

ctfa
COSMETIC TOILETRY & FRAGRANCE ASSOCIATION OF SOUTH AFRICA

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FROM THE ED'S DESK

Dear CTFA Members

Welcome to the September issue of CTFA News!

September is the beginning of Spring and brings warm weather, blooming landscapes and longer days. Spring is far more than a changing of seasons: it's a rebirth and as we welcome this beautiful time of the year, we consider what is setting the tone for cosmetics and personal care. We consider the colour of the year and what it means for beauty from a South African context.

An update on allergen regulatory developments confirms that product transparency is driving the need for increased information on product labels available to consumers. To ensure regulatory compliance, CTFA are in the process of launching a tool that assists members by calculating the final allergen percentage within a product formulation and prompts users to include the allergen in the ingredient listing when the applicable threshold is reached or exceeded, depending on the product type.

The CTFA Cosmetic Compendium annexures are continuously updated on the CTFA website. The Compendium should be an integral part of your in-house strategic focus to ensure product regulatory compliance.

In this issue we include an informative article on cannabis-derived substances and its various uses. Although in South Africa, cannabis-related legislation is in flux, there is an increasing demand for products from the Cannabis plant.

There is an interesting read on illicit and counterfeit goods across various industries including cosmetics and personal care, showcasing the economic cost of illicit trade in South Africa. CTFA along with associations of other sectors (alcohol, clothing, textiles, food, pharmaceuticals, etc.) have joined forces under the Consumer Goods Council of South Africa (CGCSA) to coordinate cross-sector action and reduce the proliferation of the illicit economy.

We focus on regulatory developments across various countries in Africa; namely Botswana, Kenya and Zambia.

An important reminder that the 2027 membership renewal form is now due. Each member company will receive a pre-populated membership renewal form in October, please verify the information, sign and send it back to CTFA as soon as possible. Continued membership ensures uninterrupted access to a wide range of essential services, resources and support designed to help your business thrive and stay compliant. Failure to renew may result in suspension of key benefits such as access to regulatory updates, participation in working groups, eligibility for artwork reviews and invitations to industry events and seminars.

Enjoy the read and thank you for your ongoing support.

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Adelia Pimentel
Executive Director

THE COLOUR AND BEAUTY TRENDS SHAPING PERSONAL CARE



As CTFA members look ahead to summer, it's worth pausing to consider what's setting the tone for cosmetics and personal care this year, both on the global stage and right here in South Africa. From an unexpected colour call to shifting consumer habits at home, 2026 is shaping up to be a season defined by restraint, transparency, and skin-first thinking.

THE 2026 COLOUR OF THE YEAR: A SOFTER SHIFT

Each year, the global colour authority, Pantone selects a shade it believes captures the cultural mood of the year ahead. The choice ripples out well beyond fashion runways, it influences interior design, branding, packaging, and closer to home for our members, beauty formulation and product development.

For 2026, Pantone made a first-of-its-kind decision: Cloud Dancer, a soft, airy off-white, officially designated PANTONE 11-4201. It marks the first time in the nearly three-decade history of the Colour of the Year programme that a white shade has taken the title.

Pantone describes the tone as calming and understated, a symbol of clarity, quiet reflection, and fresh starts, positioned as something of an antidote to an increasingly noisy, digitally saturated world. Rather than a bold, attention-grabbing hue, Cloud Dancer is being framed almost as a "blank canvas", a signal of space for new ideas rather than a loud, declarative statement. Industry commentary has noted that the pick was somewhat unexpected, arriving after several years dominated by warmer, more saturated tones. But the underlying sentiment, a desire for calm, simplicity, and considered choices, appears to be resonating widely across design and lifestyle categories.

WHAT THIS MEANS FOR BEAUTY

The shift away from bold, saturated colour towards something quieter is already shaping product development, marketing, and beauty routines internationally. A few clear directions have emerged from industry trend-watchers:

- "Cloud Skin" is the look of the moment. Rather than the glass-skin, ultra-dewy finishes that dominated recent years, or full-coverage matte bases, the emerging aesthetic favours a soft, diffused glow, skin that looks naturally luminous rather than visibly "made up." The effect is often compared to light filtering through cloud cover: soft, even, and gentle rather than sharp or high-contrast.
- Lighter, more translucent formulations. Formulators are increasingly leaning into soft-focus finishes that use light-scattering technology to create a refined, skin-first effect, rather than relying on heavy pigment loads to achieve coverage.
- Multi-use, hybrid products. Tinted primers, buildable highlighters, and skincare-meets-makeup formats are gaining ground, supporting simpler, pared-back routines rather than multi-step, product-heavy regimens. This "less, but better" philosophy appears to be a genuine throughline across both skincare and colour cosmetics categories this year.
- Softer application techniques. The overall direction favours enhancing natural features, soft sculpting, subtle highlighting, over dramatic contouring or heavy structural makeup. Finishes lean towards satin, pearlescent, and gentle sheen rather than flat matte.

For CTFA members, this global shift offers a useful signal for product development, packaging design, and marketing planning heading into the final quarter of the year, particularly for brands preparing summer ranges where lighter formulations are already a seasonal expectation.

WHAT'S HAPPENING IN SOUTH AFRICAN PERSONAL CARE

Locally, the picture aligns closely with, and in some respects moves ahead of, the global narrative.

South Africa is positioned as one of the most dynamic and closely watched beauty markets on the African continent. The expansion is being driven by a young, digitally engaged population, rising internet penetration, and a growing cultural emphasis on self-care, with social media platforms increasingly shaping what South African consumers discover, research, and ultimately purchase.

