HANA SOLUTION LLC

BUYER-SIDE WORKING REFERENCE

Turkey Cosmetics & Personal Care Manufacturer Due Diligence Checklist

A practical working reference for evaluating Turkish cosmetics and personal-care manufacturers before supplier approval, formula or sample approval, purchase order, bulk production and shipment release.

For buyers, founders, brand owners, procurement teams, importers, distributors, retailers, private-label businesses, e-commerce sellers and hospitality buyers sourcing Cosmetics & Personal Care products from Turkey.

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Why This Document Exists

A cosmetics manufacturer should not be approved simply because it offers an attractive private-label catalogue, presents a factory website, provides an ISO or GMP certificate, develops an acceptable sample or offers the lowest unit price.

Before commercial commitment, the buyer should establish:

- Who is the legal counterparty?
- Who and where will actually manufacture, fill and pack the product?
- What formulation and commercial model is actually being purchased?
- Who controls or owns the formula?
- Can the proposed facility manufacture the required product and order size?
- What evidence supports the manufacturer's quality, testing, claims and market-readiness statements?
- Who carries the regulatory and product-safety responsibilities in the destination market?

The same discipline should continue after supplier selection. An approved laboratory sample does not automatically establish that the commercial batch uses the same formula, packaging or production basis. A manufacturer statement that production is complete does not establish that the commercial order is ready for shipment.

EVIDENCE STATE — use one for each substantive control

☐
BUYER-PROVIDED
Evidence or information originated from the buyer.

☐
SUPPLIER-DECLARED
The supplier has stated the position, but it has not been independently checked.

☐
INDEPENDENTLY CHECKED
The relevant document, record or external source has been checked independently within the agreed scope.

☐
FIELD-OBSERVED
The relevant facility, process, stock, production or other condition has been directly observed.

☐
NOT PROVIDED
Requested evidence has not been provided.

☐
NOT APPLICABLE
The control does not apply to this product, model or market.

☐
UNRESOLVED
Available information does not allow the issue to be closed.

Important

Evidence state is not manufacturer approval. A document can be independently checked and still be commercially insufficient, irrelevant to the actual facility, outdated or outside the required scope.

BUYER DECISION OUTCOME — use at the relevant commercial gate

☐ **READY FOR THE NEXT DEFINED COMMERCIAL STEP**

☐ **CLARIFICATION OR ADDITIONAL EVIDENCE REQUIRED**

☐ **PAUSE BEFORE COMMITMENT**

☐ **NOT ADVANCED UNDER THE BUYER'S CRITERIA**

Project Control Record

HANA SOLUTION LLC · TURKEY COSMETICS & PERSONAL CARE MANUFACTURER DUE DILIGENCE CHECKLIST

Define the actual commercial requirement before evaluating a manufacturer. Many due-diligence questions cannot be answered correctly without linking the product + formula + manufacturer + facility + packaging + destination market.

Project / Buyer	
Brand	
Product / SKU	
Product Category	
Intended Product Function	
Supplier Legal Name	
Quoting Entity	
Contracting Entity	
Actual Manufacturer	
Bulk Manufacturing Facility	
Filling Facility	
Packing Facility	

Destination Market	
Intended Sales Channel	*Retail / Distributor / E-commerce / Marketplace / Hospitality / Other*
Manufacturing Model	*Stock / Adapted / Custom / Buyer-Owned / Filling Only / Turnkey*
Formula Ownership Status	
Formula Revision	
Product Claims	
Buyer-Excluded / Restricted Ingredients	
Fragrance / Colour Reference	
Pack Size / Nominal Content	
Primary Packaging	
Pump / Closure / Applicator	
Secondary Packaging	
Packaging Revision	
Artwork / Label Revision	
Approved Sample Reference	
Target MOQ	
Production Quantity	
Manufacturing Batch Size	
Incoterm + Named Place	
Target Bulk Production Date	
Target Shipment Date	
Buyer-Required GMP / Certification Evidence	
Testing / Safety Documentation Plan	
Destination Regulatory Route	
Responsible Person / Local Party / Importer	
RFQ Revision	

PO Revision	

CONTROL NOTE

A complete regulatory dossier is not required before initial manufacturer mapping. However, requirement maturity must increase before quotation comparison, and the commercial production basis must be sufficiently controlled before bulk production is released.

SECTION 1

1 Supplier Identity, Contracting Party & Payment Structure

01 Verify the exact legal supplier

CHECK	Establish the supplier's full registered legal name, company type, registered address and relevant Turkish company-registration information.
WHY IT MATTERS	A website name, beauty brand, factory name or salesperson's trading name does not establish the legal entity responsible for the commercial transaction.
EVIDENCE TO REQUEST	Current company-registration information; MERSİS details where available; Turkish Trade Registry information; quotation or company documentation issued in the legal name.
VERIFY	Compare the legal entity with the quotation, contract, pro-forma invoice and supplier correspondence.
RED FLAG	The supplier avoids providing the legal company name or materially changes the named company during negotiation.
AUTHORITY / BASIS	Turkey's MERSİS and Trade Registry are legal-entity sources. Legal registration does not establish cosmetics-manufacturing capability.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

02 Establish the commercial-party chain

CHECK	Identify separately: • quoting entity • contracting entity • invoicing entity • exporter • actual manufacturer
WHY IT MATTERS	These parties can legitimately differ. The buyer risk arises when the relationship is not understood.
EVIDENCE TO REQUEST	Quotation; draft contract; pro-forma invoice; supplier explanation of seller/manufacturer/exporter relationships.
VERIFY	The structure should be commercially coherent and the responsibilities for product quality, documentation and warranty should be understandable.
RED FLAG	A different company appears only when the contract, invoice or shipment document is issued.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

03 Check the payment beneficiary

CHECK	Confirm whether the requested bank beneficiary corresponds to the agreed commercial structure.
WHY IT MATTERS	Payment to an unexplained individual, unrelated company or third-country entity creates significant counterparty risk.
EVIDENCE TO REQUEST	Controlled bank details; pro-forma invoice; written explanation for any third-party payment arrangement.
RED FLAG	Personal account, unexplained beneficiary or last-minute bank-detail change.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

04 Separate legal existence from manufacturing capability

CHECK	Record legal existence and manufacturing capability as two separate conclusions.
WHY IT MATTERS	A valid Turkish company can exist without operating the facility or having the equipment, personnel, category experience or production controls required by the buyer.
BUYER RECORD	LEGAL ENTITY ESTABLISHED: _____ ACTUAL MANUFACTURING CAPABILITY: _____

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

BUYER RULE

REGISTERED COMPANY ≠ SUITABLE COSMETICS MANUFACTURER

SECTION 2

2 Actual Manufacturer, Facility, Filling & Outsourcing

05 Establish who actually manufactures the bulk formula

CHECK	Determine which legal entity and facility will physically manufacture the bulk cosmetic product.
WHY IT MATTERS	A private-label seller, exporter, brand-development company or commercial intermediary may not manufacture the formula itself.
EVIDENCE TO REQUEST	Manufacturer legal name; production-site address; relationship between seller and manufacturer; facility evidence.
RED FLAG	The supplier describes itself as “the manufacturer” but will not identify the physical production facility.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

06 Verify the exact manufacturing facility

CHECK	Record the facility proposed for the buyer's actual product.
WHY IT MATTERS	A company can have several sites with different activities, equipment, GMP evidence and product-category capability.
EVIDENCE TO REQUEST	Exact address; site identity; relevant facility documentation; recent facility photographs/video where appropriate; independent site verification where risk justifies it.
VERIFY	Facility identity should correspond to the GMP, ISO, audit and manufacturing evidence being relied upon.
RED FLAG	Certificate address and production address differ without explanation.

BUYER RULE

LEGAL SELLER ≠ ACTUAL MANUFACTURER

The company quoting, contracting, invoicing or exporting the product may not be the company that physically manufactures, fills or packs it. The buyer should establish both the commercial counterparty and the actual production structure before commitment.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

07 Identify where filling and final packing occur

CHECK	Establish whether: • bulk manufacturing • filling • labelling • secondary packing take place at the same site.
WHY IT MATTERS	A formula can be manufactured at one facility and filled or packed elsewhere, creating an additional quality and traceability interface.
EVIDENCE TO REQUEST	Simple manufacturing/filling/packing process map.
RED FLAG	The filling or packing location is disclosed only after the PO has been placed.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

08 Identify material outsourced activities

CHECK

Record relevant external operations such as:

- laboratory testing
- bulk manufacturing
- special processing
- filling
- packaging
- printing
- specialist claim testing

WHY IT MATTERS

Outsourcing is not automatically negative. Undisclosed or uncontrolled outsourcing is the issue.

