Exporting Cosmetics Outside the EU: Regulatory Requirements and Access to International Markets – China, South Korea, ASEAN

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- Cosmetics trade with China, South Korea, ASEAN and market status
- Regulatory frameworks for cosmetics in these regions
- Product registration and notification requirements
- Recent regulatory developments and compliance obligations
- Conclusion

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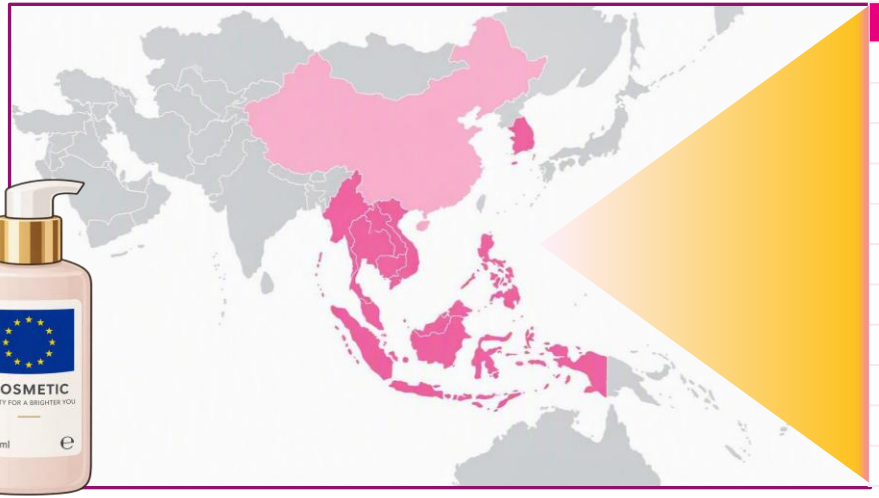
Population Overview

China: 1,4 billion
(1,400 million)

ASEAN: 0,700 billion
(700 million)
across 11 Member States

S.Korea: 0,051 billion
(51 million)

Total around 2.2 billion population



Rank	ASEAN Member State	2026 population
1	**Indonesia**	287.9 million
2	**Philippines**	117.7 million
3	**Vietnam**	102.2 million
4	Thailand	71.6 million
5	Myanmar	55.2 million
6	Malaysia	36.4 million
7	Cambodia	18.1 million
8	Laos	8.0 million
9	Singapore	5.9 million
10	Timor-Leste	1.4 million
11	Brunei Darussalam	0.47 million

