



**Cruelty Free**  
INTERNATIONAL



# Leaping Bunny Programme Guidelines

Cosmetics and personal care products

**Revised Winter 2020**

**Cruelty Free International**

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

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## Section 1: Introduction



**Cruelty Free**  
**INTERNATIONAL**

Leaping Bunny was originally established in the 1990s by our international coalition of animal protection organisations.

The Leaping Bunny logo is issued for use by companies which produce cruelty free cosmetics, personal care, household and cleaning products which comply with the Leaping Bunny criteria.

Leaping Bunny is the globally recognisable gold standard for cruelty free consumer products. More than 1000 companies across the globe are already Leaping Bunny approved, providing real choice for ethical consumers who want to identify and buy products that have the best cruelty free assurance.

Achieving Leaping Bunny approval shows consumers that a company is genuinely committed to helping end animal testing, and that they have procedures and policies in place to enable them to verify their cruelty free claims.

Today, Cruelty Free International (and our partners) approve companies and brands around the world. Regardless of where a company is headquartered, Leaping Bunny applies internationally, giving shoppers around the world confidence that companies meet 'the gold standard' for cruelty free products.

Companies are guided and supported throughout the confidential application process and are encouraged to contact Cruelty Free International with any questions before applying.

## Section 2: The application process

It is essential that every company works through this step-by-step guide when applying. To make the process as smooth as possible, companies are advised to please contact Cruelty Free International before starting if any further clarification is needed. For verified applicants, further guidance is provided, and support is also available for any queries that arise with each step of the journey.

### Step 1: Express initial interest

- Receive and review the Leaping Bunny application pack.
- Ensure eligibility to apply for approval (*refer to Section 3*).

### Step 2: Confirm intention to apply for approval

- Email Cruelty Free International to confirm intention to apply for approval or to ask any questions before committing.

### Step 3: Complete a mutual NDA and pay application fee (*refer to Appendix 1*)

- Sign and return the Leaping Bunny NDA. An invoice will be issued for the application fee. Once payment is received, further guidance is provided to support the application process.

### Step 4: Set your fixed cut-off date (FCOD) (*refer to Section 6*)

- Set a fixed cut-off date (FCOD), the date after which a company complies with Leaping Bunny criteria.

### Step 5: Contact finished product and/or raw material suppliers (*refer to Definitions*)

- Obtain written confirmation from all suppliers to confirm all eligible products meet Leaping Bunny criteria. Refer to *Appendix 2* for helpful flowcharts.

### Step 6: Check ALL declarations are compliant with Leaping Bunny

- Every company must ensure every declaration from their suppliers complies with Leaping Bunny criteria. The 'Supplementary Guidance for Applicants' provides more information on checking declarations for compliance.

### Step 7: Put in place a supplier monitoring system (SMS) (*refer to Section 6*)

- Ensure an effective management system is in place to monitor and maintain Leaping Bunny compliance.

### Step 8: Submitting your application (please check all boxes below before submitting)

- Supply a completed Leaping Bunny Application Form
- Attach a copy of any 'animal testing' policies (if applicable)
- Provide evidence of a supplier monitoring system (SMS)
- Provide the required sample of product declarations.
- Provide the required sample of raw material declarations.
- Submit ALL of the above as an application via email to the Leaping Bunny team (postal submissions will not be accepted). Further guidance on submitting an application can be found in the Supplementary Guidance for Applicants.

**Please allow up to 4 weeks for the submitted application to be reviewed**

## What happens next?

### Step 9: Application review

Our experienced team will carry out an audit of the complete submission. Detailed feedback and support will be provided for any queries that need to be resolved before an application can be completed.

### Step 10: Finalising the application process

- i) Following the final review and approval of an application, written confirmation is provided (via email) to the applicant, and a Licence Agreement is issued.
- ii) Once the signed Licence Agreement is returned, an invoice is issued for the licence fees.
- iii) On receipt of payment, the Leaping Bunny logo files, Brand Guidelines, and personalised certificate is issued.
- iv) Finally, we will arrange a mutually agreed date to jointly announce each successful applicant's Leaping Bunny approval.