Several specific trends stood out at recent local industry showcases, including the Takealot House of Beauty event held earlier in 2026:

- Skincare is leading category growth, fuelled by rising demand for multifunctional products that combine hydration, anti-ageing benefits, and sun protection into single formulations. This is especially relevant as South Africa heads into its high-UV spring and summer months, when consumers are actively seeking products that do more with fewer steps.
- Ingredient literacy is rising quickly. South African consumers, particularly urban, digitally connected shoppers in centres like Johannesburg, Cape Town, and Durban, are increasingly reading labels closely and researching active ingredients before buying. This has prompted brands to expand their serum ranges significantly, with many exhibitors at recent trade showcases presenting several serum SKUs, each targeting a specific, clearly communicated concern.
- Barrier-first skincare is gaining real traction. There's a growing local focus on supporting the skin's natural barrier before addressing secondary concerns such as pigmentation or

fine lines, a philosophy strongly influenced by the continued rise of Korean skincare ("K-beauty") in the South African market.

- Ceramide-based formulations remain foundational. Ceramides continue to anchor barrier-support products across both facial and body care categories, appearing consistently across mass and premium brand tiers alike.
- Premiumisation continues alongside affordability pressure. Even against a backdrop of economic headwinds, including high unemployment and rising living costs, demand for premium and compliant formulations continues to grow, suggesting South African consumers are prioritising skincare as a considered, meaningful category rather than cutting back on it entirely.

BRINGING IT TOGETHER

What's striking is how naturally these two threads, the global "Cloud Dancer" colour narrative and South Africa's fast-maturing skincare market complement one another. Both point in the same direction: towards simplicity, transparency, and formulations that support rather than mask the skin.

For CTFA members developing or marketing summer ranges, there's a clear and timely opportunity to combine skin-first, luminous formulations with the SPF, hydration, and barrier-support benefits that South African consumers are actively seeking out, all while aligning messaging with the calm, uncluttered sensibility that's resonating globally this year. Whether that translates into a lighter-weight moisturiser with built-in sun protection, a hybrid tinted serum, or simply a packaging refresh that leans into softer, quieter visual language and packaging design for sustainability, the direction of travel for 2026 is consistent: less noise, more considered care.

Sources: Pantone Color Institute; industry trend reporting from Global Cosmetics News, NPR, CNN, Adobe Express, and Vivify Beauty Care; South African market data from Mordor Intelligence and Nexdigm; local trend observations from the Takealot House of Beauty 2026 showcase (as reported by Pharmacos). Rand conversions calculated at approximately R16.20/US$1 (August 2026).

ALLERGEN DECLARATION

Regulatory developments focused on product transparency are driving the need for increased information on product labels. Although only a small percentage of the population develops or experiences allergic reactions to cosmetic ingredients such as essential oils, fragrance oils, and certain other ingredients, the European Commission has made it compulsory to declare specified allergens as part of a cosmetic product's ingredient listing The European Commission's Scientific Committee on Consumer Safety (SCCS) estimates that 1-3% of the European population has a contact allergy to fragrance ingredients. (ec.europa.eu)).

Based on this, the South African self-regulated cosmetics industry is following suit.

CTFA hosted an informative and well-attended Allergens Webinar in July 2026, covering the allergen threshold percentages for leave-on and rinse-off products that trigger mandatory declaration requirements, as well as the key initial compliance deadlines for both the European Union (31 July 2026) and South Africa (31 March 2027). A special thank you to our guest presenter Arshdeep Joshi, Head of Regulatory & Product Safety, Givaudan).

As part of CTFA's ongoing commitment to support a compliant and informed industry, the Association is in the process of launching a dedicated tool to assist members through this transition. The tool seamlessly calculates the final allergen percentage within a product formulation and prompts users to include the allergen in the ingredient listing when the applicable threshold is reached or exceeded, depending on the product type.

Members will be notified once the tool is uploaded onto our website.

CTFA COSMETIC COMPENDIUM – ANNEX UPDATES

As a country and industry that closely follows the European Union (EU) cosmetic regulatory developments, the South African cosmetics industry has long relied on the EU's scientific expertise and safety assessments to guide best practice while awaiting the finalisation of cosmetic-related technical regulations by the National Department of Health (NDoH).

CTFA continues to serve as a trusted resource for industry members, ensuring that the cosmetics and personal care industry remains aligned with global regulatory trends, scientific developments, and best practices. With this in mind, CTFA annually updates the ingredient annexes of the CTFA Cosmetic Compendium to reflect the latest changes and regulatory developments in the EU.

Due consideration on transition periods applicable to South Africa is taken including the foreseeable socio-economic impact; risk to consumer; availability of alternatives and costs of compliance. In 2026, the CTFA notified members of the ingredient updates for: Annex II – prohibited substances; Annex III – restricted ingredients; Annex IV- Permitted colourants and Annex V – permitted preservatives.

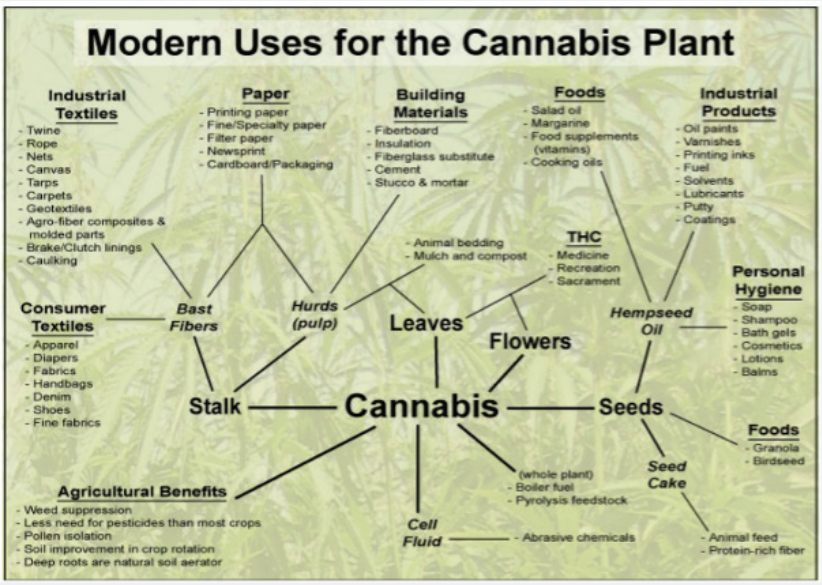
To ensure that your company remains compliant, CTFA regularly notifies members via CTFA's Policy, Regulatory & Technical Notification, as well as member engagement interventions.