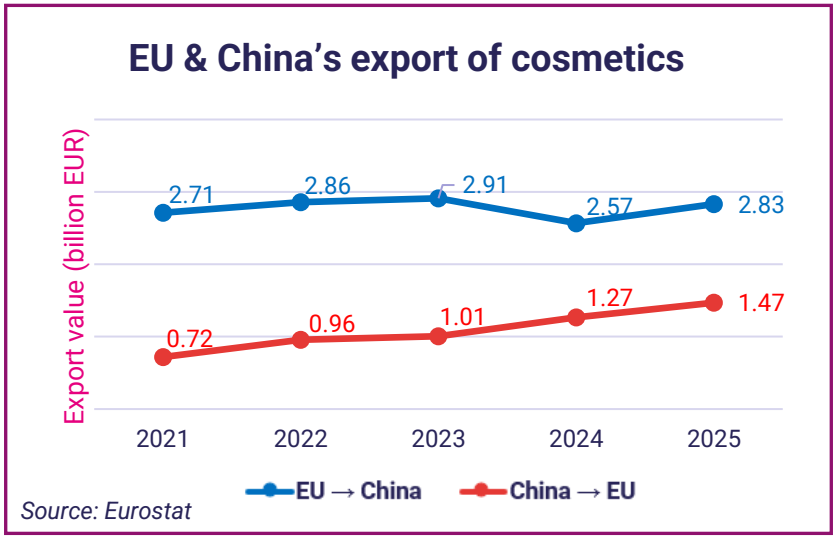
China



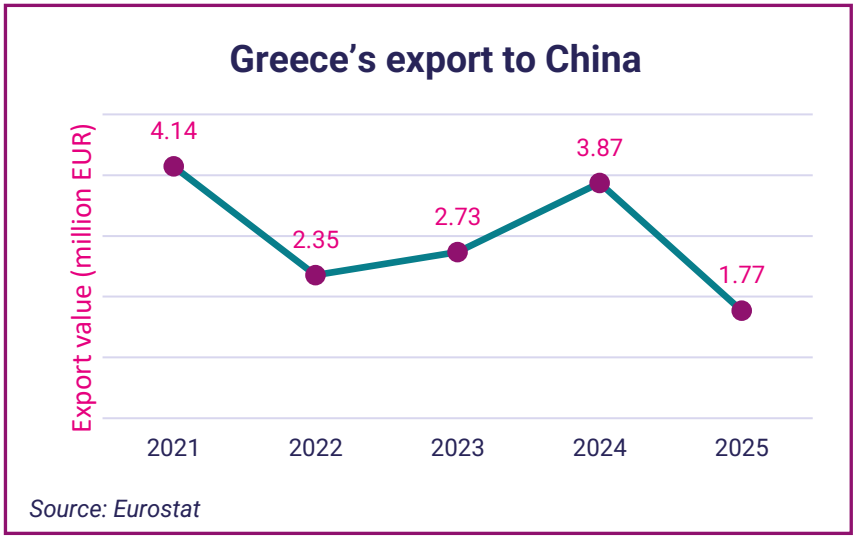
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Cosmetics trade with China

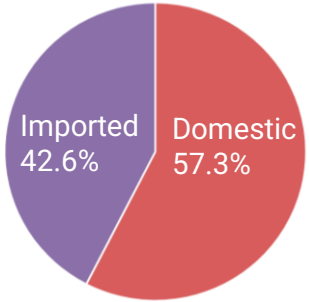


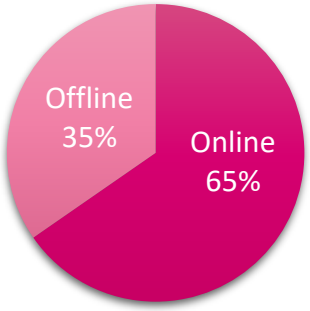
Source: Eurostat



Source: Eurostat

2025 Chinese Cosmetic Market





Source: China Association of Fragrance Flavour and Cosmetic Industries (CAFFCI)

Tiers of Chinese legislation of cosmetics

Primary Legislation CSAR:

- ✓ Issued by **State Council**; in force since January 2021
  Replaced the CHMR -Cosmetics Hygiene Management Rules from the 1980ies
  General principles and basic requirements: **"WHAT"**
  Implementation of CSAR requires +/-30 implementing laws

Secondary/Implementing Legislation (about 30 released):

- ✓ Issued by **NMPA**, detailed administrative rules and procedures: **"HOW"**

Standards / Guidance (more than 100 released):

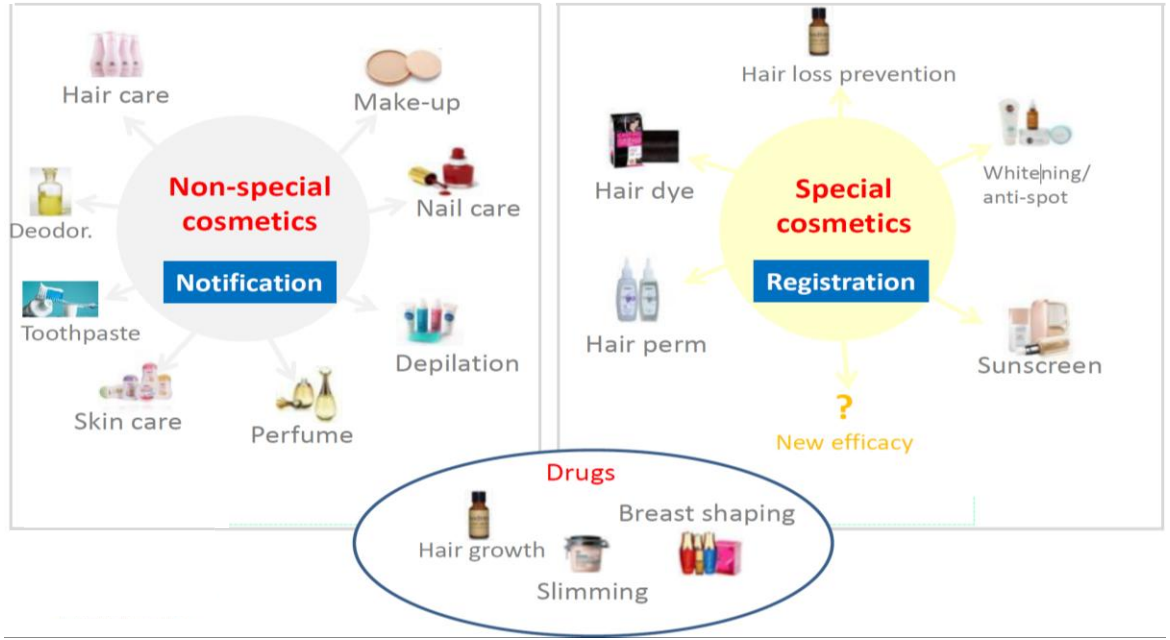
- ✓ Issued by **NIDC**, technical rules, procedures and methods
  (e.g. positive/negative ingredient lists, testing methods, safety assessment, post-market surveillance…*)*
  Mandatory and legally binding

