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## FROM THE ED'S DESK

#### Dear CTFA Members

Welcome to the July issue of *CTFA News*. Most African countries are key trading partners for South Africa, as a result the dissipating of technical trade barriers play a major role in ensuring trading in the African continent is seamless. CTFA has developed an African strategy with a main objective of assisting in African regulatory harmonization through strategic partnerships. In this issue we look at Botswana and their pending cosmetic regulations, Nigeria and the update of their current regulations through the National Agency for Food and Drug Administration and Control (NAFDAC) and the CTFA role in the African Organisation for Standardisation (ARSO).

Part of CTFA's role is to keep abreast of developments internationally, in this issue we give you some feedback on the recent International Conference of Cosmetic Regulators (ICCR). We also look at CTFA's participation in the International Organisation for Standardisation (ISO) meeting that occurred in June this year.

Notwithstanding the above, we include a synopsis of the World Trade Organisation's (WTO) main activities and the WTO agreement for technical barriers to trade, where SABS is the mandated Enquiry Point.

This issue contains a live link to the latest Look Good Feel Better (LGFB) newsletter. LGFB is CTFA's corporate social responsibility arm and plays a vital role in the lives of people living with cancer.

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

Adelia Pimentel Executive Director

# BOTSWANA MEDICAL REGULATORY AUTHORITY (BOMRA)

### **MRSA & MRA**

Since 2019, the Botswana Medical Regulatory Authority (BoMRA) has indicated an interest in regulating the cosmetic industry within Botswana. On 17 March 2019, BoMRA published a notification that confirms that the Medicines and Related Substances Act, 2013 (MRSA) and its regulations of 2019 mandates the cosmetics regulation for safety. On 27 January 2021, BoMRA published a notification Ref: MRA 1/8/5 Vol II (132) - Cosmeceutical products Listing Process. This notification required products to be listed and notified to BoMRA. For more information visit link below.

### CLICK HERE

### **BOMRA Public Notice - Cosmetics**

Link - https://ctfa.co.za/wp-content/uploads/bomra-public-notice-cosmetics.pdf

Since Botswana is one of the key trading partners for South Africa within the Southern African Development Community (SADC) region, this reform will have a direct impact on South African companies exporting cosmetics to Botswana. In response, CTFA, through the assistance of the Department of Trade Industry and Competition (DTIC), has initiated conversations on the possible harmonisation of regulatory requirements, with the South African regulatory framework which would enable trade benefits for both countries. Last year, CTFA made a written submission to BoMRA on their published MRSA which alluded to the inclusion of cosmetics.

Subsequently, CTFA was invited to attend BoMRA's virtual stakeholder engagement, on 25 & 26 May 2021. CTFA utilised this opportunity to make a verbal presentation of our submitted concerns and proposed suggestions to the MRSA. The challenges included the following:

- The lack of alignment of the definition of a cosmetic with international regulations.
- The confusion surrounding product categories and the potential registration requirement based on this.
- Product claim matters that lack clarity and are misaligned with internationally recognised cosmetic product categories.



Further to this, on 17 March 2021, BoMRA published a notification Ref: MRS 1/8/5 Vol II (153), informing of the adoption of national standards as a prelude to cosmetic regulatory oversight.

Additionally, in May 2021, BoMRA invited stakeholders to submit commentary on their proposed Medicines and Related Substances Bill. The proposed Bill attempts to include cosmetics in what is predominantly a medicines regulation. In addition to making a national submission, CTFA solicited the support of international cosmetic industry associations for their support in influencing BoMRA to rely on international best practice and regulations. Some of the key challenges that were identified and represented include:

- The potential overlap and confusion of the regulatory oversight for medicines and cosmetics.
- The notification requirement for cosmetics based on a similar established process for medicines.
- The potential confusion and misalignment with internationally accepted definition of cosmetic categories.

