

The Leaping Bunny Programme

Supplementary Guidance for Licensees

Revised Summer 2022



Cruelty Free
INTERNATIONAL

This document provides additional guidance to approved companies to support ongoing compliance with the Cruelty Free International Leaping Bunny cosmetics (and personal care) and/or household & cleaning products licenses, and is supplementary to the Leaping Bunny Guidelines.

Please refer to the Guidelines for definitions of the terms used in this document, or for further clarification on any of the information required. For additional queries that are not covered in this document or the Guidelines, we advise contacting our experienced licensing team who will be happy to help.

Contents

Section 1: Supplier engagement

Section 2: Assessing evidence of compliance

- i) Finished product compliance
- ii) Raw material compliance
- iii) Animal tests identified after the FCOD

Section 3: Maintaining compliance

- i) Animal testing policies
- ii) The supplier monitoring system (SMS)

Appendix 1: Leaping Bunny supplier monitoring system (SMS) - Template 1

Appendix 2: Leaping Bunny supplier monitoring system (SMS) - Template 2

Section 1: Supplier engagement

As per the Terms & Conditions of approval, all finished product and raw material declarations, for every product that falls within scope of a company's Leaping Bunny licence, must be renewed at least annually and, importantly, comply with Leaping Bunny criteria.

When contacting finished product and/or raw material suppliers, it is important to communicate that the requested information is for the purpose of meeting Leaping Bunny criteria. Our template declarations and 'Information for Supply Chains' documents are intended to assist with this process.

Cruelty Free International works closely with supply chains across the globe to help make the process as straightforward as possible, however if companies come across any obstacles, they are advised to let us know so that we can offer additional guidance and support, as appropriate.

Section 2: Assessing evidence of compliance

Incorrect declarations are the most common cause of non-compliance with Leaping Bunny criteria. It is therefore strongly advised that companies read through and refer back to all the guidance below to assist with assessing documents. If any declarations fail to meet the criteria below, and it is unclear how to resolve the issue, we will be happy to help.

i) Finished product compliance

Using Leaping Bunny product compliance declarations

Companies are strongly encouraged to use our Leaping Bunny template declarations, which are designed to make the process more straightforward and minimise room for error. When preparing and assessing these, companies must ensure:

- Their details and FCOD are displayed correctly in Section 1.
- Their finished product manufacturer's details are displayed correctly in Section 2.
- Finally, Section 4 has been signed and dated by the 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 product manufacturer.

Using alternative statements

Some finished product manufacturers may provide their own animal testing statements for the products they supply. These may be accepted, provided they meet Leaping Bunny criteria. When assessing these, companies must ensure:

- 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 cover all products supplied to the Leaping Bunny company by the product manufacturer.
- They declare no animal testing has occurred on the products for any purpose after the Leaping Bunny company's FCOD.
- They declare that the finished product manufacturer has obtained up to date, Leaping Bunny compliant, declarations (or equivalent) for every raw material and component ingredient, used in the supplied products.

ii) Raw material compliance

Using Leaping Bunny raw material declarations

Once again, companies are strongly encouraged to use our Leaping Bunny template declarations to avoid the risk of error or delay. When assessing these, companies must ensure:

- The relevant finished product manufacturer's details are completed correctly in Section 1.
- The raw material supplier's details are completed correctly in Section 2.
- All relevant raw material trade names, and their corresponding component ingredients (INCI/CAS), are listed in Section 3.
- 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 and delays, as can often fail to meet Leaping Bunny criteria. It is essential these type of statements meet the following:

- 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 or household purposes.
 - If any animal tests have been declared, action must be taken if the test/s occurred after the FCOD.
 - It is common for statements to only cover a raw material manufacturer "conducting or commissioning" animal testing. If this applies, they must also cover the raw material manufacturer being party to animal testing.
- Finally, if referred to, suppliers should not solely declare compliance with the EU Cosmetic Regulation (or 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 supply chains across the globe developing bespoke in-house Leaping Bunny statements/declarations and systems to support compliance. If there are questions or concerns about any declarations, we are always happy to help.

iii) Animal tests identified after the FCOD

If any animal testing is identified after the FCOD it is a requirement that an animal testing assessment (ATA) is completed for every incidence. Please contact us for further details and support.