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Definition of cosmetics

- Daily chemical industry products
- intended to be applied or sprayed on human body surfaces such as skin, hair, nails, and lips
- for the purpose of **cleaning, protection, beautification and grooming**.

Types of cosmetics



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Product management approach

Normal cosmetics

Pre-market notification with the provincial authorities or NMPA (depending on entry port) is required.

Validity indefinite.

Special cosmetics

Pre-market registration with the central authorities (NMPA) is required

Validity 5 years.

(*5 + 1 types: Sun protection, freckle-removing and whitening, anti-hair loss, hair dye, hair perm + cosmetics claiming 'new efficacy')

What about animal test?

When CSAR was introduced (2021), finished product animal test can be waived for **normal cosmetics** provided that **authority-issued GMP certificate** is submitted.

(except for children cosmetics and cosmetics containing new ingredients within 3-year safety monitoring period)

NMPA reform (Jul 2026) expanded exemption to the following scope:

- **Certain special cosmetics** (hair perm products, non-oxidative hair dye products, freckle-removing and whitening products via physical coverage)
- **More normal cosmetics** (cosmetics using new ingredient - exclude children cosmetics)

→ **Authority-issued GMP certificate submission** is still necessary

→ Exemption scope to be further adjusted via NMPA's technical body in the future.

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Ingredient management approach

Concept of “New” vs “existing ingredients”

- **Existing Ingredients** = ingredients already listed in the Inventory of Existing Cosmetic Ingredients in China (IECIC) → **can be used (8986 entries today)**
- **New ingredients** = ingredients used in cosmetics for the first time in China → **need to be registered or notified before use.**

- High risk ingredients require registration and approval: preservatives, sunscreens, colorants, hair dyes, whitening agents
- Medium/Low risk ingredients can be used immediately after a notification.



Digitalised IECIC Catalogues I & II



- Explanation of Adjustments to the Catalogue of Used Cosmetic Ingredients (June 23, 2025)
- Explanation of Adjustments to the Catalogue of Used Cosmetic Ingredients (October 20, 2025)
- Explanation of Adjustments to the Catalogue of Used Cosmetic Ingredients (January 4, 2026)
- Explanation of Adjustments to the Catalogue of Used Cosmetic Ingredients (April 13, 2026)
- Explanation of Adjustments to the Catalogue of Used Cosmetic Ingredients (August 19, 2026)

https://hzpsys.nidc.org.cn/hzpGS/ysyhzpylml#

Managing **Annexed ingredients** (restricted & positive list) and **banned substances** via ‘Safety and Technical Standards for Cosmetics’ (STSC)

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New direction

- **More exports** of Chinese cosmetics products to go overseas markets and gain global competitiveness → *"Transforming China from a **big** cosmetics manufacturer to a **strong** cosmetics manufacturer"*
- In Sep. 2025, NMPA announced **cosmetics reform** covering 24 policy items
- Clear ambition to actively **participate in international forums** for technical regulatory and international standard setting, such as ISO, ICCR, etc.

2025



Announcement Sep.2025

2030

Legal system more complete.

Standard system more established.

Technical support more powerful.

Industry innovation vitality more abundant.

Risk prevention and control capabilities comprehensively strengthened.

