Republic of the Philippines
Department of Health
FOOD AND DRUG ADMINISTRATION

CENTER FOR COSMETICS AND HOUSEHOLD/URBAN HAZARDOUS SUBSTANCES REGULATION AND RESEARCH (CCHUHSRR)

"Virtual Dialogue on the Implementation of FDA Circular No. 2020-025"
6 April 2021 / 8:00 AM – 11:30 AM and 1:00 PM – 4:30 PM
Zoom Platform

I. **Call to Order:** The meeting started at 08:00 AM for the morning session and at 01:00 PM for the afternoon session with Ms. Precious Ramos, presiding.

II. **Attendance**: See attached *Attendance Sheet*

III. **Highlights:**

Agenda	Issues & Concern	Action Taken (Timebound/ Responsible Person)
1. Opening Remarks by Engr. Ana Trinidad F. Rivera	- FDA Circular No. 2020-032, Change of Center title to Center for Cosmetics and Household/Urban Hazardous Substances Regulation and Research (CCHUHSRR) to include HUHS in its title in pursuant to RA 9711. - Recent case of household hazardous substance incident because of highly corrosive product. No MAH reflected in the product and no existing and pending LTO application. Reported on the news as the results are evident and acute in nature. - Those that are not acute in nature but are Carcinogenic. Mutagenic and Reprotoxic, and those that affect specific target organ toxicity or low dose chronic exposure. - Concerned on products with same incidence but not reported. Shared responsibility by the DTI and FDA. - HUHS Regulation is being implemented and follow the FDA Circular 2020-025. -Extension of transitory period to December 31, 2021	Noted by Stakeholders

2. Presentation on the Implementation of FDA Circular No. 2020-025	- Overview of FDA Regulation following RA 9711, with the different center's jurisdiction over specific products. - Re-instatement of HUHS Regulation through FDA AO No. 2019-0019, following FDA Circular 2020-025 on August 2020 as its implementing guidelines - FDA Advisory 2020-2035 to inform stakeholders on the update of implementation timelines, started receiving applications and processed issuance of authorizations.	Noted by stakeholders
	- Decision Matrix and Product Listing • Decision Matrix to identify HUHS products covered under FDA Circular No. 2020-025. • Product listing to guide stakeholders in identifying the covered products under Categories III and IV but are not exhaustive and will still be subject to the Centers update.	
	- Disinfectants that are to be used for meat and poultry establishments • for Anti-Microbial Products Used Solely on Non-Processed Food (Post-Harvest Facilities)	Covered by the Department of Agriculture-Bureau of Animal Industries/FPA
	- Medical Device and Hospital Facilities • all chemical germicides, disinfectants and sterilant to be used for medical devices • all disinfectants and sterilant for use in hospital facilities • Any claims on preventing, reducing exposure to a disease for humans (directly or indirectly) • Contact with human body (anti-septic)	Center for Device Regulation, Radiation Health and Research Center for Drug Regulation and Research
	- Cleaning products • Consumer Use • Professional Use • Institutional Use except for Medical Facilities • Anti-Bacterial Hand Sanitizers and Soaps (cosmetic)	Center for Cosmetics and Household/Urban Hazardous Substances Regulation and Research

	- Disinfectant Products • General purpose disinfectants Products that claim to prevent, destroy, repel or mitigate harmful microorganisms (with substantiation of claims) • Non-critical devices/surfaces (Example: wheelchairs which should undergo intermediate or low-level disinfection) • Food contact surface sanitizers Disinfectants that are intended to be applied to countertops, table tops, food processing equipment, cutlery, dishware or cookware to sanitize such objects after they have been washed • Sanitizers used in processed food or in water that comes into contact with food preparation, packing or holding of processed food for commercial purposes	Center for Cosmetics and Household/Urban Hazardous Substances Regulation and Research
	- Label Requirements • Name and Place of business of the Manufacturer or Market Authorization Holder (Responsible for placing the product in the market) • Common or Usual Name of the Hazardous Component/full composition of the products/Ingredients • Direction for Use/Signal word (Danger, Extremely Flammable, Corrosive or Highly Toxic Substance) • Precautionary Statement • Instructions for First Aid • Handling and Storage • Keep Out of Reach of Children • Net Contents • Manufacturing or Expiry Date: Day-Month-Year	Consumer products in the Household Environment. Cleaning products that are properly defined as Hazardous Substances
	- Allowed claims for disinfectant products • Kills/Prevents germs, bacteria and harmful microorganisms • Disinfects and Sanitizes • Cleans Away, washes away • Controls bacteria	With scientific studies and laboratory analysis, subject to verification and evaluation.

	- Ingredients Not Allowed for Household Urban Hazardous Substances (HUHS) • GHS Category 1A and 1B Carcinogenic, Mutagenic, Reprotoxic, • Acute Toxicity 1 (Oral, Dermal and Inhalation) • Specific Target Organ Toxicant (STOT) • Bio accumulative/Persistent • Cat 1: Physical Hazards	The FDA may on a case to case basis, allow certain ingredients but scientific, technical, risk assessment and exposure studies * would have to be for review by the Panel of Experts. * Provide exposure level recommendations or acceptable daily intake/max. residue limits TAT for Review: 60 calendar days
3. Consolidated Comments from the industry	*See listed agenda as follows*	
4. APPLICATION REQUIREMENTS	- License Application • Will secondary local labeling or simple addition of sticker (for imported products) conducted in the warehouse be required to secure LTO? If yes, what will be the type of LTO they need to get? • Is processing of LTO different to GMP, do they follow different leadtime?	Required to secure LTO as HUHS Repacker; Distributors may engage the services of FDA-licensed Repacker to conduct the stickering activity; Stickering of full panel (ensure that label does not look tampered) GMP Cert issued to Manufacturer that is at least 1yr operational; TAT follows existing CC
	- Product Registration • For new products, some requirements like Certificate of Analysis (CoA) or actual product shots may only be available after the product is registered. Can FDA provide exemptions or accept equivalent document (ie. commitment letter upon CPR approval)? • Will it be necessary to upload new labels already compliant to new labeling requirement?	Copy of CoA and product photos to be submitted as documentary requirements for product registration were set at minimum Yes, copy of complete labeling materials are part

