

PRACTICAL GUIDE · 2026 EDITION

EAC Conformity for Cosmetics and Perfume

A comprehensive handbook for manufacturers,
exporters and product managers



**COSMETICS · PERFUME · PERSONAL CARE
TESTING · DOCUMENTATION · CHECKLISTS**

How to use this guide

From your cosmetics portfolio to appropriate evidence and shipment release.

This handbook is intended for manufacturers, brand owners, contract manufacturers, exporters, importers and product managers. It covers perfumes, skin and body care, hair care, decorative cosmetics, children's and family cosmetics, oral hygiene and special cosmetic applications. It draws on the AC Inorms sector page, regulations archive and linked official legal sources.

Two procedures, no universal mandatory certificate

"EAC certification for cosmetics" is commonly used to describe the overall approval process. TR CU 009/2011 requires either an EAC declaration or state registration. Classification under Annex 12 determines the route. A general EAC certificate is not an optional alternative under this regulation. Both routes require compliance with the applicable safety requirements.

Start with classification and regulatory status on pages 4-15. Pages 16-25 explain formulation, dossier, testing, claims and manufacture. Product chapters appear on pages 26-32; marking, import and maintenance follow on pages 33-40. Then use the case study, mistakes, FAQs and worksheets.

Edition 1.0 · As of 10 October 2026

Amendments under No. 114/2024 and their transitions are considered. No. 74/2025 is presented as an upcoming amendment from 28 October 2026; one provision applies from 1 January 2027. These explanations are not official translations. Original texts and actual product assessment take precedence.

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Suggested starting point

Prepare an item and formulation list first. Add user age, application site, intended purpose and claims. “Natural”, “professional” or “EU compliant” does not replace classification or assessment under EAEU law.

Quick start: seven decisions

Application, formulation and users determine the procedure.

Step	Question to resolve	Result
01	Cosmetic purpose or medical / other application?	Applicability
02	Which products, formulations, brands and factories?	Product identity
03	Children / family, nano or special application?	Annex 12 review
04	Declaration or state registration?	Conformity route
05	Series, batch and eligible EAEU applicant?	Scheme / roles
06	Which evidence, samples and labels are usable?	Testing and dossier plan
07	Register, marking and import agreed?	Shipment release

Your initial information package

Send the product list, current labels, complete formulation with ingredient functions, technical specifications and existing reports. State manufacturer, factories, destinations, age group, application site, supply arrangement and planned shipment. Add proposed HS/TN VED codes, pack sizes and shelf life. Confidential formulations can be submitted directly to the relevant technical bodies under controlled access arrangements.

Identify children and family use explicitly

A product “for the whole family” may require state registration if intended also for children under 14. Intended use must agree across formulation, label, website and application.

FUNDAMENTALS

The EAEU market

EAC provides a common conformity framework for five countries.

One economic area - five member states

EAEU / Eurasian Economic Union

Armenia

EAC

Belarus

EAC

Kazakhstan

EAC

Kyrgyzstan

EAC

Russia

EAC

Common product requirements; assess additional national operating obligations separately.

What mutual recognition means

A properly issued and valid EAC document is generally usable in all five EAEU member states within its product scope. Common recognition concerns the relevant technical product requirements.

Language obligations, national measuring instrument rules, plant operation and registrations with authorities may still apply separately.

Understanding EAC, CE and GOST

Term	Meaning for cosmetics exports
EAC	Conformity marking for compliance with all applicable TR CU / TR EAEU. It is applied only after the required assessment is complete.
CE	EU conformity marking. EU documentation can provide a technical starting point but does not replace a required EAC document.
GOST	Standards or national conformity systems. Whether a GOST test standard applies depends on the specific regulation and its standards list.

Successful conformity assessment alone does not authorise an otherwise prohibited export. Foreign trade law and technical product conformity are separate assessments.

TR CU 009/2011: legal foundation

The cosmetics regulation has applied since 1 July 2012.

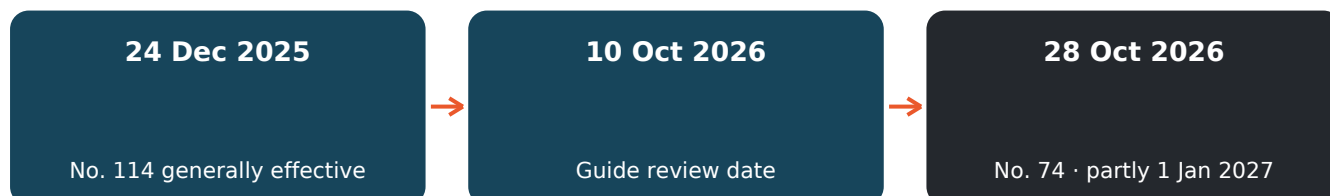
TR CU 009/2011 “On the safety of perfumery and cosmetic products” was adopted by Commission Decision No. 799 of 23 September 2011. It connects product identification, ingredient requirements, safety assessment, manufacture, packaging, marking and conformity assessment. German or EU origin does not exempt a product from EAEU requirements.

Regulation section	Project use
Articles 1-3	Scope, boundaries and terminology.
Articles 5 / 5 ¹	Safety, production, packaging, labelling and methods.
Article 6	Declaration, state registration, applicants and evidence.
Article 7	EAC mark before market placement.
Annexes 1-5	Prohibitions, restrictions, colourants, preservatives and UV filters.
Annexes 6-10	pH, microbiology, toxicology and clinical requirements.
Annexes 11-13	Information symbol, SGR list and claims criteria.

The current EEC page lists regulatory amendments separately from standards lists. Decision No. 177/2020 and its amendments provide the starting point for selecting suitable test methods. A standard must suit the product, parameter and assessment date. An old archived version alone is insufficient.

Regulatory status and amendments in 2026

Plan operative requirements separately from upcoming amendments.



Assess effectiveness conditions and transitions separately

Act	Meaning on 10 October 2026
No. 114/2024	Generally effective from 24 December 2025; some provisions from 1 July 2026, another conditional on standards inclusion.
No. 24/2025	Transitions for No. 114: old declarations until expiry; old SGRs for 60 months from entry into force of No. 114.
No. 74/2025	Generally effective from 28 October 2026; exception subparagraph d, paragraph 4 from 1 January 2027.
No. 177/2020 + amendments	Check current test-method list; EEC lists, among others, Nos. 99/2023, 78/2024 and 87/2025.

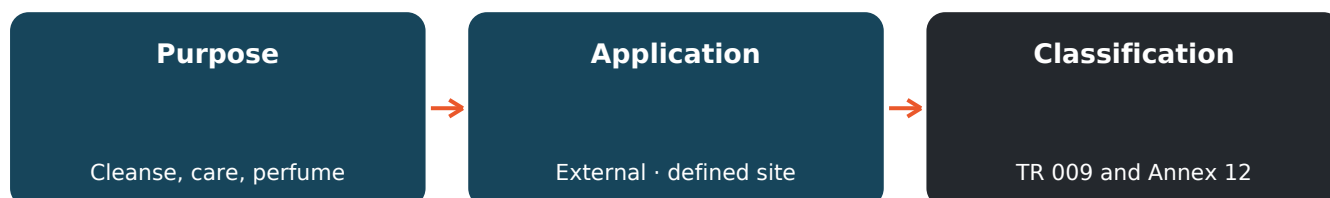
No. 114 revises, among other matters, scope, children's and family cosmetics, conformity procedures and labelling. No. 74 changes ingredient annexes, including prohibitions and restrictions. Review each formulation against the version applicable to planned market placement. Older records remain usable only within the actual applicable transitions.

Review existing evidence item by item

No. 24/2025 permits manufacture and market placement under covered old documents until their applicable expiry; products placed on the market may subsequently circulate during shelf life. This does not authorise new formulations or an unsuitable document scope.

What qualifies as a cosmetic?

Purpose and application site determine classification.