Quality and safety level significantly improved.

2035

Quality & Safety regulatory system reached **international advanced level.**

Regulatory system, mechanism and approach better adapted to **industrial innovation** and high-quality development needs.

Industry has **stronger innovation creativity & global competitiveness.**

Achieved **regulatory modernisation.**

China is changing

8 concrete policy changes announced by NMPA in July 2026 (No.70 of 2026)

I. Encourage first launch of new cosmetics in China by **waiving Certificate of Free Sales (CFS)**

II. Expand finished product scope that can **exempt animal testing**
(*authority-issued GMP certificate is still required)

III. Cancel mandatory submission of **raw material safety information (RMSI)** to government system. Instead, enterprises can retain data for recordkeeping.

IV. Open up possibility for **efficacy claim evaluation test data** shared by cosmetics with **similar formula systems**

V. Optimise requirements for **sharing safety data** of cosmetics with **similar formula systems**

VI. Expand the scope of accepted test methods for **cosmetic efficacy claim evaluation**
(*except sun protection, freckle removing and whitening and anti-hair loss efficacies that still must use Chinese-STSC methods)

VII. Simplify requirements for cosmetic registration and notification documents with **changed production sites**

VIII. Simplify document requirements for **changes to Chinese domestic responsible persons** for cosmetics

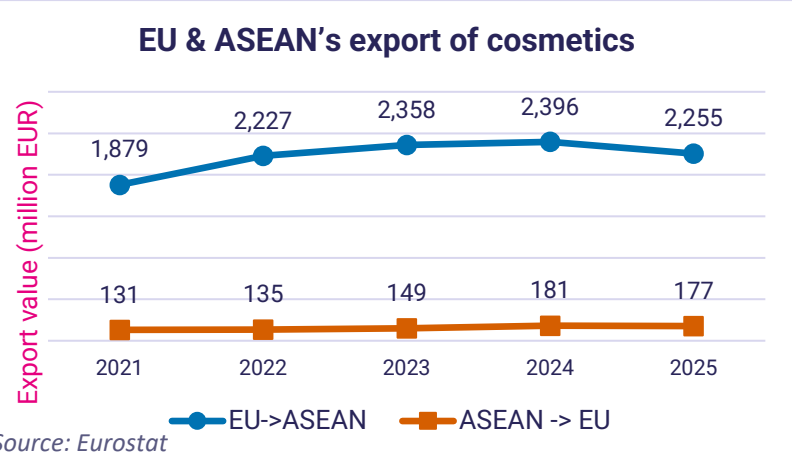
ASEAN



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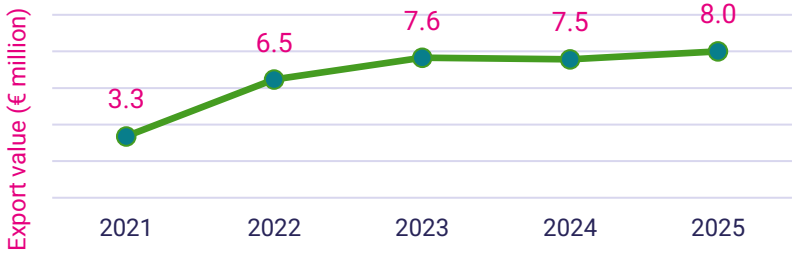
Cosmetics trade with ASEAN



Source: Eurostat

Main importers in ASEAN in 2025:

- Korea
- China
- intra-ASEAN (Thailand, Singapore, Indonesia)
- France
- United States
- Japan



Rank	Destination	Total Greece exports 2021–2025	Share
1	**Philippines**	**€24,927,412**	**75.44%**
2	Vietnam	€4,640,442	14.04%
3	Singapore	€1,892,339	5.73%
4	Malaysia	€873,322	2.64%
5	Indonesia	€470,243	1.42%
6	Thailand	€211,627	0.64%
7	Myanmar	€20,264	0.06%
8	Cambodia	€6,196	0.02%
9	Brunei	€1,614	<0.01%
–	Laos	No report	–
–	Timor-Leste	No report	–
	Total	**€33,043,459**	**100%**

Source: Eurostat

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ASEAN Cosmetic Directive (ACD)