		of documentary requirements for submission
	- Amendment/Variation • Clarify scope of CPR variation especially on change in / additional packaging type or material, variants and brand if under same formulation • Currently there is no option for amendment in the application form	The system is currently experiencing technical issues on the variation applications. In the meantime, companies may send a notification letter to FDAC informing of the intent to apply for variation once the system is made available
	- Promo Application • Can FDA provide the process, lead time and expectation for promo activities currently on-going and immediately after the transitory period? • We propose for FDA to consider issuing another moratorium period specific to compliance of promotional products as promo permit application is impossible without CPR approval.	FDA's position is for promotional activity to commence only upon issuance of promo permit. For on-going promotional activities within the transition period, FDA to consider accepting commitment letter from companies with attached affidavit claiming full responsibility over the product's safety, quality and efficacy, and adherence to acceptable standards
5. FDA E-PORTAL	- On product format, help clarify how we can apply for a single product formulation with several format/packaging if the option will not allow it since we can only select one from the drop-down menu?	Please note that product stability depending on packaging material used is being considered in the product registration process. AO 2019-0019 and FC 2020-025 aimed to reinstate the registration process that was in effect prior to the delisting AO 2015-0038 (which was per packaging type), as per recommendation of the Technical Committee and Legal Services of the FDA.
	- On variants, help clarify how will this feature be utilized if the formulation will change in terms of color and/or perfume?	For further discussion
	-Product Formula	

	• Kindly confirm that CAS No. is not required for chemicals that have none or for mixtures or fragrance component? Can we provide the range or the exact conc. of the ingredients? • Since the system automatically computes for the total, is it acceptable to go beyond 100% if there is an addition of conc. of variants? If not total to 100%, will this be ground for CPR disapproval? Also, is it allowed to have difference in the order of listing the ingredients in the form vs. the actual label? • For the active ingredient (AI) column, how do we determine an AI if all ingredients have its own function in the formula and product claims are tested based on the formula not on individual ingredient? • May we propose to remove the formulation declaration in the submission and declaring only the %AI providing key performance benefits to allow formula adjustments and manufacturing flexibility?	For mixtures without CAS No., indicate N/A in the e-portal. The system does not accept amount in range Product evaluation is based on full composition. No requirement for order of ingredient listing, for as long full ingredient listing will be declared in the label The AI is the ingredient that produces the claimed effect of the product (ie. Disinfectant AI). Please note that the declared AI will be reflected in the CPR. Product evaluation is based on full composition.
	- Safety, Hazard, and Toxicity Information • Clarify what specific information is to be provided? SDS is commonly for occupational use, what will be the basis for evaluation and should it appear on labels for consumer use? Are we expected to list all info found in the SDS to the product labels?	As consumers rely mainly on product labels, such must provide key information on the proper use, handling, storage and disposal of the product to consumers (ie. use of appropriate PPE if necessary, not mixing with other chemicals, where to properly dispose, etc)
	-Product Size/Format • Clarify the requirement of submitting applications on a per formulation per product presentation? We appeal for FDA to consider that applications be regarded on a per-formulation basis only and that companies can indicate multiple packaging types per formulation in the same application/submission.	Please note that product stability depending on packaging material used is being considered in the product registration process. AO 2019-0019 and FC 2020-025 aimed to reinstate the registration process that was in effect prior to the delisting AO 2015-0038 (which was per packaging

		type), as per recommendation of the Technical Committee and Legal Services of the FDA.
	-File Size and Type for Upload • Some artworks have big file size (more than 2MB). Also, can FDA consider removing current restrictions of file size and type?	FDA to consider increasing the file size.
	-Photos • Clarify if the angles should capture the whole product or only to capture the details reflected on the panel?	The system requires clear capture of details per panel
6. APPROVAL LEADTIMES	-May we be provided with the FDA Citizen's Charter indicating the complete leadtime on the approval for (1) Pre-assessment/Payment/Evaluation, (2) Variation, (3) Product promotion?	The updating of the FDA Citizen's Charter is being handled by a separate Technical Committee, with that, FDA is committed to implement the TAT as prescribed in RA 11032, "EODB Act
7. SDS / GHS / CMR Product Standards	- May we propose for FDA to conduct comprehensive training with regards to GHS implementation particularly on GHS SDS format, use and application of pictograms, signal words, hazard statements to product labels.	Yes, already coordinated with FDA Academy. Schedule will be posted in the FDA website.
	-What GHS model will the PH follow and what version of the GHS should we use as reference?	Latest version of the GHS
	-Guidance on how the SDS contents are expected to be included in the product label	Key information on the proper use, handling, storage and disposal of the product must be reflected in the product label
	-Will FDA consider accepting equivalent documents with SDS especially if the source does not classify the product as a hazardous substance?	Which type of equivalent document?
	-Ruling when it comes to CMR/CMR ingredients and the basis if its classification, will it be GHS?	Restrictions for the CMR is based on the GHS Category I; CMR categories 1A/B as per guidelines will not be allowed. If no alternative

		or such is necessary in the formulation, companies would have to provide sufficient scientific data that it will not cause CMR at levels below the cut off levels (to be referred to the expert panel for review)
	- Can we develop clear guidelines and definition of ban on CMR ingredients? Is there any specific list of CMR available, which list that we need to check against?	List of CMR: WHO-IARC, Annex VI of the CLP Regulation – ECHA
	- As CMR potential/potency depends on the conditions of exposure, that industry also proposes to establish guideline with clear definition like CMR1 restriction list based on a robust scientific review process and safety assessment which is regularly reviewed/updated.	
	- Guidance on the expectation on the HUHS product standards cited in Annex G of FC 2020-025?	Companies are expected to abide by the adopted standards listed in Annex G. We wish to note that Annex G aim to align and harmonize the HUHS regulation with both locally and internationally accepted standards, as applicable.
	-Difference between professional and industrial application is not clearly defined? It was stated in the AO that industrial application is exempted but the "professional" option in the portal causes confusion.	No mention of exemption of industrial application in the AO and implementing guidelines. For products intended for institutional application and are requiring further dilution by trained professional, the label must indicate the product as "For Professional Use"
7. LABEL REQUIREMENTS	- Please confirm our understanding that those marked NEW will only be complied with upon renewal and those marked NEW (GHS) must be complied with upon 3 years transition period? Please see Table.	We wish to clarify that the minimum mandatory labeling requirements for HUHS products are not new and are based upon AO 311 s. 1977 and RA

