

Regulatory Essentials – September 29, 2021

Health Updates

Important reminder from NNHPD Regarding the Transition of COVID-19 Site Licenses

Further to CA's communication from [August 3rd](#) detailing to members the 60-Day Notice for COVID-19 Site Licence holders and how to transition to a full site licence, the Natural and Non-Prescription Health Products Directorate (NNHPD) has reminded all interim COVID-19 Site Licence holders that:

- If you wish to continue activities, you are required to submit a complete application for a site licence using the most recent electronic form (<https://nnhpd-site-licence-dexploitation-dpsnso.hc-sc.gc.ca/websla/>) no later than **September 30, 2021** at 11:59pm PST.
- If you submitted an application successfully, you may continue activities under the COVID-19 SL until a licensing decision is issued.
- **After September 30, 2021**, stakeholders who did not submit on time **cannot** manufacture and/or import new products.
- **After September 30, 2021**, stakeholders who did not submit on time may, however, **liquidate their remaining alcohol-based hand sanitizer stock** that was imported or manufactured while their interim COVID-19 SL was valid.
- **After September 30, 2021**, the site licence application form will be updated to remove the COVID-19 site licence transition pathway.
- **After September 30, 2021**, stakeholders who submit a new site licence application (i.e., who apply late) to manufacture, package, label and / or import alcohol-based hand sanitizers **may not** be subject to existing service standards **AND must stop their activities** while waiting for a licensing decision to be issued.

Environmental Updates

Chemicals Management Plan Publication Schedule for October to December 2021

The Chemicals Management Plan (CMP) program is sharing the following Publication schedule from October to December 2021 but please note that the targeted publication dates are subject to change. Publications that are relevant to Cosmetics Alliance members are highlighted in

yellow below. The publication of the DSAR of flame retardants is important one to keep note, on how the DSAR concludes this substance. Though flame retardants are likely not directly used in cosmetic and personal care formulations, the assessment and approach may be of relevance due to the high-profile nature of the substances (e.g. endocrine disruption, reproductive toxicity, bioaccumulation etc.). The program anticipates sharing the Publications Plan for January to March 2022 by winter 2021.

Publications targeted for October to December
Acids & Bases DSAR ^a
Approach for a Subset of Organic and Inorganic Substances Prioritized under the Chemicals Management Plan ^b
Flame Retardants DSAR ^a
Phenol, methylstyrenated DSAR ^a

^a Draft Screening Assessment Reports (DSAR) presenting information on health and ecological considerations and, where criteria under s. 64 are proposed to be met, Risk Management Scope documents.

^b Science-based policy approach document.

Note: Group names are not final and may change

Environment and Climate Change Canada Released the Instructions for Reporting of Pollution Prevention Plans for Triclosan

Environment and Climate Change Canada (ECCC) released the instructions for reporting to the Notice Requiring the Preparation and Implementation of Pollution Prevention Plans with Respect to Triclosan in Certain Products (Triclosan P2 Notice) on September 23, 2021. This document highlights how to set up the GC key with ECCC and how to create a company profile with ECCC's Single Window Information Manager (SWIM). After you register following the instructions in the document below, you will have a direct access to the online reporting system for the Triclosan P2 Notice.

As you may recall, the final notice requiring the preparation and implementation of pollution prevention plans for Triclosan in certain products was published in CG1 in October 2020. CA highlighted the reporting requirements to members on [October 14, 2020](#). Please take the time to set up your GC Key and ECCC SWIM and reach out to your CA Regulatory Team (regulatory@cosmeticsalliance.ca) if you have any issues setting this up.

[Triclosan Guidance Document](#)

Post-Consumer Waste Updates

2021 Annual Steward Meeting

The 2021 Annual Steward Meeting (ASM) is being held on Wednesday, October 27, and will be webcast via Zoom. Please register using the link below.

The ASM will review 2022 budgets and fees for Recycle BC, MMSW, MMSM and Stewardship Ontario and provide updates on packaging and paper recycling program performance. The Report to Stewards will be distributed prior to the meeting.

Local times for the ASM:

- British Columbia: 10:00 - 11:30 a.m. PDT
- Saskatchewan: 11:00 - 12:30 p.m. CST
- Manitoba: 12:00 - 1:30 p.m. CDT
- Ontario: 1:00 - 2:30 p.m. EDT

[Register](#)

Other Updates

Clarifications related to the Implementation of IFRA Standards and Products with Potential Lip Exposure

The International Fragrance Association (IFRA) released an Information Letter (IL) 1127 which provides additional clarifications related to products with potential lip exposure. This letter is in response to the IL 1107 released on March 2, 2021, where a number of clarifications related to categorization of products and multiple use products with regards to IFRA Standards was outlined. Some additional clarification appeared necessary related to products that have a use on the lips, where the exposure scenario concerning their potential for ingestion is significantly different to the products targeted in Category 1 in the IL 1107. IL 1127 is linked below for your reference.

[IL1127 27-09-20211 Additional Clarifications related to products with potential lip exposure](#)