



13 June 2023

Esteemed IBF Customer:

As you may already be aware, the FDA has been granted additional oversight of cosmetics products with the signing of the Modernization of Cosmetics Regulation Act of 2022 (“MoCRA”).

This legislation brings cosmetics products further under the purview of FDA with expanded funding and authority. While it is still early and we are learning more about this as an industry, there are a few milestones that should be addressed this year for us all to be compliant.

We can have a more in-depth phone discussion if you would like, but here are a few key points to consider:

IBF as a contract manufacturer is responsible to:

- Register our manufacturing facility with the FDA by the end of December 2023.
- Continue to manufacture cosmetic products according to GMP guidelines. IBF follows ISO 22716 and 21 CFR pt. 211 as applicable to meet the cGMPs. The IBF Quality team performs regular internal audits to demonstrate compliance with the cGMPs.

You, our customer, are responsible as the brand owner for the following:

By December 2023:

- Register cosmetic products with the FDA.
- List a complete U.S. address with street name or U.S. phone number and website on product artwork and labels for the reporting of adverse events (the “responsible person”).
- Report any adverse events (defined as “Any problem experienced when using a cosmetic product”) to the FDA within 15 days and keep records of adverse events.
- Maintain substantiation of cosmetic product safety through raw material documentation review and product testing (with IBF assistance).

By December 2024:

- Include cosmetic allergens in product artwork and labels (with IBF assistance).

We appreciate your business and pledge to do our very best to help you succeed. Please contact us with any questions or concerns regarding this new law or any other topics.

IBF Quality Policy

“IBF customers deserve and receive from us the very best quality products and services. Everything we make, do, or say adds value, meeting or exceeding expectations.”