Section 3: Maintaining compliance

The supplier monitoring system (SMS)

Every Leaping Bunny company must operate a SMS to ensure ongoing compliance with Leaping Bunny criteria. Maintaining an effective SMS significantly reduces the risk of non-compliance at audit, and is therefore integrated into existing systems and training processes during the application process, but may be reviewed with us post-approval to ensure the system remains up to date.

When conducting a review, companies should refer to pages: 10 (definition), 13 (explanation), and 15 (outline flow chart) of the Leaping Bunny Guidelines for information about the SMS, and take into account the following:

- Each company's SMS will vary slightly depending on: how they operate, complexity of the supply chain, how often they purchase products/materials etc. Some companies may have a single document in place, whereas others may have multiple across different departments and levels of the organisation. Either way, having an overarching policy which provides an overview of company responsibilities and Leaping Bunny criteria is required.
- There are four key elements that must be included in any Leaping Bunny SMS as follows:
 - The system must ensure that data relating to animal testing for products, raw materials, and ingredients is no older than 12 months at any time and is available for audit on request.
 - This can be achieved by renewing declarations with suppliers annually, using purchase orders with product manufacturers, or a combination of the two.
 - Where purchase orders are used, we ask that companies agree wording and processes with us before incorporating them into their SMS to avoid the risks of non-compliance.
 - The system must have procedures for new finished product/formulations and raw material suppliers to ensure the required information is in place before they are approved for use.
 - The system must have procedures for new finished products/formulations, and reformulations/raw materials to ensure the required information is in place before the products are manufactured.
 - Finally, the system must have procedures for managing and recording any non-compliances with Leaping Bunny criteria (and investigations using ATAs).
- Appendices 1 and 2 may be used as templates to create/update an SMS. The SMS templates could have additional documents and buying criteria associated with them and should be tailored to suit each individual company.
 - Please note, Appendix 2 is only recommended for companies purchasing products from external manufacturers at least every 12 months.
- Finally, failure to maintain the SMS would constitute a breach of Leaping Bunny criteria, which may result in the termination of a company's Licence Agreement. Relevant technical, purchasing, and senior team members should therefore be included in the implementation and review processes (as needed) to help integrate Leaping Bunny requirements into existing processes.

We are happy to discuss any further queries regarding the SMS, and also to give feedback on drafts.

Appendix 1: Leaping Bunny supplier monitoring system (SMS) - Template 1

Overview

All [insert company name] own brand cosmetic and personal care products and/or household and cleaning products [select as appropriate] are approved under the Cruelty Free International Leaping Bunny programme, the internationally recognisable gold standard for cruelty free products.

As per the Terms & Conditions of our approval, we are responsible for adhering to the Leaping Bunny criteria at all times. This includes operating a fixed cut-off date (FCOD) policy and proactively monitoring our suppliers for animal testing after our FCOD. We must also have processes in place for managing any suspected non-compliance with Leaping Bunny criteria.

The term 'suppliers' applies to any manufacturer or distributor providing finished products, trade name raw materials, or component ingredients (INCI/CAS/EC No.) to our company, directly or indirectly. When indirectly, our approved suppliers must be notified of our Leaping Bunny requirements and ensure compliance with Leaping Bunny criteria for the suppliers of materials used in our products. The Leaping Bunny 'Information for Suppliers' contains further information on supplier responsibilities and can be shared as needed.

For more information on Leaping Bunny requirements and our legal obligations, please refer to the Leaping Bunny Guidelines, Supplementary Guidance, and the Terms & Conditions in our Licence Agreement/s. Cruelty Free International can provide further guidance and support as needed.

To meet Leaping Bunny requirements, [insert company name] has established the following supplier monitoring system (SMS). Our SMS is independently audited on behalf of Cruelty Free International, so it is important that accurate records are maintained at all times.

Leaping Bunny responsible person/s: [insert name/s of responsible team member/s]

Leaping Bunny licence/s held: Cosmetic and Personal Care products and/or Household and Cleaning products [select as appropriate]

Fixed cut-off date (FCOD): [insert company FCOD]

Maintaining animal testing information

- All new and existing suppliers must complete compliant Cruelty Free International Leaping Bunny finished product or raw material compliance declarations before being approved for use.
- All suppliers are encouraged to use Cruelty Free International's template declarations to reduce the risk of error. However, alternative supplier statements may be accepted, provided they meet Leaping Bunny criteria. Further information on assessing animal testing declarations, including alternative statements, can be found in the Leaping Bunny Supplementary Guidance.
- To ensure full transparency of all animal testing and compliance with Leaping Bunny criteria, all declarations must be renewed at least every 12 months, and must have been signed and dated within the last 12 months at the point of renewal.
- Accurate supplier records must be maintained and include the date each declaration was received. All suppliers must be contacted annually and provide the required declaration/s within 30 days of request. To reduce the risk of non-compliance, this process should commence before the 12-month deadline, and failure to facilitate a request by a supplier will result in a non-compliance being raised (see non-compliance procedures).