Reasonable proposals accompanied our comments which have been met with an acknowledgment from BoMRA. We look forward to further engagements with the authority to discuss our submission. CTFA will keep you informed on future developments.

### THE NATIONAL AGENCY FOR FOOD AND DRUG ADMINISTRATION AND CONTROL (NAFDAC) - NIGERIA

As part of the CTFA's Africa strategy, it is extremely important that we form partnerships throughout the African continent and participate in the African harmonization of regulatory strategies. This will help to overcome trade challenges throughout the industry in various African countries. The estimated value of export business is approximately R244m. Companies are exporting to various African countries, of which 46% are exported to Nigeria.

The National Agency for Food and Drug Administration and Control (NAFDAC), was established by Decree no. 15 of 1993 as amended by Decree no. 19 of 1999, and now the National Agency for Food and Drug Administration and Control Act Cap NI Laws of Federation (LFN) 2004, to regulate and control the manufacture, importation, exportation, distribution, advertisement, sale and use of Food, Drugs, Cosmetics, Medical Devices, Packaged Water, Chemicals and Detergents (collectively known as regulated products). The Act establishes NAFDAC as the governing council. The council may, with the approval of the minister make certain regulations.

NAFDAC enforces various cosmetic regulations, these include Registration, Labelling, Advertisements, Process, Ingredients and Prohibition. The benefit of this regulation is that it is a legal tool. The intention is to ensure that quality and safe regulated products are made available to the public. This regulation also provides guidelines and compliance verification and ensures uniformity of regulatory actions and decisions. NAFDAC is a Scientific Regulatory Authority, therefore, every statement is supported by scientific evidence. It is important to note that all cosmetic products that are manufactured, imported, exported, advertised, sold or used in Nigeria need to be registered.

A certificate of registration can be suspended or cancelled, if the grounds for registration were found to be false or the circumstances under which the product was registered no longer exist, or if there is a nonconformance with the quality, efficacy and safety of the product. The registration can also be cancelled if it there is a non-conformance with Good Manufacturing Practice (GMP). Upon cancellation of a certificate of registration, the product will have to be withdrawn from the market. Any person who does not conform to these regulations and is convicted, will unfortunately face imprisonment or a hefty fine. NAFDAC strives to be consumer-focused and agency-minded, while safeguarding public health with the regulations that they are enforcing.

Regulations are available on their website, to name a few: Cosmetic Products Labelling Regulations 2019, Cosmetic Products Advertisement Regulations 2019, Cosmetic Products (Prohibition of Bleaching Agents) Regulations 2019, website: https://www.nafdac.gov.ng

NAFDAC, also regulates and controls the advertisement of Food, Drugs, Cosmetics, Medical Devices, Packaged Water, Detergents and Chemicals. This is under section 5 of the Act. The function of advertisement control is to issue approvals and to monitor advertisements in the media like television, radio, print and online or social media, to ensure compliance with NAFDAC regulations. NAFDAC also needs to approve advert materials like storyboards, scripts, and artwork. The primary objective of NAFDAC to regulate and control advertisements, is to promote public health, through the regulatory functions and activities to regulated products. This helps to ensure that all advertisements and promotions are true and consistent, to help consumers make informed decisions. It also helps to restrict claims of superiority of one brand over another.

Currently, South Africa does not have pre-registration, notification or post-registration portals and there is no "medicated" cosmetic category. Our regulations support SMEs to access the market by simplifying the requirements for GMP, labelling, product claims requirement, safety assessments, product composition and post market surveillance. Product safety requirements are based on the SCCS (Scientific Committee for Cosmetic Safety), ICCR (International Cooperation of Cosmetic Regulations), SANS (South African National Standards) and ISO (International Standard Organisation). The CTFA Compendium and the National Department of Health (NDOH) draft regulation Annexes have information on banned substances, regulated substances, warning statements and information on specific usage levels. The SANS/ISO standards provide methodology to support regulations, like stability testing for shelf-life and expiry date.