## Section 3: Before applying for Leaping Bunny approval

This section helps to determine a company's eligibility for Leaping Bunny, before starting the application process.

### i) Eligibility

A company may apply for Leaping Bunny approval if:

- It sells products that fall under the Leaping Bunny definition of cosmetic (and personal care) products (*refer to Definitions*) and;
- The products are its own brand and not owned by another company and;
- It is not an agent, distributor or manufacturer acting on behalf of a third party and;
- It is preparing to trade, or currently trading with an established supply network and retail presence.

### ii) Excluded categories

Leaping Bunny does not currently include the categories below under the cosmetics licence.

Companies should check the definition of a Cosmetic (and personal care) product (*refer to Definitions*) and contact Cruelty Free International in advance if any clarification is required.

*Food & supplements*

*Herbal remedies*

*Tattoo ink*

*Brushes, applicators etc.*

*Medicines and pharmaceuticals*

*Biocides*

### iii) Scope

When applying for approval a company must include all current (own label) eligible products. Companies must also ensure that any future eligible products meet Leaping Bunny criteria.

*Please contact Cruelty Free International to discuss any queries relating to the eligibility or scope of products before applying for approval.*

### iv) Corporate structure

A company or its subsidiary may apply for approval. Group companies should discuss their corporate structure with Cruelty Free International prior to application.

### v) Confidentiality

All applications and correspondence regarding the process are strictly confidential. Only companies that have been approved and announced publicly as holding an active Leaping Bunny licence will be confirmed as such by Cruelty Free International.

### vi) The Leaping Bunny trademark logo

On completion of the application process, the Leaping Bunny trademark logo will be issued. Full Branding Guidelines will also be provided with information about how the logo may be used, including colour, size, positioning, accompanying text etc.

## Section 4: The Leaping Bunny criteria

These are the Leaping Bunny criteria, the governing criteria for all Leaping Bunny companies approved for own brand cosmetic (and personal care) products. A company must meet and continue to adhere to the criteria to achieve and retain approval. Licences are renewed annually.

- i) A company must not now or in the future **conduct, commission or be party to animal testing** of its own brand finished **cosmetic products, raw materials or component ingredients** contained in those products after its **fixed cut-off date (FCOD)**.
- ii) A company must ensure that no **animal testing** takes place in its **supply chain** for any of its **own-brand products, raw materials and ingredients** after its **FCOD** by operating a **supplier monitoring system (SMS)**.  
*\* Sample declarations are provided, or a company may use equivalent documentation to obtain the required information.*
- iii) If a company discovers **non-compliance** of these criteria within its supply chain, it must take appropriate action to remedy the breach.
- iv) A company must agree to submit to independent **audit** and must make available to auditors all aspects of its **SMS** upon request, and implement any actions and recommendations made by the auditor within timeframes agreed with Cruelty Free International.

## Section 5: Leaping Bunny definitions

Terminology	Definition
<b>i) Animal</b>	<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>
<b>ii) Animal testing</b>	<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>Post-market animal testing of a raw material or ingredient, that is not testing for cosmetics 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 cosmetics purposes is defined below.</i></p>
<b>iii) Animal testing for cosmetics purposes</b>	<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>
<b>iv) Audit</b>	<p>A mandatory assessment of compliance with the Leaping Bunny criteria by an independent audit.</p> <p><i>Refer to Section 6 for more information</i></p>
<b>v) Company</b>	<p>Legal entity (limited liability company/ sole trader/ partnership/ other entity recognised by the law) that has been awarded Leaping Bunny approval.</p>



