

NAILLEGEND

Sugar Scrub

Compliance & Technical Dossier

Anhydrous Oil-Based · Sugar / Brown-Sugar / Salt Abrasive · Fragranced & Fragrance-Free | Emulsifying
Variant Available

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0. Dossier Overview & Legal Notice

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Sugar Scrub **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 **Sugar Scrub** category (anhydrous oil-based body polish; sugar / brown-sugar / salt abrasive options; fragranced and fragrance-free 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.

Product type & system note

The NailLegend standard Sugar Scrub is an **anhydrous (water-free), oil-based** body polish: sugar (or salt) abrasive suspended in carrier oils and butters, with vitamin E and fragrance. Because the standard system contains **no water**, it is operated under a **preservative exemption** — see the Anhydrous / Preservation Statement in Sections 2 and 4. An **emulsifying ("rinse-clean") variant** that contains added water is available; where that variant is ordered, a preservation system is added and the additional microbiological / preservative-efficacy documentation is supplied. **This dossier documents the standard anhydrous oil-based product.**

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 sugar scrub claiming **exfoliating, smoothing, moisturizing, polishing** is a **cosmetic**. Wording such as "treats eczema," "anti-cellulite cure," or "medical" reclassifies the product as a **drug** and triggers separate regulation. Keep claims cosmetic — "exfoliates / polishes / leaves skin soft and moisturized," not "cures / treats." Because the product is oil-based, the on-pack **slip-hazard caution** ("may make surfaces slippery — use caution") is a standard safety statement — see Section 2.

How to read the data

- **Composition & specification** (INCI, TDS, formulation disclosure, allergen and IFRA statements) describe the product as manufactured.
- **Test sections** (stability) present the applicable **methods, acceptance criteria, and typical results** for this product, issued by NailLegend's in-house QC. They represent standard production performance; batch-specific certificates accompany each shipment.
- **Preservative-efficacy and microbiological test sections are not included** for the standard anhydrous product; the basis for their omission (water-free system / preservative exemption) is stated in Sections 2 and 4. These tests are added for the water-containing emulsifying variant.

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1. INCI Ingredient List

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Sugar Scrub **Document:** INCI Ingredient List (representative — anhydrous oil-based base) | **Issue date:** 2026-06-22 | **Version:** 1.0

The list below is the representative INCI composition for the anhydrous oil-based Sugar Scrub. 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 (abrasive choice / butter choice / fragranced / emulsifying variants).

INCI declaration (descending order)

#	INCI name	Function
1	Sucrose	Abrasive / exfoliant — humectant on dissolve (sugar line)
2	<i>Sodium Chloride</i>	Abrasive / exfoliant (salt-scrub variant)
3	Helianthus Annuus (Sunflower) Seed Oil	Carrier / emollient
4	Prunus Amygdalus Dulcis (Sweet Almond) Oil	Carrier / emollient (tree-nut source — see Section 5)
5	Cocos Nucifera (Coconut) Oil	Carrier / emollient
6	Simmondsia Chinensis (Jojoba) Seed Oil	Carrier / emollient
7	Butyrospermum Parkii (Shea) Butter	Thickening butter / emollient (tree source — see Section 5)
8	<i>Theobroma Cacao (Cocoa) Seed Butter</i>	Thickening butter / emollient (tree source — see Section 5)
9	<i>Glycerin</i>	Humectant (optional)
10	Tocopherol	Antioxidant (protects oils from rancidity)
11	Helianthus Annuus (Sunflower) Seed Oil	Carrier for tocopherol (mixed tocopherols)
12	<i>Cetearyl Alcohol</i>	Emulsifier / consistency (emulsifying variant only)
13	<i>Cetearyl Glucoside</i>	Emulsifier (emulsifying variant only)
14	<i>Phenoxyethanol</i>	Preservative (emulsifying / water-containing variant only)
15	<i>Ethylhexylglycerin</i>	Preservative booster (emulsifying variant only)
16	<i>Parfum (Fragrance)</i>	Fragrance (omitted in fragrance-free line)
17	<i>Limonene, Linalool, Vanillin, Coumarin</i>	Fragrance allergens / constituents (declared at threshold — see Section 5)
18	<i>Mica, CI 77891 (and other permitted colourants)</i>	Pearl / colour (if tinted to brief)
19	<i>Coffea Arabica (Coffee) Seed Powder / fruit-seed powder</i>	Alternative / themed abrasive (coffee-scrub variant)

