

NAILLEGEND

# Spa Tablets

## Compliance & Technical Dossier

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Effervescent · Jelly · Bubble · Foaming | Foot Soak / Pedicure Tablets

Issued by: **NailLegend** · naillegend.com

Contact: Lareina · info@naillegend.com

WhatsApp: +852 6759 2416

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# 0. Dossier Overview & Legal Notice

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Compliance & Technical Dossier — Overview | **Issue date:** 2026-06-22 | **Version:** 1.0

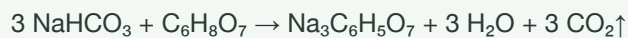
## What this dossier is

This is the **Compliance & Technical Dossier** for the NailLegend **Spa Tablets** category — effervescent foot-soak / pedicure tablets in effervescent, jelly, bubble and foaming lines. It brings together, in one document, the technical and regulatory information a brand-owner or distributor needs when sourcing this product on an OEM / Private-Label basis for the **US (FDA)** and **EU (Regulation EC 1223/2009)** markets.

The data in this dossier are **representative of NailLegend's standard production** for this category. They are typical values issued by NailLegend's in-house quality function. For a specific order, the figures are reconfirmed against the **final agreed formula and production batch**, and batch-specific certificates of analysis are issued with shipment.

## Important — this is an anhydrous (dry, low-moisture) product

A spa tablet is an **effervescent solid** built on an **anhydrous acid–base couple** (anhydrous citric acid + sodium bicarbonate). It contains **no added water** and reacts on contact with water in the soak bath:



Because the product is anhydrous and is **consumed by dilution at the point of use**, it is **not a water-containing emulsion**:

- It carries **no preservative system** and therefore needs **no preservative-efficacy (challenge) test and no finished-product microbiological release test** in the conventional sense — there is no free water to support microbial growth.
- Its single most critical control is **moisture exclusion**. Ambient humidity, monohydrate (rather than anhydrous) citric acid, or a breached pack will trigger premature reaction — doming, discolouration, loss of fizz. Manufacturing runs in a **humidity-controlled room (typically RH < 30–40%)** and every unit is **individually moisture-barrier packed** (foil / sealed sachet / blister). This is a hard requirement, not an option.
- Shelf life is governed by **packaging barrier performance**, not by preservation.

## Regulatory responsibility

Final market-placement responsibility — FDA cosmetic listing (MoCRA), EU CPNP notification, appointment of the EU Responsible Person, the Cosmetic Product Safety Report (CPSR), the Product Information File (PIF), and final labelling and claims — rests with the **brand owner / importer**.

NailLegend, as the manufacturer, supplies the supporting technical documents in this dossier to enable that work.

## Claims guardrails

A foot-soak tablet claiming **cleansing, refreshing, soothing, softening, deodorising** is a **cosmetic**. Wording such as "*cures athlete's foot*," "*kills fungus*," "*treats*," or "*medical*" reclassifies the product as a **drug** and triggers separate (US OTC) regulation. Keep claims cosmetic — tea tree may be presented as "*helps with foot odour / refreshes*," not "*cures athlete's foot*."

## How to read the data

- **Composition & specification** (INCI, TDS, formulation disclosure, allergen, IFRA and colourant statements) describe the product as manufactured.
- **Test sections** (stability; pH & acid/base data) present the applicable **methods, acceptance criteria, and typical results** for this anhydrous product, issued by NailLegend's in-house QC. They represent standard production performance; batch-specific certificates accompany each shipment.

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# 1. INCI Ingredient List

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**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** INCI Ingredient List (representative — effervescent foot-soak base) | **Issue date:** 2026-06-22 | **Version:** 1.0

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The list below is the representative INCI composition for the Spa Tablets. The definitive descending-order list and on-pack allergen call-outs are confirmed against the final agreed formula for each order before use on artwork or for CPNP notification. Ingredients in *italics* are line-dependent (jelly / bubble / foaming / fragranced / tinted variants).