A lot of work still needs to be done between the CTFA and NAFDAC to align and to overcome the trade barriers. We look forward to learning more from NAFDAC and we hope that this will be a beneficial collaboration.

# ARSO /TC40 - COSMETICS AND PERSONAL CARE

On 11 June 2021, CTFA was invited to the African Organisation for Standardisation's (ARSO) technical committee inaugural meeting. After being nominated by the South African Bureau of Standards (SABS) to represent the South African Cosmetic industry at continental level. CTFA's Dershana Jackison together with the SABS' Judy Maisha were the South African representatives at ARSO/TC40 - Cosmetics and Personal Care. The purpose of the inaugural meeting was to receive confirmations of representatives from across the continent; to explain the ARSO processes and to share the African Standards Harmonisation Model (ASHAM) which informs the adoption of standards for the continent.

Standards are not compulsory in many African countries however the concern is that certain economic regions on the continent mandate these for trade compliance, which poses as a trade barrier. South Africa's position since November 2019, when CTFA attended a technical committee meeting with SABS in Nairobi, Kenya, has been to facilitate intraAfrican trade through greater harmonisation of standards premised on international best practice which will ensure safety, quality and efficacy of products rather than compositional or product specific standards. This will continue to be our mandated position as we engage at the TC40. CTFA will encourage support through the Southern African Development Community (SADC) region as well as other regional economic areas to foster international trade in support of the African Continental Free Trade Area Agreement.

To keep informed of CTFA's engagement and developments in this area please look out for ongoing communication that will be sent to members.

# SABS COSMETIC STANDARDS

A standard is a document that provides requirements, specifications and guidelines that can be used to ensure products are fit for their purpose. They also protect consumers by ensuring safety, durability and market equity. The South African Bureau of Standards is the provider of standards, management systems and business improvement information. As the national standardisation authority, SABS is responsible for maintaining South Africa's database of national standards, as well as developing new standards and revising, amending or withdrawing existing standards as required. Various stakeholders assist SABS in the development of standards, CTFA is the representative for the cosmetic industry assisting SABS within their structures, namely at TC217 - Cosmetics.

Internationally, SABS experts represent South Africa's interests in the development of international standards, through their engagement with bodies such as the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC). South Africa has a long and proud history of involvement with these bodies and was a founding member of ISO. On a regional level, SABS currently holds the Secretariat for SADCSTAN, the standardisation body for the Southern African Development Community of 14 nations. Standards can be purchased directly from SABS.

We have the followings standards currently on our website available to view.

Please note the standards cannot be downloaded or printed, as per our subscription agreement with SABS and CTFA as a representative of the cosmetic industry.

- SANS 1302:2008: Toothpaste
- SANS 16128-1:2018: Guidelines on technical definitions and criteria for Natural and Organic Cosmetic Ingredients and Products Part 1
- SANS 16128-2:2018: Guidelines on technical definitions and criteria for Natural and Organic Cosmetic Ingredients and Products Part 2
- SANS 98:2012: Ingredient Labelling of Cosmetic Products
- SANS 289:2016: Labelling requirements for prepackaged products (prepackages) and general requirements for the sale of goods subject to legal metrology control
- SANS 1557:2019: Sunscreen products
- SANS 1841:2015: Control of the Quantity of Contents in Prepacked Packages within the Prescriptions of Legal Metrology Legislation
- SANS 9001:2015: Quality management systems -Requirements
- SANS 10393:2008: Hair Care Products General Requirements
- SANS 10398:2010: Cosmetic Cellulite Products

- SANS 18415:2009: Cosmetics Microbiology – Detection of Specified and Non-specified Microorganisms
- SANS 22716: 2011: Cosmetics Good Manufacturing Practices (GMP) – Guidelines on Good Manufacturing Practices
- SANS 368: Aloe Raw Material.
- SANS 11930: 2020 Ed 1 Cosmetics