Notes for labelling

- **Ordering** is representative of standard production; the exact descending-order list is issued for the locked formula of each order. In a sugar scrub the **abrasive (Sucrose / Sodium Chloride)** is **typically the largest single component** and leads the list.
- **Anhydrous standard:** the standard product contains **no Aqua (Water)** and no traditional preservative — items 12–15 apply only to the **emulsifying / water-containing variant**, where a preservative system is added (see Sections 2 and 4).
- **EU fragrance allergens** present at or above the labelling threshold (0.001% leave-on) appear in the on-pack INCI list — see Section 5.
- **Tree-nut / tree-fruit butters** (almond oil, shea, cocoa, mango) are declared as an allergen source note — see Section 5.
- **Preservative (emulsifying variant only) and any colourant** sit within the target-market permitted lists (EU Annex V / IV; US permitted colour additives).

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2. Technical Data Sheet (TDS)

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

1. Product description

A rinse-off cosmetic **body polish / scrub**: a sugar (or salt) abrasive suspended in a blend of carrier oils and butters, delivering three benefits in one step — **physical exfoliation, an emollient oil film after rinsing, and fragrance**. The standard form is **anhydrous (water-free), oil-based**. An **emulsifying variant** (with added emulsifier and water) is available for a non-greasy, easy-rinse finish.

2. Physical & chemical specification (typical)

Property	Specification	Method
Appearance	Granular paste; sugar/salt crystals suspended in soft oil/butter base	Visual
Odour	Characteristic of fragrance dosed / odourless (fragrance-free)	Olfactory
Colour	Off-white to pale tan (natural); tinted to brief (mica/colourant)	Visual
Abrasive grade	Fine / medium / coarse (sugar mesh to brief)	Sieve / visual
Texture / consistency	Scoopable soft paste; sugar evenly distributed, no hard set	Manual
Free-oil layer (top)	Minor expression acceptable; no gross oil/solid separation	Visual
Density (25 °C)	0.95 – 1.05 g/cm ³	Pycnometer
Peroxide value (carrier oils)	≤ 10 meq O ₂ /kg (rancidity indicator)	ISO 3960
Water / moisture content	Anhydrous standard: not added; trace only (Karl Fischer typically < 0.5%)	Karl Fischer (ISO 760)
Net content	To order (e.g. 100 / 200 / 250 / 300 g)	Gravimetric

3. Anhydrous / Preservation Statement

The standard Sugar Scrub is an **anhydrous (water-free) system**. Because there is **no free water (water activity is low; no aqueous phase)**, the product does **not support microbial growth**, and it is manufactured **without a traditional preservative under the recognised water-free / low-water-activity exemption** (consistent with ISO 29621 guidance on products that are microbiologically low-risk by formulation). Accordingly, **preservative-efficacy (challenge) and routine microbiological testing are not applicable** to the standard product. Two conditions apply and are reflected on-pack and in this dossier:

- In-use water ingress** is the only realistic contamination route. The product carries a **"keep dry / use a clean dry spoon / avoid getting water in the jar"** instruction; a **dedicated scoop** can be supplied as an anti-ingress feature.

2. The **emulsifying / water-containing variant is NOT exempt**. When that variant is ordered it is **formulated with a preservation system and undergoes preservative-efficacy (ISO 11930) and microbiological (ISO 17516 limits) testing**, and the corresponding report sections are added to the dossier.

4. Packaging & primary material

- **Standard:** wide-mouth **PET or glass jar** (consumer scoops by hand or spoon); **light-protective (amber / opaque) packaging recommended** to limit oil oxidation.
- Optional **dedicated scoop** (anti-water-ingress feature) and tamper / induction seal.
- Secondary: carton / multi-pack / gift box to brief.

5. Storage, shelf life & usage

Item	Value
Storage	Cool, dry, away from direct sunlight and heat; 5 – 25 °C. Excess heat melts butters / promotes oil bleed; reseal after use
Shelf life	12 months unopened (PAO 12M after opening); driven by oil oxidation and moisture exclusion
Directions	Massage onto damp skin in circular motion; rinse. Keep water out of the jar; use a clean dry spoon
Warnings	External use only. Avoid broken / freshly shaved skin (especially salt variant) and eyes. Caution: oils may make tub / shower surfaces slippery. Discontinue if irritation occurs

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3. Safety Data Sheet (SDS)

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Sugar Scrub **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 anhydrous oil-based formula. Batch- or formula-specific SDS is reissued where the agreed formula differs (e.g. emulsifying variant).

