

selling your soap

As you enjoy soap making as a hobby and develop your expertise, you may find a growing demand for your soaps which awakens your inner entrepreneur; it can be fun and rewarding to earn money from something you love doing. Handcrafted soaps are in a league of their own with their unique characteristics, and can command a premium price.

Before you embark on trying to sell your soaps it is really important that you spend a lot of time making and using your soaps so that you are able to honestly assess your craftsmanship and the quality of the soaps. This will mean you will be able to effectively extol their unique virtues to potential customers.

I would encourage you to concentrate on building a reputation as an honest, ethical business person who is not only interested in making lots of money. Once you have established yourself as someone of integrity with a commitment to giving your customers first-class products and service then you will reap the benefits that happy, satisfied customers bring – a strong base for your business.

Before you start selling your soaps in the UK and other EU member states, whether it is at the church and school fêtes, charitable events or on the internet, you and your products need to comply with the EU cosmetic legislation. I have provided a synopsis of the requirements of the legislation based on my own experience and understanding of the law to get you going. Please also see *resources*, page 159 for further information. You must also be covered by product liability insurance.

regulation

The manufacture and sale of soaps and toiletries is governed by the 'EC Cosmetics Directive (76/768/EEC) as amended'. This directive is implemented in the UK by the 'Cosmetics Products (Safety) Regulations 2008 as amended', is applicable to anyone selling soap irrespective of the size or scale of your business and you must be in compliance with the legislation when you accept money for your products.

safety assessment

There is a legal requirement for you as the manufacturer to hold a safety assessment for any soaps you are selling within the EU. A safety assessment must be undertaken by a 'suitably European qualified professional person' who has to sign off each soap recipe made for sale. In selecting this person it is crucial to ensure that he or she is knowledgeable and experienced and covered by Professional Indemnity Insurance, which will provide protection for you should any litigation be brought against you if someone experiences an adverse reaction to your soaps.

Once completed, the assessment is valid indefinitely. The Department for Business Innovation and Skills (BIS) and the Trading Standards Institute provide in-depth information on the regulations.

There are many companies which supply courses to help you towards regulatory compliance and some of these can also undertake safety assessments. It's best to use the internet to find one that suits you.

The safety assessor will need the following information:

- MSDS (Material Safety Data Sheets) for all ingredients. MSDS are a widely used system for cataloging information on chemicals, chemical compounds and chemical mixtures and are found wherever chemicals are being used. The relevant MSDS for each ingredient should be available from your supplier.
- a list of all ingredients in INCI (International Nomenclature of Cosmetic Ingredients) format. INCI is a standard system of listing ingredients in soaps and cosmetics using their Latin names, scientific names and common names. There are International Cosmetic Ingredient Dictionaries available online and as books.

Here is an example of one of my soaps with the relevant Latin and common names: Sodium olivate, Sodium cocoate, Sodium palmate, Water (Aqua), Glycerin, Shea Butter (*Butyrospermum parkii*), Sweet Almond Oil (*Prunus amygdalus*) Oats (*Avena sativa*), Lavender Essential Oil (*Lavendula angustifolia*), Peppermint Essential Oil (*Mentha piperita*) Lemon Essential Oil (*Citrus limon*), citra, geraniol, limonene, linalool. Your safety assessor should continue to help you after the assessment is complete and will be able to assist you with this.

- the percentages of each ingredient in the recipe, in descending order

- evidence from the supplier of any fragrance oils, essential oils or additives you use that they are in compliance with IFRA (International Fragrance Association) guidelines. IFRA is the international body governing the safe use of fragrance material.
- details of colourants used and their CI numbers, which should be available from your supplier. The CI, or Colour Index, is an index of dyes and pigments prepared, in the UK, by the Society of Dyers and Colourists to provide accurate identification.
- information about your manufacturing procedures – a step-by-step description of production processes
- details of the format you will use for batch numbers and dates of manufacture
- the names and addresses of all your suppliers and their batch numbers for the ingredients used
- a sample of your label

product information file (PIF)

As the manufacturer, you are required to have a PIF which should contain information similar to that required for the safety assessment including labelling details (see below), the weight and pH of each soap, batch records and traceability of ingredients. This file should be kept in a safe place and made available for scrutiny on request.

product labelling

Labels should include the following information:

- the ingredients list using INCI (International Nomenclature of Cosmetic Ingredients) names should be shown clearly on the product or be clearly displayed where the soaps are sold
- ingredients with concentration of 1% or less can appear in any order at the end of the list
- a list of allergens should follow the ingredients list. These are usually present in essential and fragrance oils and should be listed if they exceed 0.01% in rinse-off products such as soaps. Your supplier will have details.
- the average weight of each soap with the little 'e' (average package weight) symbol appearing after the weight
- batch number for the soap

- ‘use by’ date – if raw, fresh ingredients are used in the soap this will influence the ‘shelf-life’ of the product. Your safety assessor will be able to assist you with deciding the correct date.
- soaps that look edible should have the warning ‘do not eat’ in bold lettering
- your name as the manufacturer and address of manufacture

trading standards

The Trading Standards officers are interested in three main areas:

weights and measures

It is important that your finished soaps are the correct weight as stated, and you are required to use a scale that is ‘stamped for trade’. This will be tested by the Trading Standards officer. The same applies if you intend to cut and sell your soap by weight from a log or block of soap.

correct labelling

Please see the details provided above.

manufacturing processes

The Trading Standards officer will also be interested in your manufacturing processes which should be included in your PIF (Product Information File).

registration/notification

If you wish to make and sell your soaps within the UK you are required to notify the Department for Business, Innovations and Skills in writing via e-mail (cosmeticnotification@bis.gsi.gov.uk) that you are manufacturing soap; you should include your name, company name and address. You are also advised to contact your local Trading Standards Office at this stage.