The latest updates can be accessed on www.ctfa.co.za

LET'S TALK CANNABIS-DERIVED SUBSTANCES AND REGULATION

CTFA keeps abreast of developments relating to the use of Cannabis-derived ingredients in the cosmetic and personal care industry in South Africa. This is to ensure that members have access to the latest information that can have a positive or negative impact on innovation and product development. As can be seen in Figure 1, there are many modern uses of the Cannabis plant and although there are three recognised species (sativa; indica; and ruderalis), Hemp is often considered the best use of Cannabis in the cosmetic industry. This is because, although a few definitions exist globally, hemp generally contains very low levels of the psychoactive compound tetrahydrocannabinol (THC) and therefore does not generally face the same level of stringent drug related legislation and therefore restrictions. On the other hand, cannabidiol (CBD) from hemp is more the focus of industry.

Figure 1: the many uses of Cannabis-derived raw material



Source: Toronto Hemp Company, via Montana Department of Public Health and Human Services

In South Africa, Cannabis-related legislation is in flux, as policy is developing given the increasing demand for products from the genus. During 2025, CTFA was invited to a government-led seminar that considered various aspects of edible Cannabis products. Following the President's declaration in the 2025 State of the Nation Address that "We want South Africa to lead in the commercial production of hemp and cannabis.", national policy and regulatory developments have been underway such as with the National Cannabis Master Plan; Cannabis for Private Purposes Act; Hemp and Cannabis Commercialisation Policy; and an overarching Cannabis Act, for example. Following a Constitutional Court ruling, the South African Health Products Regulatory Authority (SAHPRA) has also amended legislation that allows a level of innovation and product development, although the supply of pure raw material could still be a challenge. In September 2025, the Department of Trade Industry and Competition reported publicly that the Hemp and Cannabis Commercialisation Policy "is expected to be ready for Cabinet approval and public comment by 2026." CTFA will be looking out for developments and requesting members to participate in the comment process. The overarching Cannabis Act is being developed " … to unify existing regulations, including the Cannabis for Private Purposes Act, 2024 …. [and] will cover private use, commercial cultivation, manufacturing and research … set to be presented to Parliament by mid-2027 ….".

The current regulatory status of CBD and THC from a Medicines and Related Substances Act is given by SAHPRA as shown in the boxes below.

CBD - Cannabidiol

Processed products containing CBD are excluded from the requirements of a medicine and the control of SAHPRA if they:

- are made from the raw plant material; **AND**
- contains not more than 0.0075% [75 ppm] of naturally occurring CBD; **AND**
- does not make any general health claim or therapeutic claim.

Note that the Department of Agriculture, Land Reform and Rural Development has the national policy and legislative mandate for **HEMP** in South Africa. Due to the confusion in the market, CTFA recently confirmed that the limits for THC and CBD content in cosmetic products, where no licensing or permitting is required by SAHPRA is as reflected. However, an unintended consequence of other legislation is that if sourced from **hemp** produced under permit in South Africa, the limits do not apply. This could change at any time, so it is not advised to follow this route. Please make contact with CTFA for further important information.

THC - tetrahydrocannabinol

Raw cannabis plant material and processed products containing THC are excluded from scheduling when:

- the intended use is for industrial purposes (not intended for animal or human medicinal use); **AND**
- it contains not more than 0.2% THC [2000 ppm].

Processed products containing THC are excluded (as Schedule 0) if it:

- contains not more than 0.001% [10 ppm] THC; **AND**
- does not make any general health claim or therapeutic claim.

Note that:

- Schedule 0 products can be made available from general sales outlets; and
- a permit is only required for the manufacture of THC-containing substances with Schedule 5; 6; 7; or 8 relevance, according to Sections 22A(9)(i) and 22A(11) of the Medicines and Related Substances Act.

For further information please contact CTFA.

STAY AHEAD OF REGULATORY CHANGES WITH CTFA







Dershana Jackison, CTFA's technical & regulatory affairs manager and Glen Malherbe, CTFA's head: policy & regulatory affairs, explain how the association helps members navigate regulatory change in South Africa's cosmetics industry.

In a self-regulatory environment, the Cosmetic, Toiletry and Fragrance Association (CTFA) plays a pivotal role in ensuring that the industry remains informed of international, continental and national regulatory developments. This proactive approach enables meaningful engagement with industry experts to assess, adapt to, or adopt regulatory changes while balancing consumer safety with the economic sustainability of the local cosmetics industry.

South Africa's current cosmetic regulatory framework comprises regulations, guidelines, codes of practice, standards and compulsory specifications. Over recent years, several ingredient restrictions and prohibitions introduced by the European Commission have had a significant impact on the South African cosmetics industry, affecting exporters, importers and local manufacturers alike. In particular, the classification of ingredients as carcinogenic, mutagenic or reprotoxic (CMR) substances by the Scientific Committee on Consumer Safety has resulted in numerous amendments to the annexes of the European Commission's Cosmetic Products Regulation (EC) No. 1223/2009. These changes have, in turn, necessitated corresponding updates to the annexes of the CTFA Cosmetic Compendium.