## INCI declaration (descending order)

#	INCI name	Function
1	Sodium Bicarbonate	Effervescent base (CO <sub>2</sub> source)
2	Citric Acid	Effervescent acid (anhydrous grade)
3	Magnesium Sulfate	Mineral soak (Epsom salt)
4	Sodium Chloride	Mineral / bulking salt
5	<i>Sodium Carbonate</i>	Auxiliary alkaline base
6	<i>Sodium Lauryl Sulfoacetate</i>	Mild foaming surfactant (bubble / foaming lines)
7	<i>Cocamidopropyl Betaine</i>	Co-surfactant / foam stabiliser
8	Zea Mays (Corn) Starch	Filler / binder
9	<i>Maltodextrin</i>	Binder / fragrance carrier
10	<i>Polyethylene Glycol (PEG-8000)</i>	Binder / compression aid
11	Magnesium Stearate	Lubricant / release aid
12	Silica	Glidant / flow aid
13	<i>Sodium Polyacrylate</i>	Gelling agent (jelly line)
14	<i>Xanthan Gum</i>	Gelling / rheology (jelly line)
15	<i>Menthol</i>	Cooling agent
16	<i>Melaleuca Alternifolia (Tea Tree) Leaf Oil</i>	Conditioning / deodorising (foot line)
17	<i>Eucalyptus Globulus Leaf Oil</i>	Conditioning / aromatic
18	<i>Urea</i>	Skin-softening (callus-soften line)
19	<i>Parfum (Fragrance)</i>	Fragrance (omitted in fragrance-free)
20	<i>Limonene, Linalool, Citronellol, Geraniol</i>	Fragrance allergens (declared at threshold — see Section 5)
21	<i>CI 42090 / CI 19140 / Mica / CI 77891 (Titanium Dioxide)</i>	Colourants / pearl (see Section 7)

## Notes for labelling

- **Ordering** is representative of standard production; the exact descending-order list is issued for the locked formula of each order.
- **Anhydrous grades:** citric acid is used in **anhydrous** form; the monohydrate is not used, as released water of crystallisation would pre-trigger the effervescent reaction.
- **EU fragrance allergens** present at or above the labelling threshold (0.01% rinse-off) appear in the on-pack INCI list — see Section 5.

- **Colourants and pearl pigments** are line-dependent and sit within the target-market permitted colour lists (EU Annex IV; US permitted colour additives) — see Section 7.
- **No preservative** is present; the product is anhydrous and consumed by dilution.

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## 2. Technical Data Sheet (TDS)

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Technical Data Sheet (representative specification) | **Issue date:** 2026-06-22 | **Version:** 1.0

### 1. Product description

An **anhydrous effervescent tablet** for foot soaking / pedicure use. Dropped into a basin of warm water, the tablet fizzes (CO<sub>2</sub>), dissolving its actives, salts and fragrance into the bath. Function depends on the line: a standard **effervescent** soak, a **jelly** soak that gels in water, a high-foam **bubble** soak, or a multi-stage **foaming pedicure** tablet. The product contains **no added water** and is consumed by dilution at the point of use.

### 2. Physical & chemical specification (typical)

Property	Specification	Method
Appearance	Compressed solid tablet (or moulded shape); white / tinted / pearlised to brief	Visual
Odour	Characteristic of fragrance dosed / odourless (fragrance-free)	Olfactory
Tablet weight	8 – 20 g per tablet (to brief)	Gravimetric
Diameter / shape	Round, square, heart or custom mould (to brief)	Calliper
Moisture content (Karl Fischer / LOD)	≤ 1.0% (anhydrous)	Loss on drying, 105 °C
Hardness (compressed line)	40 – 90 N (typical)	Tablet hardness tester
Friability (compressed line)	≤ 1.0%	USP <1216> drum method
Effervescence time (full disintegration in water)	2 – 5 min @ ~38 °C	Timed dissolution
pH of 1% aqueous solution (25 °C)	5.5 – 8.5 (line-dependent) — see Section 9	pH meter (ISO 4316)

### 3. Microbiological status (anhydrous product)

This is an **anhydrous, low-water-activity solid** with **no preservative system**. With no free water available, it does **not support microbial growth**, so a finished-product preservative-efficacy (challenge) test and routine microbiological release testing are **not applicable**. Incoming raw materials (salts, surfactant, starch) are sourced to cosmetic-grade specification. Where an importer's market specifically requires finished-product microbial data on a dry cosmetic, a representative low-bioburden screen can be provided on request.