Formula, instructions and claims must agree

A cosmetic is applied externally to skin, hair, nails, lips and external genitalia, or to teeth and oral mucosa. Its purpose includes cleansing, changing appearance, perfuming, correcting odour or caring for and maintaining normal condition. Formulation, instructions and actual claims must support this classification.

Supply item	Assessment
Cream, shampoo, perfume, lipstick	Assess finished product by purpose and Annex 12.
Cosmetics on carriers, such as certain wipes	Assess carrier, product definition and use together.
Cosmetic applied to other goods	Special rules in Articles 1 and 5; do not automatically treat as a finished cosmetic.
Raw material / fragrance concentrate for manufacture	Future cosmetic use alone does not make it a finished cosmetic.
Kit / multi-component system	Identify all components, mixing and instructions.

Document intended use

A cosmetic cream and a wound-treatment product can look similar. Intended purpose and claims matter, not container shape. Some new special provisions for cosmetically treated goods have a separate effectiveness condition.

Exclusions and borderline cases

Products outside TR 009 may require other approvals.

Case	Boundary under Article 1
Ingestion, inhalation, injection, implantation	Not a cosmetic application route under TR 009.
Diagnosis and treatment	Assess medical, pharmaceutical or other product rules.
Tattoo / permanent make-up breaking the skin	Excluded from scope; distinguish from superficially applied tattoo cosmetics.
Disinfectant, antiseptic, repellent	Expressly excluded intended purposes.
Lubricants / intimate lubricating gels	Distinguish from intimate-care cosmetics.
Eye, nasal or certain genital mucosa	Observe excluded application sites.
Eyelash, rhinestone and nail-tip adhesives	Expressly excluded; do not declare as ordinary decorative cosmetics.
Wet toilet paper / fluoride varnish	Express exclusions in the current version.

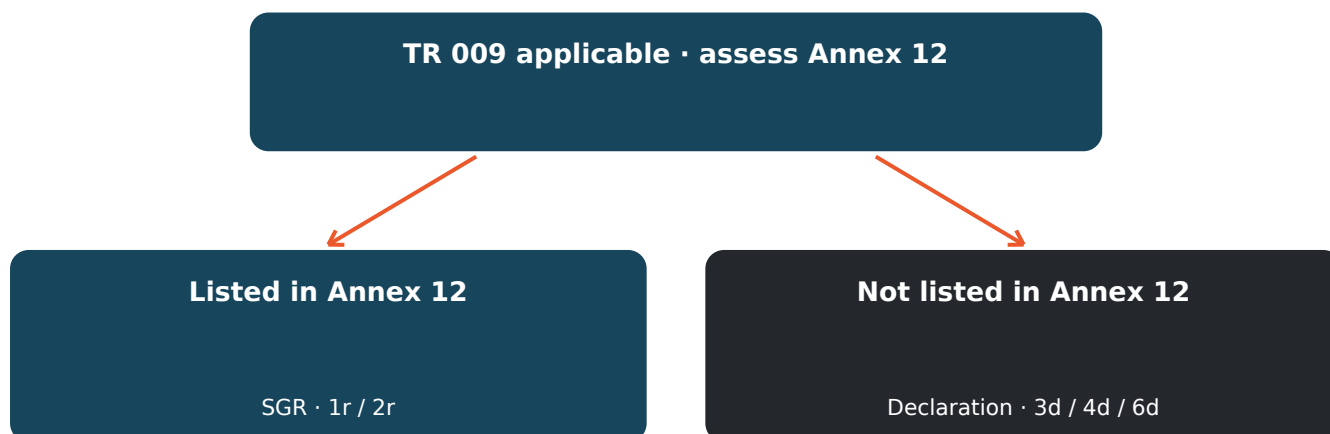
Record a justified classification decision with product description, formulation, instructions and the relevant provision. Medical claims such as “treats eczema” can challenge cosmetic classification. CE marking or an EU cosmetic notification does not automatically determine the EAEU route.

Read special lists together

Annex 12 lists tattoo cosmetics; Article 1 excludes products applied by breaking the skin. Establish scope first, then assess the SGR list.

Declaration or state registration?

Annex 12 assessment is the central procedure decision.



Question	Conformity direction
Product outside TR 009?	Determine another regulatory route.
Product covered by Annex 12?	State registration under Article 6.
Covered cosmetic not listed in Annex 12?	Declaration under 3d, 4d or 6d.
Additional packaging or national import duties?	Assess separately and coordinate with product evidence.

For a cosmetic requiring registration under Annex 12, an ordinary declaration does not replace state registration. Conversely, an SGR for one product does not approve the entire portfolio. The entry must match the names, formulations and manufacturers actually supplied.

Plan before launch

Article 6 requires imported products subject to registration to be registered before import. Test-sample imports are organised as a separate operation with the competent body and customs agent. Schedule commercial goods after evidence, label approval and import arrangements have been confirmed.

Annex 12: products requiring SGR

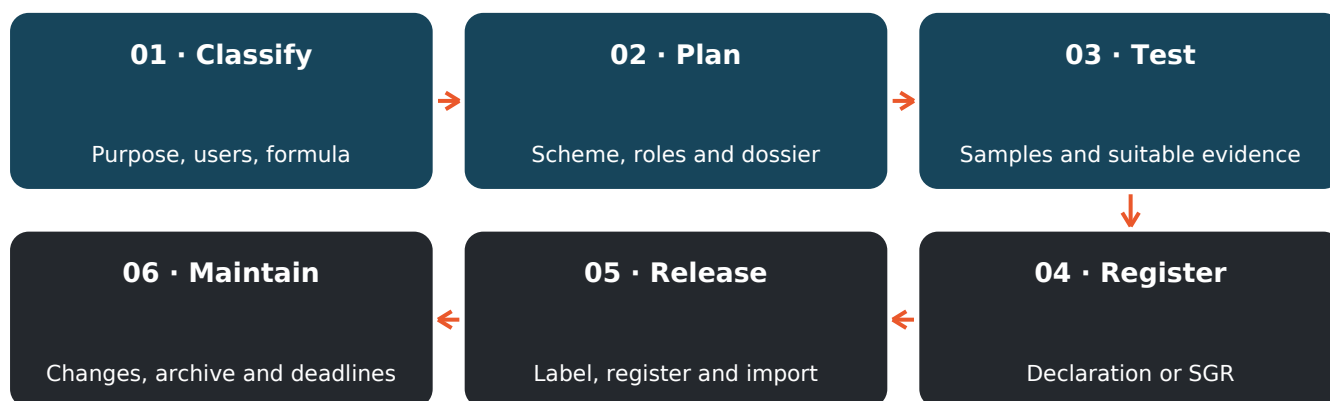
The current list covers special applications and user groups.

Group	What to establish
Artificial tanning / skin lightening	Self-tanning and lightening purpose; not all sun care automatically.
Tattoo cosmetics / intimate cosmetics	First assess scope and excluded methods.
Skin protection from harmful workplace factors	Express occupational protection function.
Children's cosmetics	Intended purpose and age group.
Chemical dyeing, bleaching, highlighting	Including hair, eyebrows and eyelashes as specified.
Chemical waving / straightening	Including eyebrows and eyelashes as specified.
Nanomaterials	Actual nano properties under the definition, not trade description.
Depilation / peelings	Function and actual product definition.
Fluoride oral hygiene	Above 0.15% fluoride; liquids above 0.05%, calculated as fluorine.
Peroxide tooth whitening	0.1-6.0% hydrogen peroxide, present or released by components.
Family cosmetics	Intended also for children under 14.

This table summarises list groups. The full current version governs boundaries, ingredient restrictions and permitted use. SGR does not legalise exceeding an ingredient limit. Oral-care values in particular do not generally permit arbitrary fluoride or peroxide concentrations.

State registration: procedure

The competent authority decides on registration.