In addition, the European Chemicals Agency's REACH Regulation continues to evolve as new safety data emerges. These developments have implications for the European cosmetics sector and, by extension, the South African industry.

Locally, the Department of Forestry, Fisheries and the Environment is responsible for chemicals and waste management regulation, amongst other mandates, such as access to and benefit sharing of indigenous natural resources with communities. When policy decisions are translated to regulatory change and implementation, impacts can also be felt on cosmetic products, including their competitiveness. It is therefore essential for businesses to adopt a comprehensive, 360-degree approach to regulatory compliance, in real-time as it is rapidly evolving, for example to include sustainability drivers, international pressures and agreements and emerging risk.

CTFA continuously monitors these developments, informs industry of regulatory changes and provides guidance to member companies on compliance requirements.

REGULATIONS AFFECT ALL INDUSTRY PLAYERS

The evolving regulatory landscape has far-reaching consequences across the cosmetics value chain. Raw material suppliers must rapidly research and develop safer alternative ingredients, while cosmetic chemists are required to reformulate products to replace restricted or prohibited substances.

Manufacturers must implement production changes and brand owners often need to redesign product labels to reflect revised ingredient declarations. Collectively, these activities represent significant additional costs, which may ultimately be passed on to consumers.

While the industry awaits the finalisation of South Africa's draft cosmetic regulations by the National Department of Health (NDoH), the CTFA Cosmetic Compendium serves as a comprehensive reference guide for industry compliance. Regular regulatory notifications, updates and alerts published on the CTFA website further assist members in staying informed of emerging requirements.

OBJECTIVE REPRESENTATION AT VARIOUS LEVELS

CTFA's active participation in the South African Bureau of Standards (SABS) ensures that the industry is represented objectively on the relevant technical committees responsible for developing and revising national standards. This collaborative approach ensures that standards reflect local testing capabilities, international best practice and practical industry needs. It also facilitates the free movement of cosmetic products within the region and across the African continent while ensuring that locally manufactured products meet internationally recognised standards.

SABS standards cover a broad range of cosmetics-related topics, including product labelling, ingredient nomenclature, sun care, hair care, toothpastes, natural and organic products, analytical testing methods and microbiological testing.

KEEPING CLAIMS IN CHECK

As companies continuously adapt to meet changing regulatory requirements, ongoing research into raw materials is driving innovation in ingredient technology. These advances are enabling improved product performance and enhanced consumer benefits. Consequently, brand owners are increasingly incorporating these innovations into their products and communicating their benefits through product claims and advertising.

In South Africa, the Advertising Regulatory Board's (ARB) Code of Advertising Practice provides clear guidance on advertising and product claims regarding cosmetics. CTFA plays an integral role in the development and annual review of the Cosmetic Code, ensuring that it remains relevant, scientifically robust and aligned with international best practice.

HARMONISATION OF STANDARDS ACROSS AFRICA

The policy, legislative and regulatory environments of African countries are changing at a rapid pace. Multiple African countries are either reviewing their cosmetics and personal care-related policies and legislation, or developing such for the first time. CTFA continues to increase its direct network with regulators in the most important regions to navigate the complexity and provide advice to members on accessing these markets.

Over the last three years, a key area of focus has been engaging with the African Organisation for Standardisation (ARSO) – the African Union's mirror of the International Organisation for Standardisation (ISO) – as an integral part of the South African delegation negotiating the harmonisation of standards across Africa. This is critical work due to the reliance that many African countries have on standards to directly regulate cosmetics. Although challenging, the engagements are bearing fruit.

The drivers for these changes include the recognition that new risks have entered markets around the world while existing risk is not being mitigated effectively – from newly identified chemical risks to illegal trade. Furthermore, from a positive and proactive perspective the continued implementation of the African Continental Free Trade Area Agreement (AfCFTA) is increasing its momentum in demanding the harmonisation of requirements on the continent to facilitate free trade. Much of this work will, in the end, result in testing requirements. Ensuring that these are rational will contribute to key indicators for the industry, such as ongoing consumer safety, competitiveness and more fluid trade.

In turn, this will contribute to trade opportunities for the South African cosmetics industry, within the African continent.

ALWAYS A STEP AHEAD

Beyond providing guidance on local compliance, CTFA actively participates in numerous international and continental regulatory forums.

This engagement enables the association to remain informed of emerging global regulatory trends, assess their potential impact on the South African market, and contribute to international discussions.

By engaging early in the regulatory process, CTFA is well positioned to influence proposed changes where appropriate and to advocate on behalf of the South African cosmetics industry before new requirements are implemented.

Reference:
Pharmaceutical & Cosmetic Review https://www.pharmacos.co.za/magazines/pharmaceutical-cosmetic-review-august-2026/

ILLICIT AND COUNTERFEIT GOODS

"Illicit trade remains one of the most significant threats to South Africa's economic stability, governance, and global reputation. Despite its position as Africa's most industrialized economy and a leading member of global forums such as the G20 and BRICS, South Africa continues to grapple with the pervasive effects of illicit activities across sectors, including alcohol, tobacco, foodstuffs, agrichemicals, pharmaceuticals, counterfeiting, mining, and wildlife trafficking. These illegal activities undermine legitimate businesses, deplete tax revenues, undermine international trade and exacerbate social and economic inequalities." (TRACIT, 2025).