1998 – ASEAN regulators and industry begin cosmetics harmonisation
2003 – ASEAN Harmonised Cosmetic Regulatory Scheme adopted
2008 – ASEAN Cosmetic Directive fully implemented

A copy from the former EU Cosmetics Directive 76/768/EEC

→ ASEAN ACD and EU CPR share very similar common regulatory principles
→ ASEAN and EU share exactly the same definition of cosmetics
→ High level of consumer protection
→ Foundation for ASEAN–EU regulatory convergence, facilitating trade

2. Why is ASEAN moving to this scheme? What are the benefits we can derive from this?

A. The Scheme aims to remove technical barriers to trade by harmonizing regulatory and technical requirements across ASEAN without compromising product safety and quality. This would facilitate the flow of cosmetic products across ASEAN Member Countries to increase ASEAN 's competitiveness in the region

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ACD documents

1. **Definition and examples of cosmetic products**
   Illustrative List of Cosmetic Products by Categories
   ASEAN Cosmetic Claim Guideline
2. **Prohibited, restricted and permitted ingredients**
   Annexes of the ASEAN Cosmetic Directive
   Annex II Part 1: List of banned substances
   Annex III Part 1: List of restricted substances
   Annex IV Part I: List of permitted colourants
   Annex VI: List of permitted preservatives
   Annex VII: List of permitted UV filters
3. **Labelling requirements**
   ASEAN Cosmetic Labelling Requirement
   ASEAN Sunscreen Labelling Guideline
4. **Good manufacturing practices**
   ASEAN Guidelines for Cosmetic Good Manufacturing Practices
5. **Safety assessment**
   Guidelines for the Safety Assessment of a Cosmetic Product
6. **Adverse event reporting**
   A Guide Manual for the Industry: Adverse Event Reporting of Cosmetic Products
7. **Documentation**
   Guidelines for Product Information File
8. **Limits of contaminants**
   ASEAN Guidelines on Limits of Contaminants for Cosmetics

Harmonised ACD framework, BUT diverging national implementation

- **Notification:** No single ASEAN-wide notification that automatically provides market access across all ASEAN Member States → National notification dossiers, administrative procedures, portal requirements, speed to 'complete' notification, and validity differ.
- **Responsible Person:** required to be established in Member States' respective territories
- **Labelling:** National languages, warning statements, and extra item requirements (e.g., animal derived) beyond ACD labelling doc. differ across ASEAN Member States.
- **Claims:** National practices on claims may differ. ASEAN does not yet have a consolidated, regularly maintained mechanism comparable to the EU Borderline Products Manual.

Challenges: country-specific requirements continue to emerge across ASEAN, creating increasing divergence in national implementation, for examples:

- Indonesia introduced mandatory **2D-barcode** on cosmetic labelling (2022)
- Indonesia requires applicable microbiological and heavy-metal test results in the CoA for **imported cosmetics** (effective from 2026)
- Thailand issued guidance on notification and claims of **whitening and anti-acne** cosmetics, covering ingredient requirements, negative list claim wordings and examples of positive list claim wordings (2026)
- Vietnam draft Cosmetic Decree proposes company to **submit extracted PIF** for on-desk post-market inspection purpose (2026)
- Risk of the Philippines establishing a **"functional cosmetics"** category under Korean influence (2025)
- More…

Indonesia Halal certification - latest development

DEADLINE EXTENDED

17 Oct 2028

2-year extension for cosmetics to comply with halal certification.
(Announced 16 Oct 2026)

PRE-SHIPMENT CONTROL ON IMPORTS

Revoked

BPJPH Regulation No. 4 of 2026 is revoked.
(Announced 16 Oct 2026)

COSMETIC RAW MATERIALS

Not mandatory

BPJPH Regulation No.387 of 2026 to replace KMA No. 748 of 2021 (enter into force on 18 Oct. 2026)

Non-halal labelling: Allowed, if the product is not certified → must be in the defined format