Step	Work required
01 · Classification	Confirm TR scope and Annex 12 for each product.
02 · Scheme / roles	1r for EAEU manufacture, 2r for manufacture outside the EAEU.
03 · Samples / testing	Identify, take documented samples and test in an accredited laboratory.
04 · Application / dossier	Submit complete, translated and certified records as required.
05 · Expertise / decision	Authority reviews evidence; issuance or reasoned refusal.
06 · Register / release	Coordinate entry, product scope, marking and import.

Under 1r the applicant is the manufacturer or its authorised person; under 2r the authorised person or importer/seller. The applicant must be an eligible legal entity or individual entrepreneur registered in an EAEU member state. A service provider coordinates the project but does not replace the authority or applicant responsibility.

No universal factory audit for every SGR

Article 6 describes samples, testing, dossier and authority expertise. It does not establish an on-site audit as a universal step for every imported cosmetic. Additional requirements must be justified for the actual procedure.

SGR dossier: plan complete documentation

Formulation, test report and label must describe the same product.

Document block	Required contents
Application / identity	Product names, manufacturer, applicant, registration and representation mandate.
Formulation / specification	Ingredients, functions, relevant mass fractions under Annexes 2-5 and manufacturing basis.
Safety information	Trace substances, physicochemical and organoleptic properties; nano data where relevant.
Samples / reports	Sampling record, suitable laboratory reports and toxicological assessment where applicable.
Manufacture	Statement of compliance with production/GMP requirements or relevant certificates.
Marking / claims	Certified label draft, instructions and evidence of claimed properties.
Import under 2r	Required evidence of test-sample import.

Article 6(5) is the authoritative documentation list. Translations are certified under application-state rules, by an appropriately qualified translator or by the applicant. An SDS or EU safety report may supply information but does not automatically replace prescribed evidence. Agree access, format and responsibility before laboratory work.

Certificate versus manufacturing evidence

Depending on the case, the list permits manufacturer statements and relevant certificates. An external ISO or GMP certificate is not universally the only permitted manufacturing evidence for every SGR application.

Declaration schemes compared

Series and batches have different prerequisites.

Scheme	Supply arrangement	Basis / validity
3d	Series production	Accredited laboratory, production control; maximum 5 years.
4d	Identified batch	Accredited laboratory, batch records; taking shelf life into account.
6d	Series production	Accredited laboratory plus certified QMS or GMP manufacture; maximum 7 years.

For 3d and 6d the EAEU applicant is the manufacturer or its authorised person. Under 4d an importer/seller may also apply. The declaration is adopted and registered on the prescribed evidence. It may cover one or several product names within the same product designation; safety records must nevertheless be established for each name.

Review test reports in time

For 3d and 6d a report must not be older than one year at registration. Under Article 6 conditions, 4d can use results from earlier analogous batches: justify identity, confirm unchanged formulation, use current methods and observe the two-year limit from report approval. This is not a general exemption for arbitrary new batches.

Separate validity and shelf life

Five or seven years of declaration validity do not extend shelf life or approve a changed formulation. Maintain conformity and assess changes throughout use of the document.

EAEU applicant and representation

Define roles, data rights and supply capability in writing.

Role	Responsibility
Manufacturer / contract manufacturer	Formulation, product identity, production control and change information.
Brand owner	Coordinate brand, product names, claims, labels and approvals.
EAEU applicant	Eligible role, document adoption, register and dossier duties.
Authorised person	Mandate for assessment and market placement; responsibility for nonconformity.
Laboratory / authority	Testing within appropriate competence or SGR decision.
Importer / customs agent	Coordinate shipment data, import procedure and national duties.

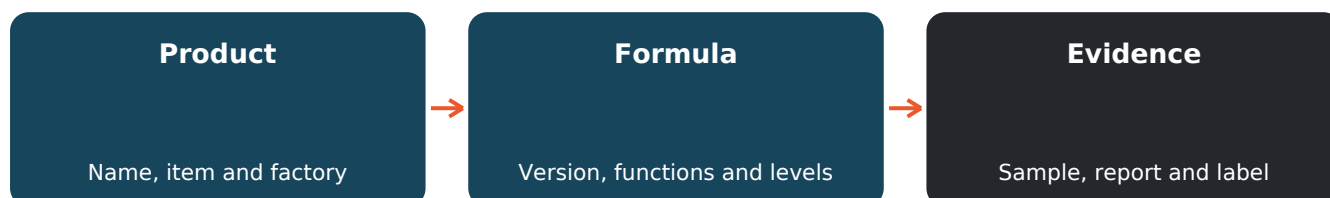
A European manufacturer without an eligible EAEU establishment arranges the required local applicant role for the actual procedure. A customer may be eligible where the prerequisites are met. Applicant status does not automatically create exclusive distribution rights. Exclusivity, use by other supply partners, report rights and termination are separate contractual matters.

Resolve dependencies before commissioning

Agree formulation access, confidentiality, ownership and usage rights for reports, access to conformity records, change notification and continuation after a partner change. A commercial supply agreement does not replace every required manufacturer mandate.

The technical evidence dossier

One controlled product version connects all records.



Link all records to the same product version

Block	Contents
Product master	Item, brand, designation, name, users, application and destinations.
Formulation	Version, INCI / chemical identity, function, mass fractions and traces.
Specification	Appearance, odour, pH and other relevant physicochemical values.
Manufacture	Manufacturer, factories, manufacturing basis, controls and GMP/QMS evidence.
Testing	Sampling record, sample identity, reports, methods and safety assessment.
Communication	Label, instructions, warnings and claims evidence.
Evidence / shipment release	Declaration or SGR, annexes, register check and shipment data.

Article 6(11) governs declaration records; paragraph 5 governs SGR records. Organise documents by product name rather than brand alone. Each translation should carry date, version and approval. Do not silently link a changed formulation to a report for an earlier version. For multiple factories, confirm the relationship between manufacturer, site and evidence.

Use EU records deliberately

PIF, CPSR, CPNP data, stability reports and raw-material dossiers can strengthen the information base. They replace neither EAEU registration nor automatically the accredited reports required there.

Formulation and ingredient assessment

Check every constituent against the relevant annex.

Assessment layer	Required decision
Annex 1 · Prohibitions	Is a constituent prohibited? Justify technically unavoidable traces separately.
Annex 2 · Restrictions	Check product type, concentration, use, purity and warning text.
Annex 3 · Colourants	Reconcile CI identity, permitted uses and conditions.
Annex 4 · Preservation	Permitted substance, concentration and product-specific restrictions.
Annex 5 · UV filters	Permitted identity/form and its conditions.
Formulation version	Link applicable version to the item's market-placement date.

A complete assessment requires chemical identity and function. A raw-material description such as “preservative blend” or “perfume oil” may conceal several relevant substances. Restricted-substance mass fractions are determined in the finished product or prescribed application mixture according to the individual entry. Review supplier data for plausibility and currency.

Document a traceable assessment

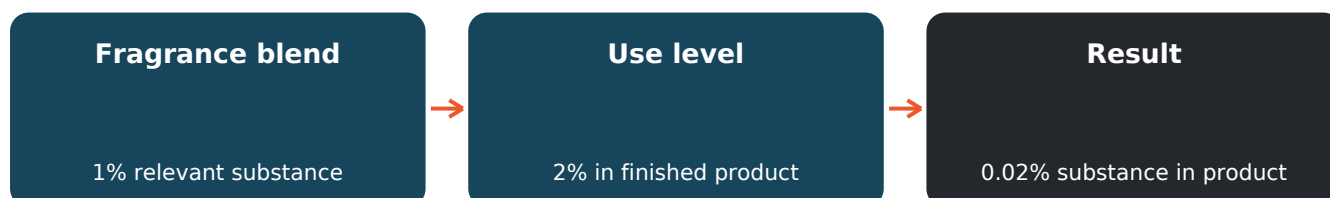
Prepare an ingredient matrix with INCI, CAS where assignable, function, use level, relevant annex entry, calculation and required labelling. For No. 74/2025 changes, add a second assessment for the upcoming effective date. Record missing data and the responsible supplier.

