

The Leaping Bunny Programme

Information for Suppliers

Cosmetic (and personal care) products



Leaping Bunny is the globally recognisable gold standard for cruelty free consumer products, with criteria above and beyond legal requirements. Cruelty Free International approves companies across the globe and works with a small number of trusted partners who are licenced to operate the programme in their individual territories.

Regardless of where a company is headquartered, Leaping Bunny criteria applies internationally, and achieving approval shows consumers that a company is genuinely committed to helping end animal testing.

Cruelty Free International works directly with supply networks worldwide to support the ever-growing number of suppliers that underpin Leaping Bunny brands. This document provides additional guidance when processing Leaping Bunny requests.

Suppliers are advised to contact LeapingBunny@crueltyfreeinternational.org with any queries or concerns not covered in this document, or if they are interested in working directly with Cruelty Free International to facilitate Leaping Bunny requests from clients.

Cruelty Free International would like to take this opportunity to express its gratitude to every supplier across the globe for their co-operation and support with every Leaping Bunny application and ongoing approval, which is helping to end animal testing globally.

Leaping Bunny criteria and responsibilities

Every Leaping Bunny company must adhere to strict criteria to achieve and retain approval; this is verified via independent audits. Criteria include:

- Implementing a fixed cut-off date (FCOD); a date prior to their first licence agreement, from which their company policy is to adhere to Leaping Bunny criteria.
- Checking every finished product, trade named raw material and component ingredient, for animal testing at least every 12 months.
- Investigate every incidence of animal testing that has occurred after the company's FCOD.
- Having in place a supplier monitoring system (SMS) and procedures for managing non-compliances.
- Being open to independent audits which verify all aspects of criteria are being complied with.

Every Leaping Bunny company is responsible for ensuring they meet criteria, and they rely on the co-operation of all their suppliers to do so.

Leaping Bunny companies are provided template product declarations and raw material declarations, plus additional guidance to support them and their suppliers when collating and checking the required animal testing information.

Please refer to [Appendix 1](#) for further guidance on preparing and checking declarations of compliance.

Cruelty Free International

● Website: www.CrueltyFreeInternational.org ● Email: info@CrueltyFreeInternational.org ● Twitter: [@CrueltyFreeIntl](https://twitter.com/CrueltyFreeIntl) ● Tel: +44 (0) 20 7700 4888

Suppliers should not be concerned about reporting animal tests. Additional support can be provided by Cruelty Free International when an animal test has been reported to enable the completion of an Animal Testing Assessment (ATA) by the Leaping Bunny company and its supplier/s to determine compliance.

Confirmation of compliance with legislation alone is not sufficient to meet Leaping Bunny criteria, which go beyond legal requirements.

Finished product manufacturer responsibilities

Whilst Leaping Bunny companies are responsible for ensuring compliance with the criteria, it is the responsibility of every finished product manufacturer to:

- conduct annual checks with relevant suppliers (by means of a Leaping Bunny declaration or equivalent) to ensure ongoing compliance of everything supplied to a Leaping Bunny company, and to capture any animal testing*, and;
- confirm to the Leaping Bunny company (at least annually) if any finished products, raw materials or component ingredients (INCI/CAS) supplied to a Leaping Bunny company have been subject to animal testing (or retesting) for any purpose since the Leaping Bunny company's FCOD, and;
- facilitate and support Leaping Bunny audits upon request.

*As every supply network is unique, the necessary checks of raw materials and INCI/ingredients may be conducted by the finished product manufacturer, Leaping Bunny company, or a combination of both.

Raw material and ingredient supplier responsibilities

In order to facilitate Leaping Bunny requests, it is the responsibility of raw material suppliers to:

- confirm (by means of a Leaping Bunny declaration or equivalent) if the raw material manufacturer has Conducted, commissioned, or been party to Animal testing, for any purpose, on any trade name raw materials and/or their component ingredients (INCI/CAS) for materials used by a Leaping Bunny company, and;
- ensure animal testing information for the raw material and component ingredients is checked at least annually to capture all animal testing, and;
- provide additional information relating to any animal tests by means of an Animal Testing Assessment (ATA).

Regarding fragrance and flavours only, declarations are only required for trade named raw materials, and not the component ingredients.

Please note that distributors must obtain the required information from the raw material manufacturer. If, due to confidentiality, the details of the raw material manufacturer cannot be shared, distributors can submit their own declaration, provided they hold the required information from the raw material manufacturer. This primary information must be dated within 12 months, include the required information to substantiate the distributor's declaration, and may be requested for Leaping Bunny audit purposes.

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Appendix 1: Assessing evidence of compliance

Incomplete or inaccurate declarations are the most common cause of non-compliance. To avoid this risk, the following is intended to assist suppliers when preparing and assessing declarations before sharing with relevant parties.

Please note, suppliers are encouraged to use Leaping Bunny template declarations, which are designed to make the process more straightforward and minimise room for error. In-house supplier statements may be accepted, provided they meet Leaping Bunny criteria. Suppliers are welcome to check these in advance with Cruelty Free International if needed.

If any animal testing is identified after the Leaping Bunny company's FCOD, further investigation is required. Finished product manufacturers should contact the Leaping Bunny company in the first instance for guidance and support.

Finished product compliance

The following is intended to help finished product manufacturers when preparing declarations for finished product compliance.

Using Leaping Bunny Product Compliance declarations

Please ensure:

- The Leaping Bunny company's details and FCOD are listed correctly in Section 1.
 - If this information has not been provided, check with the Leaping Bunny company.
- The finished product manufacturer's details are listed correctly in Section 2.
- Finally, Section 3 has been signed and dated by the finished product manufacturer within the last 12 months.
- Note: Following completion of the declaration, Annex 1 is there to support the annual renewal of animal testing information by the finished product manufacturer.