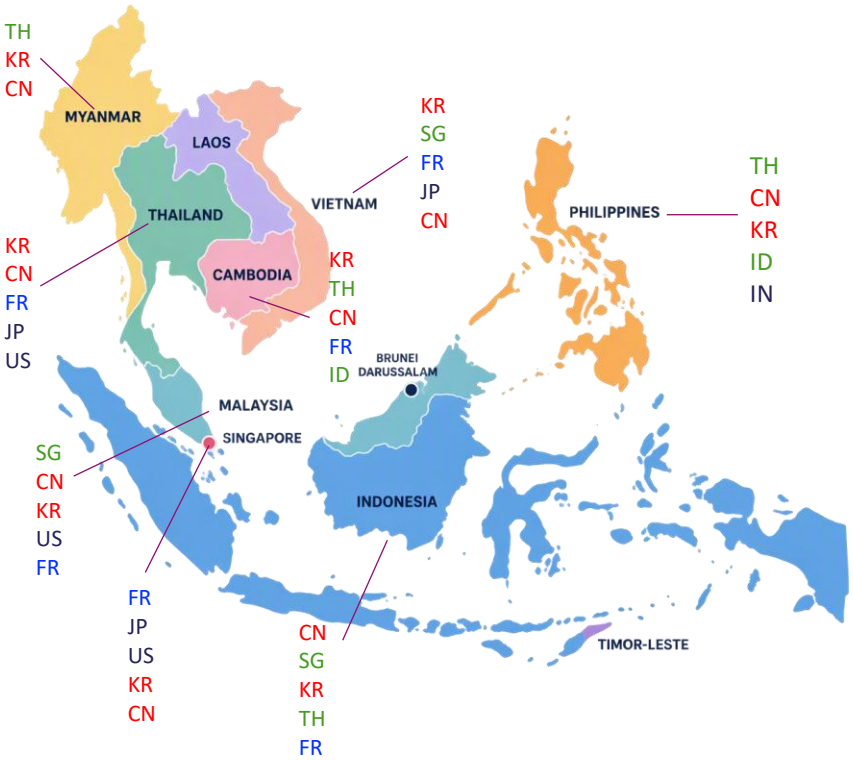
Remaining uncertainties

- **Non-halal labelling:** do I need to prove anything during post-market inspection?
- **Retail shelves:** is segregation between halal & non-halal products mandatory even no risk of cross-contamination?
- **Not all EU MS have accredited HCBs but cross-border certification is not yet allowed:** will EU Single Market be recognised by ID?

Experiences

- Work with experienced halal certification bodies
- **BPJPH Halal Certification** (~4-month in ideal scenario → start the work before BPOM notification)
- **BPOM product notification** (faster)

Trends observed



- Market growth potential
- Increasing regulatory fragmentation and country-specific requirements
- Stronger domestic industries, e.g., Thailand, Indonesia
- Stronger competition, e.g., from China, South Korea
- Growing regulatory attention to claims and borderline product classification
- Monitoring potential spillover of Indonesia's halal certification requirements to other ASEAN countries

Main importers in ASEAN in 2025: Korea (KR), China (CN), intra-ASEAN, US, France (FR), Japan (JP)