A trace is not a planned ingredient

Rules for technically unavoidable traces do not authorise deliberate use of a prohibited substance. Origin, manufacturing conditions and safety require reliable justification.

Fragrances, allergens and concentrations

A fragrance blend needs technical data and correct label reconciliation.



Calculation example · assess further permission conditions

A fragrance composition may be listed as one ingredient. Certain fragrances specified in Annex 2 must additionally appear when the relevant concentration is exceeded: 0.01% for rinse-off and 0.001% for leave-on products. Check the current substance list and all entries, including upcoming amendments; EU and EAEU lists must not be assumed identical.

Calculation example: concentration in the finished product

If a product contains 2% fragrance blend and that blend contains 1% of a relevant labelling substance, its finished-product concentration is 0.02%. This exceeds both thresholds above. The example illustrates calculation only; permitted use, substance identity and all other restrictions require separate assessment.

Data point	What to obtain
Fragrance supplier	Current quantitative data on relevant constituents.
Product formula	Use level and contributions from other raw materials.
Application	Leave-on or rinse-off based on actual use.
Label	Required individual names, order and languages.

Do not treat a fragrance certificate as overall approval

An IFRA document can support the dossier. It does not automatically establish every TR 009 requirement or replace product-specific evidence.

Nanomaterials and specialist raw materials

Actual material properties determine classification.

Cosmetics manufactured using nanomaterials are listed in Annex 12. Assess the Article 3 definition and characterisation of the individual raw material. “Nano” in marketing is neither sufficient proof nor a reason to disregard relevant properties confirmed by a supplier. Pigments and UV filters also require assessment against material- and form-specific annex conditions.

Record	Assessment use
Chemical identity	Name, INCI, CAS where assignable and possible surface treatment.
Particle characterisation	Size and relevant distribution, structure and material form.
Physicochemical data	Required properties under the substance entry.
Formulation / exposure	Use level, application, spray format and contact routes.
Labelling	Nano indication under current ingredient-list rules.
Testing and SGR plan	Suitable evidence, laboratory and competent authority.

Botanical extracts, fermentation products and complex blends may also need detailed raw-material descriptions. “Natural” or “organic” does not waive prohibitions, microbiological requirements or necessary evidence. Record relevant impurities and batch variation as well.

Assess before printing

An overlooked nanomaterial status can change the entire conformity route and ingredient labelling. Confirm it before sample planning, quotation and label approval.

Test programme and laboratory selection

Formulation, application and users determine parameters.

Assessment area	Basis / project question
Organoleptic properties	Appearance, colour, odour and product-specific properties.
Physicochemical properties	pH and other relevant specification/annex parameters.
Microbiology	Annex 7, product group and permitted exceptions.
Toxicology / clinical values	Article 5, Annexes 8-10 and permitted assessment routes.
Ingredients	Restricted substances, relevant impurities and formula reconciliation.
Claims	Separate evidence for SPF, efficacy and other label statements.
Methods	Current standards list and suitable laboratory accreditation.

Commission an accredited laboratory with suitable competence and the register eligibility required for the procedure. A general accreditation certificate does not prove coverage of every method or product. Provide the laboratory with formulation, users, application site, sample description, label and existing evidence.

Approve a specific test assignment

Record method, version, unit, limit, sample, justification and report purpose for each parameter. Establish which manufacturer data are usable and which additional investigations are needed. Plan regulatory safety assessment and voluntary marketing tests as separate work items.

Microbiology and shelf life

Assess contamination separately from long-term stability.

Annex 7 distinguishes cosmetic product groups and microbiological safety requirements. Children's products, eye-area applications and oral hygiene need particular attention. The programme follows intended use and the current regulation. Agree limits with the laboratory for the relevant category instead of applying one value to the entire portfolio.

Topic	Practical implementation
Water-containing formula	Assess water quality, preservation, manufacturing hygiene and filling.
Microbiologically low risk	Use an exception only with defensible justification under the definition and Annex 7.
Preservation	Connect permitted substances and concentrations with product effectiveness.
Shelf life	Manufacturer justification with stability, packaging and storage conditions.
Opened pack	Intended use and additional durability information where applicable.
Batch release	Controls, retained samples and deviation handling.

Passing one test at manufacture does not automatically establish safety throughout shelf life. Stability and packaging-compatibility data and appropriate preservation investigations can support the dossier in practice. Confirm in advance which data are accepted for the actual procedure.

Do not rely on alcohol content alone

A stated alcohol content or "water-free" description is not a universal testing exemption. The permitted exception and actual properties must agree.

Toxicological and clinical assessment

Observe permitted methods and product-specific exceptions.

Article 5 and Annexes 8-10 establish toxicological, clinical-laboratory and certain clinical requirements. The current version permits, where suitable, toxicological assessment based on ingredient characteristics by an accredited laboratory. Reconcile such an assessment with regulation conditions and the actual formula; an informal manufacturer note is not equivalent evidence.

Question	Meaning
Contact site	Skin, eye area, lips, oral cavity or external intimate care.
Exposure	Rinse-off / leave-on, frequency and intended application.
Users	Children, adults, professional users and relevant restrictions.
Formula features	pH, reactive substances, peroxides, dye systems and nano forms.
Evidence route	Prescribed tests, permitted alternative methods or laboratory assessment.
Oral hygiene	Additional Annex 10 requirements under its conditions.

Annex 9 restricts clinical testing for certain strongly acidic or alkaline products and other specified cases. These provisions support correct method selection; they do not waive product safety. Ask the laboratory to identify the relevant provision in the programme.

Distinguish safety and efficacy

Evidence of no irritation does not automatically substantiate anti-ageing performance or an SPF. Each needs appropriate, separately justified evidence.

Test samples and report review

Sample identity makes the report usable for exports.

Planning point	What to record
Selection	Product name, formula version, batch, factory and required variants.
Sampling	Procedure-compliant record with date, place and responsible person.
Packaging	Original or intended contact materials and correct labelling.
Quantity / transport	Laboratory needs, retained quantity, temperature and possible dangerous-goods rules.
Import	Sample-import evidence, consignee and customs procedure.
Report	Identity, method, accreditation, results, units, date and approval.

Article 6 defines permitted sampling locations and participants. For products entering production, samples from a laboratory batch made under approved technical documents and manufacturing technology may be used under the specified conditions. This does not approve any differing development formula. The primary packaging used must satisfy the required material identity.

Review reports before applying

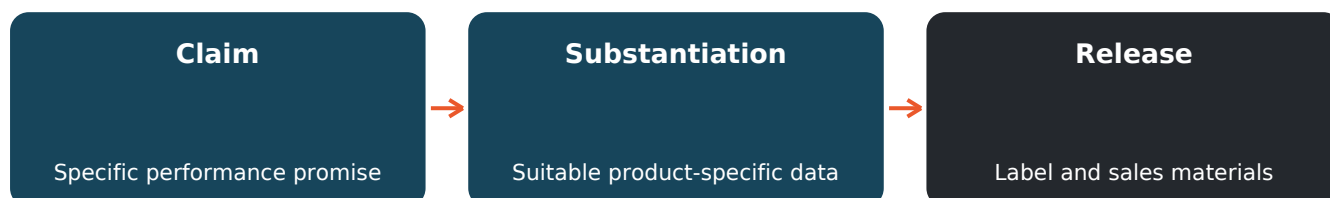
For series declarations the one-year limit applies at registration. Check usage rights too: reports may be used with written consent of the manufacturer or authorised person under the legal conditions. A PDF copy without traceability and consent is not a reliable basis.

One sample does not cover every colour

Pigments, fragrance variants and different actives can change the safety basis. Representative sampling must be justified and accepted by the laboratory and procedure.

Claims and substantiation

Approve label, website and sales materials together.