   Microbiology Evaluation of the
   antimicrobial protection of a cosmetic
   product. Specifies a procedure for the
   interpretation of data generated by
   the preservation efficacy test or by the
   microbiological risk assessment, or both,
   when evaluating the overall antimicrobial
   protection of a cosmetic product.
- SANS 21150: 2020 Ed 1 Cosmetics -Microbiology - Detection of Eschericia Coli. Gives general guidelines for the detection and identification of the specified microorganism Escherichia coli in cosmetic products.
- SANS 29621: 2020 Ed 1 Cosmetics - Microbiology - Guidelines for the

risk assessment and identification of microbiologically low-risk products. Gives guidance to cosmetic manufacturers and regulatory bodies to help define those finished products that, based on a risk assessment, present a low risk of microbial contamination during production and/ or intended use, and therefore, do not require the application of microbiological Standards for cosmetics.

- SANS 17516: 2020 Ed 1 Cosmetics -Microbiology - Microbiological limits. Applies to all cosmetics and assists interested parties in the assessment of the microbiological quality of the products.
- SANS 21148: 2020 Ed 2 Cosmetics -Microbiology - General instructions for microbiological examination. Gives general instructions for carrying out microbiological examinations of cosmetic products, in order to ensure their quality and safety, in accordance with an appropriate risk analysis (e.g. low water activity, hydroalcoholic, extreme pH values).

# CTFA AT THE INNOVATION HUB

The Innovation Hub is the innovation agency of the Gauteng Province, it is a subsidiary of the Gauteng Growth and Development Agency. It was established through the Gauteng Provisional Government through the Department of Economic Development to promote economic development and competitiveness of Gauteng, through innovation and entrepreneurship. It offers several incubation programs in various industries like pharmaceutical and cosmetics, smart industries like advanced manufacturing, Green Economy, water purification, waste management and renewable energy. It also offers enterprise development, skills development, and innovation programs in the Science Park and throughout the Gauteng region.

The innovation hub helps to expose Small and Medium sized Enterprises (SMME's) to different role players in a specific industry - to aid them with the knowledge and tools they will need in their specific enterprises. The Cosmetic Toiletry and Fragrance Association (CTFA) is one of the organizations that they intermittently partner with to train these SMMEs. The CTFA provided training on the Cosmetic Regulatory Framework, which includes regulations, standards and a code of practice at one of their events in May this year, to help small businesses enter the cosmetic market. One of the CTFA's main objectives is to promote a responsible and compliant industry. At this engagement, CTFA shared insights into the regulatory framework and its role within the industry. Some insights includes shared included that every brand

owner, importer, distributor, retailer or responsible person is encouraged to comply with the National Department of Health's draft Regulations relating to labelling, advertising and composition of cosmetics, R.1469, 22 December 2017, prior to placing a product on the market. Regulatory compliance can be demonstrated by adhering to the principles of Good Manufacturing Practices, according to the SANS/ISO 22716; Production Composition, in compliance with SANS 98, Labelling and labelling in compliance with SANS 289. These standards as well as other relevant standards are available to our members on the CTFA website with restrictions or can be purchased on www.sabs.co.za

Safety Assessments must be performed on the ingredients as well as the final product

to ensure that the product is safe for consumers. Currently, this is a theoretical assessment, but it must be performed by a safety assessor who has a science/chemistry and product development background and who displays a good understanding of the interaction of different raw materials within a formulation. During the training session we looked at the Product Information File (PIF) and its components, as well as Post Market Surveillance and the importance thereof was also discussed.

CTFA's contribution at this session hosted by The Innovation Hub, was well received and we will continue to contribute towards disseminating regulatory guidance to the industry as part of our role.

# ICCR/ISO FEEDBACK

### ICCR ANNUAL MEETING 2021 FEEDBACK

On an annual basis CTFA represents the South African cosmetic industry with the national regulator at the International Conference of Cosmetic Regulators (ICCR). This year, the meeting was hosted by the USA's FDA and held virtually between 21-24 June 2021. The South African delegation attends this meeting as an observer with the National Department of Health (NDOH) representative forming a member of the regulator's committee (steering committee) and the CTFA forming a member of the industry committee.