	-Please confirm that inclusion of details like warning statements, logos, signs and symptoms of poisoning, phrases on hazard and safety information that are based on SDS must be implemented fully upon full implementation of GHS?	7394 or the Consumer Act of the Philippines. Only the GHS elements are considered new requirements, thus, would be complied with upon renewal of the product registration. Should there be inconsistencies with the safety information in the SDS against the current label, correction or alignment of such information will be part of the conditions of your product registration for compliance upon renewal of the CPR. Industry should inform which requirements (other than GHS) will not be made readily available to consumers?
	- May we request for FDA to provide trainings on the new labeling requirements plus GHS. In the meantime, we appeal to the FDA to accept label submissions during registration of current labels or "as is" so long as they meet the old requirements (to provide opportunity for companies to comply to the new requirements upon renewal; consider 6-8 months requirement to develop and produce labels plus additional timing to exhaust any old labels)	Yes, trainings will be provided.
8. PIF REQUIREMENTS	-May we propose to revisit PIF requirements if there is an opportunity to simplify and limit only to what is relevant for HUHS products	Industry to clarify which documents in the PIF are not relevant to HUHS products?
	- Also, request FDA to issue a guidance document or sample format and/or trainings for those documents that some companies are not familiar with (ie HUHS Safety Assessment, Summary of undesirable health effects)	FDA is of the opinion that the industry should be able to provide safety assessment document as you know the ingredients of the products, potential and safety concerns of their formulated product and be responsible for placing them in the market
9. TRANSITION TIMINGS	- May we appeal to extend the transition period by (6) months and move the deadline to 30 October 2021, and providing a	FDA will consider the industry's appeal; will issue extension of

	provisional/conditional CPR approval, to avoid unnecessary business disruption and challenges	transition period until 31 December 2021.
10. OTHER CONCERNS	- Please provide for a schedule of fees for LTO, CPR, variation and promo permit applications - Help address delays in posting of payments / technical glitches we experience when accessing the e-Portal	Schedule of fees based on existing AO 50 s. 2001. Will coordinate with FDA Cashier and IT Team to address technical glitches and delays
	- May we propose for a separate Category for those HUHS/HUP product that are herbal based (with non-hazardous / non-toxic natural ingredient) in order to have a simplified application and labeling requirements	Industry to substantiate this proposal
	- Do we need to secure Certificate of Exemption for importing product samples for testing/research? - Is there a limit on the quantity of product samples that can be imported for testing/research?	Yes, this is an option for as long as testing/research will not involve distribution of products to consumers (as market study). Quantity will depend on test protocol to be submitted.
	- Does the regulation cover raw material kits and product for refilling? As many start-up companies and online sellers are offering HUHS DIY kits, do we expect FDA to monitor these activities?	Will be covered by a separate issuance.
11. Q & A	-Nu Skin-Misa, Ryanna Misa • For the extension of transition to Dec 31, 2021 of CPR application, is it only applicable to products that are already in the market? How about newly developed products? Can we sell without approval before 31 Dec 2021?	Will be applicable to all products, including newly developed product. However, FDA is encouraging everyone to proceed with the application while further extending transitory period. Kindly maximize the period so that by the end of transitory period, the product is registered.
	-D'ARC Management Consultancy, Bernadette Aragon • What is the circular for the implementation of extension of the application (until 31 December 2021), as BOC is asking for paperwork in lieu of the renewed CPR?	We will coordinate with BOC with regards to the extension. The announcement shall be released in the coming days.
	-Mighty Phoenix, Dalia Latido • Do we have to submit substantiation to support detergent label claims such as 'removes the toughest stains' and 'long lasting smell/fragrance?'	All types of claims should be substantiated with test and studies proving that the product is effective following the claims reflected in the label
	- La Peñica Corp, Marie Andrea Yu	Access the Summary column in the case no.

	• We have started submitting our CPR applications and we have noticed that the status is "Payment Verification" in the portal but we have not received the email for us to be able to pay in the bank. We tried printing it through the portal but there is no such option available to do so. How can we resolve this technical issue in the portal?	and click Generated Documents. This contains all the documents generated by the system including the Order of Payment for viewing and printing purposes.
	-CET Pharma and Medical Supplies, Carla Manalansan • Just to clarify po, Antibacterial lang po ang under Cosmetics and hindi po kasama ang Isopropyl Alcohol or Ethyl Alcohol? How about po ang mga CPR Registration Nos. starting with NN-********?	Follows the recent Interim Guidelines FDA Circular No. 2021-004. Claims are limited to sanitizing and antibacterial and/or antiseptic. Applications beyond these claims shall be disapproved.
	-Philusa Corporation, Joelle Faye Cortez • We have a deodorizer product available in 2 packing types, one is without plastic holder and the other one with plastic holder. However, both products are wrapped using cellophane and same formulation. Can we register these 2 packing types under 1 CPR?	Same packaging material e.g. cellophane, they can apply as one CPR. However, be cautious in applying products with one (1) CPR, because if one product will be subject to cancellation, all variants/net content included in the CPR shall also be deemed as cancelled.
	-Personal Collection, Crystal Santiago • Is it mandatory to indicate the expiration date on the label or manufacturing date will already suffice?	Not necessary to reflect both manufacturing and expiration date. If, however, with expiration, the client must provide the stability study for verification.
	-Nu Skin-Misa, Ryanna Misa • Can we apply for certificate of free sale even without CPR yet?	Required to obtain a CPR first in order to process the Promo Permit Application.
	- La Peñica Corp, Marie Andrea Yu • The labeling of the products we import complies with European guidelines, which require the description of ingredients in the label. However, in the requirement from the FDA, it is stated that all components need to be stated specifically. For instance, instead of stating "anionic surfactants < 5%", which is how it is oftentimes stated, a comprehensive description of all chemicals is requested. It would not fit in the label in a way that it is readable to	The center is continuing the discussion in this matter. We will issue an announcement in the coming days once we have finalized the discussion. In the meantime, following the FDA Circular 2020-025, you are required to reflect the chemical name, ingredient name or INCI

	the consumer. Also, some components, such as colorants and fragrances are quite complex. How to meet the FDA requirement in this case?	name, whichever is applicable.
	-La Peñica Corp, Marie Andrea Yu • Can the content of a liquid product be stated either in liters or Kg indistinctively?	Following the policy, the net content should be in metric unit.
	-Mighty Phoenix, Dalia Latido • Do we have to declare the CAS no. for fragrance that is proprietary? mandatory po ba i attach the IFRA certificate sa portal application?	For fragrance - if a mixture, declare only the components of fragrance classified as potentially allergenic, when present in concentration greater than 0.001% in leave-on products and 0.01% in rinse-off products in ratio by weight and submit IFRA certificate as part of their substantiation, whenever applicable. The list of potential allergens is found on Annex III of EU Cosmetic Regulation 1223/2009. If the product does not contain allergen, you may declare the fragrance as a mixture in your re-application and include in the listing that no allergens was found in the fragrance mixture (e.g. CAS No.: Mixture (no allergen)). If fragrance is not a mixture and is an identified chemical: you need to declare the CAS or CI no, whichever is applicable.
	-DSS ProductMakers Inc., Najee Mae Alejandro • Regarding on the ingredients checking. Where can we find references regarding on the restricted, banned/prohibited, maximum allowable limit of the ingredients as well as the colorants? Like in Cosmetics, there's COSING and ACD while in Food, there's CODEX. • Is there an applicable or appropriate precautionary warnings/statements to be	Adopted ECHA, ACD and EU regulations.