Safety and efficacy require different evidence

Claim	Required assessment
SPF / sun protection	Suitable product-specific evidence; do not infer from UV-filter content.
Anti-wrinkle / care performance	Claim type, measurement method, users and actual product data.
Antimicrobial effect	Substantiation and boundary to excluded disinfectant purpose.
Contains a specific ingredient	Actual presence and accurate quantity/performance presentation.
Raw-material properties	Do not transfer without justification to the finished product.
Authority recommended / approved	Annex 13 prohibits statements of executive-authority approval.

Annex 13 requires justification suited to the claim. A claim's safety implications affect the necessary evidence strength. Claims about absence of legally prohibited substances are not permitted. Obviously abstract exaggeration differs from measurable efficacy statements; a specific percentage needs an appropriately reliable basis.

Claims can change the conformity route

"Lightens skin", "for children" or "protects from harmful workplace substances" can trigger Annex 12. "Treats disease" can leave cosmetic classification. Approve marketing before the application.

Manufacture, GMP and quality management

Stable manufacture is required under every conformity route.

Control area	Practical implementation
Raw materials / water	Specifications, suppliers, release and contamination control.
Premises / equipment	Cleanability, suitable surfaces, air, hygiene and material flow.
Personnel	Hygiene, work clothing, training and defined responsibility.
Manufacture / filling	Approved formula, process parameters, batch records and mix-up prevention.
Finished product	Defined testing and acceptance criteria before release.
Traceability	Batch linkage, records and retained samples.
Changes / deviations	Assessment, correction, release and applicant information.

Article 5 establishes specific manufacturing requirements. An appropriate GMP system can support implementation. Under 6d Article 6 requires certified quality management or certification of GMP manufacture. Under 3d relevant manufacturer production evidence is prescribed; under 4d and SGR assess their expressly permitted evidence forms. ISO 9001 or ISO 22716 must therefore not be treated universally as a mandatory certificate for every cosmetic.

A certificate must match manufacture

Check factory, activity, product scope, validity and acceptable certification coverage. A sales-office certificate does not automatically establish suitable manufacture at the actual contract factory.

Perfume, eau de toilette and fragranced care

Assess cosmetic use separately from transport requirements.

A finished fragrance applied to the human body for a cosmetic purpose generally requires TR 009 assessment. Room fragrance, fragrance raw materials and products intended for inhalation are not classified identically merely because they smell. Ordinary adult perfume without an Annex 12 feature follows declaration; child use or nanomaterials may change the route.

Project area	What to assess
Fragrance / formulation	Composition, relevant restrictions, allergens and solvents.
Properties	Appearance, odour, physicochemical specification and shelf life.
Microbiology	Applicable requirements or justified permitted exception.
Packaging	Bottle, seal, spray head, material contact and leakage.
Labelling	INCI, relevant individual fragrances, quantity, batch, warnings and EAC.
Logistics	Alcohol content, flammability and product-specific transport classification.

A new fragrance variant may have different allergens and substance levels. “Same base” is therefore insufficient to justify unchanged evidence. Travel bottles and consumer samples must match product scope and permitted labelling. Assess actual properties and applicable transport rules for shipment; EAC evidence does not replace that classification.

Skin care, body care and cleansing

Application and claims govern safety assessment.

Product	Assessment focus
Cream / lotion / serum	Leave-on, users, pH, preservation, stability and packaging.
Shower gel / soap / cleanser	Rinse-off, skin contact and physicochemical properties.
Deodorant / antiperspirant	Purpose, restricted ingredients, application and possible aerosol.
Sun care	Permitted UV filters and substantiated sun-protection claims.
Self-tanner / skin lightening	Annex 12 classification; distinguish from ordinary care.
Occupational skin protection	Special Annex 12 group and actual protective function.

Ordinary adult care without special features may require declaration. “Sensitive” or “dermatologically tested” does not replace safety evidence and requires suitable claim substantiation. A product intended for medical treatment may fall outside TR 009. Review product imagery and online descriptions as well as printed packaging.

Establish a defensible cream family

Record the shared base formula and every difference: fragrance, actives, colourants, preservation, users and intended purpose. A face cream and an intimate product do not become one assessment group merely through similar raw materials. Supplement the dossier for each product name.

Hair care, colouring and styling

Distinguish ordinary care from chemical alteration.

Assess shampoo, conditioner and styling products by actual function. Chemical dyeing, bleaching and highlighting, and chemical waving and straightening are listed in Annex 12; the current list also covers eyebrows and eyelashes under the relevant entries. “Professional use only” creates no general exemption.

System	Project needs
Shampoo / conditioner	Formula, rinse-off / leave-on, users and microbiological basis.
Hair dye / oxidant	All components and relevant concentrations after mixing.
Bleach / lightener	Reactive ingredients, pH, application and special restrictions.
Waving / straightening	Actives, concentration, contact time and prescribed warnings.
Brows / lashes	Application site, eye risks and precisely permitted ingredient use.
Kit	Component names, quantities, formulas and preparation/mixing instructions.

Current and upcoming ingredient rules are especially important here. A substance permitted for scalp hair may have different conditions for lashes or brows. Obtain warning texts, age restrictions and mixing ratios from the relevant entry and translate professionally. Safety assessment addresses the intended application.

Hair products do not share one universal route

An adult shampoo and a chemical hair dye may require different procedures. Separate them in the item matrix from the start.

Decorative cosmetics and nail products

Document pigments, application site and variants fully.

Product group	Assessment focus
Lipstick / gloss	Lip contact, colourants, formulation and variants.
Mascara / eyeliner / eye shadow	Eye area, suitable ingredients and microbiology.
Foundation / blush / powder	Pigments, application, powder format and possible nano properties.
Nail polish / nail care	Cosmetic purpose, solvents, film and instructions.
Nail modelling / multi-component products	Precisely classify finished system, reactive ingredients and application.
Nail-tip / eyelash adhesive	Observe Article 1 exclusion.

Check colourants against Annex 3 and any further restrictions. A pigment is not automatically equally permitted for lips, eye area and all other body sites. A shared brand or product name does not justify grouping all shades without assessment. Prepare a variant matrix with pigment identity and relevant quantities.

Separate label families and test groups

For a range of different shades, ingredient rules permit possible colourants to be listed using “may contain” or (+/-) under the conditions stated. This label option does not prove that one test report covers every formula variant. Testing and document scope each require technical justification.

Children's and family cosmetics

Define users and age information before choosing the procedure.

Children's cosmetics and family cosmetics intended also for children under 14 appear in the current Annex 12. "Family" is therefore regulatory information. Reconcile definitions and safety requirements with the youngest intended users. A warning not to use an adult product below a certain age does not automatically turn it into children's cosmetics.

Decision	Dossier and label contribution
Users	Newborns, child age or minimum age for a family product.
Application	Skin, hair, cleansing, oral hygiene or another specific purpose.
Formula	Permitted ingredients and age-related restrictions.
Safety	Appropriate microbiological and other product-specific requirements.
Labelling	Child/family purpose and necessary age information.
Evidence	SGR with appropriate scope, manufacturer, names and evidence.

Align label, product line, website and sales materials. An item declared as adult care must not later be marketed as a baby product without assessment. New users may trigger stricter safety requirements and another conformity route even where the formula is unchanged.

Specify "for everyone"

State the actual minimum age and all intended applications. These details affect SGR, laboratory programme and labelling.

Oral hygiene and tooth whitening

Assess substance levels together with intended purpose.

Product	Conformity decision
Ordinary adult dental care	Assess Annex 12, formula and purpose; often declaration without special features.
Children's / family dental care	SGR based on users and current list entry.
Fluoride products	SGR above 0.15%; liquid oral care above 0.05%, calculated as fluorine.
Peroxide tooth whitening	Annex 12 group at 0.1-6.0% H ₂ O ₂ , present or released.
Fluoride varnish / plaque disclosure	Observe Article 1 exclusions.
Treatment of disease	Assess medical classification separately.

Distinguish a fluoride compound's level from the value calculated as fluorine. For peroxide systems, substances releasing hydrogen peroxide also matter. Ingredient restrictions, user age and instructions follow the individual annex entries. The SGR threshold is not itself the maximum permitted concentration.