EVIDENCE TO REQUEST

Subcontractor identity; activity; site; responsibility; relevant quality evidence where material.

RED FLAG

The supplier refuses to identify a subcontracted process that materially affects the finished commercial product.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

09 Assess facility capability against the actual category

CHECK

Determine whether the proposed facility has relevant capability for the required product form and production process. Possible considerations include:

- emulsions
- gels
- liquids
- anhydrous products
- shampoos
- cleansers
- soaps
- fragrance products
- colour cosmetics
- specific filling formats

WHY IT MATTERS

“Cosmetics manufacturer” is too broad to establish technical fit.

EVIDENCE TO REQUEST

Relevant category experience; process/equipment information; practical batch-size capability; filling capability; QC structure.

VERIFY

Assess the actual facility rather than the supplier’s overall group catalogue.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 3

3 Manufacturing Model, Formula Ownership & Commercial Control

10 Define the manufacturing model

CHECK

Classify the commercial model as closely as possible:

- READY / STOCK FORMULA
- ADAPTED FORMULA
- CUSTOM FORMULATION
- BUYER-OWNED FORMULA
- FILLING / PACKAGING ONLY
- TURNKEY PRIVATE LABEL

WHY IT MATTERS

Development cost, ownership, MOQ, testing, exclusivity, documentation and supplier-switch risk depend heavily on this distinction.

NOTE

These are buyer working categories. Manufacturers may use the same commercial terms differently.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

11 Clarify what “custom” actually means

CHECK

Where “custom formula” is offered, determine whether the supplier is:

- creating a genuinely new formulation
- substantially adapting an existing formulation
- changing fragrance/colour/texture only
- rebranding an existing stock formula

WHY IT MATTERS

Different development models should not be compared as though they provide the same commercial value.

EVIDENCE TO REQUEST

Development brief; proposed modifications; development stages; cost; revision policy.

RED FLAG

A formula initially described as exclusive custom development later appears to be a standard catalogue formula.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

12 Establish formula ownership

Scope note — ownership and IP rights can require qualified legal advice.

CHECK	Determine who owns or controls the commercial formulation.
ASK	Who owns the original formula? Who owns buyer-funded modifications? Can the buyer obtain the formula documentation required for another manufacturer? What happens when the manufacturing relationship ends?
WHY IT MATTERS	A successful product can become commercially locked to one manufacturer if formula control was never clarified.
EVIDENCE TO REQUEST	Contractual wording and written commercial position.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

13 Clarify exclusivity and transferability

CHECK	If exclusivity is commercially important, establish: • what is exclusive • to whom • in which market • for what period • under what volume conditions • whether the formulation can be transferred
WHY IT MATTERS	“Exclusive formula” can mean different things commercially.
RED FLAG	Exclusivity is repeatedly promised verbally but not reflected in the commercial agreement.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

14 Control confidentiality and technical-document access

CHECK	Define what formulation, manufacturing and testing information the buyer may receive or access.
WHY IT MATTERS	The buyer, Responsible Person, safety assessor or regulatory specialist may require technical information that the supplier treats as confidential.
EVIDENCE TO REQUEST	NDA/confidentiality arrangement where appropriate; agreed document-access process; specialist-to-specialist disclosure mechanism if required.
RED FLAG	Commercial launch is approaching but the parties have not established how necessary safety/regulatory information will reach the responsible professional.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

15 Establish formula-change control

CHECK

Require disclosure before changing an approved:

- ingredient
- ingredient supplier where material
- concentration where material
- preservative system
- fragrance
- colour
- manufacturing method
- formula revision

WHY IT MATTERS

A formulation change can affect safety documentation, testing, claims, compatibility, cost and destination-market position.

EVIDENCE TO REQUEST

Controlled change request; revised formula reference; buyer disposition.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

BUYER RULE

FORMULATION MODEL ≠ FORMULA OWNERSHIP

SECTION 4

4 Product, Formula, Ingredient & Specification Readiness

16 Define the product and intended function

CHECK

Record what the product is intended to do and how it is intended to be used.

WHY IT MATTERS

Product function and claims can affect classification, safety work and destination requirements.

EVIDENCE TO REQUEST

Buyer product brief; intended-use statement; target user; proposed claims.

RED FLAG

Supplier and buyer describe materially different intended functions.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

17 Control the formula revision

CHECK Assign a controlled identifier to the formulation being sampled, tested, documented and manufactured.

WHY IT MATTERS “Same product” is not sufficient if laboratory sample, test report, safety assessment and commercial batch relate to different formulation versions.

EVIDENCE TO REQUEST Formula code/revision/date; change history where relevant.

BUYER RULE

NO TRACEABLE FORMULA REVISION = NO RELIABLE SAMPLE-TO-BULK CONTROL

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

18 Establish ingredient / INCI evidence

Turkey’s current TİTCK Product Information File guidance includes qualitative and quantitative composition, INCI names/ functions, raw-material and finished-product specifications, GMP information, safety reporting and claim evidence where applicable. [T4]

CHECK Obtain ingredient information appropriate to the project stage and destination-market work.

WHY IT MATTERS The relevant safety assessor, Responsible Person or regulatory professional may need detailed composition information beyond the label-level INCI list.

EVIDENCE TO REQUEST AS APPLICABLE INCI list; formula information; ingredient functions; supplier/manufacturer declarations; supporting raw-material data.

VERIFY The information should correspond to the commercial formula revision.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

19 Record buyer-excluded and market-sensitive ingredients

CHECK Identify any ingredient position driven by:

- buyer policy
- retailer policy
- destination restrictions
- claim strategy
- consumer positioning

WHY IT MATTERS “Free-from” or restricted-ingredient requirements can materially change formulation, cost and documentation.

EVIDENCE TO REQUEST Controlled restricted/excluded-ingredient requirement and supplier response.

RED FLAG The supplier confirms a “free-from” position before checking the actual formulation.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

20 Define relevant finished-product specifications

CHECK

Establish the characteristics required to control the product. Depending on product, these may include:

- appearance
- colour
- odour/fragrance
- texture
- pH
- viscosity
- density
- other physical, chemical or microbiological criteria

WHY IT MATTERS

Not every parameter applies to every cosmetic product. The right control set should reflect the actual product.

EVIDENCE TO REQUEST

Controlled finished-product specification and tolerance/range where appropriate.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

21 Define nominal content, shelf-life and storage basis

CHECK

Record:

- nominal fill quantity
- proposed shelf life or durability basis
- storage conditions
- special handling requirements where relevant

WHY IT MATTERS

These affect production, packaging, artwork, stability evidence and logistics.

EVIDENCE TO REQUEST

Approved specification and supporting basis where required.

RED FLAG

Commercial shelf-life changes without any visible change to the underlying supporting evidence.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

22 Check product classification before treating it as an ordinary cosmetic

EU Commission guidance also cautions that ingredient database presence does not establish that a substance is approved for cosmetic use, and classification can depend on product action and intended function. [EU4]

CHECK

Escalate products whose classification may depend on claims, composition or intended function. Possible borderline areas include:

- therapeutic claims
- medicinal positioning
- disinfectant/biocidal claims
- medical-device positioning
- ingestible beauty products
- other non-cosmetic intended uses

WHY IT MATTERS

A product marketed as “beauty” does not automatically fall within the cosmetic regulatory regime.

ESCALATION

PRODUCT CLASSIFICATION REQUIRES MARKET-SPECIFIC SPECIALIST REVIEW

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 5

5 Packaging, Components, Artwork & Compatibility

23 Define the final primary packaging

CHECK

Record the exact commercial primary pack. Examples:

- bottle
- jar
- tube
- sachet
- ampoule
- pump bottle
- sprayer
- other direct-contact container

WHY IT MATTERS

The packaging is part of the commercial product and can affect stability, compatibility, functionality, cost and lead time.