Using alternative statements

In-house statements of compliance are accepted, provided they meet Leaping Bunny criteria. When preparing these, please ensure:

- They are signed and dated within the last 12 months.
- They cover all finished products supplied to the Leaping Bunny company.
- They declare no animal testing has occurred on the products for any purpose after the Leaping Bunny company's FCOD.
- They declare that up-to-date declarations (or equivalent) for the raw materials, and their component ingredients, used in the supplied products have been collated and are compliant with Leaping Bunny.

Raw material and component ingredient compliance

The following is intended to help raw material suppliers when preparing the required information, and finished product manufacturers when checking any declarations provided by their raw material suppliers.

Using Leaping Bunny raw material declarations

When preparing and assessing evidence for raw material compliance, please ensure:

- The relevant finished product manufacturer's details are listed correctly in Section 1.
- The raw material supplier's details are listed correctly in Section 2.
- All relevant raw material trade names, and their corresponding component ingredients (INCI/CAS), are listed in Section 3.
- All component ingredients are listed where prompted in Section 3.
 - If the raw material contains a single component ingredient, this should still be listed.
- The raw material supplier's details are completed correctly in Section 4.
- Finally, Section 4 has been signed and dated by the raw material supplier within the last 12 months.
- Note: Raw material suppliers must declare any animal tests after 11th March 2013 in Annex 1. If any animal tests have been declared, action must be taken if the test/s occurred after the FCOD.

Using alternative statements

In-house animal testing statements from raw material suppliers are the most common cause of non-compliance, as the terminology used often fails to meet Leaping Bunny criteria. It is essential these type of statements meet with the following criteria to be accepted:

- They are signed and dated within the last 12 months (electronic or typed signatures are acceptable with a personal cover email to confirm who provided the information).
- They declare that animal testing has not taken place on both the raw material trade name/s and their component ingredient/s (INCI/CAS).
- Animal testing must be declared for all purposes, not just for cosmetic purposes.
 - It is common for statements to only cover a raw material manufacturer conducting or commissioning animal testing. If referred to, they must also cover the raw material manufacturer being party to animal testing.
- Finally, if referred to, they do not solely declare compliance with the EU Cosmetic Regulation (or any other legislation).
 - Although the EU cosmetic testing prohibitions were a huge positive step, Leaping Bunny goes further than legal requirements.

Cruelty Free International works closely with suppliers across the globe developing bespoke in-house Leaping Bunny statements/declarations and systems to support compliance and are happy to help with any questions or concerns from suppliers.



Appendix 2: Leaping Bunny definitions

Terminology	Definition
Animal	<p>a) Live non-human vertebrate animals, including: (i) independently feeding larval forms; and (ii) foetal forms of mammals as from the last third of their normal development (or earlier if the animal is to be allowed to live beyond that stage of development and, as a result of the testing procedures, is likely to experience pain, suffering, distress or lasting harm after it has reached that stage of development);</p> <p>b) Live cephalopods.</p> <p><i>(Note: Definition under EU Directive 2010/63)</i></p>
Animal testing	<p>Any use of an animal for experimental or other scientific purposes which may cause the animal pain, suffering, distress or lasting harm.</p> <p><i>(Note: Definition under EU Directive 2010/63)</i></p> <p>Pre-market animal testing is not permitted for products, raw materials or ingredients.</p> <p><i>Pre-market testing is defined below.</i></p> <p>Post-market animal testing of a product is not permitted.</p> <p><i>Post-market testing is defined below.</i></p> <p>Post-market animal testing of a raw material or ingredient, that is not testing for cosmetic purposes, and where that test is required by a regulator is permitted. In this case, evidence that the testing is required by the regulator (reference to regulations specifying the animal test and/or a specific request) is needed. The Company is expected to use all reasonable means to challenge, with the support of Cruelty Free International where appropriate, this requirement.</p> <p><i>Post-market testing is defined below.</i></p> <p><i>Testing for cosmetic purposes is defined below.</i></p>
Animal testing for cosmetic purposes	<p>Animal testing for the purposes of assessing the safety of the product, raw material or ingredient for use in a cosmetic product.</p> <p><i>Cosmetic product is defined below.</i></p>
Conduct, commission, being party to	<p>Conduct: A company directly carries out animal testing</p> <p>Commission: A request by a company that another company or third-party conducts animal testing on its behalf.</p> <p>Being party to: Paying for animal testing data. This includes paying for the results of animal testing conducted by a third party in order to obtain regulatory approval.</p>

Cruelty Free International

Cosmetic (and personal care) products

A substance or mixture intended to be placed in contact with the various external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with teeth and the mucous membranes of the oral cavity with a view to exclusively or mainly to cleaning them, perfuming them, changing their appearance and/or correcting body odours and/or protecting them or keeping them in good condition.

(Note: Definition under Regulation 1223/2009)

Ingredient

A chemical substance or compound defined by its INCI name or CAS number that is required to be listed on the label (as per Regulation 1223/2009).

Post-market testing

When the product, raw material or ingredient is already being sold (marketed) as, or for use in, a cosmetic product in the region for which animal testing is now being requested.

Pre-market testing

When the product, raw material or ingredient is being sold (marketed) as, or for use in, a cosmetic product for the first time in the region for which animal testing is being requested.

Raw material

A single substance or mixture of substances provided to the product manufacturer that constitutes part of the cosmetics product. Identified by a supplier-specific trade name or number and not an INCI name or CAS number. Usually includes one or more active ingredients along with solvents, stabilisers and preservatives.

Supply network

The manufacturers of a product, raw material and/or ingredient (as defined above) including any distributors, agents or suppliers thereof.