Additional oral-care requirements

Annex 10 includes demineralisation requirements under its specified conditions. Article 5 requires oral-care packaging with first-opening control or protection against unauthorised opening. Anti-caries or other efficacy claims need suitable evidence. Record concentration, pH, application and age group in the enquiry form.

Special applications and kits

A special purpose can change the entire classification.

Application	Project question
Intimate care	External cosmetic care, lubricant or excluded mucosal contact?
Peeling / depilation	Actual product definition, actives, pH and Annex 12.
Self-tanning / lightening	Cosmetic purpose and registration list group.
Occupational skin protection	Protection from which harmful workplace factors?
Cosmetic kit	Components, quantities, preparation/mixing and finished application.
Aerosol	Propellant, ingredients, warnings and separate transport assessment.

A cosmetic purpose does not replace assessment of the actual application site. Intimate-care cosmetics may be in Annex 12, while lubricants and certain mucosal applications are excluded. Similarly, superficially applied tattoo cosmetics differ from pigment introduced by breaking the skin.

Describe every component

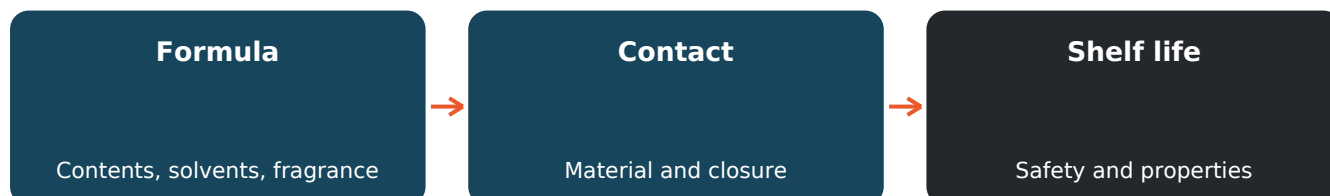
For a preparation or mixing kit, labelling must identify components and quantities and provide preparation instructions. Each component needs an unambiguous name. Check whether all components and the product obtained through intended use are covered by evidence and document scope.

Professional use is not an exemption

Salon, clinic and workplace products must follow the correct route too. Users affect requirements and warnings but do not create general exemption from approval.

Packaging and product compatibility

Packaging must preserve safety and properties throughout shelf life.



Assess cosmetics and packaging as an interacting system

Assessment field	Project contents
Contact material	Bottle, tube, jar, pouch, seal and product-contact parts.
Compatibility	Formula, solvents, fragrance, material changes and possible interaction.
Function	Leakage, dosing, closure and protection during storage/transport.
Oral hygiene	Required first-opening control / tamper protection.
Presentation	No misleading identical design resembling food, alcohol or medicines.
TR CU 005/2011	Appropriate packaging requirements in addition to cosmetics evidence.

Article 5(8) connects cosmetic safety with packaging. Record material, supplier and relevant technical data. A packaging change can affect stability and safety even where the formula is unchanged. Determine the regulatory treatment of separately traded empty packaging separately from that of the finished cosmetic.

Justify multiple pack formats

A 30 ml and 100 ml pack of the same product can be included in document scope. Different contact materials or dosing systems need technical review; the same formula is not always sufficient.

Mandatory label information

Article 5 assigns information by product and application.

Information	Requirement / special feature
Product identity	Designation and name, purpose where needed; no misleading similarity to medicine/device names.
Children / family	Purpose and required age information.
Manufacturer / origin	Name, legal address including country; manufacturing country if different.
Consumer complaints	Suitable EAEU contact organisation where manufacturer does not handle claims there.
Nominal quantity	Volume, mass and/or count; exceptions for certain small packs/samples.
Shade / fluoride	Colour/shade where applicable; fluorine value for fluoride oral care.
Shelf life / storage	Permitted date presentation and special storage conditions.
Warnings / use	Prescribed ingredient warnings and necessary instructions.
Batch / ingredients	Identifiable batch code and ingredient list under paragraph 9.3.
EAC	Observe Article 7 and official mark design.

Provide mandatory information in Russian and in the destination's state language where national law requires it. Certain names and units may use Latin letters; INCI has a specific rule. These exceptions do not generally allow an English EU label to replace Russian instructions.

Approve professionally before printing

Review every packaging face, including base, carton, sticker and insert. Regulatory status, formula, claims and register scope must agree.

INCI, ingredient lists and small packs

Ingredient-list rules include several important exceptions.

Point	Implementation under Article 5
Order	Generally decreasing mass fraction; below 1% may be ordered freely after higher-level ingredients.
Fragrance blend	May be one ingredient; additionally list relevant substances above thresholds.
Colourants	Permitted names / CI; for shade ranges “may contain” or (+/-) under the rules.
Nanomaterial	Add “nano” / statutory equivalent after the ingredient name.
Propellant	List composition within ingredients or separately.
Language / heading	Latin INCI permitted; check required heading or reference presentation.
Insert	Use symbol or permitted location reference where ingredient and warning information is elsewhere.

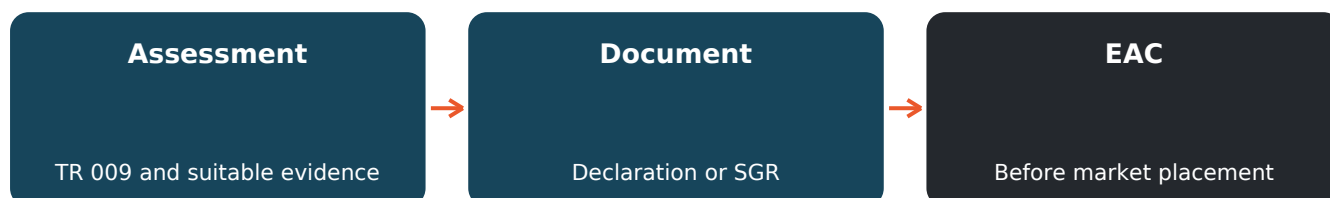
Consumer samples follow the relevant mandatory labelling requirements. For demonstration testers not given to consumers, Article 5 defines a special information scope. Packs below 5 ml or 5 g and product samples have a nominal-quantity exception; this does not exempt them from all labelling or safety assessment.

Present shelf life correctly

Use one of the legally permitted date/shelf-life formats and an unambiguous reference to the print location where necessary. The EU open-jar symbol does not universally replace EAEU shelf-life information. Small or complex packs have special presentation rules to assess item by item.

EAC mark and release

Appropriate assessment precedes marking.



Process diagram · not an official EAC print template

Article 7 requires the EAC mark after successful Article 6 assessment and before market placement. This applies to cosmetics with a declaration and to cosmetics with the relevant state registration under TR 009. An SGR for a different product category or an SDS does not automatically authorise EAC marking.

Assessment field	Requirement
Placement	Each unit: consumer packaging, tag, label and/or accompanying documents under Article 7.
Timing	Before market placement; evidence and scope must match.
Legibility	Clear throughout the full shelf life.
Design	Official shape, proportions and monochrome contrast; base dimension at least 5 mm.
Reconciliation	Product name, formula, manufacturer and scope have been approved.

The “and/or” wording in Article 7 must not be replaced by an invented duty to mark every label and every shipment paper simultaneously. Agree the actual permitted placement with the responsible party and review the full label under Article 5. The diagram above explains the process and is not an official EAC print template.

Check the register before goods release

The document number and PDF alone are insufficient. Check current status and annexes in the appropriate official register.

Registers, import and transport

Approval and actual import must agree.

Reconciliation	What to confirm
Evidence	Declaration or SGR, status, validity and annexes.
Product	Name, item, formula, manufacturer and intended-use scope.
Shipment	Batch / series, quantity, pack formats, invoice and packing list.
Customs	TN VED classification and permitted import operation.
Labelling	Languages, warnings, shelf life, batch and EAC.
Transport	Product classification, packaging, temperatures and possible dangerous-goods duties.
Additional national duties	Digital product marking, sale and environmental duties in the actual destination.