#### 4. Packaging & primary material — moisture barrier is the control point

- **Primary (mandatory):** each tablet in an **individual moisture-barrier pack** — aluminium-foil flow-wrap, sealed sachet, or blister. This is the product's lifeline against ambient humidity; it is **standard, not optional**.
- **Secondary:** PET jar, blister card, gift box, or refill pouch to brief — selected to maintain the moisture barrier through the supply chain.
- Bulk / unwrapped tablets are **not** supplied for distribution, as they pre-react in transit.

#### 5. Storage, shelf life & usage

Item	Value
Storage	Cool, <b>dry</b> place, away from humidity and direct sunlight; 5 – 30 °C, RH < 60%
Shelf life	24 months unopened in intact moisture-barrier pack
Directions	Drop 1 tablet into a basin of warm water; allow to fizz/dissolve; soak feet 15 – 20 min; dry feet after.
Warnings	External use only. Keep dry until use. Avoid broken skin and eyes. Slippery when dissolved — avoid slip hazard. Discontinue if irritation occurs. Keep out of reach of children.

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## 3. Safety Data Sheet (SDS)

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Safety Data Sheet — GHS 16-section (representative) | **Issue date:** 2026-06-22 | **Version:** 1.0

Prepared in the UN GHS 16-section format (aligned with US OSHA HazCom 29 CFR 1910.1200 and EU REACH Annex II). The finished product is a cosmetic; classification below reflects the representative formula. Batch- or formula-specific SDS is reissued where the agreed formula differs.

**1. Identification** — Product: Spa Tablets (effervescent foot-soak tablet). Use: cosmetic, external foot soak. Supplier: NailLegend (naillegend.com). Contact: Lareina. Emergency: contact supplier during business hours.

**2. Hazard identification** — GHS classification: Not classified as hazardous for the finished cosmetic tablet. Note: the tablet contains an effervescent acid–base couple and **releases carbon dioxide on contact with water**; it is a **solid that reacts with moisture**. Surfactant/menthol lines may be mildly eye-irritating. Signal word: None (standard line) / Warning (high-surfactant line). Precautionary statements where applicable: P264, P280, P305+P351+P338. Keep dry until use; do not ingest.

**3. Composition / information on ingredients** — Mixture (cosmetic, anhydrous solid). Components of note: Sodium Bicarbonate (CAS 144-55-8), Citric Acid, anhydrous (CAS 77-92-9), Magnesium Sulfate (CAS 7487-88-9), Sodium Lauryl Sulfoacetate (CAS 1847-58-1), Menthol (CAS 89-78-1), Tea Tree Oil (CAS 68647-73-4) — present only in the relevant lines and within cosmetic use limits. Full composition: see Section 1 (INCI).

**4. First-aid measures** — Eyes: rinse with water for several minutes; remove contact lenses; seek advice if irritation persists. Skin: external use; if irritation occurs, rinse and discontinue. Ingestion: do not swallow; effervescent tablet releases gas — rinse mouth, sip water, do not induce vomiting, seek advice. Inhalation: not a normal route of exposure; avoid inhaling fine dust during bulk handling.

**5. Fire-fighting measures** — Not flammable. Suitable extinguishing media: water spray, foam, CO<sub>2</sub>, dry powder. (Concentrated essential-oil raw material is combustible, but the finished diluted tablet is not.)

**6. Accidental release** — Sweep up solid; keep away from water/moisture to avoid premature reaction and CO<sub>2</sub> release. Dissolved product is slippery — avoid slip hazard. Avoid bulk release to drains.

**7. Handling & storage** — Handle per good hygiene practice; keep dry. Store cool, **dry**, out of direct sunlight; keep individual packs sealed until use. Avoid humid environments — the tablet reacts with moisture.

**8. Exposure controls / PPE** — Consumer use: no PPE required. Bulk handling (manufacturing): dust mask, gloves and eye protection during powder blending/compression; humidity-controlled area. No specific occupational exposure limit assigned to the finished mixture.