Throughout the ICCR-15 cycle we participated in the consumer communications and microbiome working groups. Projects from these and other working groups formed the agenda of the meetings held in June this year. The steering committee approved all projects to progress into the next cycle. The communications work group developed a series of questions and answers on the topic of allergens in context of cosmetic and personal care products. The steering committee approved these for publishing on the ICCR website. The microbiome work group's terms of reference document was approved by the steering committee with editorial changes on the format of the presented document. The work group has two objectives, namely, to finalise terminology/definitions and to ascertain whether the current microbiological limits are appropriate for cosmetic products making microbiome claims. This work will be undertaken in the next ICCR cycle.

### **ISO PARTICIPATION AND FEEDBACK**

This year the International Organisation for Standardisation (ISO) held the first of its bi-annual meetings in April-May 2021. Several work groups are active in the current cycle namely: WG 1 Microbiological standards; WG 3 Analytical test methods; WG 7 Sun protection test methods. WG 1 was attended by the SABS representative. CTFA is the nominated SABS representative for WG 3. WG 7 is attended by the sun care expert from Sefako Makgatho Health Sciences University.

The outcome of the June meeting was the progression of the analytical test method to the final draft international standard: *ISO 21392 Measurements of traces of Heavy metals in cosmetic finished products using ICP/MS technique. ISO 23674 Measurements of traces of heavy metals in cosmetic finished product using Integrated Mercury Analytical Systems*, has progressed to the draft international standard stage. The WG 7 discussions included alternative methods for the determination of sun protection factor (SPF) and water resistance test method.

## WORLD TRADE ORGANIZATION - TECHNICAL BARRIERS TO TRADE TRANSPARENCY

Over the past 60 years, the World Trade Organization (WTO), which was established in 1995, and its predecessor organization the General Agreement on Tariffs and Trade (GATT) have helped to create a strong and prosperous international trading system, thereby contributing to unprecedented global economic growth. The WTO has 164 members, of which 117 are developing countries or separate customs territories. South Africa is one of the 117 developing country members. The primary purpose of the WTO is to open trade for the benefit of all. The WTO provides a forum for negotiating agreements aimed at reducing obstacles regarding international trade and ensuring a level playing field for all, thus contributing to economic growth and development.

The main activities of the WTO include the following:

- Monitoring and reviewing trade policies of the members.
- Ensuring transparency of regional and bilateral trade agreements.
- Building the capacity of developing country government officials in international trade matters.
- Assisting in the process of accession of some 30 countries who are not yet members of the organization.
- Conducting economic research and collecting trade data that help support their main activities.

On 14 June 2021, the WTO in collaboration with the South African Bureau of Standards (SABS) introduced the WTO new agreement for Technical Barriers to Trade (TBT). The DTIC mandated SABS as the Enquiry Point (EP).

As the South African TBT EP Notification Authority, SABS will monitor the South African gazette for technical regulations and will notify the WTO of potential TBTs. The WTO TBT notification details and full text will be made available via the EP. The SABS will keep members and trade organizations informed by collating comments and correspondence from South African stakeholders and WTO members for submissions to the DTIC. The SABS will distribute comments and responses from the WTO members and keep members and trade organizations informed.

# WHAT ARE THE BENEFITS OF COMMENTING THROUGH THE ENQUIRY POINT (EP)?

- It will allow for inter-agency coordination, awareness of possible consequences of a regulation or notification.
- It will help to understand the TBT agreement and obligations.
- It will help to connect organizations and will also help to maintain a repository of comments.

#### HOW CAN I STAY INFORMED OF WTO/TBT NOTIFICATIONS?

CTFA registered as an industry official and tracks and receives email alerts regarding TBT/SPS notifications. CTFA members are kept informed via our weekly "Regulatory notifications/Alerts" communications.