Check declarations and SGRs through their respective official registers and national parts. Record a dated register check and retain full evidence with annexes. A QR code, reseller link or stamp alone does not prove current status. For imported cosmetics requiring registration, SGR precedes commercial import; organise sample import separately.

Assess digital marking separately

National Data Matrix or traceability systems are distinct from EAC marking. Confirm product codes, start dates and exceptions under current destination-country rules before shipment.

Validity and record retention

Validity, shelf life and retention have different functions.

Evidence / record	Current Article 6 rule
3d declaration	Maximum 5 years; observe name and safety-relevant formula changes.
6d declaration	Maximum 7 years; maintain certified production basis and assess changes.
4d declaration	Identified batch taking its shelf life into account.
1r / 2r SGR	5 years under the new procedure rule; changes remain relevant.
Older SGR before No. 114	Transition under No. 24/2025: 60 months from No. 114 entry into force.
Applicant archive	Continue retention during product shelf life after production ceases / final supply.
Declaration registration body	Retain evidence 5 years after declaration expiry.

An older “indefinite” SGR must not be planned without an end date given the new transition. Review issue date, actual transitional basis, register status and product identity. Goods already placed on the market have separate transition and shelf-life conditions. Distinguish these from new manufacture and new import.

Assign ownership and review dates

Before expiry, plan dossier review, new reports, required certificates, registration and label reconciliation. Renewal is not automatically a simple date change.

Formula changes and new variants

Every change needs documented assessment.



Product-name changes and safety-relevant formula changes affect validity under Article 6. For a formula change not changing the required safety indicators and without a name change, paragraph 17 describes testing the new formula and supplementing the dossier without a new declaration. The conditions must be technically met; “only a new fragrance” is insufficient justification.

Change	Next decision
Fragrance, active, preservative, pigment	Assess ingredient matrix, tests, labelling and document needs.
New name / new users	Reassess Annex 12 and document validity.
New packaging	Confirm compatibility, format coverage and label.
New factory	Resolve production/evidence linkage and document scope.
Address / legal form / typo	Assess permitted SGR replacement route under Article 6.
New regulatory version	Record formula review, effective date and actual transition.

SGR has its own replacement options, for example certain administrative changes or information without sanitary significance. Do not extend these to safety-relevant changes. Release a product change for export after assessment, updated records and required evidence have been agreed.

Keep old and new traceable

Retain traceable formula versions, batches, samples, labels and document linkage.
Coordinate a new register document with the status of the document being replaced.

Costs, schedule and quotation

Portfolio breadth and conformity route determine effort.

Cost block	Typical driver
Classification	Number of product groups, SGR cases, users and borderline cases.
Dossier	Formula quality, translation, labels and claim evidence.
Testing	Parameters, variants, sample count and usable existing reports.
Manufacture	QMS/GMP evidence required for the chosen scheme.
Registration / representation	Procedure, applicant and agreed maintenance services.
Logistics	Samples, import, packaging and transport classification.
Maintenance	Changes, new variants, register checks and replacement evidence.

The AC Inorms sector page quotes approximately 10 working days and EUR 3,000-5,000. These are indicative figures, not a binding deadline or universal all-inclusive price guarantee. SGR, complex formulas, many variants or missing data may create different effort. Planning starts with defined scope and reliable records.

Build a reviewable quotation

Agree items and formulas, procedure, report count, sample logistics, translation, registration, representation period and changes as specific work items. Distinguish laboratory and authority lead times from dossier preparation and clarification. Establish additional services and their triggers before commissioning.

Case study: one portfolio, three product groups

A fictional example illustrates appropriate scope division.

A German brand owner commissions adult perfume, family shower gel from age three and a chemical hair dye from a contract manufacturer. Ongoing EAEU supplies are planned. EU records exist, but suitable EAEU evidence does not. A shared brand does not justify one universal approval.

Item	Decision in the example
Adult perfume	No Annex 12 feature assumed: 3d series declaration or 6d with suitable certification.
Family shower gel	Intended also for children under 14: SGR under Annex 12, 2r for EU manufacture.
Chemical hair dye	SGR under Annex 12; components, mixing ratio, restrictions and warnings.
Shared organisation	Centrally coordinate mandate, manufacturer data, factories, sample logistics and versions.
Separate release	Testing, labels and evidence for each technically appropriate product scope.

From information package to goods release

First review the formulation matrix and claims. Reconcile perfume allergens, prepare an age-appropriate safety plan for shower gel, and a component-based plan for hair dye. After suitable testing and registration, reconcile labels, registers and shipment data. National digital marking and transport requirements remain additional release points.

Outcome: shared coordination, appropriate evidence

Work can be coordinated together. Regulatory routes and evidence remain product-specific. The example does not replace assessment of an actual portfolio.

Common mistakes and consequences

Early decisions prevent repeated testing and label printing.

Mistake	Consequence	Better approach
Expect a certificate for every cosmetic	Wrong procedure.	Review Article 6 and Annex 12 first.
Always plan SGR as indefinite	Expiry / transition missed.	Observe new five-year rule and No. 24.
Treat family product as adult care	SGR and age information missing.	Define actual users.
Group hair dye with shampoo	Unsuitable conformity grouping.	Separate care and chemical alteration.
EU formula without EAEU reconciliation	Ingredient conditions / warnings missing.	Check current annexes and upcoming changes.
Reuse old reports without limits	Unusable evidence.	Check scheme, date, method and identity.
New fragrance without formula review	Allergens / safety changed.	Update quantitative fragrance data and label.
Customer automatically exclusive	Contract rights misunderstood.	Agree mandate and distribution separately.
Print labels before classification	Reprint and delay.	Approve claims, users and label first.

Assign an owner and deadline to every open issue in the project matrix. A manufacturer statement is usable only where prescribed as an accepted evidence form. A new date on an old document replaces neither required testing nor correct registration.

Frequently asked questions

Key answers for cosmetics exports.

Do I need an EAC certificate?

TR 009 requires declaration or state registration. “Certification” is often an umbrella term; Article 6 and Annex 12 determine the correct document.

Are CPNP, CPSR or an EU label sufficient?

They may supply useful data. They do not replace EAEU assessment, registration or prescribed local labelling.

Does every sunscreen require SGR?

No; artificial tanning is a specific list group. Check further features of the actual sunscreen, such as child use, nano and skin lightening.

Is GMP certification always mandatory?

Manufacture must comply. External certification is part of the specified basis particularly under 6d; other procedures have their own permitted production evidence.

How long is an SGR valid?

The new 1r and 2r rule specifies five years. Older documents follow the actual transition under No. 24/2025; safety-relevant changes and register status remain decisive.

Can my customer be the applicant?

If it satisfies the procedure-specific role and EAEU eligibility. An importer alone does not automatically qualify as a series applicant under 3d or 6d.

Does one document cover every fragrance and shade?

Only confirmed product scope supported by suitable evidence is covered. Assess ingredient and application differences.

Checklist before shipment and market release

Link every check to the same product version.

Check	Release criterion	Status
Classification	Cosmetic purpose, application site and exclusions resolved.	☐
Identity	Items, names, formulas and factories unambiguous.	☐
Annex 12	Children/family, nano and special purposes assessed.	☐
Regulatory status	Current version, Nos. 114, 74 and transitions checked.	☐
Applicant	Eligible role, EAEU establishment and mandate confirmed.	☐
Ingredients	Prohibitions, restrictions, functions and concentrations assessed.	☐
Samples / reports	Identity, sampling, method, age and usage rights appropriate.	☐
Manufacture	Scheme-specific GMP/QMS and production evidence complete.	☐
Claims	Efficacy substantiated and cosmetic classification consistent.	☐
Packaging	Compatibility, opening protection and TR 005 assessed.	☐
Labelling	Languages, ingredients, warnings, durability, batch and EAC.	☐
Register	Declaration/SGR valid; scope and annexes agree.	☐
Import / logistics	Import, digital marking and transport confirmed.	☐
Maintenance	Changes, archive, traceability and deadlines assigned.	☐

Project / shipment: _____ Responsible person: _____

Date: _____ Decision / open points: _____

Document release

Retain the completed checklist with product list, label version, register evidence and shipment data. Resolve safety- or evidence-relevant open issues before release.