South Korea

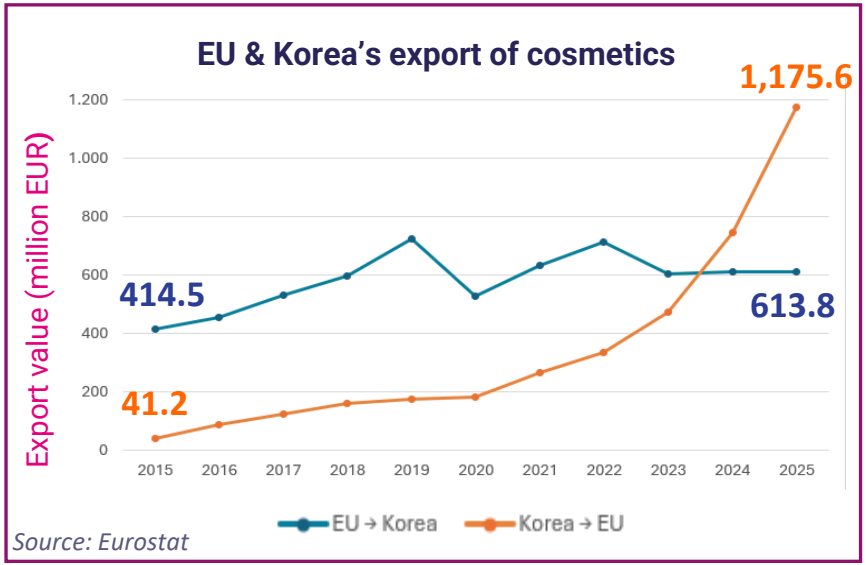


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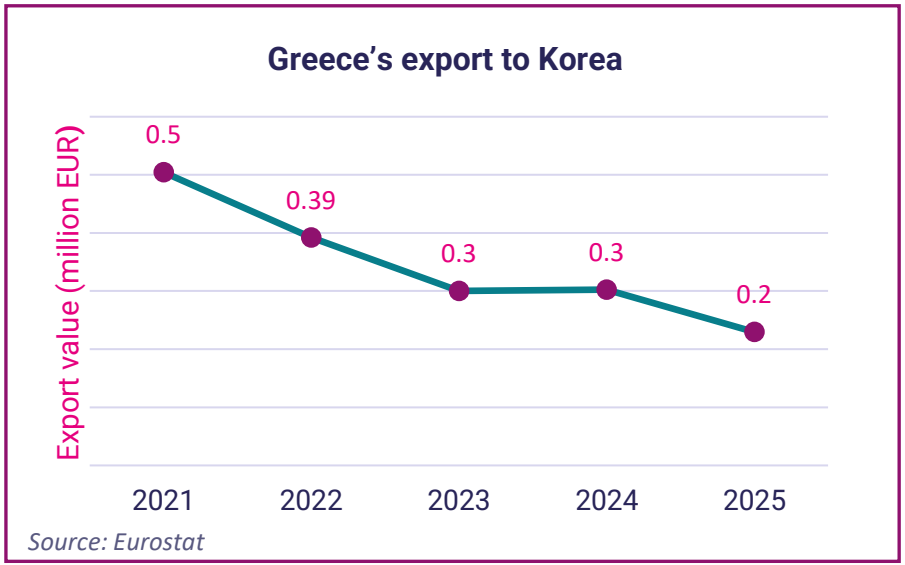
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In 2025, Korean cosmetics exports reached **USD 11.4 billion**, with SMEs accounting for 73%.
Korea becomes the world's **2nd largest** cosmetics exporting country after France*

Cosmetics trade with South Korea



Source: Eurostat



Source: Eurostat

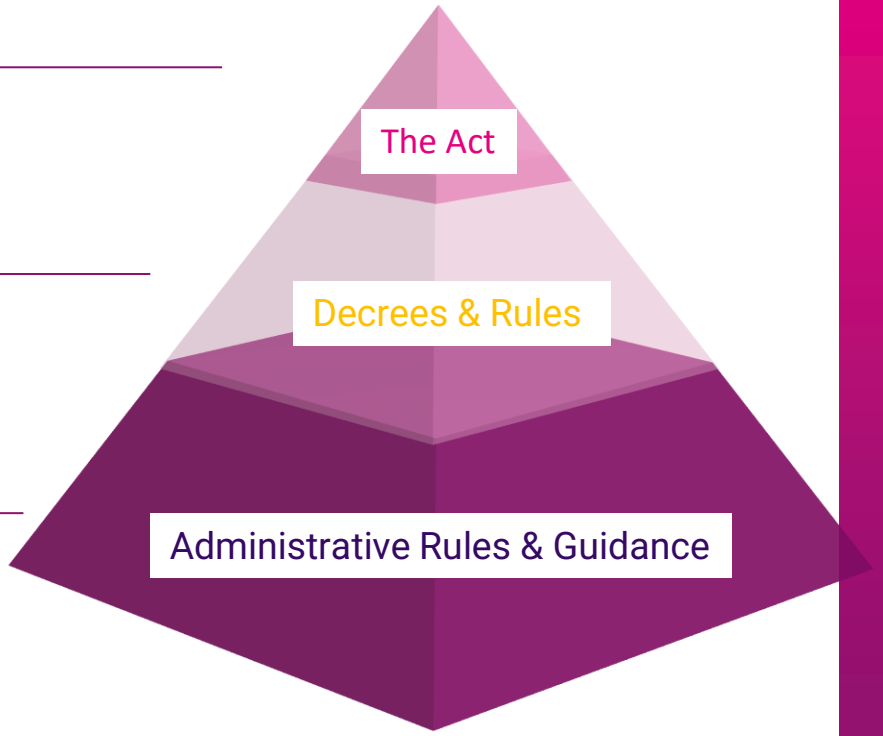
How does Korea punch above its weight in cosmetics?