**9. Physical & chemical properties** — Solid compressed tablet; appearance, odour, weight, hardness and 1%-solution pH: see Section 2 (TDS). Reactivity: effervesces (CO<sub>2</sub>) on contact with water. Flash point: not applicable (anhydrous solid). Solubility: dissolves in water with effervescence.

**10. Stability & reactivity** — Stable when kept dry in sealed moisture-barrier packaging. **Reactive with water / moisture** (acid–base effervescence). Incompatibilities: water, humidity, strong oxidisers. Hazardous decomposition products: carbon dioxide on contact with water (non-hazardous under normal soak use).

**11. Toxicological information** — Finished cosmetic confirmed safe for normal external use through the brand owner's CPSR. High-surfactant lines may be mildly irritating to eyes; not for use on damaged skin or for ingestion.

**12. Ecological information** — No significant adverse effects expected in normal consumer use. Salts and surfactant are used at consumer dilution. Avoid bulk discharge to the environment.

**13. Disposal** — Dispose of contents and container in accordance with local regulations.

**14. Transport information** — Not classified as dangerous goods for transport (finished cosmetic, anhydrous solid). UN number: none. Keep dry in transit to preserve the moisture barrier.

**15. Regulatory information** — Cosmetic finished product. US: FDA cosmetic (MoCRA). EU: Regulation (EC) 1223/2009. Ingredients comply with applicable cosmetic inventories for the declared markets; colourants per permitted colour lists (see Section 7).

**16. Other information** — Abbreviations: LOD loss on drying; PAO period after opening; SLSA sodium lauryl sulfoacetate. An SDS is not legally mandatory for a finished cosmetic in all markets but is commonly requested by importers and logistics partners; this SDS is provided for that purpose.

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## 4. Formulation Disclosure Statement

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Formulation Disclosure Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

This statement gives the brand owner's safety assessor the functional composition and permitted-range information needed to build the CPSR / PIF, while protecting NailLegend's specific know-how. Exact weight percentages of the locked formula — including the precise **acid : base ratio and degree of neutralisation** — are disclosed **confidentially to the named safety assessor under NDA**; this statement provides the functional framework and confirms each restricted ingredient sits within its permitted limit.

### 1. Functional composition framework

Block	Function	Representative ingredients
Effervescent couple	CO <sub>2</sub> generation / fizz	Sodium Bicarbonate, Citric Acid (anhydrous), Sodium Carbonate
Mineral soak	Soak feel, "mineral" positioning	Magnesium Sulfate (Epsom), Sodium Chloride / sea salt
Active (line-dependent)	Foot care positioning	Tea Tree Oil, Menthol, Eucalyptus Oil, Urea
Foam system (bubble/foaming)	Foam, bubble experience	Sodium Lauryl Sulfoacetate, Cocamidopropyl Betaine
Gel system (jelly line)	Gel/jelly texture in water	Sodium Polyacrylate, Xanthan Gum
Compression / process aids	Tablet integrity, flow, release	Corn Starch, Maltodextrin, PEG-8000, Magnesium Stearate, Silica
Sensory & colour	Fragrance, colour, pearl	Parfum (or none), CI colourants, Mica, Titanium Dioxide

## 2. Restricted-ingredient confirmation

Ingredient (class)	Permitted basis	This product
Effervescent couple (citric acid / bicarbonate)	Standard cosmetic use; <b>anhydrous acid grade only</b>	Anhydrous grade; ratio set to target soak pH
Sodium Lauryl Sulfoacetate (surfactant)	Standard cosmetic use level	Bubble/foaming lines only, within use level
Tea Tree Oil	Cosmetic use; within recommended dermal limits at soak dilution	Foot line; within recommended level
Menthol	Standard cosmetic use level	Within use level
Urea	Standard cosmetic use level	≤ 10% (softening line)
Colourants (if any)	EU Annex IV / US permitted colour additive	Per Section 7; none unless tinted to brief
Fragrance & allergens	IFRA-compliant; allergens declared at threshold	See Sections 5 & 6
Preservative	Not used — anhydrous product	None present

## 3. What is and is not disclosed

- **Disclosed openly:** the functional framework, restricted-ingredient identities, and confirmation each is within its permitted limit.
- **Disclosed under NDA to the safety assessor only:** exact weight percentages of the locked formula, the precise acid : base ratio and degree of neutralisation, supplier identities, and process parameters.
- **Not disclosed:** proprietary compression/moulding process know-how unrelated to safety assessment.