EVIDENCE TO REQUEST

Component specification; material; size; supplier/reference code; approved sample.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

24 Control pumps, closures, liners and applicators

CHECK

Identify critical functional components separately from the main container. Possible items:

- pump
- sprayer
- cap
- closure
- liner
- seal
- dropper
- applicator

WHY IT MATTERS

A visually similar replacement can perform differently or interact differently with the formulation.

EVIDENCE TO REQUEST

Approved component reference and specification.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

25 Establish packaging supply-chain and tooling ownership

CHECK

Understand:

- component supplier
- component MOQ
- custom mould/tooling
- tool ownership
- lead time
- repeat-order dependency

WHY IT MATTERS

Packaging can create a separate single-source or MOQ risk even when formula manufacturing is straightforward.

RED FLAG

The buyer funds tooling but ownership and post-termination access remain undefined.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

26 Link compatibility evidence to the final formula and final pack

CHECK

Establish whether packaging-compatibility work used:

- the final formula revision
- the intended container material
- the intended pump/closure/applicator

WHY IT MATTERS

Compatibility evidence has limited value if either the formula or primary pack changes afterwards.

EVIDENCE TO REQUEST

Compatibility/stability record appropriate to the product; tested sample identity; packaging reference; dates.

VERIFY

Formula revision + pack revision + test record.

BUYER RULE

TESTED FORMULA ≠ FINAL COMMERCIAL FORMULA + FINAL PACK

unless the evidence actually connects them.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

27 Freeze commercial artwork and label revision

Scope note — Hana does not legally approve cosmetic artwork.

CHECK

Use controlled artwork before printing or commercial packing.

CONTROL

- Brand name
- Product name
- Nominal content
- Ingredients / INCI
- Warnings / precautions
- Batch information
- Responsible-party information
- Country/origin information where applicable
- Claims
- Barcode
- Language
- Artwork revision

WHY IT MATTERS

Manufacturer capability to print artwork is not the same as regulatory approval of the wording.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

28 Control packaging changes after approval

CHECK

Require buyer review before changing the approved:

- container
- material
- pump
- closure
- liner
- applicator
- decoration
- label stock
- secondary carton

WHY IT MATTERS

A packaging substitution can affect compatibility, appearance, functionality, claims presentation and logistics.

RED FLAG

Packaging is changed after compatibility work without reassessment of relevance.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 6

6 MOQ, Batch Size, Capacity, Lead Time & RFQ Comparability

29 Break down the MOQ

CHECK

Do not accept one headline MOQ without understanding its components. Ask separately for:

- formula MOQ
- manufacturing batch minimum
- filling MOQ
- SKU MOQ
- variant/fragrance MOQ
- packaging MOQ
- label/print MOQ
- carton MOQ

WHY IT MATTERS

A 1,000-unit finished-product MOQ may hide a 5,000-piece bottle or pump commitment.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

30 Match manufacturing batch size to the order model

CHECK

Determine whether practical manufacturing batch sizes support:

- initial launch quantity
- repeat orders
- multiple SKUs
- multiple fragrances/variants

WHY IT MATTERS

Technical capability does not automatically mean commercial fit.

EVIDENCE TO REQUEST

Batch-size range; minimum economical batch; filling plan.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

31 Identify packaging-component minimums separately

CHECK

Establish minimums for:

- bottles
- jars
- tubes
- pumps
- closures
- decoration
- labels
- cartons

WHY IT MATTERS

Packaging minimums can create more working-capital exposure than the formula itself.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

32 Identify all development and non-unit costs

CHECK

Separate the unit price from:

- formula-development fees
- sample costs
- mould/tooling
- packaging development
- testing
- compatibility work
- specialist safety/regulatory work
- artwork/prepress/setup
- other one-off charges

WHY IT MATTERS

A low unit price can be commercially misleading when substantial launch costs are excluded.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

33 Assess available production capacity, not only installed capacity

CHECK	Determine whether the factory has a credible production slot during the buyer's required window.
WHY IT MATTERS	Annual production capability does not establish immediate availability.
EVIDENCE TO REQUEST	Expected production start; batch schedule; filling schedule; major external dependencies.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

34 Break down the lead time

CHECK	Separate relevant stages: • formula development • sample revisions • testing • packaging procurement • artwork approval • bulk manufacturing • filling • packing • documentation • shipment readiness
WHY IT MATTERS	"Four-week lead time" can mean different things depending on what has already been approved or purchased.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

35 Normalize RFQs before comparing quotations

CHECK

Confirm suppliers are pricing the same basis. Compare:

- formula model
- formula revision/basis
- ingredients where commercially relevant
- fill size
- primary packaging
- pump/closure
- decoration
- label
- carton
- quantity
- MOQ
- development
- samples
- testing
- safety/regulatory support
- tooling
- payment terms
- lead time
- Incoterm + named place
- included/excluded services

BUYER RULE

LOWEST UNIT PRICE ≠ BEST OR EVEN COMPARABLE QUOTATION

when the underlying product or commercial assumptions differ.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 7

7 Sample Development & Approved Production Reference

36 Define what each sample is intended to prove

CHECK

Record the purpose of each sample. Possible stages:

- initial laboratory sample
- formula revision
- fragrance/colour sample
- packaging sample
- compatibility sample
- pilot/pre-production sample
- finished commercial reference

WHY IT MATTERS

Approval of one development stage does not automatically approve the final production configuration.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

37 Link every formula sample to a formula revision

CHECK

Give each substantive formulation sample a traceable reference.

EVIDENCE

- Sample ID
- Formula revision
- Date
- Manufacturer
- Development stage

WHY IT MATTERS

“Sample 3 approved” is weak control if nobody can determine which formulation it contained.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

38 Record sensory and appearance approvals separately

CHECK

Where relevant, record approval of:

- fragrance
- colour
- texture
- appearance
- sensory characteristics

WHY IT MATTERS

These can change without an obvious change to the product name.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

39 Approve packaging as a separate production input

CHECK
Record the commercial packaging set separately from formula approval.

EVIDENCE
- Container reference
- Material
- Pump/closure
- Decoration
- Label position
- Carton
- Packaging revision

WHY IT MATTERS
An approved formula does not approve the commercial pack.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

40 Establish whether compatibility / pilot work uses the final commercial basis

CHECK
Verify the relevant formula and packaging revisions used.

WHY IT MATTERS
A successful test on a development pack cannot automatically be transferred to a changed pack or formula.

RED FLAG
Commercial packaging changes after the last compatibility or pilot exercise.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

41 Establish the Approved Production Reference

CHECK
Before bulk production, identify the complete reference set against which production will be evaluated.

APPROVED PRODUCTION REFERENCE
- Formula revision
- Approved product/sample ID
- Fragrance/colour reference
- Finished-product specification
- Primary packaging revision
- Pump/closure/applicator
- Artwork/label revision
- Secondary packaging
- Approval date
- Approver

WHY IT MATTERS
The commercial product is the combination of formula + pack + artwork, not the formula alone.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

42 Record approval and post-approval changes

CHECK

Maintain a visible record of:

- what was approved
- when
- by whom
- what changed later
- whether the change was accepted

BUYER RULE

APPROVED SAMPLE ≠ BULK BATCH CONFORMITY

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 8

8 GMP, ISO 22716 & Facility Quality Evidence

43 Establish the actual GMP / quality-control basis

CHECK

Ask how manufacturing controls are structured at the proposed production site.

EVIDENCE TO REQUEST AS APPROPRIATE

GMP evidence; manufacturing procedures; QC structure; batch-record controls; internal/ external audit evidence; facility inspection evidence.

WHY IT MATTERS

A certificate logo is not a substitute for understanding which facility and activities are actually controlled.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

44 Interpret ISO 22716 correctly

ISO states that ISO 22716:2007 remains current after its 2022 review and provides GMP guidelines for the production, control, storage and shipment of cosmetic products. ISO also states that it does not cover research/development or distribution of finished products. [G1]

CHECK

If ISO 22716 is claimed or required, establish what the evidence actually covers.

VERIFY

- Certificate holder
- Facility/site
- Scope
- Validity
- Certification body
- Actual manufacturing relevance

CRITICAL BUYER RULE

ISO 22716 CERTIFICATION ≠ COSMETIC PRODUCT APPROVAL

ISO itself develops standards but does not perform certification or issue certificates; certification is carried out by external certification bodies. [G2]

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

45 Match GMP / ISO evidence to the actual facility and activity

CHECK

Compare:

- legal holder
- manufacturing site
- filling site
- scope/activity
- product-category relevance
- validity

WHY IT MATTERS

A genuine certificate can still be irrelevant to the buyer’s order.