	used in the packaging label of HUHS products? (Can we use this reference for GHS pictograms and precautionary statements > https://pubchem.ncbi.nlm.nih.gov/ghs/?)	For GHS labeling, you may follow literatures and other educational references consistent with the latest GHS labeling requirement.
	- Mactan Rock Industries, Inc., Corazon M. Ygona • Our CPR applications had been under Application Evaluation Status for 4 weeks already, can we be advised of the FDA timeline for this process?	The internal agreement timeline for pre-assessment would be 7 days. We will look into the application to facilitate the processing.
	-Philusa Corporation, Joelle Faye Cortez • Clarification on declaration of fragrances on the application form. HUHS recently sent an email stating that we only need to declare potential allergenic fragrance components when concentration is greater than 0.01% in rinse-off and 0.001% in leave-on products. If no allergenic components, we can declare as Fragrance only and under CAS No. as "Mixture (No allergen)".	Most product shall fall as leave-on, specifically on products intended to be sprayed on the area. Follow the directions provided for fragrant and colorants. Allergen declaration in the label will be subject to discussion. Following the CPR issuance, the labeling conditions shall be complied upon renewal.
	-Philusa Corporation, Joelle Faye Cortez • Is there a required presentation or color of the GHS pictograms? Or do we have the discretion to decide? What if our supplier cannot accommodate the required colors due to printer limitations?	Client must abide with what is the recommended color of the GHS.
	-Personal Collection, Crystal Santiago • Is there a reference or a table just like in Household Urban Pesticides showing specific GHS pictograms, signal word and hazard statement that we should indicate in the label depending on the acute toxicity classification of the product?	Refer to GHS Purple Book with latest 8th Edition. Client will also consider the highest toxicity category, it should be declared in the label.
	-Naturale Labs, Inc, Dyan Pabustan • For newly developed products, is it possible to submit a photo render of what the product would look like, in lieu of taking actual photos from different angles? • Use formulation to come up with a pictogram?	We can accept the digital representation of the actual product once in the market.

	• With regards to GHS training, will it be possible to conduct trainings?	Use bridging principles to come up with the final acute toxicity category. Already in pipeline, we will coordinate with FDA Academy once we have finalized the proposal.
	-Philusa Corporation, Joelle Faye Cortez • Does country of manufacture mean the country of origin or can we declare country of our supplier which is the repacker? (The chemical is sourced abroad but is repacked in the Philippines)	Should declare the primary assembler of the finished product.
	-La Peñica Corp, Marie Andrea Yu • Sometimes the reason for disapproval or the product name is not reflected in the response email. Can those be included in future notifications?	You may check the reason for disapproval on the e-portal with the particular case. Once the result is available, you may open the inbox in the e-portal system and view the reason for disapproval.
	-Soapking, Incorporated, Rose Angelli Cortez, • For LTO HUHS variation, do we have to submit letter of intent? or we can apply using the portal? • Pre-assessment is processed in more than 7 days	Clients are advised to submit a notification letter to FDAC, stating your intent to apply the changes in the portal once the system accommodates the variation. Variation is to be made available in the coming months. Well noted on the request. The variation application in the system is in its polishing stage and will be accessible soon. There is an influx and overwhelming surge of application. We will adhere to the timelines and mend the shortcomings in the application processing.
	-Pacific Prime Consumer Products Inc., Katrina Costales • Based on the presentation, did I get it correctly that the word "Sanitizes" can also be used for Disinfectants (under HUHS) and not restricted to Cosmetic products only?	Allowed to use "sanitize" as HUHS claims. Given that the client provide substantiation on the claim on surface sanitizers.

	-Lean 'N Green Trading Corp., Sharmaine R. Valdez • If fragrance used is with possible allergen ingredient and more than 0.001% for leave on products and has 3 variants, how should we fill up the portal? Is my understanding correct as, under ingredient name column, Name of Variant 1 (Allergen 1, Allergen 2), Under CAS No. Column, (CAS of Allergen 1, CAS of Allergen 2), Function Column, Fragrance. Then the next row will follow as Name of Variant 2 ((Allergen 1, Allergen 2), Under CAS No. Column, (CAS of Allergen 1, CAS of Allergen 2) • On the label of FG, shall we print as: Print as Fragrance (Allergen 1, Allergen 2…) • On the label of FG without possible allergen: Print as Fragrance • To check the % of the allergen component listed on Annex III, shall we only copy from IFRA or do we need to compute % per usage on the finished product. For example, Allergen 1 as per IFRA contains 0.19%, should we copy as is or shall we multiply to 5% (the % of fragrance in the formulation).	Yes, you may follow the directions provided for fragrant and colorant ingredient declaration. Yes, you may declare and attach the IFRA Certificate. Consider with the percentage on the formulation of the finished product. Have to come up with the value per formulation if they will exceed the value on the EU.
	-Luxebrand Global Inc., Mona Rica Sison, • I read that even if the pre-assessment is already passed and paid, possible that the application will be disapproved under evaluation status. Would like to know if its LOD or NOD? and if the payment would be forfeited.	Yes, the pre-assessment stage will be verifying the completeness of the application. The evaluation process will check the correctness of the application and can either be approved or disapproved. The payment will then be considered as consummated since the application was deemed processed (approved/disapproved)
	-Corpuz Jr. Marketing, Mr. JR. • What type of substantiation documents do you need?	Substantiated documents on the claims such as evidence-based studies and test reports on the finished products.