## 4. Manufacturer statement

For the locked formula supplied to a customer, NailLegend confirms that all ingredients are used within the limits and conditions permitted for cosmetic use in the customer's declared target markets, and that supporting analytical data (1%-solution pH and acid/base balance, stability) is provided in this dossier. As an anhydrous product, no preservative-efficacy or routine finished-product microbiological testing applies.

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NailLegend · naillegend.com — Functional disclosure for safety-assessment support; exact percentages under NDA. Confidential — for the intended recipient only.

## 5. Fragrance Allergen Declaration

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** EU  
Fragrance Allergen Declaration | **Issue date:** 2026-06-22 | **Version:** 1.0

Basis: EU Regulation (EC) 1223/2009. A foot-soak tablet is used as a **rinse-off / dilute-in-water** product; allergens present at  $\geq 0.01\%$  (**100 ppm**) in the product as supplied must be named in the on-pack INCI list. The table below shows a representative tea-tree / mint fragrance-and-oil package dosed at 1.0% of the tablet. Content is reconfirmed by the fragrance / essential-oil supplier for the specific scent of each order; a **fragrance-free** variant declares "none present." (Note: Reg. (EU) 2023/1545 expands the declarable list — the supplementary sheet is added where the target market requires it.)

### Allergen content (representative — tea-tree / mint package @ 1.0% of tablet)

#	Allergen (INCI)	CAS	Present	% in product	On-pack declaration
1	Limonene	5989-27-5	Yes	0.060	Required
2	Linalool	78-70-6	Yes	0.025	Required
3	Eucalyptol (1,8-cineole, terpene)	470-82-6	Yes	0.040	(constituent — not a listed allergen)
4	Citronellol	106-22-9	Yes	0.018	Required
5	Geraniol	106-24-1	Yes	0.012	Required
6	Citral	5392-40-5	Yes	0.008	Not required (below 0.01% threshold)
7	Coumarin	91-64-5	Trace	< 0.010	Not required (below threshold)
—	Eugenol, Isoeugenol, Cinnamal, Benzyl Benzoate, Benzyl Salicylate, Farnesol, Benzyl Alcohol, others	various	No / trace	< 0.010	Not required

**On-pack declaration required for this fragrance:** *Limonene, Linalool, Citronellol, Geraniol.*

### Declaration

For the fragrance / essential-oil package dosed in this product, the allergens marked "Required" above are included in the on-pack INCI list. A **fragrance-free** variant contains no added fragrance allergens. Values are reconfirmed by the fragrance / essential-oil supplier for the specific scent and dosage of each order.

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## 6. IFRA Conformity Statement

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** IFRA Conformity Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

This statement is supported by the **IFRA Certificate of Conformity issued by the fragrance / essential-oil supplier** for the specific fragrance compound and its dosage. The supplier's certificate is held on file and provided to the brand owner's safety assessor on request. A **fragrance-free** variant requires no IFRA statement.

### 1. Product use category

Item	Value
Product type	Spa Tablet (foot-soak, dissolved in water; rinse-off use)
IFRA product category	Category 9 (rinse-off products — soaps, bath/soak products)
Fragrance / oil dosage in finished tablet	1.0% (representative; to brief)
IFRA Standards edition	51st Amendment

### 2. Conformity statement

The fragrance / essential-oil compound used at **1.0%** in this Spa Tablet conforms to the **IFRA Standards (51st Amendment)** for the applicable rinse-off product category. All restricted, prohibited and specified materials — including those naturally present in tea tree, eucalyptus and mint oils — are within the maximum levels set by the relevant IFRA Standards for this use, as confirmed by the supplier's IFRA Certificate of Conformity held on file. Because the tablet is **diluted into a basin of water** before skin contact, the effective on-skin exposure is well below the in-tablet level.

### 3. Relationship to allergen labelling

IFRA conformity governs **safe use levels** and is separate from EU **allergen labelling** (declaring allergens at threshold). Allergen content for the dosed fragrance is reported in Section 5.