New products, formulations, suppliers, and reformulations

- Our Leaping Bunny licence covers all new and existing eligible own brand products. As such, the relevant Cruelty Free International Leaping Bunny finished product and raw material compliance declarations must be collated and checked to ensure compliance with Leaping Bunny criteria before any new products, formulations, and/or suppliers are approved for use. Once approved, they must also be incorporated into our SMS, and the relevant documentation made available for Leaping Bunny audit purposes on request.
- Provided the above process is followed, the relevant products are covered under our licence, and can carry the Leaping Bunny logo. New product types should be reported to Cruelty Free International so our search profile can be updated on their website.

Non-compliance procedures

- Any supplier suspected to be in breach of Leaping Bunny criteria, must be subject to further investigation. The outcome of the investigation must be recorded for audit purposes.
- If the supplier fails to facilitate a request within 30 working days, the request must be escalated, and the supplier notified. If the supplier fails to facilitate the request within a further 14 working days, a non-compliance must be raised (see below).
- If any animal testing is declared after our FCOD, Cruelty Free International must be provided with a completed Leaping Bunny Animal Testing Assessment (ATA). If we encounter any issues with the completion of an ATA, we must notify Cruelty Free International of this concern. The completed ATA must be returned to Cruelty Free International via email for a final decision, and if a breach in Leaping Bunny criteria is identified, a non-compliance must be raised (see below).
- If a non-compliance is raised, in accordance with the Terms & Conditions of approval, we must take action to remove the non-compliant product/material/supplier from our supply network within 30 days. Such measures may include removing the product/material/supplier from our supply network, reformulating the product, or resourcing the product/material. Once appropriate action is taken, provided no further orders are placed for the non-complaint material or product, we are permitted to sell through/use remaining stocks of the product/material.

SMS Declaration

We hereby confirm that the above SMS has been implemented to support our ongoing compliance with Leaping Bunny criteria, and can provide evidence on request for Leaping Bunny audit purposes.

Contact name	
Position held	
Email	
Signature	
Date	

Appendix 2: Leaping Bunny Supplier Monitoring System (SMS) – Template 2

Overview

All [insert company name] own brand cosmetic and personal care products and/or household and cleaning products [select as appropriate] are approved under the Cruelty Free International Leaping Bunny programme, the internationally recognisable gold standard for cruelty free products.

As per the Terms & Conditions of our approval, we are responsible for adhering to the Leaping Bunny criteria at all times. This includes operating a fixed cut-off date (FCOD) policy and proactively monitoring our suppliers for animal testing after our FCOD. We must also have processes in place for managing any suspected non-compliance with Leaping Bunny criteria.

The term 'suppliers' applies to any manufacturer or distributor providing finished products, trade name raw materials, or component ingredients (INCI/CAS/EC No.) to our company, directly or indirectly. When indirectly, our approved suppliers must be notified of our Leaping Bunny requirements, and ensure compliance with Leaping Bunny criteria for the suppliers of materials used products. The Leaping Bunny 'Information for Suppliers' contains further information on supplier responsibilities, and can be shared as needed.

For more information on Leaping Bunny requirements and our legal obligations, please refer to the Leaping Bunny Guidelines, Supplementary Guidance, and the Terms & Conditions in our Licence Agreement/s. Cruelty Free International can provide further guidance and support if needed.

To meet Leaping Bunny requirements of, [insert company name] has established the following supplier monitoring system (SMS). As our SMS is independently audited on behalf of Cruelty Free International, it is important that accurate records are maintained at all times.