*National statistical data by MFDS and Korea Customs Service

Korean Cosmetics Regulatory Framework

1. **Cosmetics Act**
   Basic legal framework
2. **Cosmetics Act Enforcement Decree**
   Detailed requirements and penalties
3. **Cosmetics Act Enforcement Rules**
   Practical procedures and compliance
4. **MFDS Notifications and Standards**
   Detailed safety and functional requirements
5. **Technical Guidance**
   Testing and evaluation guidance



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Cosmetics Definition in Korea

- Any commodity intended to be used by means of spreading, rubbing, spraying on or otherwise applied to the human body
- **for cleansing, beautifying, promoting attractiveness or brightening the appearance, or maintaining or improving the health of skin and hair**
- have light effects on the human body.

General cosmetics

Not involved 'functional' claims

Functional cosmetics – 11 categories

Involved 'functional' claims

1. Melanin inhibition (whitening)
2. Pigment fading (whitening)
3. Wrinkle improvement
4. UV protection (SPF)
5. Gentle tanning
6. Hair coloring
7. Chemical body hair removal
8. Anti hair loss
9. Acneiform skin cleansing
10. Dryness alleviation (atopic skin)
11. Stretch mark alleviation

Product management approach

*Note: Labelling must be in Korean and ingredients must be labelled using Korean-designated ingredient names instead of INCI

1. Any enterprise planning to import, distribute, or sell cosmetic products in Korea must first register with the MFDS as a **Responsible Cosmetic Seller** (~2-4 weeks)

2. Product classification

General cosmetics

- No pre-market notification or approval. However, before market placement, **Responsible Cosmetic Seller** must ensure cosmetics comply with Korean regulations.

Functional cosmetics:

1. **Reporting:** If the efficacy, dosage, and usage of **'functional' ingredients** match those already in MFDS' listing, the applicant can simply submit a report to MFDS online. Upon system verification, a certificate is automatically issued.
2. **Pre-market approval:** If the functional ingredient do not match those conditions in MFDS' listings, the product must undergo evaluation by the MFDS for approval (2+ month)

3. For **all imported products**, importers must **submit a list of documentations** to the **Korea Pharmaceutical Traders Association (KPTA)** for obtaining **Standard Customs Clearance Notice** before customs clearance of **each shipment**.

- Certificate of Free Sale (CFS)*
- Certificate of Manufacturing*
- BSE-Free Certificate/Declaration*

*Require legalization of original doc.

- Exact concentration (%) of ingredients with restricted limit in Korea
- Functional cosmetics certificate (where applicable)

Phased Introduction mandatory safety assessment

MFDS announcement 8 July 2026

	1 Jan. 2028	1 Jan. 2029	1 Jan. 2030	1 Jan. 2031
≥ KRW 1 billion Annual production/import performance, or companies registered after 30 Dec. 2025	**Functional cosmetics** approved or reported after 30 Dec. 2025	Cosmetics for infants, toddlers and children	Cosmetics first manufactured or imported after 30 December 2025	**All cosmetic products**
< KRW 1 billion Annual production/import performance		Cosmetics for infants, toddlers and children		**All cosmetic products**

- **June 2026:** MFDS published “Cosmetic Safety Assessment Guidelines”
- **In progress:** detailed implementation rules, incl. qualifications of safety assessor

What's the secret of K-beauty success?

Comparable time to market, technologies and ingredients as EU...

BUT,

- Shared joy and enthusiasm across regulators and consumers for cosmetics
- Selling not just cosmetics, but the whole Korean cultural experience
- Pragmatic regulatory focus. Once safety is ensured, room for creativity and innovation
- Strong governmental support: 15+ cosmetics-related MoUs with international regulators since 2012 and dedicated policies promoting K-beauty exports

Conclusion

The **landscape has changed**. In the past, cosmetic trade between Europe-Asia was largely one-directional, with European cosmetics once holding a clear advantage.

Asian cosmetics have built **equally strong capabilities** in Safety, Quality and Efficacy (S/Q/E). Today these capabilities are increasingly *the baseline* globally.

The competitive edge is not making “safer” cosmetics after safety is achieved, but **creating an environment where safe innovation can flourish.**

Passion needs to be there as well.

Thank you for your attention!

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