Cosmetics-project enquiry form

Complete information enables a specific testing and cost plan.

Field	Your information
Company / contact	_____
Manufacturer / factories	_____
Brand owner / contract manufacturer	_____
Destination / importer / representative	_____
Product names / items / brands	_____
Purpose / application site	_____
Users / minimum age	_____
Series / batch / quantity	_____
Formula version / INCI / functions	_____
Nano / special actives	_____
Fluorine / peroxide if relevant	_____
Claims / efficacy	_____
Pack / contact material / quantity	_____
Shelf life / storage	_____
HS / TN VED code	_____
Reports / dates / GMP / QMS	_____
Existing declaration / SGR	_____
Shipment date / services	_____

Attach product list, label drafts, technical specifications, formulations and existing reports. Add intended languages, age groups and requested services. Provide confidential data through the agreed secure access route.

List variants individually

Record fragrance, shade, active and packaging variants with formula versions. “Entire catalogue” without a clear product list is not a reliable quotation scope.

Project matrix worksheet

Connect item, formula, regulatory route and evidence.

Item / formula	Users / purpose	Route / evidence	Owner / date
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

How to manage the project

For each item, record name, formula version, users, application and factory. Assign the regulatory provision and Annex 12 decision. Record missing concentration data, reports, translations and approvals as tasks with owner and date. Identify new variants clearly rather than attaching them retrospectively to existing evidence without assessment.

Milestone	Documented decision
M1 · Scope	Items, formulas, purpose and regulatory status confirmed.
M2 · Evidence	Samples, laboratory, reports, claims and manufacture resolved.
M3 · Evidence document	Declaration / SGR and register scope approved.
M4 · Shipment	Label, languages, import and transport confirmed.
M5 · Maintenance	Changes, archives and review dates assigned.

Keep changes visible

New users, names, formulas, factories or claims create a new assessment point. Compare every new version with the last approved version.

Regulations archive and key terms

The archive supports orientation; current original texts remain authoritative.

Regulation	Project relevance
009/2011	Cosmetics and perfume: central regulatory route.
005/2011	Packaging: assess applicability separately.
007/2011	Children's goods: do not automatically classify children's cosmetics here.
017/2011	Light industry: assess cosmetically treated goods separately.

Review archive text, amendments and transitions together. The EEC TR 009 page contains current acts and standards lists; sources 3-8 lead there. Medical, disinfectant and other excluded products need another regulatory route. A downloaded document alone is not a classification decision.

Term	Meaning
EAEU	Eurasian Economic Union with five member states.
Declaration	Registered conformity statement by an eligible applicant.
SGR	State-registration certificate for covered products.
3d / 4d / 6d	Declaration: series / batch / series with certified production basis.
1r / 2r	SGR: manufacture inside / outside the EAEU.
INCI	International cosmetic ingredient name; does not replace a quantitative formula.
GMP / QMS	Good manufacturing practice / quality management system.
Leave-on / rinse-off	Remaining / washed off based on actual use.
Claim	Statement of product properties, purpose or performance.

Sources and legal foundations · 1

Core original texts and current amendments.

[1] AC Inorms · cosmetics and perfume

<https://ac-inorms.com/eac-zertifikat-fuer-kosmetik-und-parfuem>

[2] AC Inorms · regulations archive

<https://ac-inorms.com/richtlinien-ac-inorms-gmbh>

[3] EEC · TR CU 009/2011: original acts, amendments, standards

<https://eec.eaeunion.org/comission/departement/deptexreg/tr/bezopParfum.php>

[4] TR CU 009/2011 · updated original text and annexes

<https://old.adilet.zan.kz/rus/docs/H11T0000799>

[5] Council Decision 114 of 29 November 2024 · amendments

<https://docs.eaeunion.org/en/documents/435/9762/>

[6] Council Decision 74 of 12 September 2025 · upcoming amendments

<https://docs.eaeunion.org/en/documents/447/10246/>

[7] Board Decision 24 of 4 March 2025 · transitions for No. 114

<https://docs.eaeunion.org/documents/446/9894/>

[8] Board Decision 177/2020 · standards lists; amendments via source 3

<https://docs.eaeunion.org/documents/247/5556/>

Accessed and reviewed on 10 October 2026. Numbered chapter footnotes refer to these sources. German and English explanations are technical summaries, not official translations. Before applying, recheck current original texts, national procedure rules and actual product data.

Further sources and regulatory position in 2026

Confirm dates and applicability before every new registration.

[9] Decision 41/2018 · declaration registration and status

<https://old.adilet.zan.kz/rus/docs/H18EK000041>

[10] Decision 293/2012 · common declaration form

<https://old.adilet.zan.kz/rus/docs/H12EK000293>

[11] Decision 711/2011 · EAC mark and design

<https://old.adilet.zan.kz/rus/docs/H11T0000711>

[12] EEC · TR CU 005/2011: packaging and amendments

<https://eec.eaeunion.org/comission/departement/deptexreg/tr/bezopypakovki.php>

[13] AC Inorms · general EAC information and document images

<https://ac-inorms.com/eac-zertifikat>

What to recheck before applying

Confirm the current TR 009 version, amendments under No. 114/2024, actual transition and standards list. No. 74/2025 generally applies from 28 October 2026; one provision from 1 January 2027. Review formulation and label for planned launches after those dates too. Additionally confirm national digital marking, register access and import processing for the actual destination.

Images and graphics

Cover image and document photograph come from AC Inorms. Decision, workflow, formulation, marking and change diagrams were created for this guide. They explain the framework and are not official marking templates.

Your cosmetics project with AC Inorms

Clear product and formulation scope leads to the appropriate procedure.

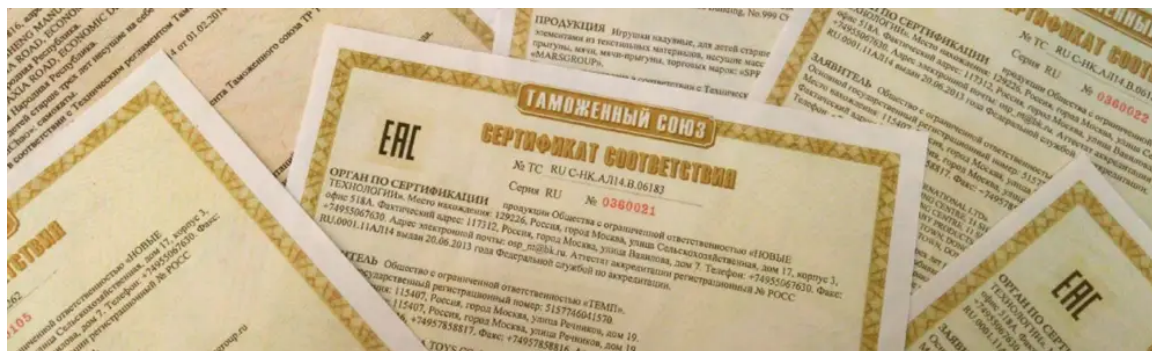


Image: technical records and EAC documentation.

AC Inorms supports manufacturers and brand owners in classifying cosmetics and perfume, building a product matrix and coordinating declaration or state registration. Existing records are reviewed for usability; missing data, translations and required laboratory work are planned for the actual project.

Service	Project contribution
Classification / matrix	Clarify product, users, formula, Annex 12 and scheme.
Documentation	Support technical data, labels, translations and claims records.
Testing / registration	Coordinate samples, laboratory, applicant and appropriate evidence.
Maintenance	Plan changes, deadlines, register status and document archive.

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Send the enquiry form, item list, formulation versions and available records. State destination, users, requested services and planned shipment date.