 29 November 2019 in Nairobi, Kenya. The invitation was extended to members of SABS/TC0217 Cosmetics for an industry member to be represented. CTFA volunteered to attend on behalf of the cosmetic industry in its capacity as the industry association. The workshop was attended by Mrs. Morwesi Ntuka (SABS Team Industry Leader) and Ms. Dershana Valla (CTFA Head: Policy and Regulatory Affairs).

The objective of the workshop was to consider the adoption of the various national standards proposed for adoption as ARSO standards. The outcome of the workshop would be that all participating members would reach a consensus to progress these proposed standards through the approval process, namely, the African Standards Harmonisation Model (ASHAM).

SABS proposed SANS 10393 Hair Care standard for consideration, as one of the counter proposal to the product specific specifications proposed by the East African Community (EAC) for adoption as ARSO standards.

To further contest the proposal and the consideration of the EAC specifications, for ISO the international electrotechnical commission CTFA, through the SABS submitted the position below on the standards being proposed by the EAC:

"General comments on the new work item proposal (MWIP)

The proposed NWIPs are technical barriers to trade that South African cosmetic companies encounter when they export products to East African Countries. Through various engagements with the South African Department of Trade and Industry, they are aware and acknowledge these barriers. Based on this the South African Cosmetic Industry does not support a process where the East African Standards are adopted by ARSO as harmonised African standards as this would continue to hamper and heavily disadvantage the continental export capacity of our local cosmetic industry. Should these NWIPs be adopted as harmonised African standards, the results would further isolate not only locally manufactured but other cosmetic products manufactured from other parts of the world that follow a standardisation system similar to ours and are based on global harmonisation driven by International Standards Organisation (ISO). This would ultimately hamper the African economy from thriving.

Specific comments on the New Work Item Proposal (MWIP)

The proposed NWIPs are prescriptive in that they are written as regulatory texts. In South Africa, standards are voluntary and complimentary to formal regulation and are mostly based on method and best practice, unless the National Regulator for Compulsory Specifications makes them a compulsory specification, in very specific cases, namely, Legal metrology.

We recognise that the continent's needs are closely aligned to that of South Africa and would therefore like to raise our concerns and share our experience which we trust will be of benefit:

- The South African Bureau of standards, through input from industry customises ISO standards taking into consideration that certain product types require unique guidelines for South Africa. This customisation is always cognisant of our unique market and allows for innovative, efficacious and safe products. This process of adoption has successfully worked in South Africa for 25 years and continues to do so as the industry continues to provide scientifically enhanced products for the SA market.*

- ARSO's proposed approach to standardisation is premised on product quality whereas in South Africa our approach is product safety driven. This disparity poses a serious risk of technical barriers to trade within and outside the continent if the NWIP is adopted and further, inclusively hampers consumer driven innovation within the cosmetic industry due to the prescriptive standards."*

At the workshop, participants were divided into two groups to address the two scopes outlined by ARSO and the relevant standards proposed for each category:

1. Cosmetic: Standardisation in the field of cosmetic products, in terms of terminology, classification, characteristics, specifications and test and performance methods.
2. Cosmetology: Standardisation in the subject of cosmetology and wellness services and products.

The two groups were allocated with the task to discuss standards relevant to each category as outlined above. As the SA delegation, we're aware that Cosmetology & Wellness is not a recognised topic and sector within the ambit of SABS/TC0217, however, it was evident from the discussions held in this working group that there is a need to explore the possibility of creating a sub-committee of SABS/TC0217 to address the need for standards for this area of services in order to align with the rest of the continent.

As there are existing EAC standards that are recognised by ARSO, consensus was reached that in the event that there is an existing EAC Standard addressing a specific product, the EAC standard would be converted to a draft ARSO standard for commentary and balloting. The motivation for this was that this will allow a shorter journey through the approval process. Even though the SA delegation voiced disagreement to this process however we were appeased that the draft standards would allow for commentary submission and balloting prior to the approval and adoption of these standards. In the case where no existing EAC standard was available, the relevant proposed national standard was considered as a draft ARSO standard for commentary and balloting by all ARSO participants.