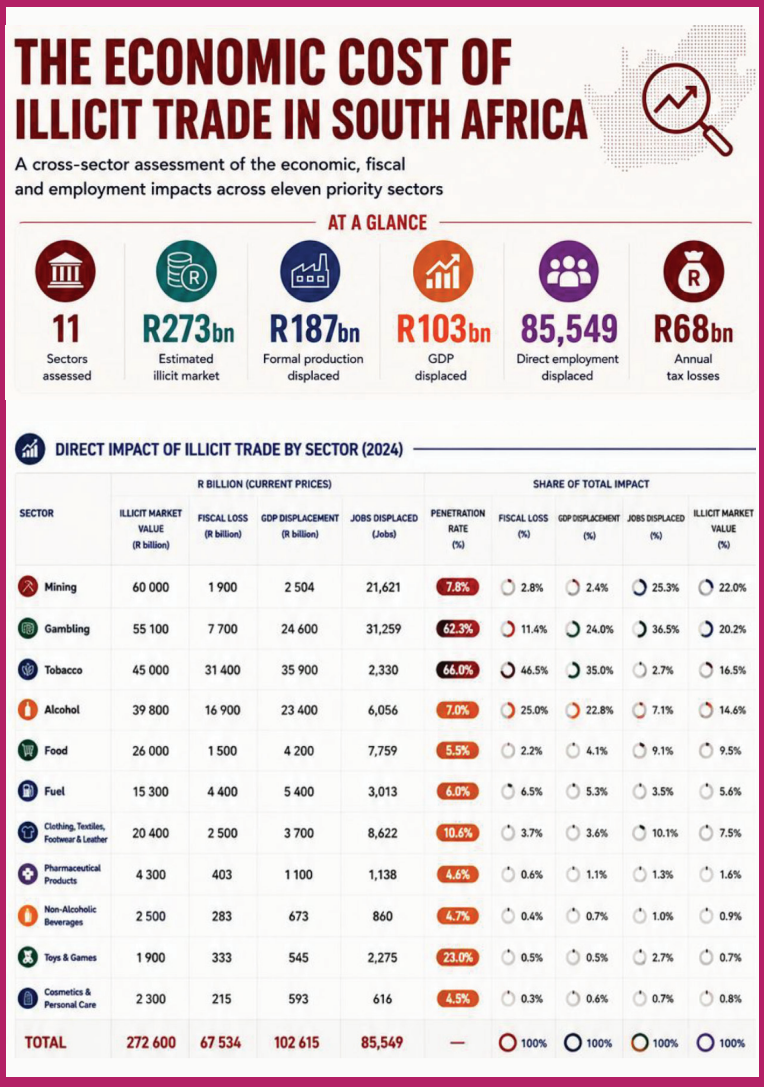
Illicit trade can take place in a several ways. Below is a list of some of these as well as challenges being experienced:

- counterfeiting/fake goods, i.e. goods purporting to be brands they are not;
- illegal trade/trade in prohibited goods and/or substances (e.g. skin lightening cream);
- intentional use of incorrect, or non-specific HS Codes (e.g. "Other")/illegal trade of excise goods;
- genuine goods traded illegally;
- intellectual property theft and damage (e.g. brands);
- the contribution of the online marketplace to illicit trade;
- the contribution of local origin goods vs imports; and
- porous borders.

CTFA, along with associations of other sectors of the economy (alcohol; clothing; textiles; footwear and leather; food; automotive fuel; gambling; mining; non-alcoholic beverages; pharmaceutical products; tobacco; and toys and games) is a member of the Consumer Goods Council of South Africa's (CGCSA) Illicit and Counterfeit Goods Multi-Task Force that aims to "coordinate cross-sector action, drive evidence-based policy advocacy, support enforcement, and foster public-private partnerships to reduce the proliferation of the illicit economy.". Furthermore, by eradicating illicit trade and the counterfeiting of goods a sustainable, secure and legitimate consumer goods industry will be advanced in South Africa. The Multi-Task Force aims to achieve this through unified, evidence-based, and collaborative action. In addition, co-benefits of these outcomes are the empowerment of industry; multistakeholder engagement; protecting public health, fiscal revenue, economic stability and brand equity.

CTFA has surveyed members and subsequently established its own Task Force – the outcomes of the internal work will result in CTFA's contributions to the CGCSA Multi-Task Force. Important parts of CTFA's work is to determine i) what members can contribute to the project - for example, data; research; time; information on successful as well as unsuccessful interventions that have already been conducted; and ii) the way forward for the Association and its members when it comes to possible interventions that can be made in addition to that which CGCSA is working on from the policy perspective.

A groundbreaking study, in response to the President of South Africa escalating South Africa's fight against counterfeit and illicit goods by launching the National Illicit Economy Disruption Programme has been commissioned by CGCSA. The research shows some shocking results (Box 1) and is the first of its kind to get data on a topic where information is hard to come by due to the nature of the illegal activities.



SECTOR	R BILLION (CURRENT PRICES)				SHARE OF TOTAL IMPACT				
	ILLICIT MARKET VALUE (R billion)	FISCAL LOSS (R billion)	GDP DISPLACEMENT (R billion)	JOBS DISPLACED (Jobs)	PENETRATION RATE (%)	FISCAL LOSS (%)	GDP DISPLACEMENT (%)	JOBS DISPLACED (%)	ILLICIT MARKET VALUE (%)
Mining	60 000	1 900	2 504	21,621	7.8%	2.8%	2.4%	25.3%	22.0%
Gambling	55 100	7 700	24 600	31,259	62.3%	11.4%	24.0%	36.5%	20.2%
Tobacco	45 000	31 400	35 900	2,330	66.0%	46.5%	35.0%	2.7%	16.5%
Alcohol	39 800	16 900	23 400	6,056	7.0%	25.0%	22.8%	7.1%	14.6%
Food	26 000	1 500	4 200	7,759	5.5%	2.2%	4.1%	9.1%	9.5%
Fuel	15 300	4 400	5 400	3,013	6.0%	6.5%	5.3%	3.5%	5.6%
Clothing, Textiles, Footwear & Leather	20 400	2 500	3 700	8,622	10.6%	3.7%	3.6%	10.1%	7.5%
Pharmaceutical Products	4 300	403	1 100	1,138	4.6%	0.6%	1.1%	1.3%	1.6%
Non-Alcoholic Beverages	2 500	283	673	860	4.7%	0.4%	0.7%	1.0%	0.9%
Toys & Games	1 900	333	545	2,275	23.0%	0.5%	0.5%	2.7%	0.7%
Cosmetics & Personal Care	2 300	215	593	616	4.5%	0.3%	0.6%	0.7%	0.8%
TOTAL	272 600	67 534	102 615	85,549	—	100%	100%	100%	100%