### 4. Authorisation

Confirmed on the basis of the fragrance / essential-oil supplier's IFRA certificate for the dosed compound.

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# 7. Colourant Compliance Statement

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Colourant Compliance Statement | **Issue date:** 2026-06-22 | **Version:** 1.0

Spa tablets are frequently tinted (single colour, layered/two-tone) and may carry **mica pearl**. Every colour additive must appear on the **permitted colour list of each target market: US** — FDA-listed colour additives (FD&C / D&C / external D&C, 21 CFR Parts 73/74/82); **EU** — Regulation (EC) 1223/2009 **Annex IV**. The colours below are **representative**; the actual palette is confirmed against the agreed artwork and the target markets for each order.

## 1. Representative colourants & permitted basis

Colourant (INCI)	Colour Index	US status	EU Annex IV status	Typical use
CI 42090 (Blue 1 / FD&C Blue No. 1)	42090	Listed colour additive	Listed	Blue / teal soak
CI 19140 (Yellow 5 / FD&C Yellow No. 5)	19140	Listed colour additive	Listed	Green/yellow blends
CI 16035 (Red 40 / FD&C Red No. 40)	16035	Listed colour additive	Listed	Pink / red soak
CI 77891 (Titanium Dioxide)	77891	Listed colour additive	Listed	White / opacifier
Mica (CI 77019)	77019	Permitted (with listed surface colourants)	Listed	Pearl / shimmer
Iron Oxides (CI 77491 / 77492 / 77499)	77491–77499	Listed colour additive	Listed	Earth tones

## 2. Compliance points

- **Market-specific approval:** a colour permitted in one market is not automatically permitted in another. The final palette is verified against the colour list of **each declared target market** before artwork is locked.
- **Use restrictions:** any colourant carrying a use restriction (e.g. "not for use near the eye," batch certification for certain FD&C lakes) is applied within that restriction; this is a foot-soak (no eye-area contact).
- **Mica / pearl:** mica is used as a carrier for permitted surface colourants; pearl effect pigments are selected from the permitted lists for the target markets.
- **Restricted colours avoided:** colourants not on the relevant permitted list are not used. The product is supplied uncoloured where a market does not permit the requested shade.

### 3. Statement

For the locked palette of each order, NailLegend confirms that all colourants used in the Spa Tablets are listed/permitted for cosmetic use, and used within any applicable restriction, for the customer's declared target markets (US permitted colour additives; EU Annex IV). The brand owner's safety assessor uses this confirmation in the CPSR/PIF and to lock compliant artwork.

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# 8. Stability Test Report

**Issued by:** NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Spa Tablets **Document:** Stability Test Report — representative result | **Issue date:** 2026-06-22 | **Version:** 1.0

Physical, chemical and packaging-compatibility stability supporting shelf life, tested **in market packaging** (individual aluminium-foil flow-wrap / sealed sachet / blister). For an anhydrous effervescent tablet, stability is driven almost entirely by **moisture ingress**: a breached or low-barrier pack lets ambient humidity pre-trigger the acid–base reaction, causing doming, discolouration and loss of fizz. Results are **typical of NailLegend standard production**, issued by NailLegend in-house QC. Batch-specific stability is monitored under the ongoing programme.

Reference batch (example): **SPT-2406-01**

## 1. Study design

Condition	Temperature / humidity	Pull points
Real-time	25 ± 2 °C / 60% RH	0, 3, 6, 12, 24 months
Accelerated	40 ± 2 °C / 75% RH	0, 1, 2, 3 months
Humidity challenge (open-dish)	30 °C / 75% RH, unwrapped	0, 24, 72 h (barrier-need demonstration)

Packaging tested: aluminium-foil flow-wrap (primary) vs. unwrapped control.