Terminology	Definition
vi) <b>Conduct, commission, being party to</b>	<p><b>Conduct:</b> A company directly carries out animal testing</p> <p><b>Commission:</b> A request by a company that another company or third party conducts animal testing on its behalf</p> <p><b>Being party to:</b> Paying for or indirectly financially contributing to animal testing data. This includes paying for the results of animal testing conducted by a third party in order to obtain regulatory approval.</p>
vii) <b>Cosmetic (and personal care) products</b>	<p>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.</p> <p><i>(Note: Definition 'cosmetic product' under Regulation 1223/2009)</i></p>
viii) <b>Declarations</b>	<p>Sample declarations are provided by Cruelty Free International to indicate the information required from product manufacturers and raw material manufacturers. These documents (or equivalent documents) may form part of the SMS of the approved company. Declarations (or equivalent) must be no older than 12 months at any time. They must be obtained from all product and raw material manufacturers to indicate compliance with the company's fixed cut-off date for any of the products, raw materials or ingredients supplied for use in the approved company's products. Agents and distributors may only sign these if they hold the primary information which is accessible to audit.</p> <p><i>Refer to Section 6 for more information</i></p>
ix) <b>Fixed cut-off date (FCOD)</b>	<p>A date after which the approved company must not accept animal testing of any of its products, raw materials or ingredients. This date is fixed and cannot be changed.</p> <p><i>Refer to Section 6 for more information</i></p>
x) <b>INCI</b>	The International Nomenclature of Cosmetic Ingredients
xi) <b>Ingredient</b>	<p>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).</p> <p><i>Refer to Section 6 for more information</i></p>
xii) <b>Manufacturer</b>	Any company which makes products, raw materials or ingredients within the supply chain of the approved company.

Terminology	Definition
<b>xiii) Non-compliance</b>	Being in breach of any aspect of the Leaping Bunny criteria. <i>Refer to Section 6 for more information</i>
<b>xiv) Post-market testing</b>	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.
<b>xv) Pre-market testing</b>	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.
<b>xvi) Raw material</b>	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.
<b>xvii) Responsible person</b>	The company seeking approval or an external third party that has been nominated by the company to ensure it meets the Leaping Bunny criteria.
<b>xviii) Supplier monitoring system (SMS)</b>	<p>A system put in place by the company seeking Leaping Bunny approval to ensure all levels of its supply chain have not conducted, commissioned or been party to animal testing of the company's products, raw materials or ingredients beyond the company's FCOD.</p> <p>The SMS must ensure that data relating to animal testing for products, raw materials and ingredients is no older than 12 months and is readily available for the Leaping Bunny audit.</p> <p><i>Refer to Section 6 for more information</i></p> <p><b>Exemption from implementing a SMS</b></p> <p>A company that manufactures products for which they grow all of their own ingredients, or that purchases all ingredients from growers or retailers of natural agricultural ingredients, may not require declarations for such ingredients. Please contact the Leaping Bunny team to discuss the situation if looking to use such ingredients. However, if the company uses substances such as essential oils, stabilisers, preservatives or other additives that are supplied by a manufacturer, they must indicate on the application form that they do use suppliers and collate the required information about animal testing.</p>
<b>xix) Supply Chain</b>	The manufacturers of a product, raw material and/or ingredient (as defined above) including any distributors, agents or suppliers thereof.

## Section 6: Additional guidance

### i) Audit for Leaping Bunny compliance

The mandatory audits are official inspections, by an independent auditor, of everything that forms a company's supplier monitoring system to verify that the company is continuing to adhere to Leaping Bunny criteria.

An initial audit will be conducted by Cruelty Free International during the application process. Subsequent audits will take place within 2-3 years of obtaining approval, and then every 3 years thereafter. As Leaping Bunny is international, audits can be arranged wherever a company is headquartered and may take place at a company's offices or remotely via any appropriate means. Auditors may work directly with any parties within supply chains in order to carry out their inspections, and may request information held by finished product/ raw material suppliers, or a responsible person on the company's behalf. It is the responsibility of the company to facilitate the provision of this information.

Additional guidance will be provided to companies in advance of their audit date.

### ii) China

Cruelty Free International can provide additional guidance to companies considering entering the Chinese market to ensure any routes used are permissible to Leaping Bunny brands. Regulations concerning access to the Chinese market for cruelty free companies are constantly evolving. Cruelty Free International can provide the most up to date guidelines, if required, before applying for approval.

### iii) Fixed cut-off date (FCOD)

A Leaping Bunny approved company commits not to Conduct, commission or be party to any Animal testing for finished products after a specific Fixed cut-off date (FCOD).