Leaping Bunny responsible person/s: [insert name/s of responsible team member/s]

Leaping Bunny licence/s held: Cosmetic and Personal Care products and/or Household and Cleaning products [select as appropriate]

Fixed cut-off date (FCOD): [insert company FCOD]

Maintaining animal testing information

- All new and existing suppliers must complete compliant Cruelty Free International Leaping Bunny finished product or raw material compliance declarations before being approved for use.
- All suppliers are encouraged to use Cruelty Free International's template declarations to reduce the risk of error. However, alternative supplier statements may be accepted, provided they meet Leaping Bunny criteria. Further information on assessing animal testing declarations, including alternative statements, can be found in the Leaping Bunny Supplementary Guidance.
- To ensure full transparency of all animal testing and compliance with Leaping Bunny criteria, all declarations must be renewed at least every 12 months, and must have been signed and dated within the last 12 months at the point of renewal.
- Accurate supplier records must be maintained and include the date each declaration was signed. All suppliers must be contacted annually and provide the required declaration/s within 30 days of request. To reduce the risk of non-compliance, this process should commence before the 12-month deadline, and failure to facilitate a request will result in a non-compliance being raised (see non-compliance procedures).

Finished product supplier purchase orders

- Once a compliant finished product declaration is on file, and provided specific requirements are met, the following wording will be included on all finished product supplier purchase orders:
 - “We hereby confirm that by fulfilling this order the supplied finished products, and their component materials, comply with Leaping Bunny criteria and have not been subject to animal testing since **[Insert FCOD]***.”

We also confirm that we have collated raw material declarations (or equivalent Leaping Bunny compliant written evidence) for the raw materials, and their component ingredients, used in these products and agree to ensure these declarations are renewed annually. This information will be available on request for Leaping Bunny audit.

*according to Leaping Bunny criteria in force at the date of this order and with the exception of any animal testing reported via Leaping Bunny animal testing assessments (ATAs).”

- To reduce the risk of non-compliance with Leaping Bunny criteria, the use of the above wording is only permitted when a brand is purchasing finished products from the finished product supplier at least every 12 months, and a Leaping Bunny compliant finished product declaration is already on file for the supplied products.
- Furthermore, purchase order wording is never permitted for use with raw material suppliers, and brands must ensure the latest versions of the Cruelty Free International template declarations and Information for Suppliers have been shared with the finished product supplier, who in turn has provided written confirmation that they understand and will continue to meet requirements regarding Leaping Bunny compliance.
- Finally, when using the above purchase order wording, although the supplier is supporting with Leaping Bunny compliance and maintaining the raw material information, as per the Terms & Conditions of the Leaping Bunny Licence Agreement, the licensed company is ultimately responsible for ensuring products meet Leaping Bunny criteria. Cruelty Free International therefore recommends brands routinely conduct internal audits of any finished products suppliers which use the above purchase order wording to ensure they continue to meet requirements.

New products, formulations, suppliers, and reformulations

- Our Leaping Bunny licence covers all new and existing eligible own brand products. Therefore, the relevant Cruelty Free International Leaping Bunny finished product and raw material compliance declarations must be collated and checked to ensure compliance with Leaping Bunny criteria before any new products, formulations, and/or suppliers are approved for use. Once approved, they must also be incorporated into our SMS, and the relevant documentation made available for Leaping Bunny audit purposes on request.
- Provided the above process is followed, the relevant products are covered under our licence, and can carry the Leaping Bunny logo. New product types should be reported to Cruelty Free International so our search profile can be updated on their website.

Non-compliance procedures

- Any supplier suspected to be in breach of Leaping Bunny criteria, must be subject to further investigation. The outcome of the investigation must be recorded for audit purposes.
- If the supplier fails to facilitate a request within 30 working days, the request must be escalated, and the supplier notified. If the supplier fails to facilitate the request within a further 14 working days, a non-compliance must be raised (see below).
- If any animal testing is declared after our FCOD, Cruelty Free International must be provided a completed Leaping Bunny Animal Testing Assessment (ATA). If we encounter any issues with the completion of an ATA, we must notify Cruelty Free International of this concern. The completed ATA must be returned to Cruelty Free International via email for a final decision, and if a breach in Leaping Bunny criteria is identified, a non-compliance must be raised (see below).
- If a non-compliance is raised, in accordance with the Terms & Conditions of approval, we must take action to remove the non-compliant product/material/supplier from our supply network within 30 days. Such measures may include removing the product/material/supplier from our supply network, reformulating the product, or resourcing the product/material. Once appropriate action is taken, provided no further orders are placed for the non-complaint material or product, we are permitted to sell through/use remaining stocks of the product/material.

SMS Declaration

We hereby confirm that the above SMS has been implemented to support our ongoing compliance with Leaping Bunny criteria, and can provide evidence on request for Leaping Bunny audit purposes.

Contact name	
Position held	
Email	
Signature	
Date	