Announcing the country's plan during his 2026 State of the Nation Address, President Ramaphosa declared that organised crime and illicit trade pose an immediate threat to the country's democracy and economic development. The government's updated strategy focuses heavily on leveraging advanced technology to secure the local economy, such as by using artificial intelligence and data analytics; high risk industry targeting; inter-agency operations; and stricter border control. Ramaphosa emphasised that the primary motivation behind the crackdown is protecting local jobs; safeguarding state tax revenue; and defending legitimate businesses from being hollowed out by unfair competition.

Together, South Africa can fight illicit trade and further contribute to securing losses to the country's economy. An awareness campaign launched and run by CGCSA, called "Checka daai ding, Reka Makoya!" helps consumers spot and report fake, illicit, or expired goods. Checking the label; avoiding obvious signs such as missing information or no label, identifying evidence of tampering; or very low pricing can assist with identifying real from illicit goods. The CGCSA App can be used to verify products and report any issues.

CTFA will be running its own cosmetic-sector specific awareness campaign and engaging further with its own internal Task Force. Should members still be interested in participating in the CTFA Task Force and/or would like to take the CTFA Survey, please make urgent contact.



AD VALOREM PROPOSAL TO SARS

Schedule 1 Part 2B of the Customs and Excise Act No. 91 of 1964 ("Act") governs Ad Valorem excise duties on locally manufactured goods or on imported goods of the same class or kind. Also known as a luxury tax, Ad Valorem is calculated as a fixed percentage of the assessed value of the goods, rather than a per-unit basis. Ad Valorem excise duty is specifically relevant in the cosmetics industry as it pertains to skin care products and fragrance products. For many years the cosmetic industry has faced challenges in its dealings with the South African Revenue Service ("SARS"), the threat of audits and seizures of goods, and the calculation and administration of its Ad Valorem liability.

Through various engagements with stakeholders within the cosmetics industry a proposal has been submitted by CTFA on behalf of its members to SARS and National Treasury.

The cosmetics industry is of the view that there are inconsistencies in the calculation and interpretation of Ad Valorem values across various branches of SARS. In addition, these matters often take an extended period to be resolved and are frequently concluded unsatisfactorily for the taxpayer. In many cases, registrants also cannot afford the costs associated with pursuing matters. The cosmetics industry continues to face practical difficulties in this regard. This is especially concerning as businesses often must cease trading as the retrospective duties and concomitant penalties and interest cannot be paid. Some employ costly additional administrative instruments that change the scope of trading abilities until outstanding issues are resolved, due to concerns that continuing to trade without clarity or guidance from SARS may result in further inspections or penalties.

CTFA, on behalf of the cosmetics industry, has engaged in discussions to develop this proposal to present to SARS and National Treasury, providing insight into the cosmetics industry and making suggestions to improve the administration of Ad Valorem excise duty, with a view to streamline its application, ensuring greater transparency and consistency for all parties involved. This in turn will also help to avoid disputes between SARS and industry.

CTFA proposed the following initial considerations:

- In respect of the Customs and Excise Act: Removal of subclause (d) from Rule 69.01 ***["Notwithstanding the provisions of paragraph (c), no discount is deductible from the invoice price in respect of any goods specified in the items stated paragraph (a) (i)"]*** which restricts and/or prevents cosmetic manufacturers from utilising tiered pricing structures despite the fact that these are commonly used throughout industry to encourage business development and sales.
- The issuance of a guideline document or practice note by SARS (in collaboration with the cosmetics industry) clearly outlining the administration of ad valorem, with specific reference to the meaning of (1) "price paid or payable" and (2) what constitutes a "discount" for the purposes of various kinds of pricing arrangements used in the cosmetics industry.
- Talks and engagements directly between industry and SARS to resolve ongoing matters and reduce litigation proceedings.
- Training to be undertaken by SARS so that officials conducting audits and inspections are more knowledgeable about the cosmetics industry and how it operates.

SUPPORTING THE CTFA ON AD VALOREM REFORM

Harty Rushmere has been working closely with the CTFA and industry task team on the Ad Valorem project, assisting with the preparation of the proposal to SARS aimed at promoting discussions around the more effective administration of Ad Valorem. The initiative seeks to highlight the practical challenges experienced by the cosmetics, toiletry and fragrance industry, encourage greater alignment and understanding between industry stakeholders and SARS officials, and ultimately reduce unnecessary disputes and litigation.

Our team of specialist customs consultants and experienced attorneys is proud to support the CTFA in advancing this important initiative and advocating for practical, workable solutions for the industry.

Drawing on extensive experience across the customs and supply chain environment, Harty Rushmere assists importers and exporters with comprehensive customs compliance reviews to ensure adherence to the Customs and Excise Act. Our reviews are designed to identify potential risks and areas of non-compliance at an early stage and cover key aspects such as tariff classification, customs valuation, origin determination, rebate utilisation, licensing requirements, record-keeping obligations, and customs disputes with SARS.

By reviewing documentation, systems, and internal processes, the company provides practical recommendations that give businesses greater visibility of potential customs exposure while strengthening internal controls. This proactive approach helps minimise audit risk, improve compliance, and facilitate more effective engagement with SARS.