The company also commits not to purchase any products, raw materials or ingredients for its own brand eligible cosmetics from any manufacturer that has conducted, commissioned or been party to animal testing of the products, raw materials or ingredients in the supply chain after the company's FCOD.

To ensure compliance with the FCOD a company must put in place a supplier monitoring system (SMS) to ensure that animal testing does not take place in the supply chain after this FCOD.

For all companies applying for the cosmetic (and personal care) products licence, a FCOD of 11 March 2013 is used, as this harmonises with the date the EU cosmetic testing and marketing bans came into force. Whilst many Leaping Bunny companies are headquartered outside the EU, they may be trading within it to varying extents. Leaping Bunny is a globally harmonised programme so, for consistency, all companies are required to use this date.

#### **iv) Manufacturing products for a third party**

##### **Complimentary products for leisure and hospitality**

A Leaping Bunny approved company providing products for a hotel or membership venue such as a golf club, spa or gym, that are to be provided as complimentary products, may include the Leaping Bunny logo on the products if ALL the following conditions are met:

- i) Leaping Bunny criteria are met for all products displaying the logo; and
- ii) Products are labelled on the back of the packaging as 'Made by [approved company name], a Leaping Bunny approved company'; and
- iii) The specific wording above (ii) is displayed in close proximity to the Leaping Bunny logo wherever it is used; and
- iv) The Leaping Bunny logo is not used by the hotel or membership venue etc. without prior written permission from Cruelty Free International; and
- v) The hotel or membership venue etc. will not make any statements that imply they are Leaping Bunny approved.

**If a Leaping Bunny approved company is manufacturing products for a third party that is selling those products under its own brand name, the third party must apply for its own licence to be able to use the Leaping Bunny logo.**

##### **Leaping Bunny own brand products using a third party licensed logo**

A Leaping Bunny approved company may use the Leaping Bunny logo on its own brand products that also carry a third party logo, e.g. a limited edition, celebrity endorsed range. However, the Leaping Bunny logo must not be used by the third party without prior written permission from Cruelty Free International, nor must they make any statements that imply they are Leaping Bunny approved.

#### **v) Non-compliance with Leaping Bunny criteria**

A company should have in place procedures to manage a breach of the Leaping Bunny criteria. In the case of non-compliance of raw materials and ingredients, steps to remedy the breach could include:

- Removing the raw material or ingredient that is non-compliant and/or replacing it with a compliant one; or
- Changing the manufacturer to ensure compliance; or
- Removing the product from the range.

The company must keep a record of any non-compliance issues, including any remedial actions, for audit purposes. Guidance and support is available, if needed, when investigating suspected non-compliance.

## vi) Supplier monitoring system (SMS)

An effective SMS must be put in place to ensure that every company meets, and continues to adhere to Leaping Bunny criteria at all times.

### Designing a SMS

Every business has its own unique supply chain and therefore will operate its SMS differently. Cruelty Free International does not therefore prescribe how a company should monitor its supply chain. However, guidance is provided to ensure the key elements are included (*refer to Appendix 2*).

Regardless of how the SMS is structured, a company must be sure that their FCOD has not been breached. In order to achieve this, declarations are required from finished product and raw material suppliers, and each declaration must not be older than 12 months at any time. A Leaping Bunny company must ensure its manufacturers are aware of this and ensure it has procedures in place to keep information up to date and available for audit.

### Collating information about animal testing in your supply chain

Cruelty Free International provide template declarations that can be used to collate information from suppliers (copies are included in the application pack). A company may, however, use its own documentation and systems if the same level of detail is obtained, and the same questions are asked. This flexibility enables companies to gather the required information from suppliers and manufacturers as part of their usual business practice.

We recommend that companies supply their manufacturers with a copy of the 'Information for Supply Chains' document, which is provided once a company confirms their intention to apply for approval. This document helps to ensure suppliers understand the requirements of Leaping Bunny.

If a company is uncertain if their current systems are sufficient, further guidance is available to assess them. The Leaping Bunny team can also review systems to help integrate Leaping Bunny if needed.