The commentary and balloting process would lead to one of two outcomes:

1. Commentary received could be accepted and the approved changes would be captured to refine the document to proceed to the final approval stage resulting in a standard that would be made available for member states to adopt if they deemed it suitable depending on their individual regulatory frameworks.
2. Member countries could reject the draft standard and contest its progress through the approval process.

The proposed draft ARSO standards will be distributed to the national standards bodies for commentary and balloting. CTFA will in-turn share these draft standards with the CTFA technical committee. Commentary and ballots will be collated for submission via SABS to ARSO within the allocated timelines.

CTFA will once again raise the concerns already addressed in our formal submission to the ARSO head office, as well as the workshop organisers in Nairobi, in an effort to ease trade barriers created by the current system of EAC standards.





PLASTICS COLLOQUIUM

OVERVIEW OF THE PLASTICS COLLOQUIUM

CTFA attended the Plastics Colloquium, held on the 21st and 22nd of November at the Birchwood Hotel and Conference Centre in Boksburg. The event was attended by various members of government, media, industry representatives, and civil society. The colloquium aimed to gather relevant people to exhibit innovative ideas, hold discussions and eventually set objectives to improve the current state of plastic waste in South Africa.

The Minister of Environment, Forestry and Fisheries (DEFF), Barbara Creecy, addressed the colloquium, delivering opening addresses on both days, as well as the final closing remarks. Minister Creecy acknowledged Plastics SA, the South African Waste-Pickers Association (SAWPA), the Consumer Goods Council (CGCSA), among all other attending guests. Exhibitions were on display throughout the two-day event, and showed off many innovations from various industries. Examples included The Coca-Cola Company's "light weighted technology... removing colored packages into clear PET" and the creation of a brick made entirely of recycled plastic by Ramtsilo.

Panel Discussions involved representatives from the Coca-Cola Company; Plastics SA; World Wide Fund for Nature (WWF) South Africa; South African Research Chairs Initiative (SARCHI); Chemicals and Waste Management sector at DEFF; SAWPA and the South African Local Government Association (SALGA). Discussions were mostly related to the recyclability of plastics and possible way to adjust consumer attitudes and perceptions.

OUTCOMES OF THE PLASTICS COLLOQUIUM

Breakaway groups on Day 2 of the colloquium allowed for experts to address small groups, before engaging in discussions surrounding each of the seven key areas, including: product standards; product design; integration of the informal waste economy; biodegradable and compostable plastics; infrastructure; consumer education and awareness.

Following the breakaway groups, the following points were brought up at the feedback session:

- The end user doesn't necessarily know what is recyclable and how to recycle it. Product labels should address this issue.
- Conformity of logos and certification is a challenge with regards to biodegradable and compostable plastics.
- Collaboration across the value chain is vital.

This includes the need for regulation to support the design of recyclable packaging.

- More research is required for what happens with biodegradable materials in SA. Most of the research currently available has been conducted in European environments.
- Land availability is an issue.
- Consumer education and awareness is important- all media platforms should be utilized including social media. Topics surrounding waste management should also be part of the school curriculum.

RELEVANT POINTS FOR THE COSMETIC INDUSTRY

Waste management continues to be an important issue across industries, with each industry experiencing unique challenges. Anton Hanekom, Executive Director at Plastics SA explained during the panel discussions that "plastics disposed of correctly is one of the most environmentally responsible products". With this in mind, special attention must be paid to product design, particularly in the cosmetic industry where the aesthetics of the packaging is often important to the consumer.

Packaging accounts for most of plastic waste, and cosmetic packaging is often multilayered and difficult to recycle. Often small containers, colored containers, and pumps and droppers cannot be recycled. Furthermore, it is vital that the container is completely cleaned from residue prior to recycling it. Another consideration for the industry is how to maintain product integrity with alternative packaging options.

Minister Creecy mentioned the importance of "designing a product from the beginning for reuse and recycling". It is important to think about how the standards and regulatory environment support this, and this will require collaboration with the South African Bureau of Standards (SABS) and the Department of Trade and Industry (DTI).