	-NU SKIN, RYANNA MISA • If CPR is not required yet, but we need CFS, is there an alternative in lieu of Cert of Free Sale?	CPR is a requirement in order to apply for the CFS. For now you can submit a letter, if it would suffice, that you are given a transitory period by the administration to acquire the CPR authorization.
	-Personal Collection, Crystal Santiago • For substantiations, are internal test of the company allowed, or do we need third party testing?	Ideally to produce substantiation outside the company. We encourage clients to obtain a third party testing.
	-La Peñica Corp., Marie Andrea Yu • Is there a way for the portal to delete the disapproved applications?	With legal basis for the retention of documents, the system needs to retain all processed applications. Once the retention period is met, the system will automatically delete the applications.
	-Lean 'N Green Trading Corp., Sharmaine R. Valdez • All existing labeling of the products in the market is still acceptable until June 2022?	Clients are given additional 6 months following the transitory period for the exhausting the products existing in the market that are not compliant with the FDA Regulation.
	-Sumochem Corporation, Villanueva, Maeriz • Leadtime for the posting of payment?	Posting of payment will follow 5 working days.
	-D'ARC Management Consultancy, Bernadette A. • Is there a possibility that the vet cosmetics be transferred to cosmetics?	Veterinary Products are not yet formally endorsed in the CCHUHSRR.
	- If the application is already passed the pre-assessment and paid already, will still there be a chance that the application be disapproved while under evaluation status?	Yes, there is a chance for the application to be disapproved since the pre-assessment checks for the completeness of the documentary requirements only, for the correctness and veracity of information, it will be checked during evaluation.
	- I would like to clarify/confirm if the extension period until 31 Dec 2021 is both applicable for existing products and NEW company putting the products in the market? Meaning we can produce, import	Yes, the companies can use the period to market their products, but still the Center is encouraging the

	and sell while the app is ongoing during transition period?	industry to collate and submit applications to cover all applications.
	- Will the extension be communicated to BOC? BOC is already holding shipment of HUHS products such as product samples.	Yes, this will be communicated to BOC once the issuance on the extension of our transitory period be approved. We will be providing them a copy for them to be informed that our transitory is extended, and for the moratorium to be applied that they will not need to warrant a certification for as long as we are in the transitory period.
	- For the transition Period of Oct 31, 2021 and probably extended to Dec. 31, 2021, do we expect approval by FDA by this time or is this the deadline for companies to submit application?	Yes, we may use the time up until Dec. 31, to submit an application and to acquire CPR from FDA, but the Center is encouraging industry to collate and submit documents now since the evaluation will instill time.
	- Does the FDA accept a multi-purpose product? For example, the product has a HUHS claim and also has a Cosmetic claim, is it registrable to FDA? If yes, what are the requirements? -In terms of production, can they be produced as single production only using same facility and equipment?	Yes, the product is registrable, but will be registered separately, because they have different regulation and adherent to labeling guidelines. -The matter will be referred to the inspectorate to evaluate the facility.
	- For fragrances used in HUHS products, there is a requirement to list potential	We will take note of the suggestion, we have

	allergens in the CPR. However, these specific instructions were not covered in any sort of documentation provided by the FDA in circulars. So I would suggest that any specific requirements and guidelines for components should be fully disclosed to avoid the frequent disapproval in the pre-assessment stage.	initiated since we are preparing the FAQ's to be posted in the FDA website together with the specific instructions, and also we have included the notifications and pop-up messages for the viewing of specific instructions.
	- Please clarify this: Products that do not contain restricted allergenic ingredients are therefore allowed to declare the fragrance as a mixture in lieu of the required CAS No. of each component of the mixture in the application/re-application and include in the listing that no allergens were found in the fragrance mixture (e.g. CAS No.: MIXTURE (no allergen)) provided that you declare the percentage of the fragrance mixture used in the product. Please give example. Are we going to declare the Trade name of Fragrance Mixture or just provide "Fragrance Mixture (No Allergen) especially that most fragrance contains 5 or more chemicals. Considering no allergens, how do we declare fragrance mixtures in labels?	The trade name for the fragrance can be provided, the evaluators can refer to the SDS thereafter, IFRA certificate will also be a part of your substantiation to check on the declared ingredient. Also, the company may declare only the function in the label but on the application, it has to be specific on details.
	- If the HUHS product is imported, should the CoA requirement of CPR come from the manufacturer? Or you accept CoA that is done here in the Philippines?	If the product is imported and has a COA already, it will suffice, but if you still want to add another COA done in the Philippines that would be okay also.
	- Once the CPR is ok for released, will it be picked up at Releasing Unit or will it be downloadable in e-portal? What if one of the potential allergens in the mixture is in range?	-Answered using video tutorial. -It can be declared in the cell inside a parenthesis, but the supporting document should be attached.
	-Seeking guidance on perfume and colorant declaration. Will the FDA consider	Since we are adopting guidelines on

	accepting formula statement declaration of these as is given these are complex mixtures and mostly proprietary. This has been the previous practice in the past HUHS CPR/CPN schemes. The latest notice from FDA CCHUHSRR involves referring to EU Cosmetic regulations which may not necessarily be fully applicable to HUHS products that are not intended for cosmetic use. -For example, in colorants, in EU regulation it may be restrictive in a sense that some HUHS may not be using cosmetic-grade colorants. How will we comply? Maybe the FDA can consider and can help develop further guidance to the industry on how to.	internationally accepted standards, we are referring to EU regulations, for perfume and colorant mixtures, CAS and CI nos. is acceptable for as long as the company will declare the allergens if there is and will attach supporting documents such as IFRA cert for substantiation. -Since the transitory period is extended, we will also use the time to discuss the matter further and provide more guided ruling. FDA will be open to suggestions that is workable on both parties.
	- What proof can we provide to stores asking already for an approved CPR despite the information that it is still under the transition period.	The released issuances can be of use as a proof that the HUHS is still in the transitory period.
	- In list of ingredients. Do you accept the abbreviated name, INCI name or IUPAC name? Thank you	Yes, we will be accepting INCI and IUPAC names.
	- For further clarity please regarding labeling requirements. Does it mean that we can still submit our currently used labels even though these are not yet in their GHS format, as long as they have the safety information/precautionary statements? If yes, can we sell through or deplete these currently used labels within 3 years and comply upon renewal registration of the products?	The minimum labeling requirements should be put with the exception of GHS requirements, upon renewal, or in the lapse of 3 years, that is the time the GHS will be mandatory.
	- It is correct to interpret that CCHUHSRR will issue CPR (w/ condition) for HUHS with discrepancy in labels attached in product shots vs. submitted artwork?	Yes, we will be providing at the back of the CPR to be complied upon renewal.
	- In case that the exporting country still use an older version of the GHS for the SDS format, is it acceptable to FDA?	Yes, this will still be accepted.