**Please note that we are unable to accept (as evidence of Leaping Bunny compliance) documentation demonstrating adherence to other certifications e.g. ECOCERT, Vegan Society etc. since they do not meet the same criteria.**

### Sourcing products from another Leaping Bunny approved company

If a product manufacturer holds a Leaping Bunny licence for its own brand, companies must still obtain the required information from them. The process is more straightforward however, and the Leaping Bunny team can offer additional guidance on what is required, if needed.

## vii) Reservation of rights

Cruelty Free International reserves the right to decline an application for approval from any applicant on the basis that:

- The applicant company does not meet Leaping Bunny criteria; or
- Association with the applicant company once approved may be damaging to the reputation of Cruelty Free International and/or the Leaping Bunny programme; or
- There is a conflict between the applicant, its values or associations and the organisational values and objectives of Cruelty Free International.

## Appendix 1

### i) Fees

Once a company confirms in writing that it is applying for Leaping Bunny approval, they are provided a non-disclosure agreement by Cruelty Free International and, following receipt of the signed agreement, every company is invoiced a £300 (+VAT) application fee.

Following receipt of the application fee payment, each company is provided further written guidance to support their application journey and offered a call with Cruelty Free International to discuss any questions or concerns. The application fee is non-refundable, valid for a period of 18 months and requires a company be actively engaged in their application. If an application is left inactive and re-initiated at a later date, or is passed on internally with no handover, Cruelty Free International reserves the right to charge a new application fee.

Licence fees are based on a company's gross annual sales for eligible own label Cosmetic (and personal care) products (*refer to Definitions*).

The licence fee is payable after approval of an application and upon receipt of a signed licence agreement by Cruelty Free International. Licence agreements run annually and are renewed every April, when the annual fee becomes due. The first year licence fee will be invoiced on a pro-rata basis running to the end of March in that licence year.

Licence fees do not represent a profit and instead contribute towards the costs of running the programme including:

- Operating costs including external audits.
- Licensing the Leaping Bunny logo and assistance with use of Cruelty Free International's intellectual property.
- Launching brands as Leaping Bunny approved on the Cruelty Free International website and on social media.
- Support and advice before, during and after every audit.
- Guidance and support on regulatory and technical matters.
- Reviews of documentation as required to assist companies in ongoing compliance with the programme.
- Ongoing work with global supply networks to support Leaping Bunny companies.

Gross annual sales (own label cosmetic and personal care products)	Annual fee (+VAT)
Up to £20,000	£149.00
Exceeding £20,000 and up to / including £50,000	£275.00
Exceeding £50,000 and up to / including £150,000	£449.00
Exceeding £150,000 and up to / including £300,000	£649.00
Exceeding £300,000 and up to / including £500,000	£775.00
Exceeding £500,000 and up to / including £2 million	£1,495.00
Exceeding £2 million and up to / including £5 million	£2,995.00
Exceeding £5 million and up to / including £20 million	£6,995.00
Exceeding £20 million	£9,995.00

Cruelty Free International is keen to encourage a wide range of companies to apply. If a company has any queries about the fee structure and what it covers, further advice is available on request. If a company's licence agreement is terminated and they wish to reinstate their licence, subject to approval by Cruelty Free International, a £100 (+VAT) administration fee will apply.

