

CTPA COVID-19 Guidance on In-Store Testers and Cosmetic Counters

Beauty – Safe in Store

8 June 2020



During the current COVID-19 health emergency, stores that have remained open have removed make-up and other cosmetic testers from their shelves.

As the UK Government considers an easing of restrictions in the coming weeks and months, the re-opening of retailers, concessions and cosmetics counters can be anticipated.

These guidelines promote beauty being safe in store for the customer and staff by addressing the use of testers and how companies can prepare for retailers in general and stores with counter staff to re-open.

Legal Background

Cosmetic legislation equally applies to testers of cosmetic products. Manufacturers would be wise to design their testers so that product contamination is avoided under multi-use retail conditions. Sprays and 'single-dose' containers are often used for this purpose. For reasons of commercial security it is customary to mark the container of a tester with 'tester - not for sale' (or similar wording) in indelible, easily legible and visible lettering.

Customer Charter

CTPA has created a Customer Charter to reassure customers of the safety considerations and processes in place when shopping for beauty safely in-store. The Charter is available at www.thefactsabout.co.uk/covid19advice.



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The CTPA would also like to thank Caroline Rainsford, Head of Scientific and Environmental Services, and Christine Lawson, Sustainability & Technical Affairs Manager, at CTPA, for the compilation of this document and their input.

The guidelines will be reviewed and updated as Government advice changes. However, CTPA welcomes comments, questions or suggestions for improvements to this guideline. These should be addressed to Emma Meredith, Director-General, at the CTPA Secretariat or sent via email to: info@ctpa.org.uk.

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The Cosmetic Toiletry and Perfumery Association (CTPA) is the trade association for the UK cosmetic and personal care industry.

The Association's role is to advise manufacturers, distributors and suppliers about the strict legal framework for cosmetics, to represent industry views to UK government, and external stakeholders and help promote information to the media on issues relating to the safety of cosmetic products. The CTPA is the voice of the British cosmetics industry and provides the most up-to-date interpretation of, and guidance on, regulatory matters affecting cosmetic products in the UK and Europe.

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Transmission of COVID-19

According to the World Health Organisation ([WHO](#)), COVID-19 spreads primarily from person to person through small droplets from the nose or mouth, which are passed on when an infected person coughs, sneezes or speaks. People can catch COVID-19 if they breathe in these droplets from a person infected with the virus. This is the basis of the advice to employ social distancing.

The infected droplets can land on objects and surfaces such as tables, doorknobs and handrails. People can become infected by touching these objects or surfaces, then touching their eyes, nose or mouth.

Fortunately, surfaces contaminated by the droplets containing COVID-19 can easily be cleaned with common disinfectants that will kill the virus. According to the [WHO](#), studies have shown that the COVID-19 virus can survive for up to 72 hours on plastic and stainless steel, less than four hours on copper and less than 24 hours on cardboard.

To minimise the risk of infection, wash your hands frequently with soap and water. If handwashing facilities are not available nearby, clean hands regularly with an alcohol-based hand sanitiser. Avoid touching your eyes, mouth or nose. Wipe surfaces down regularly with an appropriate sanitiser or cleaner.

The German Federal Institute for Risk Assessment ([BfR](#)) considers that transmission of COVID-19 through cosmetic products is unlikely. However, it is important not to share cosmetic products.

General Considerations for Testers

Terminology

Self-select tester

A tester available for customers to try in a self-select environment, such as a gondola display of cosmetics, including make-up, skincare or fragrance, in a customer retail store.

Controlled tester

A tester administered in a controlled environment by a consultant or other member of staff; for example, single-shot samples or product samples provided via a disposable applicator by a consultant or other member of store staff.

Display product

A product that is available to view, but access is controlled; for example, through screened display sections. Display products are not available to purchase.

The Responsible Person manufacturing a cosmetic product must ensure GMP (Good Manufacturing Practice) is still complied with throughout manufacture, and for testers available in-store for customer use, to ensure customer safety. This should form part of the defined procedures made available in the legally required Product Information File.

Under GMP and quality controls, possible product contamination should have been addressed and therefore there would be no concern regarding products on shelf. However, once opened the products will be exposed to possible contacts and contamination. Under any circumstance, this carries a risk of disease transmission, and the COVID-19 situation, while alarming, does not change this fact.

In addition to the actual product, contact of people with the packaging, where viable microorganisms might also survive, should be taken into account by the manufacturer.

While the use of in-store testers is a commercial practice and is not covered under the scope of the legislation, best practice and risk minimising strategies should be put in place.

