

Impact of Changes to NZ Cosmetic Product Group Standard (CPGS)

February 2024

Summary of changes and their impact

Change	Impact Rating	Summary of Impact	Actions
Increased the scope of the Group Standard to include non-hazardous cosmetic products that contain a hazardous substance.	Medium	Cosmetics classified as non-hazardous were exempt from the CPGS. Now these products will be required to comply with the standard if they contain an ingredient that is hazardous. For example, a plant oils/wax-based balm may not be classified as hazardous but if it contains an essential oil, it will now have to comply because it contains a hazardous ingredient.	Review products currently classified as non-hazardous to verify if they are now covered under the new scope.
Banned persistent PFAS (perfluoroalkyl and polyfluoroalkyl substances) in cosmetic products	Low	<p>PFAS chemicals can no longer be used in cosmetic products manufactured and/or sold in NZ. Affected products must be reformulated. Previous Cosmetics NZ survey indicated there is no use of PFAS by NZ manufacturers.</p> <p>The newly amended Section 4 clause 5(c) in the Cosmetic Products Group Standard states "other than a trace level of that component provided that such presence is technically unavoidable in good manufacturing practice, and the cosmetic product complies with condition 7 of Schedule 1".</p> <p>A cosmetic product could contain a trace amount of PFAS if it can be demonstrated that PFAS is technically unavoidable and does not present any harm to human health at that level.</p> <p>In summary, this impacts PFAS intentionally added only and trace elements not able to be removed would not be included.</p>	<p>No action required if products do not contain PFAS chemicals.</p> <p>Products containing PFAS chemicals can no longer be imported or manufactured after 31 December 2026.</p> <p>These products can be supplied until 31 December 2027.</p> <p>All must be disposed of by 30 June 2028.</p>
Updated schedules 4 to 8 of the Group Standard to include substances (with one exemption for zinc pyrithione) listed in the European Union Cosmetics Regulation ((EC) No 1223/2009), which was approved 15/Sep/22	Low	<p>Updates to schedules to reflect changes in ingredient permissions in the EU cosmetic regulation. The EU ban for zinc pyrithione was adopted and current permissions in Schedule 5 and 7 have been retained.</p>	Review the amended standard to verify if any ingredient changes are applicable.

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Updated the reference to the International Fragrance Association (IFRA) Standards from the 39th amendment to the 50th amendment	Low	Updating IFRA compliance requirements to reflect the latest amendment of the IFRA standards.	Check that fragrance materials are complying with 50 th amendment of IFRA standards.
Updated the record-keeping requirements for nanomaterials	Low	People making nanomaterial notifications to the EPA must keep a record of the notification on file and make it available upon request. The scope of exclusions from notification has increased – it is no longer just zinc oxide or titanium dioxide but now any nanomaterial that is listed in the Schedules as a colourant, preservative, or UV filter.	Any future nanomaterial notifications must be held on file by the notifier.
Amended clauses and conditions for label exemptions, included the 24-hour contact label exemption, added the United Kingdom (UK) to the alternative international regulators list, and updated the outdated Australian Government Therapeutic Goods Order (TGO) reference.	Low	No longer required to have the 24-hour emergency phone number for products with certain hazard classifications such as skin sensitisation, irritation or eye irritation. UK now added to the list of countries for permitted exemptions to ingredient listing and labelling requirements in Schedules 5-8. This is in recognition of the fact that the UK cosmetic regulations are now separate to the EU regulations and there is a UK/NZ free trade agreement in place.	Labels currently containing a 24-hour emergency phone number such as NZ Poisons Centre can be amended to remove this.

NOTE: Application to require the statement of fluoride concentrations on toothpaste labels was not accepted. Therefore, there is no change to the current labelling requirements for toothpastes with fluoride.

Transition Timeframe: Products (excluding PFAS chemicals) that have not incorporated the above amendments can be imported or manufactured until 31 December 2025. These products can be supplied until 31 December 2026. All non-compliant product must be disposed of by 30 June 2027.

See PFAS section in the above table for specific timelines on the phase out of PFAS chemicals.

Links:

- [Amendments to Cosmetic Products Group Standard 2020 with tracked changes.](#)
- [Committee’s decision making for amendments to Cosmetic Products Group Standard 2020.](#)

Note: Reasonable care has been taken in preparing this advice and the information provided is believed to be accurate. However, this information is not intended to constitute legal advice or an "authoritative statement" under the relevant regulatory authority’s rules and regulations.