RED FLAG

Certificate belongs to the supplier group but not the production facility being proposed.

BUYER RULE

CERTIFICATE NAME ≠ RELEVANT CERTIFICATE COVERAGE

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

46 Interpret the TİTCK cosmetics GMP certificate correctly

TİTCK currently maintains an official list of cosmetics production facilities that have received GMP certificates and separately lists domestic facilities subject to TİTCK inspection. [T5]

CHECK Where a Turkish supplier presents a TİTCK cosmetics GMP certificate, verify the facility and current evidence, but do not describe the certificate as Turkish domestic-market product approval.

IMPORTANT TURKEY-SIDE DISTINCTION

Under the TİTCK mechanism verified for this project, cosmetics GMP certificates are issued to registered cosmetics manufacturing sites for export use.

BUYER RULE

TİTCK GMP CERTIFICATE ≠ DOMESTIC PRODUCT APPROVAL

and: TİTCK GMP CERTIFICATE ≠ GUARANTEE OF DESTINATION-MARKET COMPLIANCE — the buyer should still verify the actual site, scope, current status and destination requirements.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

47 Extend quality review to material outsourced operations

CHECK Where manufacturing, filling or another critical process is outsourced, determine whether the buyer’s quality/GMP expectations extend to the external facility.

WHY IT MATTERS The principal supplier’s quality documentation does not automatically cover an external filler or manufacturer.

EVIDENCE TO REQUEST Outsourced-site identity; agreement/quality responsibility; relevant site evidence.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 9

9 Testing, Safety Documentation & Product Claims

48 Define a product-specific testing and evidence plan

CHECK

Establish what testing or technical evidence is actually needed for the product, pack and destination. Possible areas may include:

- stability
- microbiological quality
- preservative efficacy
- physical/chemical specifications
- packaging compatibility
- batch QC
- claim substantiation
- other product-specific evidence

WHY IT MATTERS

There is no single universal test package that applies identically to every cosmetic product.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

49 Link stability evidence to the commercial formulation

CHECK

Determine:

- which formula revision was evaluated
- which packaging was used
- test dates
- conditions
- whether the resulting shelf-life/storage position applies to the commercial product

RED FLAG

Shelf-life is claimed from testing performed on a materially different formula or pack.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

50 Review microbiological and preservative evidence in product context

Do not assume every product requires the same microbiological or challenge-test package.

CHECK

Establish what microbiological controls and, where applicable, preservative-efficacy evidence support the actual product.

WHY IT MATTERS

Risk and testing needs differ by formulation and intended use.

EVIDENCE TO REQUEST

Product-specific microbiological specification and relevant supporting test evidence.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

51 Link finished-product specifications and batch evidence

CHECK
Determine what batch QC or Certificate of Analysis is expected for the actual commercial order.

WHY IT MATTERS
A historic CoA or generic product sheet does not establish the status of the batch being shipped.

EVIDENCE TO REQUEST WHERE RELEVANT
Batch number; manufacturing date; applicable physical/chemical/microbiological results; sample identity; release status.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

52 Assign Product Information File / safety-document responsibilities

Turkey's TİTCK ÜBD guidance identifies composition, physical/chemical and microbiological specifications, GMP method/ declaration, a Cosmetic Product Safety Report, undesirable-effects data and claims evidence among relevant file elements. [T4]

CHECK
For destination markets requiring safety documentation, establish:

- who prepares it
- who supplies formula/raw-material information
- who performs qualified safety assessment
- who maintains the dossier
- where it is held
- when it must be completed

WHY IT MATTERS
The manufacturer may supply technical data without being the person legally responsible for the final safety assessment or dossier.

> **HANA SCOPE**
> Hana does not prepare or approve a CPSR and does not act as Product Safety Assessor.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

53 Require evidence for product claims

CHECK

For every commercially material claim, ask:

- WHAT EXACTLY IS CLAIMED?
- WHAT EVIDENCE SUPPORTS IT?
- WHO PRODUCED OR REVIEWED THE EVIDENCE?
- WHICH FORMULA WAS EVALUATED?
- DOES THE WORDING MATCH THE EVIDENCE?
- IS THE CLAIM APPROPRIATE FOR THE DESTINATION MARKET?

POSSIBLE CLAIMS

- dermatologically tested
- clinically tested
- hypoallergenic
- sensitive skin
- anti-ageing
- brightening
- microbiome-related
- free-from
- performance claims

RED FLAG

Claim wording becomes stronger than the underlying study or evidence.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

54 Separate private schemes and declarations from legal market compliance

CHECK

Where claims include natural, organic, vegan, cruelty-free, halal or sustainability, determine whether the position is based on:

- a legal definition
- private certification
- company declaration
- ingredient evidence
- a recognised scheme
- another commercial standard

WHY IT MATTERS

These terms and schemes do not have one universal legal meaning across markets.

RED FLAG

A voluntary logo is presented as proof of full legal market compliance.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

55 Match all technical evidence to the final commercial product

CHECK

For each critical report, record:

- formula revision
- sample identity
- packaging reference
- laboratory/provider
- test date
- scope
- commercial relevance

BUYER RULE

VALID TEST REPORT ≠ RELEVANT TEST EVIDENCE

A genuine report can still be irrelevant to the formulation or packaging being purchased.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 10

10 Production, Batch & Sample-to-Bulk Control

56 Lock the production basis before bulk manufacturing

CHECK

Before irreversible bulk work, confirm the production team is using the approved:

- formula revision
- product specification
- primary packaging
- components
- artwork
- PO revision

WHY IT MATTERS

Approval by email has little value if production uses another version.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

57 Control raw-material and formula substitutions

CHECK

Require disclosure of material substitutions that could affect:

- formula composition
- performance
- safety documentation
- claims
- appearance
- fragrance
- cost
- destination-market status

WHY IT MATTERS

A commercially convenient supplier substitution can create a product different from the approved reference.

RED FLAG

Substitution is disclosed only after bulk production.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

58 Establish usable batch identification

CHECK

Ensure commercial production has a traceable batch/lot identity.

EVIDENCE TO REQUEST

Batch number; manufacturing date; production record; relevant raw-material/bulk traceability; finished-product identification.

WHY IT MATTERS

Testing, QC, complaints and shipment evidence need to be connected to identifiable production.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

59 Reconcile filling and packaging against the approved requirement

CHECK

Review:

- fill quantity
- container
- pump/closure
- decoration
- label
- carton
- SKU/variant configuration

WHY IT MATTERS

The bulk formula can be correct while the commercial packed product is wrong.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

60 Compare commercial bulk with the Approved Production Reference

CHECK

Review applicable characteristics such as:

- formula/version
- appearance
- colour
- fragrance
- texture
- relevant specifications
- fill quantity
- primary packaging
- components
- label/artwork
- secondary packaging

WHY IT MATTERS

A successful development sample does not establish repeatability at commercial scale.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

61 Record deviations, rework and final QC position

CHECK

List every known deviation before commercial release.

EVIDENCE TO REQUEST

Deviation/NCR record; affected quantity; rework; corrective action; final disposition; QC status.

WHY IT MATTERS

An unresolved deviation should remain visible rather than disappear into email or messaging traffic.

RED FLAG

Supplier pushes shipment before a material quality or documentation deviation is closed or consciously accepted by the buyer.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 11

11 Destination-Market Gate Checks

TURKEY-SIDE READINESS

62 Separate Turkey domestic-market requirements from export-market requirements

TİTCK states that cosmetic products placed on the Turkish market must be notified before market placement and maintains the relevant cosmetics regulatory, company, technical-person, notification, PIF and product-tracking framework. [T3]

CHECK

First determine whether the product will:

- be placed on the Turkish domestic market
- be manufactured in Turkey solely for export
- be supplied into both routes

WHY IT MATTERS

A Turkey domestic-market notification requirement should not be automatically presented as a universal destination-market approval for exported cosmetics.

