

PUBLIC NOTICE



COMMON QUESTIONS : COSMETICS LISTING/NOTIFICATION

1. What is cosmetics listing?

It is a process in which cosmetics stakeholders provide information on their cosmetics products. Sometimes it may be referred to as cosmetic notification.

2. What is the historical context for mandatory listing?

This process started initially in 2021 with a deadline of September 2022. It was then restarted in October 2023 with the introduction of BRIMS. In October 2024, stakeholders were informed that listing will become mandatory in the 2025/26 financial year.

3. Who is responsible for listing?

The product owner is responsible. They can however designate a representative to list on their behalf.

4. Are there any cosmetics products exempt from listing?

Currently there are none.

5. How do I list a combo pack?

They can be listed as one product provided, that the components are not sold separately as well. The unique ingredients for all the products in the pack would need to be provided. Additionally labels for all the components and the pack need to be provided.

6. Do I list ingredients separately?

Yes.

7. I have not appointed a Cosmetic Notification Holder can I still list?

Yes, provision for adding CNH will be added to the system at a later time.

8. What other changes are coming 1 April 2026?

The only change is listing will become mandatory. Listing will still continue however only listed products can be imported and/or sold in Botswana after 1 April 2026. For other changes that have been introduced in prior engagements and those brought forth by the new legislation, implementation guidance will be shared in the next and future stakeholder engagements.

9. Is there guidance that I can use for listing?

Yes, there is a step-by-step guide, that will be shared with all stakeholders. Additionally, guidance on Account Management (adding additional users, resetting system password, password recovery, account creation, logging into the self—service portal) can be found here: [Knowledgebase lists - Botswana Medicines Regulatory Authority \(BoMRA\)](#)

10. Is the label mandatory?

Yes. The product label should be uploaded in the documents section.

11. Is the responsible person supposed to be on the label?

The manufacturer and the Cosmetic Notification Holder should be on the product label.

12. Are there listing fees?

Currently, there are no fees.

13. How should I list products with the same base formulation, but different fragrances, flavourants and/or colourant?

As a single product, specify the different fragrances, flavourants and/or colourant in the colourant section on Page 1 of listing.

14. Do I need a PMS plan?

Yes. Its provisions should be adequate to monitor and respond to any issues related to the product. It does not need to be Botswana specific.

15. Do I need GMP/ISO certification?

It is currently not a requirement, however it will be a requirement in the future.

16. Is the importer license a new requirement just implemented through the guideline?

The requirement for import licenses has been discussed from 2023 as part of the planned cosmetic regulation. The exact roll out plan will be communicated in due time.

17. Will previously migrated cosmetics be migrated?

All cosmetics listed in 2022 have been migrated.