THE WAY FORWARD

The South African Initiative to end Plastic Waste in the environment previously identified four areas that need to be addressed (Plastics SA, 2019):

- (a) Infrastructure development to collect and manage waste and increase recycling.
- (b) Innovation to advance and scale new technologies that make recycling and recovering plastics easier and create value from all post-use plastics.

- (c) Education and engagement of governments, businesses, and communities to mobilise action.
- (d) Clean-up of concentrated areas of plastic waste already in their environment, particularly that major conduits of waste, like rivers, that carry land-based plastic waste to the sea.

The two-day colloquium provided a platform for various industries to interact on their waste management plans. It was decided that targets and time frames will be set within the working groups. These groups will report back every 3 months and finally the colloquium will reconvene in a year to discuss the progress made and the overall achievements. Minister Barbara Creecy closed mentioning the importance of the colloquium saying that "what we decide here will impact on future generations".

Look out for further updates on plastics and waste management!



RECYCLABILITY OF PLASTICS

Following the Plastics Colloquium, CTFA was made aware that there are many misconceptions surrounding the recyclability of plastics. The results of the 2018 National Plastics Recycling Survey, highlighted some statistics surrounding the idea of the plastics circular economy (Plastics SA, 2019).

A circular economy is “a concept that enables economic growth by turning waste into valuable materials that can be resold and reused” (Turning local waste industry into circular economy, 2019). This concept allows for plastics to remain in the economy, rather than being discarded while new plastics are manufactured. This also has an impact on the various other resources that are used to produce plastics, such as water. Single use plastics should therefore be eliminated wherever possible, as they have been identified as the main cause of increasing pollution levels.

NATIONAL PLASTICS RECYCLING SURVEY RESULTS

While the full version of the survey can be purchased directly from Plastics SA, a few of the important points are listed below (Plastics SA, 2019):

- In 2018, South Africa converted 1 876 250 tons of polymer into plastic products, which increased 4.9% from 2017.
- 70% of the plastics recycled was obtained from landfill and other post-consumer sources. An important consideration is the infrastructure put in place to support this. This includes the appropriate facilities to allow for the separation of recyclables from wet waste.
- PE-LD and PE-LLD packaging films are the most commonly recycled materials. This includes heavy duty refuse bags, stretch films and yoghurt containers.
- In 2018, the plastics industry managed a 46.3% input recycling rate, and recycled 352 000 tons of raw material.









DIFFICULT-TO-RECYCLE MATERIALS

It is important for industry and consumers to understand differences in plastics, and that not all plastics can be easily recycled. The 2018 National Plastics Recycling Survey makes mention of “multi-layer or multi-material products, too much printing inks” and “the wrong combination of closures and bottles, or webbing and stitching in woven bags” (Plastics SA, 2019).

In some cases, it is possible for difficult-to-recycle materials to be recycled, however this requires more complex, alternative methods, which are often very expensive.

MATERIAL IDENTIFICATION CODES: COSMETIC APPLICATIONS

Although information provided to industry may provide guidance in terms of product design and the regulations that support waste management, it is imperative for consumers to be educated and aware of the recyclability of plastics. The material identification coding system is a set of symbols used to identify the type of polymer used in the product/packaging. The following table outlines the material/type of polymer; cosmetic product examples and whether or not the material is recyclable. Consumers should be aware that the container should be cleaned of residue prior to recycling the product.

MATERIAL	EXAMPLES OF RECYCLABLE PRODUCTS	EXAMPLES OF PRODUCTS NOT CURRENTLY RECYCLED IN SA	MATERIAL IDENTIFICATION CODE
PET Poly (ethyleneterephthalate)	Clear bottles, clear jars	Clear barrier films, blister packs, colored bottles	 PET
PE-HD High density polyethylene	Packaging films, tubs, closures, cosmetic bottles, jars		 PE-HD
PVC-P Flexible Poly (vinyl chloride)		Cling film, pouches, cap liners	 PVC
PVC-U Rigid Poly (vinyl chloride)		Clear bottles, jars, blister packaging, tamper evident neck seals	 PVC
PE-LD and PE-LLD Low and Linear low density polyethylene	Packaging films, shrink wrap, bubble wrap and peelable lids	Cosmetic Tubes	 PE-LD
PP Polypropylene	Bottles, caps and closures, clear crispy packaging films, metallised (printed) films, shrink labels	Self-adhesive labels	 PP
PS and PS-HI Polystyrene (general purpose and high impact)	Display boxes		 PS
PS-E Expanded Polystyrene	Protective packaging		 ABS
ABS Acrylonitrile Butadiene Styrene	Tubs		 POM