A procedure should be in place to review or replace testers giving consideration to the PAO (Period After Opening) or Best Before Date, and estimated exposure to air, environment and people. The use of disposable applicators will protect against further microbial transmission.

Finally, it is important to adhere to any differing devolved Government rules in England, Scotland, Wales and Northern Ireland, or if counters are located in sites with specific measures in place, such as airports. Differing advice may be in operation on matters including the use of face coverings.

General Hygiene Considerations

Considerations for the Brand

- Any testers which were opened prior to the COVID-19 situation should be disposed of, unless a risk assessment has been undertaken which deems the tester to be low risk. For example, fragrances or products in sealed pump containers that can be easily sanitised. If a PAO or Best Before Date is present on the product, it must be adhered to.
- Consultant and staff safety must be ensured at all times in all aspects of the work including work rotas.
- Companies should consider staff uniforms or other work clothes. In particular, aspects such as washability, washing instructions and frequency, whether staff will travel to work in their uniforms, and changing facilities available at work if this is not the case.
- Companies may wish to consider the use of face coverings and gloves, either disposable or cotton. In this case, consideration should be given to possible allergies, environmental impact and procedures for safe removal and disposal where applicable.
- Good hand hygiene **must** be maintained at all times through regular hand washing and/or the use of alcoholic hand sanitiser. If staff wear gloves, the gloves must be changed between each customer and product contact, removed without the contaminated part touching the skin, and disposed of appropriately.
- Consultants and staff members should maintain the appropriate distance, according to Government instructions, from customers whenever possible.
- All counter and display surfaces must be disinfected thoroughly and regularly.

It is important to understand the customer mindset in relation to the availability of testers and to provide an environment which makes the customer feel safe and comfortable.

Considerations for the Retailer

- Thorough hygiene and sanitisation processes should be in place.
- Distance markings should be available, to help all staff and visitors maintain the correct social distance.
- The store layout should be carefully considered, to avoid over-exposure of certain areas of the store to high customer traffic.

Phase One

The initial phase when retail stores reopen

- Self-select testers should not be available during this phase.
- The use of controlled testers during this phase is unlikely to be appropriate unless specific protocols have been fully considered and agreed.
- Display products, which are not accessible to the public, may be on view during this phase, for example, behind a Perspex screen.
- Novel ways to convey the product ethos and characteristics to the customer could be used; for example, digital images and explainers, or touch-free methods to allow the customer to smell a fragrance.
- It is very important that phase one is 'touch free', with no physical contact between customers and staff.
- Training should be provided to store staff on how to engage with customers, reassuring them on the safety processes in place.

Phase Two

When the reintroduction of controlled testers is unlikely to risk COVID-19 transmission

- Self-select testers should not be available during this phase. Self-select testers are handled by many different people and there is a risk of contamination of the product surface and subsequent transfer of COVID-19.
- It is important to discourage customers from opening or testing products at self-select counters. For example, through the use of communication, tamper-proof seals or intervention by store staff.
- Controlled testers may be reintroduced if the risk of contamination and transmission of COVID-19 is negligible.
- Store staff should be fully trained on all procedures relating to controlled testers, especially hygiene procedures.
- Controlled testers should not be handled by the customers.
- Controlled testers should be handled by trained staff in a way that minimises surface contamination.
- Wherever possible, controlled testers should still operate under a 'touch-free' system. Ideally, companies may show the product to the customer using a white tile or similar item. However, if the customer wishes to apply the tester to their skin, this must take place via a disposable applicator controlled by counter staff, or a single-use product.
- Controlled testers in the form of single-use products can be distributed to customers upon request. Hand sanitiser or hand washing must be employed after each customer interaction.

Companies should also consider the environmental impact of the materials that are selected for this purpose.

Example controlled tester procedures for different product formats

Products should be decanted and demonstrated as below, placed on the counter for the customer to use:

Creams or Liquids

place on a sanitised tile or decant using a disposable spatula or pump into a disposable pot.

Powders

take a swipe of the powder using a disposable sponge applicator and place applicator onto a sanitised tile or into a disposable pot.

Lipsticks

take a small slice from the top of lipstick using a disposable spatula, and place onto a sanitised tile or into a disposable pot.

Fragrance

spray onto fragrance blotter.

Mascara

use a disposable applicator and place into a disposable pot.

Phase Three

When the reintroduction of self-select testers is unlikely to risk COVID-19 transmission

- Self-select testers should not be reintroduced until the circulation of COVID-19 in the general population no longer poses a significant risk.
- The procedures outlined in phase two for controlled testers also represent good practice in normal circumstances and should still be followed.