	- For HUHS CPR - can you give us an example of documentation to substantiate product claims? As this is vague.	This includes journals, certification, risk assessment any sort of documents to substantiate claim, you may also refer to PIF for specific documents.
	- Can we clarify which labeling requirements are expected for compliance upon renewal? Perhaps share what is expected in terms of label submission during transition? There are new requirements listed in Minimum Labeling Requirements Annex J that are not included in AO 311 or Consumer Act. As per 2020-2035, Full compliance to the new labelling requirements shall be made mandatory upon renewal of the product registration, therefore those marked NEW will only be complied with upon renewal. Those marked NEW (GHS) must be complied with upon 3-year transition period. - Also please help to confirm that implementation of any warning statements and logos BASED ON SDS must be implemented fully only upon full implementation of GHS In relation to above. As per Annex J of Circular 2020-025, Appropriate hazard information and precautionary statement or warnings in accordance with GHS will be provided 3 years trans - On labeling requirements, may we request that the FDA considers to review our position statements on what are NEW (ie not in old AOs or Consumer Act) -- there are several labeling requirements such as Ingredient Listing, Manuf/Exp date, etc that are not covered by these old regulations and therefore are new.	-The position will be the labeling requirements be reflected in the label, the existing labels will be considered. -The company may give the FDA the inventory of their products to tackle on the possible implementation of the extension on exhaustion. -For the exhaustion, yes, this will be extended for 6 months following the extended transitory period.
	- Regarding the CPR for deodorizer, if we have 5 variants, and applied in 1 case number. How many CPR will be issued? Do we still need to submit different SDS per variant?	1 CPR only, but all the variants will be declared, and the SDS is per variant.

	On labels (for products that are already in trade following current labeling requirements), what will be the exhaustion period? Will it follow the FDA Advisory 2021-0035 where it is cited that full compliance shall be made mandatory upon CPR renewal? Our concern is regarding the other new requirements outside of GHS (such as Poison control number, full ingredients listing) which are not included in the old labeling guidelines/requirements. This will give industry ample time to exhaust existing products in the trade and comply with the labeling requirements.	Yes, the exhaustion will follow the extended transitory period.
	- Suggestion: In the form for ingredients, I think the "with Active Ingredient" column may be renamed to "Is/with Active Ingredient" so it is clearer that an applicant should indicate whether an ingredient is an active ingredient in the product claim or not	We will take note of the suggestion.
	- Some dyes contain polymers and would usually do not have CAS/CI numbers and are mostly proprietary formulas. Can we indicate N/A in the CAS number? Can you accept TSCA Accession numbers for proprietary formulas in place of the CAS/CI numbers?	The allergens should be declared if the CAS/CI no is not applicable, long as a substantiation will be provided for the reference of evaluators.
	- May we request FDA to expound on the requirement for fragrances, - Declare only the components of fragrance classified as potentially allergenic, when present in concentration greater than 0.001% in leave-on products and 0.01% in rinse-off products in ratio by weight and submit IFRA certificate as part of their substantiation, whenever applicable. The list of potential allergens is attached as Annex III nos. 76-92 of EU Cosmetic Regulation 1223/2009. - Can we request FDA to expound on the fragrance component to be declared in the application	The allergen will only be needed to be declared if there is, if none kindly put mixture then no allergen.

12. Closing Remarks by Ms. Ofelyn C. Cabrido	We will update the FAQs and video materials for client's reference. Future engagements with the clients to have a smooth transition on the implementation. For questions that were not included and answered during this session, kindly email us at cchuhsrr.lrd.huhs@fda.gov.ph for our feedback/responses. To keep posted on the issuance of announcement for the extension of the transitory period to December 31, 2021.	Noted by Stakeholders

IV. Adjournment: The morning and afternoon meeting was adjourned at 11:45 AM and 4:30 PM respectively.

VI. Schedule of Next Meeting: To be announced.

Prepared by:

Apol Clarissa B. Bagon
FDRO I, LRD, CCHUHSRR

Chelsea Jazmine S. Sangalang
FDRO II, LRD, CCHUHSRR

Checked by:

Ofelyn C. Cabrido, RPh, MGM
Chief, LRD, CCHUHSRR

Approved by:

Engr. Ana Trinidad F. Rivera, MSc.
Director IV, CCHUHSRR

Republic of the Philippines
Department of Health
FOOD AND DRUG ADMINISTRATION

ATTENDANCE SHEET		
Name of Participant (LN, FN, MN)	**Name of Company**	**Name of Industry Association**
PATRON, IRENE GRACE A.	ATC HEALTHCARE INTERNATIONAL CORP.	ATC HEALTHCARE INTERNATIONAL CORP.
FORTU, MARIANNE ISABEL, MAGSINO	STORES SPECIALISTS, INC.	NONE
Gorospe, Regine Mae, Casamena	Nanoscience Inc.	Trader, Distributor
VARGAS, CAMILE G.	ETW PHILIPPINES INC.	Cosmetics
Gorospe, Regine Mae, Casamena	Nanoscience Inc.	Trader, Distributor
Dimacale, Mary Ann, Santiago	Neumann & Mueller Philippines, Inc.	HUP/HUHS
Cerado Alexis U	Lamoiyan Corporation	CCIP
HERNANDEZ, EDRIAN MAE T.	RPG DISTRIBUTION SERVICES, INC.	N/A
Rios, Reynalle,Maisa	Sahar International Trading Inc.	Pharmaceutical
Piano, Kamille Rianna Rasco	Mini Depato Corp.	N/A
Villasenor, Erlinda, Nadurata	Green Cross, Inc.	CTFAP
Fedilo, Rhea, Gimoto	Gandang Kalikasan, Inc.	CCIP
BINUYA, CYNTHIA O	ENSYSTEX PHILIPPINES, INC	PAPVI, INC.
ROLDAN,DANA RAE, DNGAT	N/A	N/A
Santos, Elaine Patricia, Alejandre	Christian Cosmetic Science Inc.	Chamber of Cosmetic Industry
KIM, NELPE B	EUNBITNANO BUBBLE SOAP MANUFACTURING & TRAVEL HYPE TOUR EUNBITNANO BUBBLE SOAP INC.,	MANUFACTURING OF COSMETICS & DISTRIBUTOR WHOLESALER
Nuñez, Jenny Rose, Saculles	Diversey Philippines Inc.	CCIP
Simbulan, Jewell Tarrayo	Global Winds Corp.	n/a
SACRAMENTO, DANICA P.	SUNTRA INTERNATIONAL TRADING CORPORATION	-
MATIAS, AYA PATRICIA C.	HOVID INC.	N/A
Malamug, Teresita Estacio	Zuellig Pharma Corporation	n/a
KIM, NELPE B	EUNBITNANO BUBBLE SOAP MANUFACTURING & TRAVEL HYPE TOUR EUNBITNANO BUBBLE SOAP INC.,	MANUFACTURING OF COSMETICS & DISTRIBUTOR WHOLESALER
Marigold V. Adalid	Valiant Distribution Inc.	NA
VALDEZ, ROCELIZA ROSARIO	DYNAMIC MULTI-PRODUCTS INC.	NA