# SUMMARY: Q2 REGULATORY NOTIFICATIONS/ALERTS

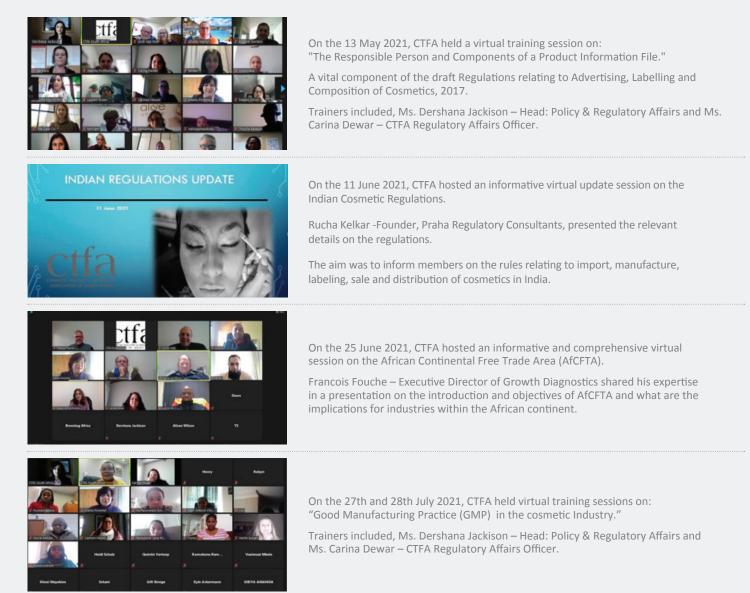
The following provides a summary of the more relevant global and national regulatory alerts and notifications that CTFA shared with members in Q2 2021.

NOTIFICATION DETAILS	REGULATORY ALERT	PROPOSED DATE OF ADOPTION/COMMENTS	IMPACT FOR SOUTH AFRICAN INDUSTRY
Date: 12 May 2021 Notifying country: South Africa WTO/TBT reference no.: N/A	The purpose of these Regulations is to prohibit the production, distribution, import, export, sale and use of the substances contemplated in regulation 3 – Perfluoroctanoic Acid (PFOA), its salts and PFOA – related compounds. Anyone in possession of the substances listed in regulation 3, may continue to distribute, sell or use the substances for a period of 12 months from the commencement of these regulations, but may not import or export it.	12 May 2021	These Regulations apply uniformly to any person who produces, distributes, imports, sells and uses a listed substance within the Republic of South Africa.
Date: 21 May 2021 Notifying country: Uganda WTO/TBT reference no.: G/ TBT/N/UGA/1243/ Add.1	The aim is to inform WTO Members that the Draft Uganda Standard; DUS 2275:2020, Castor oil for cosmetic industry — Specification, First Edition; notified in G/TBT/N/UGA/1243 was adopted on 2 March 2021.	2 March 2021	Relevant to all companies who manufacture in or export Cosmetic Products to Uganda.
Date: 1 June 2021 Notifying country: European Union WTO/TBT reference no.: G/ TBT/N/EU/803	This draft Commission Decision aims at identifying resorcinol as a substance of very high concern due to its endocrine disrupting properties whose effects to human health give rise to an equivalent level of concern according to Article 57(f) of Regulation (EC) No 1907/2006 (REACH). Resorcinol to be included it in the Candidate List referred to in Article 59(1) of REACH; Protection of human health or safety.	4th Quarter 2021	Relevant to all companies that use Resorcinol in their products. Objective and rationale, including the nature of urgent problems where applicable: Resorcinol meets the criteria for its identification as a substance of very high concern in accordance with Article 57(f) of Regulation (EC) No 1907/2006 due to its endocrine disrupting properties whose effects to human health give rise to an equivalent level of concern to other substances of very high concern. The objective of this draft is to identify resorcinol as a substance of very high concern due to these properties and to include it in the Candidate List referred to in Article 59(1) of REACH.; Protection of human health or safety
Date: 8 June 2021 Notifying country: Uganda WTO/TBT reference no.: G/ TBT/N/UGA/1336	This Draft Uganda Standard specifies the requirements, sampling and test methods for bath oils based on refined vegetable oils or vegetable oils blends, mineral oils or mixture of the vegetable oils and mineral oils meant for application on the skin.	November 2021	Relevant to all companies who manufacture in or export bath oils to Uganda. Objective and rationale, including the nature of urgent problems where applicable: Consumer information, labelling; Prevention of deceptive practices and consumer protection; Protection of human health or safety; Quality requirements