TURKEY BUYER RULE

TURKEY NOTIFICATION ≠ DESTINATION-MARKET APPROVAL

For export projects, confirm the Turkish manufacturing/export-side documentation separately from the regulatory obligations for the market where the product will actually be sold.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

EUROPEAN UNION

63 Establish the EU Responsible Person, PIF and safety-assessment route

The current consolidated text of Regulation (EC) No 1223/2009 is dated 1 May 2026. European Commission guidance states that only products with an EU-designated Responsible Person can be placed on the EU market and identifies the safety-report and responsible-person framework. [EU1] [EU2]

CHECK

Before EU market placement, establish:

- EU Responsible Person
- qualified safety-assessment responsibility
- Cosmetic Product Safety Report
- Product Information File
- GMP/manufacturing documentation
- final formula and packaging information required by the responsible specialists

BUYER QUESTION

Who is responsible for completing each regulatory step — the Turkish manufacturer, buyer/brand, importer, EU Responsible Person or appointed specialist?

HANA SCOPE

Hana does not act as the EU Responsible Person or Product Safety Assessor.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

64 Confirm EU notification, ingredient, label and claims responsibilities

The European Commission describes CPNP as the Article 13 notification system and states that once the product is notified through CPNP no additional national notification is needed within the EU. [EU3]

CHECK

Establish that the responsible parties have addressed, as applicable:

- CPNP notification
- final formula / ingredient restrictions
- final label/artwork
- required warnings
- claims support
- commercial-product identity

CRITICAL BUYER RULE

CPNP NOTIFICATION ≠ PRODUCT APPROVAL

CPNP is a notification mechanism, not a certificate issued by the European Commission. Also do not treat a CosIng search result as product or ingredient approval: the Commission expressly states that CosIng is informative and that appearance of an ingredient in the database does not mean it is approved for cosmetic use. [EU4]

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

GREAT BRITAIN

65 Establish the Great Britain Responsible Person and SCPN route

GOV.UK states that GB cosmetic products require a Responsible Person with a UK-established address and that the PIF contains the product safety report, GMP information and evidence supporting claimed effects. [GB1]

CHECK

For products intended for England, Scotland or Wales, establish:

- UK-established Responsible Person
- safety assessment / product safety report
- Product Information File
- GMP information
- final label
- SCPN notification

SYSTEM NAME

SCPN — Submit Cosmetic Product Notifications. Businesses placing cosmetics on the GB market notify through SCPN via the Responsible Person. GOV.UK confirmed this structure again in July 2026. [GB2] [GB3]

BUYER RULE

SCPN NOTIFICATION ≠ UK PRODUCT APPROVAL

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

NORTHERN IRELAND

66 Do not treat Northern Ireland as Great Britain

Current GOV.UK guidance states that the Responsible Person for NI must be established in Northern Ireland or the EEA and products for NI are notified through CPNP. Products also placed on the GB market can trigger separate GB notification requirements. [NI1]

CHECK

If the destination is Northern Ireland, establish the NI/EEA Responsible Person and CPNP pathway rather than automatically applying the GB SCPN route.

BUYER RULE

“UK COMPLIANT” IS NOT A SUFFICIENT REGULATORY STATUS

Always identify GB or Northern Ireland.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

UNITED STATES

67 Establish MoCRA registration, listing and safety responsibilities by applicability

FDA confirms that MoCRA includes facility registration/product listing and adequate safety-substantiation responsibilities, while certain small businesses can be exempt from GMP, registration and listing requirements subject to statutory product exceptions. [US1]

CHECK

Determine which MoCRA obligations apply to the actual facility, product and responsible person. Potentially relevant controls include:

- facility registration
- biennial facility-registration renewal
- cosmetic product listing
- listing updates
- safety substantiation
- serious adverse-event responsibilities

DO NOT WRITE

"Every Turkish cosmetics manufacturer must be FDA registered." Instead: determine whether this facility and product are subject to the relevant MoCRA requirement or an applicable exemption. FDA provides a decision tool for this purpose.

CRITICAL BUYER RULE

FDA REGISTRATION / LISTING ≠ FDA APPROVAL

FDA explicitly states that cosmetic facility registration and product listing are neither an approval program nor a promotional tool and that FDA does not issue certificates for them. [US2]

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

68 Record the current MoCRA GMP rulemaking status correctly

CURRENT STATUS — AUGUST 2026

MoCRA directed FDA to establish cosmetic GMP regulations. FDA's stated statutory dates were: proposed rule — 29 December 2024; final rule — 29 December 2025. Those dates have passed without a final MoCRA cosmetic GMP rule being issued. FDA's current MoCRA page still refers users to its GMP public-meeting material and draft cosmetic GMP guidance rather than a final regulation. The Unified Agenda entry for RIN 0910-AJ00 — Good Manufacturing Practice for Cosmetic Product Facilities is shown under Long-Term Actions, with the NPRM timetable listed as "To Be Determined." [US3] [US4] [US5]

BUYER CONSEQUENCE

Do not: describe a final MoCRA cosmetics GMP regulation as already operative; ask a Turkish supplier for a fictitious "MoCRA GMP certificate"; treat ISO 22716 certification as FDA product approval. Instead: establish the manufacturer's current GMP evidence and separately determine the current U.S. legal obligations applicable to the product and business.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SAUDI ARABIA

69 Use the Saudi GHAD route and current ingredient position

SYSTEM NAME — GHAD. SFDA currently publishes a User Guide for Cosmetic Licensing and Products Services in Ghad System and maintains a list of cosmetic products for which importers or manufacturers have submitted marketing notification. [SA1] [SA2]

CHECK

For Saudi-bound cosmetics, identify the Saudi importer/local responsible commercial party and confirm the current SFDA product-notification/licensing pathway.

REQUEST / VERIFY AS APPLICABLE

- Product classification
- Formula / ingredient information
- Final artwork/label
- Local/importing party
- GHAD status
- Applicable conformity/import documentation
- Current prohibited/restricted ingredient position

CURRENT SAUDI INGREDIENT CONTROL

SFDA maintains current official lists of substances prohibited and restricted in cosmetic products. [SA3] [SA4]

BUYER ACTION

For a Saudi-bound product, check the current SFDA prohibited and restricted ingredient lists against the final commercial formula during market-entry preparation, and repeat the check when the formula is changed or an older regulatory assessment is being relied upon. Do not assume that a previous Saudi formula review remains current.

BUYER RULE

“MENA COMPLIANT” ≠ SAUDI MARKET READINESS

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

UNITED ARAB EMIRATES / DUBAI

70 Separate UAE federal conformity requirements from Dubai market procedures

MoIAT's cosmetics service specifies the UAE Conformity Assessment Scheme (ECAS) and lists documentation including accredited test evidence, formula declaration, imported-product documentation, GMP evidence where applicable, artwork/label, safety report, CoA and electronic declaration of conformity. [UAE1] [UAE2] [UAE3]

CHECK

For UAE-bound cosmetics, determine the actual emirate and applicable federal/local route.

DUBAI

Dubai Municipality maintains separate Technical Guideline 116 — Cosmetic & Personal Care Products and Technical Guideline 117 — Fragrance Products. Dubai Municipality also describes Montaji as its consumer-product registration initiative for registering and assessing consumer products before local-market trade. [DXB1] [DXB2] [DXB3]

BUYER CONSEQUENCE

Do not compress MoIAT ECAS + Dubai Municipality / Montaji into the vague statement "The supplier is UAE approved." Determine the route actually applicable to the product and emirate.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

71 Treat other MENA / GCC and Balkan destinations as jurisdiction-specific

CHECK

For any other destination, determine:

- exact country
- product classification
- local/importing party
- notification/registration route
- ingredient restrictions
- label requirements
- required conformity/testing/documentation

WHY IT MATTERS

Neither "GCC compliant" nor "Balkans compliant" has a single universal regulatory meaning. For Balkan markets, first establish whether the destination is an EU Member State or a separate national jurisdiction.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 12

12 Special & Borderline Product Cautions

72 Escalate borderline cosmetic classification

SFDA itself maintains product-classification guidance for borderline situations, illustrating the same basic principle outside Europe.

CHECK

Escalate where claims or intended use could move the product into a different regulatory regime. Examples:

- therapeutic treatment
- disease prevention
- disinfection
- medicinal action
- medical-device action
- ingestion
- other non-cosmetic purpose

WHY IT MATTERS

The manufacturer's commercial label "cosmetics" does not determine regulatory classification.

DECISION

REQUIRE SPECIALIST MARKET-SPECIFIC CLASSIFICATION REVIEW

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

73 Treat sunscreen, SPF and higher-risk claims by jurisdiction

CHECK

Do not assume sunscreen/SPF products have the same classification and regulatory route in the EU, UK, U.S., Saudi Arabia or other markets.