## 2. Parameters & results (typical – in foil pack)

Parameter	Acceptance	T0	Accel. 3 mo	Real-time 12 mo	Pass/Fail
Appearance (no doming / cracking / spotting)	Conforms	Conforms	Conforms	Conforms	Pass
Colour	Within range	Pass	No significant change	No significant change	Pass
Odour	No off-note / oil rancidity	Pass	Pass	Pass	Pass
Moisture content (LOD)	≤ 1.0%	0.4%	0.6%	0.7%	Pass
Tablet hardness	Spec ± 20%	65 N	within	within	Pass
Effervescence time	2 – 5 min	3.0 min	3.4 min	3.5 min	Pass
1% solution pH	Target ± 0.5	6.8	6.7	6.7	Pass
Pack seal integrity / leak	No breach	Pass	Pass	Pass	Pass

### 3. Open-dish humidity control (demonstrates barrier need)

Parameter	T0	24 h (open, 75% RH)	72 h (open, 75% RH)
Appearance	Conforms	Surface softening / early doming	Doming, discolouration
Effervescence time	3.0 min	4.8 min	Sluggish / partial

This control is included to evidence that the **moisture-barrier pack is a functional requirement**, not a cosmetic choice — once exposed to humidity, the tablet pre-reacts and loses performance.

### 4. Conclusion

In the intact moisture-barrier pack, the product meets all acceptance criteria under accelerated and real-time conditions to date; the assigned shelf life is **24 months unopened**. Outside the barrier pack, stability is not assured. Real-time study to 24 months is ongoing. Overall result: **PASS (real-time ongoing)**.

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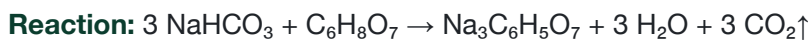
# 9. pH & Effervescent Acid–Base Data

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Because a spa tablet is **anhydrous** and only develops pH **once dissolved in water**, the meaningful values are the **acid : base couple ratio** and the **pH of the dissolved soak** (reported on a 1% aqueous solution). These drive both the fizz and the comfort/safety of the foot soak. Values are **typical of NailLegend standard production**, issued by NailLegend in-house QC; batch-specific values are confirmed per production. Specific permitted limits are verified against current target-market regulations for each order.

## 1. Effervescent couple (representative)

Component	Role	Grade	Note
Citric Acid	Acid source	<b>Anhydrous</b>	Monohydrate not used — would release water of crystallisation and pre-trigger reaction
Sodium Bicarbonate	Base source	Standard	Primary CO <sub>2</sub> source
Sodium Carbonate	Auxiliary base	Standard	Optional; raises fizz / "sandy" feel, more alkaline



Item	Representative value	Note
Acid : bicarbonate mass ratio (full neutralisation)	≈ 1 : 1.3	Stoichiometric reference (MW 192 vs 3×84)
Production target	Slight base excess <b>or</b> partial neutralisation (residual acid)	Set per line to tune fizz duration and soak pH; locked ratio under NDA (Section 4)

## 2. Dissolved-soak pH (by line, 1% aqueous solution, 25 °C)

Line	pH (1% solution)	Method
Standard effervescent / mineral	6.5 – 7.5	pH meter, ISO 4316
Bubble / foaming (surfactant)	6.0 – 7.0	pH meter, ISO 4316
Tart / citrus (residual-acid)	5.5 – 6.5	pH meter, ISO 4316
Carbonate-boosted (alkaline fizz)	7.5 – 8.5	pH meter, ISO 4316

In-use, one tablet is diluted into a full basin of warm water, so the actual soak pH sits within a comfortable, skin-tolerant range; the 1% figures above are the controlled QC reference.

### 3. Compliance flags

Market	Requirement	This product
US	Cosmetic foot soak; no AHA/BHA sun-sensitivity warning required (no AHA acid line)	Effervescent salts only; cosmetic claims
EU	Ingredients per Reg. (EC) 1223/2009; colourants per Annex IV (Section 7)	Within permitted use; verified per order
All	Tea tree / essential-oil claims must stay cosmetic (deodorising / refreshing), not therapeutic	Claims guardrails in Section 0

### 4. Statement

The effervescent acid–base balance and dissolved-soak pH typical of standard production are recorded above. The brand owner's safety assessor uses these in the CPSR and to confirm labelling for each target market; the exact locked acid : base ratio is disclosed under NDA (Section 4) and batch-specific values are provided with shipment.

Issued by: **NailLegend – Quality Control (in-house)** · naillegend.com · 2026-06-22

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