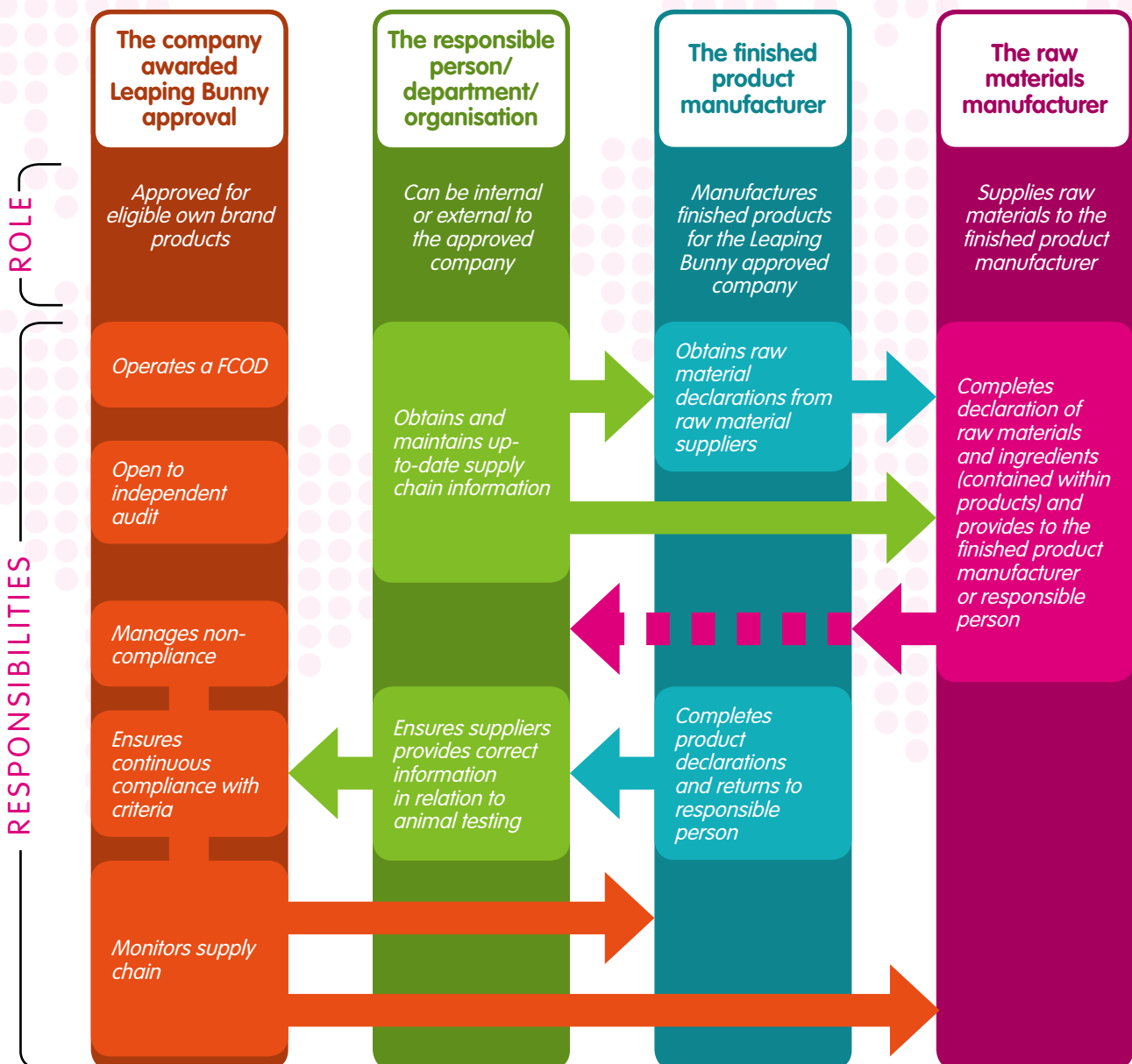
## ii) Licensing agreement and logo

A company will be offered a non-exclusive License Agreement on successful completion of their application. The Leaping Bunny logo files and Brand Guidelines will be provided on receipt of the signed licence and payment of the licence fee. Following this, the application process is completed by means of an official combined public launch. The logo may then be used on all eligible products and in all marketing etc. in relation to the company's Leaping Bunny approval.

## Appendix 2

### i) Supplier monitoring system *(refer to Section 6 for further information)*

This sample flow chart shows who is involved in the Leaping Bunny SMS, their roles and responsibilities.



NOTE: The data that an approved company relies on to verify its compliance must not be older than 12 months. All approved companies must renew declarations from suppliers annually either by using our sample declarations forms or by an alternative method that uses the same language. For example, this might be by issuing a statement that the suppliers agree to in writing or by inserting approved text into purchase orders.

Further information for checking declarations can be found in the supplementary guidance document.

**ii) Ingredient flow chart – checking for animal testing in the supply chain**

Finished product manufacturers must check with raw material suppliers that raw materials (RMs) and ingredients have not been animal tested since the FCOD (*refer to Section 6*)