1. Identification — Product: Sugar Scrub (anhydrous oil-based body polish). Use: cosmetic, external skin care (rinse-off scrub). Supplier: NailLegend (naillegend.com). Contact: Lareina. Emergency: contact supplier during business hours.

2. Hazard identification — GHS classification: Not classified as hazardous. Signal word: None. Physical-hazard note: oil-based — **product and rinse water make floors / tub surfaces slippery (slip hazard)**; not a GHS class but flagged for safe use. Precautionary (general): P262 (avoid contact with eyes); keep out of reach of children.

3. Composition / information on ingredients — Mixture (cosmetic). Components of note: Sucrose (CAS 57-50-1) or Sodium Chloride (CAS 7647-14-5) as abrasive; vegetable carrier oils (e.g. Sunflower Seed Oil CAS 8001-21-6, Sweet Almond Oil CAS 8007-69-0, Coconut Oil CAS 8001-31-8); Tocopherol (CAS 59-02-9); Fragrance (where dosed). Emulsifying variant additionally contains water and Phenoxyethanol (CAS 122-99-6) 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: topical use; if irritation occurs, rinse and discontinue. Ingestion: rinse mouth, do not induce vomiting, seek advice. Inhalation: not a normal route of exposure.

5. Fire-fighting measures — Not readily flammable (no low-flash solvents). Suitable extinguishing media: water spray, foam, CO₂, dry powder. Note: vegetable-oil residues are combustible at high temperature.

6. Accidental release — Wipe up promptly; product is **oily and very slippery — avoid slip hazard**. Use absorbent material; avoid bulk release to drains (oil load).

7. Handling & storage — Handle per good hygiene practice. Store cool, dry, out of direct sunlight; keep jar sealed and water-free until use to preserve the anhydrous system.

8. Exposure controls / PPE — Consumer use: no PPE required. Bulk handling (manufacturing): gloves and eye protection; no specific occupational exposure limit assigned to the finished mixture.

9. Physical & chemical properties — Appearance, odour, density: see Section 2 (TDS). Form: granular oily paste. Flash point: not applicable (no volatile solvent; vegetable oils have high flash point). Solubility: oil phase not water-soluble; sugar abrasive dissolves in water on use.

10. Stability & reactivity — Stable under recommended storage. Main degradation route: **oxidation (rancidity) of carrier oils** — controlled by tocopherol antioxidant and light-protective packaging.

Incompatibilities: strong oxidisers; excess heat (butter melt / oil bleed). Hazardous decomposition products: none under normal use.

11. Toxicological information — Finished cosmetic confirmed safe for normal use through the brand owner's CPSR. Abrasive scrub: avoid use on broken, irritated or freshly shaved skin (salt variant especially). May be mildly irritating to eyes (mechanical).

12. Ecological information — No significant adverse effects expected in normal consumer use. Avoid bulk discharge of oils to the environment / drains.

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

14. Transport information — Not classified as dangerous goods for transport (finished cosmetic). UN number: none.

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.

16. Other information — Abbreviations: PAO period after opening; PV peroxide value. 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:** Sugar Scrub **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 proprietary **sugar-to-oil ratio** — 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
Abrasive system	Physical exfoliation (humectant on dissolve)	Sucrose / Brown Sugar / Sodium Chloride / themed (coffee, fruit-seed)
Carrier oils	Suspend abrasive, deliver after-rinse oil film	Sunflower, Sweet Almond, Coconut, Jojoba, Grapeseed oil
Butters	Body, richness, consistency	Shea Butter, Cocoa Butter, Mango Butter
Humectant (optional)	Extra moisturisation	Glycerin
Antioxidant	Protect oils from oxidation / rancidity	Tocopherol (vitamin E)
Emulsifier (variant only)	Rinse-clean, non-greasy feel (water-containing)	Cetearyl Alcohol, Cetearyl Glucoside
Preservation (variant only)	Microbiological safety of water-containing variant	Phenoxyethanol, Ethylhexylglycerin
Sensory	Fragrance, colour, pearl	Parfum (or none), Mica / permitted colourant