MATERIAL	EXAMPLES OF RECYCLABLE PRODUCTS	EXAMPLES OF PRODUCTS NOT CURRENTLY RECYCLED IN SA	MATERIAL IDENTIFICATION CODE
E/VAC Ethylene (Vinyl acetate)	Cap liners		 PET
POM Polyoxymethylene or acetal		Aerosol container valves	 PC
PC Polycarbonate	Re-usable water bottles		 PETG
PETG Poly (ethylene terephthalate glycol)		Personal care bottles manufactured in smaller volumes and non-symmetrical shapes	 PET+PA
Multi-layer PET and PA		Barrier PET bottles used for oxygen sensitive products	 PET+PA
Multi-layer PE and PA		Barrier films used as oxygen and moisture barriers	 PET
Multi-layer PE and E/VAL		Often used in multi-layer oxygen sensitive punnets and tubes	 PE-E/VAL

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ROOIBOS TRADE KHOI-KHOI AND SAN AGREEMENT

A great milestone has been reached for the Khoi-Khoi and San communities. On the 1st of November 2019, a ceremony was held to officialize the signed agreement between the SA Rooibos Council (SARC) and the National Khoi-San Council (NKC).

In 2014, as one of most biodiverse countries in the world, it was vital for South Africa to become one the first 50 countries to subscribe to the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization to the Convention on Biological Diversity (Department of Environmental Affairs, 2013). This was a significant step to protecting traditional knowledge, as well as the biological resources within South Africa.

In 2019, this agreement between the Rooibos Industry and the Khoi-Khoi and San was one of historic Access and Benefit-sharing (ABS), and came after 4 years of negotiations. The benefit sharing levy agreed upon of 1.5% equates to "an estimated R9-million per annum", and the appropriate use will be decided by NKC and SARC.

The first agreement of its kind, this is a huge step for the bioprospecting community, and will lead

to the rightful upliftment of the Khoi-Khoi and San communities. Barbara Creecy, the Minister of Environment, Forestry and Fisheries described the agreement as "a good story for all of us to tell considering that Rooibos is an existing industry with prospects for transformation, where small players in the value chain have the potential to become big players in a global industry" (Bizcommunity, 2019).

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THE POISONS INFORMATION CENTRE

AN INTRODUCTION TO POISONS CENTRES

Poison Centres, as recognized by the World Health Organisation (WHO), are “specialized units that advise on and assist with the prevention, diagnosis and management of poisoning” (World Health Organization, 2019). Most often through a helpline, poisons centres share information about exposure to chemicals with healthcare practitioners and the public.

The chemical agent at the root of the exposure can include medicines, household agents, pesticides and other substances including cosmetic products. The role of a poison centre is to assess the extent of the exposure and the risk of harm using their database of products and chemicals, and finally assist with the management of the patient, in the event of an adverse reaction on misuse of products.

In order to build an accurate toxicological database of chemicals in such products, poison centres often rely on information from manufacturing companies. In South Africa, the Poisons Information Centre at the Red Cross Children’s Hospital has developed and currently maintains a poisons database - AfriTox. The AfriTox database includes approximately 40 000 substances and 20 000 products (Afritox, 2015).

CTFA’S ENGAGEMENT WITH POISONS INFORMATION CENTRE

According to the statistics of the Poisons Information Centre, 38.9% of the 496 calls (n=193) related to cosmetic poisoning were symptomatic in 2018. As CTFA strives to ensure that our members have updated information on all relevant topics, an engagement was had with the Poisons Information Centre. The objective was to gain a better understanding of the expectations the organisation has of the cosmetic industry, in terms of providing pertinent information on assessing cosmetic products as containing potentially harmful ingredients if misused.