NOTIFICATION	REGULATORY	PROPOSED DATE OF	IMPACT FOR SOUTH AFRICAN
DETAILS	ALERT	ADOPTION/COMMENTS	INDUSTRY
Date: 17 June 2021 Notifying country: Turkey WTO/TBT reference no.: G/ TBT/N/TUR/185	The Implementing Regulation on Cosmetic Products of Turkey is one of the areas where harmonization with the 1223/2009 (EC) Legislation is continuing as a requirement of the EU-Turkey Customs Union Agreement. Accordingly, as the Cosmetics Regulation 1223/2009/EC is frequently updated, the cosmetic product groups listed within the scope of this Regulation also change frequently. For this reason, in order to ensure the harmonization with the 1223/2009 (EC) Legislation, the Annexes of the Implementing Regulation are rearranged and will be followed under the Communiqué on Cosmetic Ingredients. In this regard, firstly, the Communiqué on Cosmetic Ingredients will enter into force and then the Implementing Regulation will enter into force accordingly. The Communiqué on Cosmetic Ingredients applies to cosmetic products within the scope of the Implementing Regulation on Cosmetic Products published in the Official Gazette dated 23.05.2005 and numbered 25823. The Implementing Regulation is applied to cosmetic products and this Implementing Regulation does not apply to a substance or mixture intended to be ingested, inhaled, injected, or implanted into the human body for the purposes set out in point (ö) of Article (4)(1).	The regulation will be adopted upon its publication.	Relevant to all companies, who manufacture in, or export cosmetic products to Turkey. Objective and rationale, including the nature of urgent problems where applicable: The objective of this Implementing Regulation is to determine principles and procedures relevant to cosmetic products that are made available on the market in order to ensure a high level of protection of human health. The objective of the Communique is to determine the categories of cosmetic products placed on the market and the properties of the ingredients they contain.; Protection of human health or safety; Harmonization

# THE IMPORTANCE OF A TRAINING ETHOS

CTFA has built a reputation for encouraging a responsible South African Cosmetic Industry. Training is one of the platforms used to create awareness and define compliance, our Regulatory Team provides training on topics like Labeling and Product Composition, Claims Substantiation and our popular "GMP in the Cosmetic Industry Training". CTFA also hosts updates on pertinent topics such as the Indian Regulations update and The Africa Continental Free Trade Area (AfCFTA) update.



For more information on upcoming training and events, please contact us at info@ctfa.co.za.

## LOOK GOOD FEEL BETTER

A very important aspect of CTFA is it's corporate social responsibility arm, Look Good Feel Better (LGFB), who have made a huge difference in the lives of so many people fighting cancer. In the midst of the very difficult times we are all experiencing assisting cancer patients has become an even more difficult task as oncology centres need to adhere to lockdown regulations and a whole new way of sustaining the LGFB Programme has needed to be implemented.

The June/July 2021 LGFB Newsletter can be seen on the link below with highlights of the status quo and the unwavering dedication to their worthy vision.

**CLICK HERE** 

#### LGFB Newsletter

Link - https://ctfa.co.za/wp-content/uploads/lgfbnewsletter-june-july-2021.pdf









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