Harty Rushmere is a full-service commercial law firm, that can also assist with drafting, reviewing, and negotiating general or customs and excise related commercial agreements.

AFRICA IN FOCUS

BOTSWANA – LISTING OF COSMETIC PRODUCTS AND DRAFT LEGISLATION

Following the announcement of the requirement for cosmetic products to be listed in Botswana, stakeholder engagements have been held that resulted in the following extended deadlines being implemented for the listing requirement:

- Voluntary listing period: until 31 December 2026, listing of cosmetic products will remain voluntary. Stakeholders are encouraged to continue submitting product information even before mandatory compliance deadline.
- Mandatory listing (no fees): From 1 January 2027 to 31 March 2027, mandatory listing of all cosmetic products placed on the Botswana market will take effect. During this period, no listing fees will be charged.
- Mandatory listing (with fees): Effective 1 April 2027, mandatory listing will continue and applicable listing fees will be introduced. Details of the fees will be communicated in due course.

At the end of 2025, the revised Medicines and Related Substances Act was assented to by the President of Botswana. As a result, a plethora of legislation falling under the Act needed revision while others needed to be developed. The regulatory regime for cosmetics in Botswana is changing rapidly, and substantively. This year alone has seen two tranches of draft regulations being released for comment under tight timeframes by the Botswana Medicines Regulatory Authority (BoMRA). It is noteworthy that the proposals include references to specific chemicals from a safety perspective, in addition to international alignment - including on endocrine disrupting chemicals and nanomaterial for example. CTFA has not only been alerting members to these possible changes, but also to the opportunities provided to take part in providing input on the proposed changes and regulations.

Due to a number of challenges that CTFA identified in the proposed legislation, the Association engaged bilaterally with BoMRA that was open to considering CTFA's input. While feedback from BoMRA is still awaited, a new set of draft legislation has been released. A stakeholder engagement that included cosmetics regulation was held on 11 September 2026.

KENYA - CHANGES TO THE PRE-EXPORT VERIFICATION OF CONFORMITY (PVOC) PROGRAMME

Since 2005 the KEBS PVoC Programme has been in place, applying to products at exporting countries before export, to ensure their compliance with the applicable Kenya standards; approved specifications; and other applicable legislation. From 9 February 2026, Kenya implemented a "Destination Inspection" Programme for South Africa and some other countries that changes the way that imports from South Africa are handled - the "pre-export" principle has been changed to a "Destination Inspection" principle. Consignments from these countries now undergo "Destination Inspection" (DI). A DI fee of 0.6% of the approved customs value is levied (minimum of US$ 300 – maximum of US$ 3500, per consignment). Where required, testing fees may apply to determine conformity.

Through CTFA's bilateral engagement with KEBS, other potential options that may be available for products to enter Kenya satisfactorily were shared with members along with documents to assist implementation of the new requirements. For example, Option 2 includes annual product registration that is levied at Ks 7500 per product; and there is also the option of applying for the use of the KEBS Mark.

A successful CTFA Webinar with KEBS officials was held on 18 August 2026 during which members and non-members received the latest information and had opportunity to ask questions and have them answered by the officials.

ZAMBIA - GRACE PERIOD FOR MARKET AUTHORISATION OF COSMETICS ON THE MARKET HAS ENDED

Cosmetic products on the market or to be placed on the market in Zambia need to undergo the "marketing authorisation" process. The Zambia Medicines Regulatory Authority (ZAMRA) provided up to two years for products on the market or to be placed on the market, to be listed.

Products considered of low microbiological risk (Section 4 of the Marketing Authorisation Guideline) undergo "listing" (also called the "abbreviated" marketing authorisation process), while products not on the low-risk list will need to undergo the full marketing authorisation process.

Note that:

- all products on the market or to be placed on the market could undergo the abbreviated process up to 9 September 2026;
- all products already on the market had to be listed before 9 September 2026; and
- a Certificate of Free Sale (CoFS) is required to be submitted as a part of the market authorisation process.

ARTWORK REVIEWS SUBMISSION DEADLINE - 2026

As part of our commitment to support members, CTFA offers artwork review services to help ensure that product labels and claims comply with South African regulations, including Department of Health Government Notice R1469; relevant South African Bureau of Standards standards (SABS); and the Advertising Regulatory Board's (ARB) general Code and Cosmetic Code appendix.

To assist with year-end planning, please take note of the cut-off date for 2026 submissions: 30 November 2026.

Any artwork received after this date will still be logged, but reviews will only be processed in the new year.

We encourage members to plan ahead and submit artwork early to avoid delays. This ensures a smoother review process and helps you stay compliant as we move into 2027.

For more information on these services, visit www.ctfa.co.za or contact info@ctfa.co.za

CTFA TRAINING & WEBINARS — 2026 ROUNDUP

CTFA has kept members equipped with practical, regulation-focused training throughout 2026. Here's a look back at what was covered in the third quarter:

COSMETIC GOOD MANUFACTURING PRACTICE (cGMP) TRAINING (25 JUNE 2026)

CTFA hosted the Cosmetic Good Manufacturing Practice (cGMP) Training 2026 — a hybrid session bringing together industry professionals for a day dedicated to quality, compliance, and continuous improvement.

The training provided valuable insights into the principles of ISO/SANS 22716:2011 Cosmetic GMP and explored the practical application of GMP across the cosmetic and personal care industry. Topics covered included responsibilities within an organisation, training programmes, premises and equipment requirements, manufacturing processes, quality control, documentation, audits, complaints, recalls, and more.

A key focus throughout the day was the importance of embedding quality into every stage of the product lifecycle — from raw material management and manufacturing operations through to finished product release and ongoing quality monitoring.