Pedregosa, Janelle Escover	Tupperware Brands Philippines, Inc.	Cosmetics/HUHS/HUP
RIVERA, SAHARA, JAVIER	ITFC PHILS., INC.	DISTRIBUTOR
Nim, Ma. Camille Francesca, Tiongco	Etihealth Philippines Inc.	NA
Sabaco, Fae Ann, Paulino	Colgate Palmolive Philippines, Inc.	Cosmetics Toiletries Fragrances Assoc. of the Philippines
Casimiro, Marifel Franchesca, Tobias	Unilever	CTFAP
Arcillas, Lizette Sahar, N	Dell Biologics, Inc.	N/A
PADIERNOS, MARY JAYCEL ORELLE L.	REFINETTE COSMETIC MANUFACTURING CORPORATION	COSMETIC CHAMBER INDUSTRY OF THE PHILIPPINES
Travino, Carina S.	Clorox International Philippines, Inc.	NA
Esguerra, Razhel Razon	Conjug8 Corp	PPhA
MORILLO, MARK, CALMA	GlaxoSmithKline Consumer Healthcare	CTFAP
COLLE,ENGELE,MANGLO	AVON PRODUCTS MFG., INC	CTFAP
PILLER, TRICIA MAE, ACLAO	SPLASH CORPORATION	CCIP
Falcis-Ortega, Marivic, Lopina	N/A	N/A
RABELO, MARITES MAGTALAS	ESTEE LAUDER COMPANIES	CCIP
Nabos, Carla C	P&G	CTFAP
Mariam M. Carbonell	Lloyd Laboratories, Inc.	PCPI
Dacuscus, Rosabella, Trinidad	ACS Manufacturing Corporation	CTFAP
Dela Cruz, Laira Mae, Laquindanum	8Sources,Inc.	8Sources,Inc.
De Guia, Marie Alejandra Radaza	RSG MKTG CORP	HUHS
CASTILLO, GENNA D.	SANITARY CARE PRODUCTS ASIA , INC.	Manufacturer
Penus, Lorena Hilbero	Lio Chem Trading	Cleaning chemicals
NABUYA, RACHEL N.	iNTERNATIONAL PHARMACEUTICALS, INC.	CCIP
Dela Cruz, Emelda Ramirez	Chic Centre Corporation	CCIP
Santos, Elaine Patricia, Alejandre	Christian Cosmetic Science Inc.	Chamber of Cosmetic Industry of the Philippines
Manalili, Marietta, Teopaco	Manalili Solmix Enterprises	Phil Pharmaceutical Association
EUNBITNANO BUBBLE SOAP MANUFACTURING - KIM, NELPE B.	EUNBITNANO BUBBLE SOAP MANUFACTURING & TRAVEL HYPE TOUR EUNBITNANO BUBBLE SOAP INC.,	MANUFACTURING OF COSMETICS & DISTRIBUTOR WHOLESALER

Florendo, Kristine Carla Unday	Consumer Care Products, Incorporated	none
Mariñas, Christelle Elliese Tobias	Nuevochem Specialties, Inc.	-
REYES, CHRISTINE MICHELLE, PANGILINAN	Amway Philippines, L.L.C.	CHAMBER OF COSMETICS INDUSTRY OF THE PHILIPPINES
Lorica Nora Joren	La croesus Pharma, Inc	NA
MATABANG, CONCHITINA PARDO	FIA MEDICAL SUPPLY	N/A
De Guia, Marie Alejandra Radaza	RSG MKTG CORP	Huhs
Balayong, Divimaris Andilab	Aso Philippines, Inc.	Cosmetics
joy alejandria	glorious lifestyle direct Int'l inc	latt liv
MATABANG, CONCHITINA PARDO	FIA MEDICAL SUPPLY	N/A
alejandria joy alvarez	glorious lifestyle direct Intl	lattliv
dela Cruz, Jemica G.	Dynast Cosmetics & Household Manufacturing Inc.	Manufacturer
MATABANG, CONCHITINA PARDO	FIA MEDICAL SUPPLY	N/A
Sy, Cara Wimbie, Chua	Sapontec Company Ltd.	HUHS Manufacurer
Rivera, Catherine P.	S. C. Johnson & Son, Inc.	NA
NELPE BONITA KIM	EUNBITNANO BUBBLE SOAP MANUFACTURING & TRAVEL HYPE TOUR EUNBITNANO BUBBLE SOAP INC.,	MANUFACTURING OF COSMETICS & DISTRIBUTOR WHOLESALER
Maambong, Jerome B.	International Pharmaceuticals, Inc.	Chamber of Cosmetics Industry of the Philippines
Kathleen Mer Boni	Marrbont Corporation	Manufacturing of detergents
BENTILANON, ALDRICH F.	DKSH PHILIPPINES, INC	CCIP
de Guzman, Johansson, Lo	Lloyd Laboratories	Chamber of Cosmetics Industry of the Philippines (CCIP) / Philippine Pharmaceutical Manufacturers Association (PPMA) / Philippine Chamber of the Pharmaceutical Industry (PCPI)
Elisha Gloria	AG Consultants	NA
Gungon, Marlie Angelique Asilo	Stada Philippines Inc	PPHA
Santos, Elaine Patricia, Alejandre	Christian Cosmetic Science Inc.	Chamber of Cosmetic Industry of the Philippines
PRECIOUS PAULINE PADILLO	ASP PILIPINAS LTD CO.	HOUSEHOLD/ URBAN HAZARDOUS SUBSTANCES SECTION (HHUS)