2. Anhydrous / Preservation Statement

- **Standard product is anhydrous (water-free).** With no aqueous phase / low water activity, the system **does not support microbial growth** and is produced **without a traditional preservative under the recognised water-free exemption** (consistent with ISO 29621 principles). **Preservative-efficacy (challenge) and microbiological test sections are therefore not applicable** to the standard product and are omitted from this dossier by design — not by oversight.
- **Conditional, not unconditional.** The exemption holds **only while water is kept out of the jar in use**. The product is labelled to keep dry and use a clean dry spoon; a dedicated scoop can be supplied as an anti-ingress feature.
- **Emulsifying / any water-containing variant: exemption does not apply.** Such variants are **formulated with a preservation system** and undergo **preservative-efficacy (ISO 11930) and microbiological (ISO 17516) testing**; the corresponding report sections are then added to the dossier.

3. Restricted-ingredient confirmation

Ingredient (class)	Permitted basis	This product
Tocopherol (antioxidant)	Standard cosmetic use	Used at functional antioxidant level (typ. \leq 1%)
Phenoxyethanol (preservative — variant only)	EU Annex V / target-market list — \leq 1.0%	\leq 1.0% (emulsifying variant only); not present in anhydrous standard
Colourant / Mica (if any)	EU Annex IV / US permitted colour additive	None unless tinted to brief
Fragrance & allergens	IFRA-compliant; allergens declared at threshold	See Sections 5 & 6
Abrasive (Sucrose / NaCl / botanical)	Food-grade / cosmetic-grade abrasive, no restriction	Within standard formulation
Carrier oils / butters	Standard cosmetic emollients (tree-nut/tree source — see Section 5)	Within standard formulation

4. What is and is not disclosed

- **Disclosed openly:** the functional framework, restricted-ingredient identities, and confirmation each is within its permitted limit; whether the order is the anhydrous-exempt or water-containing-preserved system.
- **Disclosed under NDA to the safety assessor only:** exact weight percentages of the locked formula (including the sugar-to-oil ratio), supplier identities, and process parameters.
- **Not disclosed:** proprietary process know-how unrelated to safety assessment.

5. 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, that the product is correctly identified as either **anhydrous (preservative-exempt)** or **water-containing (preserved + microbiologically tested)**, and that supporting analytical data (stability — plus preservative-efficacy and microbiological data for the water-containing variant) is provided in this dossier.

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5. Fragrance Allergen & Tree-Nut Source Declaration

Issued by: NailLegend · naillegend.com | **Contact:** Lareina | **Product:** Sugar Scrub **Document:** EU Fragrance Allergen Declaration + Tree-Nut / Tree-Source Note | **Issue date:** 2026-06-22 | **Version:** 1.0

Basis: EU Regulation (EC) 1223/2009. As a product applied to the skin, fragrance allergens present at \geq **0.001% (10 ppm)** (rinse-off threshold; leave-on residue considered for the after-rinse oil film) are named in the on-pack INCI list. The table below shows a representative vanilla / brown-sugar-type fragrance dosed at 0.5%. Content is reconfirmed by the fragrance supplier for the specific fragrance 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 — vanilla / brown-sugar-type fragrance @ 0.5%)

#	Allergen (INCI)	CAS	Present	% in product	On-pack declaration
1	Coumarin	91-64-5	Yes	0.0150	Required
2	Linalool	78-70-6	Yes	0.0095	Required
3	Limonene	5989-27-5	Yes	0.0048	Required
4	Benzyl Benzoate	120-51-4	Yes	0.0021	Required
5	Geraniol	106-24-1	Yes	0.0013	Required
6	Vanillin (declarable per 2023/1545)	121-33-5	Yes	0.0040	Required (where applicable)
7	Eugenol	97-53-0	Trace	< 0.0010	Not required (below threshold)
—	Citral, Citronellol, Cinnamal, Isoeugenol, Hexyl Cinnamal, Farnesol, Benzyl Salicylate, others	various	No / trace	< 0.0010	Not required

On-pack declaration required for this fragrance: *Coumarin, Linalool, Limonene, Benzyl Benzoate, Geraniol, Vanillin (where the target market applies 2023/1545).*

Tree-nut / tree-source ingredient note (allergen-awareness)

The standard formula commonly uses oils and butters derived from **tree nuts and tree fruits**. These are declared so the brand owner can place an appropriate consumer-awareness statement on pack:

Ingredient (INCI)	Botanical source	Source class
Prunus Amygdalus Dulcis (Sweet Almond) Oil	Almond	Tree nut
Butyrospermum Parkii (Shea) Butter	Shea	Tree (tree-nut-adjacent)
Theobroma Cacao (Cocoa) Seed Butter	Cocoa	Tree (tree seed)
Mangifera Indica (Mango) Seed Butter	Mango	Tree fruit (tree seed)
Cocos Nucifera (Coconut) Oil	Coconut	Tree fruit (allergen status varies by market)

Highly refined nut-derived oils are generally low in residual protein; nonetheless, a "**contains tree-nut-derived ingredients (almond / shea / cocoa)**" awareness note is recommended where the brand owner targets allergen-sensitive consumers. A **nut-free formula** (e.g. sunflower / jojoba carriers, no almond/shea/cocoa) can be supplied on request.

Declaration

For the fragrance 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. Tree-nut / tree-source ingredients are declared above. Values are reconfirmed by the fragrance supplier for the specific fragrance and dosage of each order.

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6. IFRA Conformity Statement

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This statement is supported by the **IFRA Certificate of Conformity issued by the fragrance supplier** for the specific fragrance compound and its dosage. The fragrance 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	Sugar Scrub (rinse-off body scrub, applied to body skin)
IFRA product category	Category 9 (rinse-off products — soaps, body wash, scrubs)
Fragrance dosage in finished product	0.5% (representative; to brief)
IFRA Standards edition	51st Amendment

2. Conformity statement

The fragrance compound used at **0.5%** in this Sugar Scrub conforms to the **IFRA Standards (51st Amendment)** for the applicable product category. All restricted, prohibited and specified materials are within the maximum levels set by the relevant IFRA Standards for this use, as confirmed by the fragrance supplier's IFRA Certificate of Conformity held on file.

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 supplier's IFRA certificate for the dosed fragrance.

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7. Stability Test Report

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

Physical, chemical and packaging-compatibility stability supporting shelf life / PAO, tested in market packaging (wide-mouth PET / glass jar, light-protective). For an anhydrous oil-based scrub the critical failure modes are **carrier-oil oxidation (rancidity), sugar dissolution / syrup formation if moisture enters, oil/abrasive separation, and butter re-crystallisation ("graining")**. 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): **SGS-2406-01**

1. Study design

Condition	Temperature	Pull points
Real-time	25 ± 2 °C / 60% RH	0, 3, 6, 12 months
Accelerated	40 ± 2 °C / 75% RH	0, 1, 2, 3 months
Cold / cycling	4 °C; 4 ↔ 40 °C cycles (butter graining check)	per protocol
Light exposure	Window / light cabinet (oxidation check)	per protocol

Packaging tested: wide-mouth PET jar / glass jar (light-protective).

2. Parameters & results (typical)

Parameter	Acceptance	T0	Accel. 3 mo	Real-time 12 mo	Pass/Fail
Appearance (no gross separation/leak)	Conforms	Conforms	Conforms	Conforms	Pass
Colour	Within range	Pass	No significant change	No significant change	Pass
Odour	No rancidity	Pass	Pass	Pass	Pass
Peroxide value (oils)	≤ 10 meq O ₂ /kg	2.1	5.6	4.2	Pass
Texture / abrasive suspension	No hard set / caking	Pass	Pass	Pass	Pass
Oil bleed (top layer)	Minor; redisperses on stir	Pass	Slight, redisperses	Slight, redisperses	Pass
Sugar dissolution / syrup	None (moisture excluded)	None	None	None	Pass
Butter graining (cycling)	No persistent grain	—	Pass	Pass	Pass
Jar seal integrity / leak	No leak	Pass	Pass	Pass	Pass

3. Conclusion

Based on accelerated and real-time data, the assigned shelf life is **12 months** in the light-protective wide-mouth jar (PAO 12M after opening), conditional on storage cool, dry and out of direct sunlight and on **keeping water out of the jar in use**. The dominant shelf-life driver is **oil oxidation**, controlled by the tocopherol antioxidant and light-protective packaging. Real-time study is ongoing and confirms stability to date. Overall result: **PASS (real-time ongoing)**.

Note: the standard product is **anhydrous (water-free)**; as set out in Sections 2 and 4, preservative-efficacy and microbiological testing are not applicable and are not part of this study. They are performed for the water-containing emulsifying variant.

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