WHY IT MATTERS

The same physical product can fall under materially different regulatory frameworks depending on destination and claims.

BUYER ACTION

Before manufacturer commitment, establish: product classification; required active/ingredient position; required testing/evidence; labelling; market-entry responsibilities.

HOLD / PAUSE

If the manufacturer is pricing and developing the product on an ordinary-cosmetic basis while the destination may treat it differently.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

SECTION 13

13 Quality, Documentation & Shipment Readiness

74 Reconcile the completed commercial batch and quantity

CHECK

Confirm what has actually been manufactured, filled and packed.

COMPARE

- PO quantity
- SKU/variant
- batch number
- filled quantity
- finished quantity
- rejected/reworked quantity
- packed quantity
- carton count

WHY IT MATTERS

“Production complete” does not prove that the ordered commercial quantity exists in release-ready form.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

75 Establish final QC and batch-document status

CHECK

Confirm whether the required final QC and product-specific evidence are complete.

EVIDENCE WHERE RELEVANT

- Batch record
- Internal final QC
- Certificate of Analysis
- Applicable test results
- Deviation/rework closure
- Buyer-appointed inspection/check
- Other destination-required technical evidence

VERIFY

Evidence should relate to the actual batch being released.

BUYER RULE

HISTORICAL CoA ≠ CURRENT BATCH EVIDENCE

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

76 Verify final packaging, artwork and labels

CHECK

Confirm the finished goods use the approved:

- container
- pump/closure
- decoration
- label
- artwork revision
- secondary carton
- barcode
- market-specific information

WHY IT MATTERS

A technically acceptable formula can still become commercially unusable because of a packaging or artwork error.

RED FLAG

Supplier proposes to correct a material label discrepancy after export.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

77 Reconcile invoice, packing list and origin/export documentation

CHECK

Compare the final shipment file. Potential documents can include:

- commercial invoice
- packing list
- Certificate of Origin
- A.TR
- EUR.1 where actually applicable
- destination-specific documentation

VERIFY

- seller/exporter
- buyer/consignee
- product description
- SKU
- quantity
- cartons
- weights
- Incoterm
- named place
- destination

CRITICAL ORIGIN RULE

A.TR DOES NOT PROVE TURKISH ORIGIN

A.TR relates to free-circulation/customs-union treatment and does not itself establish the origin of the goods. Exact origin/preference requirements should be confirmed for the shipment and destination.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

78 Identify product-specific transport classification

CHECK

Determine whether the product requires special transport handling or dangerous-goods review. Potentially relevant products include:

- aerosols
- high-alcohol products
- flammable formulations
- pressurised packs
- other specifically classified goods

WHY IT MATTERS

Dangerous-goods requirements should not be assumed for all cosmetics, but they should not be discovered only after freight booking.

EVIDENCE TO REQUEST WHERE RELEVANT

Product transport classification; carrier/forwarder requirements; relevant safety/transport documentation.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

79 Confirm booking and physical handover position

CHECK

Establish:

- cargo-ready date
- collection location
- freight responsibility
- booking status
- collection date
- Incoterm handover point
- product-specific handling condition where relevant

WHY IT MATTERS

“Ready to ship” should describe a verified operational position.

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

80 Record the final buyer release decision

CHECK

Before shipment, list every issue that remains unresolved. Possible items:

- quantity difference
- batch issue
- QC deviation
- test/document pending
- label discrepancy
- packaging discrepancy
- regulatory-document issue
- transport issue

WHY IT MATTERS

An unresolved point should remain visible rather than disappear into email or messaging traffic.

FINAL DECISION

☐ **READY FOR SHIPMENT RELEASE**

☐ **CLARIFICATION OR ADDITIONAL EVIDENCE REQUIRED**

☐ **PAUSE SHIPMENT RELEASE**

☐ **NOT RELEASED UNDER THE BUYER'S CRITERIA**

EVIDENCE STATE ☐ BP ☐ SD ☐ IC ☐ FO ☐ NP ☐ N/A ☐ UR

"PRODUCTION COMPLETE" IS A MANUFACTURER STATUS.
"COMMERCIAL BATCH RELEASED FOR SHIPMENT" IS A BUYER DECISION.

CROSS-REFERENCE REGISTER

High-Value Red Flags

These are triggers for clarification, enhanced verification or a pause decision. They are not automatic proof of misconduct.

RED FLAG	BUYER RESPONSE
Supplier refuses to identify the actual manufacturing facility	Pause supplier approval until production identity is established.
Filling or packing location will not be disclosed	Treat the production chain as unresolved.
Quoting company and manufacturer relationship cannot be explained	Clarify contractual, quality and warranty responsibilities.

RED FLAG	BUYER RESPONSE
Bank beneficiary is unrelated to the transaction	Obtain documentary explanation before payment.
GMP / ISO evidence relates to a different site	Do not treat it as evidence for the proposed production facility.
Certificate is expired or scope cannot be established	Record it as unresolved, not valid evidence.
Supplier says “ISO 22716 certified, therefore EU compliant”	Separate facility GMP evidence from product/market requirements.
TİTCK GMP certificate is presented as domestic product approval	Correct the certificate purpose and market-access logic.
Stock formula is sold as exclusive custom development	Establish actual formulation model and contractual rights.
Formula ownership is unclear	Resolve control/transfer position before investing in launch.
Supplier refuses to establish how regulatory professionals obtain necessary formula information	Resolve document-access structure before market-entry work.
Formula revision cannot be identified	Do not release bulk production.
INCI/formula data differ between documents without explanation	Reconcile the commercial formula.
Test report relates to another formulation revision	Do not use it as evidence for the final commercial formula.
Packaging changed after compatibility work	Reassess relevance before bulk release.
Pump/closure replaced without buyer approval	Review functional and compatibility implications.
Claim has no identifiable evidence	Do not rely on the claim commercially.
Voluntary organic/vegan/halal logo is presented as full market-compliance proof	Separate scheme scope from legal requirements.
Supplier says “EU approved” because CPNP notification exists	Correct the notification-versus-approval distinction.
Supplier says “FDA approved” because facility registration or product listing exists	Correct the registration/listing-versus-approval distinction.
Supplier offers an “FDA certificate” for MoCRA registration/ listing	FDA states it does not issue such certificates.
Supplier says all U.S. cosmetic facilities follow the same MoCRA requirements	Check actual applicability and exemptions.
Supplier claims a final MoCRA GMP regulation is already in force	Apply the August 2026 rulemaking-status correction.
Saudi product relies on an old ingredient review	Re-check current SFDA prohibited/restricted lists.
Supplier says “GCC compliant” without naming jurisdiction	Establish exact destination-country requirements.

RED FLAG	BUYER RESPONSE
UAE supplier evidence does not distinguish ECAS from local/ emirate procedures	Establish the actual route.
Batch/CoA cannot be linked to actual shipment	Do not use it to release the commercial order.
Shipment is being pushed while a material quality/document issue remains unresolved	Pause shipment release.
A.TR is presented as proof of Turkish origin	Correct the origin-document logic.
Product carries therapeutic/SPF/disinfectant claims but has been treated as ordinary cosmetic everywhere	Require market-specific classification review.

A RED FLAG DOES NOT REQUIRE AN ACCUSATION.
IT REQUIRES A CONTROLLED RESPONSE.