Thank you to all attendees, both onsite and online, for your engagement, questions, and commitment to maintaining world-class standards within our industry. A special thank you to our trainers Dershana Jackison - CTFA Technical and Regulatory Manager and Nadia Rashid - Lamelle Technical and Regulatory Manager, for sharing their expertise and supporting the continued growth of the cosmetic and personal care sector.

Together, we continue to set and maintain world-class standards, principles, and practices in our industry.



FRAGRANCE ALLERGENS LISTING UPDATE (23 JULY 2026)

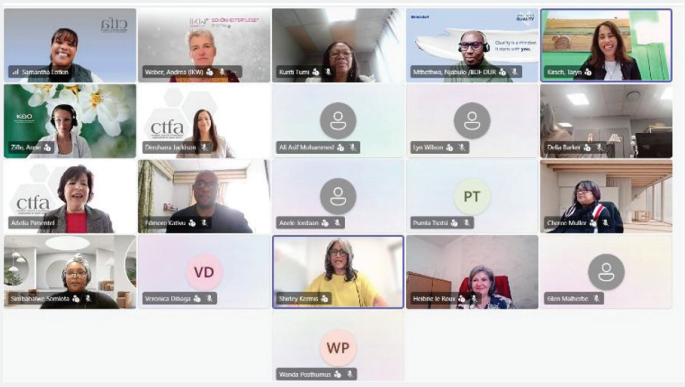
Dershana Jackison, together with Givaudan's Arshdeep Joshi, walked members through the EU's expanded fragrance allergen labelling requirements — growing from 26 to over 80 listed allergens. The session covered new thresholds for leave-on vs rinse-off products and key initial compliance deadlines: 31 July 2026 for the EU, and 31 March 2027 for South Africa.

SAFETY ASSESSOR SEMINAR (27 AUGUST 2026)

CTFA hosted the annual Safety Assessor Seminar with IKW – The German Cosmetic, Toiletry, Perfumery and Detergent Association.

Speakers and topics:

- Dr. Andrea Weber – Safety Assessment of Cosmetic Products: Regulatory Requirements, Practical Aspects, Education and Training
- Dr. Taryn Kirsch – Framework for Human Health Risk Assessment
- Dr. Anne Zifle – Modern Safety Assessment of Cosmetic Spray Products: Integrating Exposure, Risk Assessment and New Approach Methodologies (NAMs)



A timely reminder that competent safety assessment draws on chemistry, toxicology, dermatology and cosmetics law — and requires regular continuing education to stay current with the science.

In South Africa, the draft Regulations relating to the Labelling, Advertising and Composition of Cosmetics (No. R.1469) reinforces this: the responsible person must ensure a safety assessment is carried out on the finished product and its ingredients, by an appropriately trained person.

KENYA BUREAU OF STANDARDS (KEBS) - CHANGES TO THE PRE-EXPORT VERIFICATION OF CONFORMITY (PVoC) REQUIREMENTS (18 AUGUST 2026)

On 18th August, CTFA hosted a webinar with the Kenya Bureau of Standards (KEBS) team who presented to our members on the new Destination Inspection process effective from 1st March 2026.

The session covered key areas including:

- The legal and regulatory basis for destination inspection
- The role and responsibilities of importers and suppliers
- The different certification and clearance pathways available
- Requirements around the Free Sale Certificate
- Options for faster market access, such as Product Registration and the Diamond Mark Scheme



2027 MEMBERSHIP RENEWAL FORMS

It's almost time to renew your CTFA membership for 2027. Completing your Membership Renewal Application Form ensures that we have your most up-to-date details on file, connected you to all the regulatory updates, industry notifications, training opportunities, and advocacy and support services available through CTFA.

WHY RENEWAL IS IMPORTANT

- Stay informed with timely regulatory and technical updates
- Access exclusive CTFA training, workshops, and networking opportunities
- Ensure uninterrupted membership benefits throughout 2027

HOW TO SUBMIT

Please return your completed membership renewal form to info@ctfa.co.za. If you need assistance the CTFA team is happy to help.

We thank all our members for their continued support. Your active participation strengthens our industry voice and ensures we move forward together in 2027.

The 2027 Renewal forms will be sent to each member company in October 2026.

KEEP YOUR CONTACT DETAILS UP TO DATE

As a member, one of the simplest things you can do to stay connected with us is to make sure your contact details are current. Every week we send out communications with updates, notices, and announcements to the information we have on file. If that information is out of date, you could easily miss something important.

WHY THIS MATTERS

Our weekly communications only work if they actually reach you. An old email address can mean messages bounce, go unread, or never arrive in the first place. Keeping your details current means you stay in the loop and we can get hold of you quickly when it counts.

PAYMENT PROCESSES AND RENEWAL FORMS

If your company uses a specific payment process or portal, please let us know when you send back your renewal form. Sharing these details up front helps us invoice member fees correctly and on time. Leaving this out can lead to invoicing errors or unnecessary delays while we sort things out.

WHAT YOU CAN DO

- Update your contact details as soon as they change, rather than waiting for the next renewal.
- When you submit your membership renewal form, mention any company specific payment processes or portal requirements.
- Get in touch if you're ever unsure whether your details on file are correct.

It only takes a few minutes to keep your information accurate, and it makes a real difference in how smoothly our communication and invoicing run as well as how up to date you are with industry developments. Thanks for helping us keep things on track.

ctfa
COSMETIC TOILETRY & FRAGRANCE ASSOCIATION OF SOUTH AFRICA

T: +27 11 795 4272 | **E:** info@ctfa.co.za | **www.ctfa.co.za**

PHYSICAL ADDRESS
59 Woodlands Avenue, Hurlingham Office Park, Bushwillow, Ground Floor, Suite 2 & 3, Hurlingham, Sandton