CHINA - ANIMAL TESTING ON COSMETICS - NATRUE Q&As

The fact that animal testing is mandatory for all cosmetics and that alternatives to animal testing are not accepted for imported products on the Chinese market has obliged NATRUE to ban the marketing of NATRUE certified products in China.

Why NATRUE did not address the issue of animal testing in China before?

1. The regulatory environment in China concerning animal testing was unclear. Initially NATRUE label users reported that only some cosmetic product categories were subject to animal testing making it possible to market certain products. Then NATRUE was informed that animal testing was carried out randomly and more recently that all imported products were to be subjected to animal testing and that China would not accept alternatives to animal testing. This was confirmed by DG SANCO of the European Commission. Consequently NATRUE decided to update the NATRUE Label criteria with a ban on the marketing of NATRUE certified products in China if it could not be officially proved that no animal testing had been or would be carried out and alternatives accepted.

Why does NATRUE refer to a transitional period for the animal testing ban?

2. Today there are more than 140 brands with over 3400 products bearing the NATRUE Label at a global level. Whilst NATRUE will henceforth not award the NATRUE Label to any existing or future label-user who puts products on the Chinese market without proving that the Chinese authorities have not and will not conduct animal testing on those products, NATRUE sought legal advice concerning the implementation of this new requirement. Up until now, it was confirmed that NATRUE should remain coherent with existing rules concerning a transitional period when adaptations are introduced into the criteria. NATRUE is however in the process of further investigating this point. In practice, this infers that if during the validity period of the certification declaration, an update of the NATRUE criteria results in a product already certified no longer complying with the amended requirements, compliance to the revised criteria must be realized at the end of the certification period following the current validity period at the latest. In this manner companies will be granted sufficient time to realistically ensure that all existing stocks of products on the Chinese market are exhausted/recalled. Hopefully this will equally encourage manufacturers to actively influence the Chinese Authorities to issue certificates confirming the absence of animal testing and accept alternatives to animal testing thus progressing NATRUE’s ultimate goal: no animal testing on cosmetic ingredients or finished products at a global level.

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