THE OPERATIONAL SUMMARY OF THIS CHECKLIST

Three Buyer Release Gates

Gate 1

Before Supplier / PO Commitment — do not make the commercial commitment until the buyer can establish:

- ☐ legal seller identified
- ☐ payment beneficiary understood
- ☐ manufacturing site identified
- ☐ material outsourcing disclosed
- ☐ formula ownership/control position understood
- ☐ facility capability assessed
- ☐ development and one-off costs understood
- ☐ credible production capacity/lead time established
- ☐ destination regulatory path identified
- ☐ material technical-document responsibilities identified
- ☐ contracting/invoicing structure understood
- ☐ actual manufacturer identified
- ☐ filling/packing sites identified
- ☐ manufacturing model understood
- ☐ product category and intended function defined
- ☐ MOQ/batch/component minimums understood
- ☐ quotation basis normalized
- ☐ GMP/facility evidence assessed
- ☐ Responsible Person/local/importer responsibilities allocated
- ☐ no unresolved issue requires a pause decision

DECISION

☐ READY FOR THE NEXT DEFINED COMMERCIAL STEP

☐ CLARIFICATION OR ADDITIONAL EVIDENCE REQUIRED ☐ PAUSE BEFORE COMMITMENT

☐ NOT ADVANCED UNDER THE BUYER'S CRITERIA

Gate 2

Before Bulk Production — do not release commercial bulk until:

- ☐ approved formula revision locked
- ☐ final product specification controlled
- ☐ final primary packaging approved
- ☐ packaging-compatibility position acceptable where required
- ☐ required testing/evidence plan established
- ☐ manufacturing facility remains approved
- ☐ outsourced critical processes remain visible
- ☐ supplier-requested substitutions reviewed
- ☐ no unresolved issue requires a pause decision
- ☐ approved product/sample reference recorded
- ☐ fragrance/colour/appearance approved where relevant
- ☐ pump/closure/applicator approved
- ☐ final artwork/label revision approved
- ☐ relevant safety/regulatory work allocated or completed for the stage
- ☐ filling/packing structure remains controlled
- ☐ production schedule confirmed
- ☐ post-approval changes documented

DECISION

☐ RELEASE BULK PRODUCTION ☐ CLARIFICATION OR ADDITIONAL EVIDENCE REQUIRED

☐ PAUSE BULK PRODUCTION ☐ NOT ADVANCED UNDER THE BUYER'S CRITERIA

Gate 3

Before Shipment Release — do not release the commercial order until:

- ☐ actual commercial batch identified
- ☐ SKU/variant/batch breakdown reconciled
- ☐ relevant QC completed
- ☐ deviations/rework position recorded
- ☐ components correct
- ☐ carton/packing configuration confirmed
- ☐ commercial invoice and packing list aligned
- ☐ product-specific transport classification checked where required
- ☐ Incoterm handover responsibility understood
- ☐ buyer records an explicit shipment-release decision
- ☐ completed quantity reconciled
- ☐ bulk aligned with Approved Production Reference
- ☐ relevant CoA/test evidence linked to actual batch where required
- ☐ final primary packaging correct
- ☐ final label/artwork matches approved revision
- ☐ destination-required documentation status established
- ☐ origin/preference route confirmed where applicable
- ☐ booking/collection position confirmed
- ☐ every remaining unresolved item visible to buyer

DECISION

☐ RELEASE SHIPMENT ☐ CLARIFICATION OR ADDITIONAL EVIDENCE REQUIRED

☐ PAUSE SHIPMENT RELEASE ☐ NOT RELEASED UNDER THE BUYER'S CRITERIA

USE AFTER DUE DILIGENCE

Supplier Comparison & Decision Record

Use this record after due diligence so that final supplier selection does not revert to unit price alone.

Decision Area	Supplier A	Supplier B	Supplier C
Legal entity established			
Actual manufacturer established			
Manufacturing facility established			
Filling/packing structure established			
Outsourcing visible			
Product-category capability			
Manufacturing model			
Formula ownership/control			
Exclusivity / transfer position			
Specification readiness			
Packaging suitability			
MOQ fit			
Batch-size fit			
Packaging MOQ exposure			
Available capacity			
Lead-time credibility			
Normalized unit price			
Development / tooling cost			
Payment terms			
GMP / ISO evidence			
Testing/evidence relevance			
Claims evidence			
Destination-market readiness			
Sample/development fit			
Communication reliability			

Decision Area	Supplier A	Supplier B	Supplier C
Open / unresolved risks			
Overall commercial fit			
Final decision			

Buyer Decision

Preferred supplier: _____

Reason for preference: _____

Conditions before PO: _____

Remaining risks consciously accepted by buyer: _____

Decision made by: _____ **Date:** _____

THE OBJECTIVE IS NOT TO IDENTIFY A UNIVERSALLY "BEST COSMETICS FACTORY." It is to determine which verified production and commercial structure fits this buyer's product, formulation model, order economics, destination and risk position best.

SCOPE BOUNDARY

Quality, Documentation & Regulatory Scope Boundary

This checklist is a buyer-side supplier due-diligence and procurement working reference. Requirements can vary according to: product classification; formula; ingredients; claims; packaging; consumer group; intended use; manufacturing model; destination market; Responsible Person/importer structure; sales channel; business size; applicable regulatory route.

Hana Solution LLC may, within an agreed assignment:

- structure buyer requirements
- identify suitable manufacturers
- verify supplier/manufacturer identity
- review supplier-provided evidence
- organise evidence by entity, facility, issuer, scope, validity and relevance
- identify documented gaps
- compare supplier quotations
- coordinate agreed independent checks
- maintain buyer-side production visibility

- support shipment-readiness decisions

Hana Solution LLC does not:

- manufacture cosmetics or personal-care products
- trade or resell goods
- hold supplier inventory
- represent manufacturers
- receive supplier commissions or supplier mark-ups
- issue ISO or GMP certificates
- perform laboratory testing
- approve cosmetic formulations for regulatory purposes
- prepare or sign a CPSR as Product Safety Assessor
- automatically act as EU/UK Responsible Person
- automatically undertake CPNP, SCPN, FDA, GHAD, ECAS, Montaji or Turkish notification responsibilities
- issue regulatory approvals
- provide legal opinions
- guarantee customs clearance
- guarantee market acceptance
- guarantee future manufacturer quality or delivery performance

Where specialist legal, regulatory, safety-assessment, toxicological, laboratory, certification, customs or transport review is required, the appropriate qualified professional or competent authority should be used.

REVIEWING EVIDENCE IS NOT THE SAME AS ISSUING APPROVAL.
IDENTIFYING A GAP IS NOT THE SAME AS ASSUMING THE REGULATORY RESPONSIBILITY.
THE FINAL SUPPLIER AND COMMERCIAL DECISION REMAINS WITH THE BUYER.

DO NOT CONVERT FUTURE OR PENDING RULEMAKING INTO CURRENT CLAIMS

Regulatory Watch — August 2026

UNITED STATES — MOCRA GMP

MoCRA requires FDA to establish cosmetic GMP regulations, but the statutory proposed-rule and final-rule dates have passed without a final rule. The relevant rulemaking appears under Long-Term Actions, and FDA continues to refer industry to existing GMP guidance while rulemaking remains outstanding. Do not treat a future MoCRA GMP rule as an already operative final regulation. [US3] [US4] [US5]

SAUDI ARABIA — INGREDIENT CONTROLS

SFDA maintains current official prohibited and restricted substance lists for cosmetic products. For Saudi-bound products, check the current lists against the final commercial formula during market-entry preparation and repeat the review when the formula changes or an older assessment is being relied upon. Do not assume that a previous Saudi formula review remains current. [SA3] [SA4]

CURRENT REQUIREMENT must not be confused with NOTIFICATION / REGISTRATION or VOLUNTARY CERTIFICATION or PUBLISHED FUTURE REQUIREMENT or PRODUCT APPROVAL.

VERIFIED WORKING SOURCES

Source Register

The following source codes are used throughout this checklist as inline references — e.g. [T3], [EU1], [US4].