What information should the industry supply to the poisons information centre?

It is important for the cosmetic industry to supply information to poison centres, so that the database contains all the possible information, and accidental ingestions can be managed quickly.

The following information is requested of the cosmetic industry for the AfriTox database:

- The ingredient listing for the product
- The name of the product as it appears on the label
- A copy of the label
- The chemical name of the product
- The CAS number of the product
- Ingredient concentrations (a range)

On an ongoing basis, it is imperative that changes in product formulation, discontinued products or changes to product trade name should be communicated by the manufacturer so that the database can be accurately updated. In the case of changes to product trade names where there are no changes to the formulation, informing the Poisons Information Centre about the change assists in minimizing the duplication of information.

If a manufacturer who has already supplied information would like to know whether or not the product was loaded onto AfriTox, they are able to contact Poisons Information Centre to inquire. It should be noted that the website is not a submission portal for manufacturers, and all submissions must be sent via email.

The contact details for sending information are listed below:

- Email: poisonsinformation@uct.ac.za
- Phone: (021) 658 5308 (Farah or Linda)

The Poisons Information Centre offers logos to companies in exchange for a fee. The logo confirms that the product is listed on AfriTox and is accompanied by the emergency helpline number. Companies who wish to place these logos on their products, can contact the Poisons Information Centre directly.

HIGH-RISK COSMETIC PRODUCTS

Poisons Information Centre provided lists of high-risk cosmetic products, often implicated in accidental exposure. The list includes toners, nail products, hair dyes/relaxers and toothpastes, amongst others.

CTFA will continue to engage with the Poisons Information Centre. From a consumer safety perspective, it is important that as an industry we enable the centre to effectively manage accidentally poisoned consumers through the information supplied by the industry.

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CTFA MEMBERSHIP BREAKFAST

On the 22 November 2019 CTFA held a successful networking member breakfast at the Holiday Inn in Sandton. The focus of the presentation included a summary of both global and local regulatory updates in 2019 and included a pro-active look at 2020 on how potential regulatory changes will impact businesses.

The CTFA Technical Committee (TC) is an integral part of the CTFA. This Committee is comprised of representatives of member companies who give freely of their time to discuss ongoing regulatory practices and how to implement them in the South African cosmetic industry. The ongoing support of TC members was acknowledged at this breakfast.

A presentation was made by Dr Martyn Davies, Partner and Managing Director of Emerging Markets & Africa at Deloitte. Dr Davies unpacked Political and Economic Insights directly impacting on business in South Africa.



CTFA CALENDAR – 2020

February 2020

19/02/2020 – Product Labelling & Claims Substantiation Training
21/02/2020 – Department of Trade and Industry Meeting

March 2020

11/03/2020 – Induction Training for New Members
19/03/2020 – Technical Committee Meeting

April 2020

02/04/2020 – Executive Committee Meeting (AGM)
08/04/2020 – Product Labelling & Claims Substantiation Training (KZN)
17/04/2020 – Department of Trade and Industry Meeting
22/04/2020 – Product Labelling & Claims Substantiation Training (CPT)

May 2020

13/05/2020 – CTFA Summit (Day 1)
14/05/2020 – CTFA Summit (Day 2)
28/05/2020 – Technical Committee Meeting

June 2020

03/06/2020 – Good Manufacturing Processes (GMP) Training
19/06/2020 – Department of Trade and Industry Meeting
25/06/2020 – Executive Committee Meeting

July 2020

30/07/2020 – Technical Committee Meeting

August 2020

07/08/2020 – Department of Trade and Industry Meeting
19/08/2020 – Product Information File Training

September 2020

10/09/2020 – CTFA – IKW Safety Assessment Training
10/09/2020 – Technical Committee Meeting (TBC)
17/09/2020 – Executive Committee Meeting

October 2020

02/10/2020 – Department of Trade and Industry Meeting
14/10/2020 – Induction Training for New Members

November 2020

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

December 2020

03/12/2020 – Technical Committee Meeting



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