PRECIOUS PAULINE PADILLO	ASP PILIPINAS LTD CO.	HOUSEHOLD/ URBAN HAZARDOUS SUBSTANCES SECTION (HHUS)
Sison, Richelle Joyce Lazatin	Cosmolab Laboratories, Inc.	n/a
KIM, NELPE B.	EUNBITNANO BUBBLE SOAP MANUFACTURING & TRAVELHYPE TOUR &EUNBITNANO BUBBLE SOAP INC.,	MANUFACTURING OF COSMETIC AND DISTRIBUTOR WHOLESALE
So, Julien Michelle C.	Molina & Sons (Phils.) Inc.	Importer and Distributor
Ong,Jessica Kathleen G.	Okala Quality Research and Development Enterprises	cosmetics
CORRO, JO-ANN, CLEMENTE	ONI DISTRIBUTION CORPORATION	N/A
Costales, Katrina, Enfestan	Pacific Prime Consumer Products Inc.	n/a
Aquino, Marie Rigene C.	Vibelle Manufacturing Company	CCIP
Renier, Laurice Gasgas	La Croesus Pharma, Inc.	pcpi, ppma
MEGA Y. NAPOLES	CERES SUMMIT CORPORATION	MANUFACTURING INDUSTRY
Asistio, Luisita Christia M.	Asistio-Martinez & Co., Inc.	Manufacturing
Billedo, Mary Gerarden Ritz, Subejano	Qdynamics Global Corporation	Qdynamics Global Corporation
Cortez, Joelle Faye Mamucud	Philusa Corporation	PAPPI
Anisco, Stephanie Grace Cruz	Gentle Supreme Philippines, Inc.	NA
Cortez, Rose Angelli B.	Soap King Incorporated	Household Manufacturer
Jazul, Jay Permejo	Brand Concepts Supplies and Manufacturing, Inc.	Philippine Pharmacists Association
Cruz, Kristel Anne Tanjuatco	Luxasia Inc.	CTFAP
Alviar, Catherin, Aslil	Rohi de Mobel Corp.	None
Roson, Charmaine C	Kimberly-Clark Phils. Inc.	CCIP
Barro, Aidan Divine T.	Marklene Fabricate Corporation	Toll Manufacturer
Edjec, Emily D.	Biocare Lifesciences Inc.	PAPPO
SANTIAGO, MA. CRYSTAL, AGUILAR	PERSONAL COLLECTION DIRECT SELLING, INC.	CCIP
ALEJANDRO, NAJEE MAE R.	DSS PRODUCTMAKERS, INC.	CCIP
So, Alfredo P.	Reckitt Benckiser	CTFAP
Costales Ferdinand Enfestan	fercosjr marketing	Household Hazardous
LATIDO, MARIA DALIA PHILLINE, TURCO	MIGHTY PHOENIX TOLL PACKAGING CORP	N/A
Tolentino, Edward Agravante	Regicon Healthcare Inc.	N/A

Derder,Rechelle J	Xylem Bio-Solutions Incorporated	Manufacturing
Luis, Krisan M.	Exal Industries Corp.	NA
Villanueva, Maeriz P.	SUMOCHEM CORPORATION	Importer
Cuevas, Arianne Bornay	Phil. Pharmawealth, Inc.	N/A
MEGA Y. NAPOLES	CERES SUMMIT CORPORATION	MANUFACTURING INDUSTRY
Biagtan, Jenifer, Reyes	East Pacific Star Bottlers Phils., Inc	East Pacific Star Bottlers Phils., Inc
Ignacio, Darlene Kate	Alog & Company, Inc.	Regulatory
Pabustan, Dyan, Reyes	Naturale Labs, Inc.	N/A
Manalansan, Carla Altre	C.E.T. PHARMA AND MEDICAL SUPPLIES DISTRIBUTION	PPhA
Reyes, Josielyn D.	Prosweal Healthcare Inc.	Pharmaceutical
Misa, Ryanna Joy E	Nu Skin Enterprises Philippines LLC.	NA
Carandang, Leobelle Chavez	Golden ABC Inc.	Fashion Industry-Penshoppe Store
Mary Geraldine N. Vasco	Wilnor Packaging & Environmental Services	HUHS, Cosmetics
Ygona, Corazon Magalona	Mactan Rock Industries, Inc,	Water Treatment
Bergonia, Patricia Erin Rose S.	Pharmcle Philippines Inc.	HUP: Household Pesticides
DUTERTE, CARLO MANOLO, LACSON	PROTECH UNLIMITED INDUSTRIES CO.	HUHS
RODRIGUEZ, ANTONINO LANSI	GCRM PHILIPPINES INC.	IMPORTER
Aquino Larissa Joy Becina	Beauty Elements Ventures Manufacturing Inc.	Manufacturer
Vetus, Cristina D.	Mercury Drug Corporation	PHAP
Yu, Marie Andrea, Huan	La Peñica Corporation	La Camara (Spanish Chamber of Commerce)
Ln	Zoleta and Lenon Inc	N/A
Aragon, Bernadette L.	D'ARC Management Consultancy	D'ARC Management Consultancy
DIAZ - DY, REGINE DIANNE, ANZURES	L'OREAL PHILIPPINES, INC.	CTFAP
OLVIGA,JENILYN ANN D	BIOFINA HEALTH GROUP 360, INC.	N/A
Mago, Krizle Grace, Ukkong	Pharmally Pharmaceutical Corporation	HUHS
Klyntonzky Ubaldo	BEVA	Distributing
Aguilar, April	Mercury Drug	PHAP
Abenir, Emelita A	Aero-Pack Industries Inc.	n/a

Tolentino, Edward Agravante	Regicon Healthcare Inc.	N/A
AVERION, ARVEE JILL	ONESTANDPOINT MANUFACTURING CORP	MANUFACTURING
Ocares, Danna Mae Lim	Indoplas Philippines Inc.	None
Sison, Mona Rica, Alimbubuyog	Luxebrand Global Inc.	Luxebrand Global Inc.
kaiei guzman	Refinette cosmetic manufacturing corporation	ccip
Gorospe, Regine Mae, Casamena	Nanoscience Inc.	Trader, Distributor
Samonte, Priscilla Alice, Lazaro	Nuevochem Specialties, Inc.	SPIK, ICP, CPIOPI
BIlledo, Mary Gerarden Ritz, Subejano	Qdynamics Global Corporation	Qdynamics Global Corporation
ALEJANDRO, NAJEE MAE REMO	DSS PRODUCTMAKERS INC. / EVER BILENA COSMETICS INC.	CCIP
SANTIAGO, MA. CRYSTAL, AGUILAR	PERSONAL COLLECTION DIRECT SELLING, INC.	CCIP
ROLDAN,DANA RAE, DNGAT	N/A	N/A
Barro, Aidan Divine T.	Marklene Fabricate Corporation	Toll Manufacturer