Turkey — Company / Cosmetics / Customs

T1 — **T.C. Ministry of Trade — MERSİS**
Primary Turkish central commercial-registry reference for legal-entity checks.
https://mersis.ticaret.gov.tr/

T2 — **Türkiye Ticaret Sicili Gazetesi**
Official Turkish Trade Registry publication system.
https://www.ticaretsicil.gov.tr/

T3 — **TİTCK — Türkiye Kozmetik Mevzuatı / Cosmetics Portal**
Current TİTCK cosmetics landing point covering legislation, company processes, Responsible Technical Person, notification, PIF, export certificates and ÜTS resources.
https://www.titck.gov.tr/faaliyetalanlari/kozmetik

T4 — **TİTCK — Ürün Bilgi Dosyası**
Official buyer-relevant reference for PIF content, including composition, INCI/functions, finished-product specifications, GMP method/declaration, safety report and claims evidence.
https://www.titck.gov.tr/faaliyetalanlari/kozmetik/urun-bilgi-dosyasi

T5 — **TİTCK — GMP Sertifikası Verilen Kozmetik Üretim Tesisleri**
Official TİTCK register of the cosmetic production facilities to which a GMP certificate has been issued, the primary resource for the export-use GMP certificate mechanism referenced in this checklist.
https://www.titck.gov.tr/faaliyetalanlari/denetim/gmp-sertifikasi-verilen-kozmetik-uretim-tesisleri

T6 — **T.C. Ministry of Trade — Origin / A.TR / EUR.1 Guidance**
Official guidance distinguishing free-circulation documentation from origin evidence.
https://ticaret.gov.tr/gumruk-islemleri/sikca-sorulan-sorular/ticari/mense

GMP / International Standard

G1 — **ISO 22716:2007 — Cosmetics GMP**
Official ISO page. ISO states the 2007 edition was reviewed and confirmed in 2022 and remains current; scope covers production, control, storage and shipment.
https://www.iso.org/standard/36437.html

G2 — **ISO — Certification**
Official clarification that ISO develops standards but does not itself certify organizations or issue certificates.
https://www.iso.org/certification.html

European Union

EU1 — **Regulation (EC) No 1223/2009 — Consolidated Text, 1 May 2026**
Current consolidated EU Cosmetics Regulation used for this research.
https://eur-lex.europa.eu/eli/reg/2009/1223/2026-05-01/eng

EU2 — **European Commission — Cosmetics Legislation**
Official summary of EU Responsible Person, safety-report and central notification structure.
https://single-market-economy.ec.europa.eu/sectors/cosmetics/legislation_en

EU3 — **European Commission — Cosmetic Product Notification Portal**
Official CPNP reference; confirms Article 13 notification and no further national notification after CPNP notification.
https://single-market-economy.ec.europa.eu/sectors/cosmetics/cosmetic-product-notification-portal_en

EU4 — **European Commission — CosIng**
Ingredient-information database, with the Commission's explicit warning that database inclusion is not ingredient approval.
https://single-market-economy.ec.europa.eu/sectors/cosmetics/cosmetic-ingredient-database_en

EU5 — **Regulation (EU) No 655/2013 — Cosmetic Claims**
Common criteria for justification and use of cosmetic product claims.
https://eur-lex.europa.eu/eli/reg/2013/655/oj/eng

Great Britain / Northern Ireland

GB1 — **GOV.UK — Making Cosmetic Products Available to Consumers in Great Britain**
Primary GB reference for Responsible Person, PIF, safety assessment, GMP, labelling and notification.
https://www.gov.uk/guidance/making-cosmetic-products-available-to-consumers-in-great-britain

GB2 — **GOV.UK — Submit a Cosmetic Product Notification**
Official SCPN guidance.
https://www.gov.uk/guidance/submit-a-cosmetic-product-notification

GB3 — **SCPN Portal**
Official Submit Cosmetic Product Notifications system.
https://submit.cosmetic-product-notifications.service.gov.uk/

NI1 — **GOV.UK — Cosmetic Products in Northern Ireland**
Official NI Responsible Person and CPNP route.
https://www.gov.uk/government/publications/cosmetic-products-enforcement-regulations-2013/regulation-20091223-and-the-cosmetic-products-enforcement-regulations-2013-northern-ireland

United States

US1 — **FDA — Modernization of Cosmetics Regulation Act of 2022**
Primary current MoCRA overview; includes safety substantiation, facility registration/listing, GMP rulemaking and exemptions.
https://www.fda.gov/cosmetics/cosmetics-laws-regulations/modernization-cosmetics-regulation-act-2022-mocra

US2 — **FDA — Registration & Listing of Cosmetic Product Facilities and Products**
Current reference; includes decision tool, exemptions and FDA's explicit statement that registration/listing is not an approval program.
https://www.fda.gov/cosmetics/registration-listing-cosmetic-product-facilities-and-products

US3 — **FDA — Cosmetic GMP Draft Guidance**
Official current guidance reference while MoCRA GMP rulemaking remains outstanding.
https://www.fda.gov/regulatory-information/search-fda-guidance-documents/draft-guidance-industry-cosmetic-good-manufacturing-practices

US4 — **RegInfo / Unified Agenda — RIN 0910-AJ00**
Official federal rulemaking record for Good Manufacturing Practice for Cosmetic Product Facilities; shown as Long-Term Actions with NPRM date To Be Determined.
https://www.reginfo.gov/public/do/eAgendaViewRule?RIN=0910-AJ00

US5 — **FDA — Cosmetic GMP Listening Session, 1 June 2023**
Official FDA meeting material recording statutory dates for proposed and final GMP rulemaking.
https://www.fda.gov/media/169954/download

Saudi Arabia

SA1 — **Saudi Food & Drug Authority — Cosmetics**
Official cosmetics resources including the Ghad licensing/product-services guide.
https://www.sfda.gov.sa/en/taxonomy/term/47

SA2 — **SFDA — List of Notification of Marketing for Cosmetic Products**
Official list of cosmetic products for which importers or manufacturers have submitted notification of marketing in Saudi Arabia.
https://www.sfda.gov.sa/en/cosmetics-list

SA3 — **SFDA — Prohibited Ingredients List**
Current official SFDA reference for substances prohibited in cosmetic products.
https://www.sfda.gov.sa/en/ProhibitedIngredientsList

SA4 — **SFDA — Restricted Substances List**
Official current restricted-substances reference.
https://www.sfda.gov.sa/en/RestrictedSubstancesList

SA5 — **SFDA — Electronic Clearance (FASEH) System**
Official SFDA electronic clearance service through which importers can submit clearance requests for products within SFDA scope, including cosmetics. Not to be confused with the broader Saudi FASAH import/export and customs single-window platform.
https://www.sfda.gov.sa/en/eservices/85542

United Arab Emirates / Dubai

UAE1 — **MoIAT — Service Card for Cosmetics Products**
Official service card for issuance of conformity certificates for cosmetics under the UAE Conformity Assessment Scheme (ECAS).
https://eservices.moiat.gov.ae/backend/api/v1.1/UploadAttachment/GetAttachmentByRecordId?download=true&recordAttachmentId=644921

UAE2 — **MoIAT — Product Conformity Data**
Official conformity-certificate search, including ECAS.
https://moiat.gov.ae/en/open-data/product-conformity-data

UAE3 — **MoIAT — Regulation Card for Cosmetics Products**
Official regulation card summarising the health-and-safety conformity documentation applicable to the cosmetics ECAS route.
https://eservices.moiat.gov.ae/backend/api/v1.1/UploadAttachment/GetAttachmentByRecordId?download=true&recordAttachmentId=649245

DXB1 — **Dubai Municipality — Technical Guidelines for Cosmetics and Personal Care Products, DM-HSD-GU116-CPCP2, V2.1**
Issue date 15 September 2025.
https://dmpmedia.dm.gov.ae/uploads/2026/01/DM-HSD-GU116-CPCP2_Technical-Guidelines-for-Cosmetic-Personal-Care-Products_V2.1.pdf

DXB2 — **Dubai Municipality — Technical Guidelines for Fragrance Products, DM-HSD-GU117-FP2, V2.0**
Dubai Municipality current guidelines index lists 116 and 117 as separate resources.
https://dmpmedia.dm.gov.ae/uploads/2024/07/DM-HSD-GU117-FP2_Technical-Guidelines-for-Fragrance-Products_V2.0.pdf

DXB3 — **Dubai Municipality — Montaji**
Official Dubai Municipality consumer-products registration initiative; products are registered and assessed before local-market trade.
https://www.dm.gov.ae/dubai-municipality-app/

Better Evidence. Better Buyer Control.

A cosmetics manufacturer should be assessed against the buyer's actual product, formulation model, packaging, quantity and destination requirement — not simply against the supplier's catalogue or the stock formula it wants to sell.

A quotation should be compared on a common commercial basis. A GMP or ISO document should be relied upon only when its holder, facility, scope and relevance are understood. A test report should be connected to the actual formula and packaging it is intended to support. A sample should become a controlled production reference. Regulatory responsibilities should be assigned to the correct qualified parties before market placement.

A commercial batch should be released only after the buyer can establish what was actually produced, what remains unresolved and whether the order is genuinely ready to move.

The objective is not to choose a manufacturer for the buyer.
It is to create a stronger evidence base for the buyer's own commercial decision.

Hana Solution LLC

Independent Buyer-Side Sourcing & Procurement Support in Turkey

Sourcing Direction · Supplier Mapping · Supplier Verification · RFQ & Quote Comparison · Production Monitoring · Shipment Readiness

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