



Chapter: Cosmetic Labels

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01 Decoding Cosmetic Labels

Cosmetic labels are intended to communicate pertinent product information that enable consumers to make informed purchasing decisions. The term “labeling” refers to all labels and other written, printed, or graphic matter on, or accompanying a product. Cosmetic products sold in the US are required to comply with both the [Food, Drug and Cosmetic Act](#) and the [Fair Packaging and Labeling Act](#). The label statements required under the authority of the FD&C Act must appear on the inside as well as any outside container or wrapper. To ensure compliance with these two federal acts, the FDA has issued [regulations](#) covering the types of information that must be provided on the labels of cosmetic products sold in the US. Cosmetic labels are comprised of two parts, a Principal Display Panel, and an Information Panel, each having its own requirements.

02 Principal Display Panel

The **Principal Display Panel** is the one most predominantly displayed on the front of a product. Its requirements are comprised of the following elements:

- **Name of the Product**
- **Function** communicates the product’s intended use via words or illustration.
- **Net Quantity** is a statement that communicates the net quantity of contents in the package in terms of weight, measure, numerical count, or a combination of numerical count and weight or measure.
- **Warning** lets a consumer know that the cosmetic product contains an ingredient for which adequate substantiation of safety has not been obtained such as “Warning – the safety of this product has not been determined”.



03 Information Panel

The Information Panel is the one typically found on the back and/or sides of a product's package/container that provides more detailed information pertaining thereto such as:

- **Name and place of business** of the entity promoting/marketing the product. This may be the manufacturer, distributor, or packer of the product.
- **Distributor statement** in the event the entity promoting the product is not the manufacturer. Sample statements included, "Manufactured for..." or "Distributed by..."
- **Warning and Caution Statements** let consumers know that a cosmetic may be hazardous if misused. For example, flammable products such as aerosol sprays require a warning that they be kept and/or used away from open flames.
- **Ingredient Declaration** is a list of each ingredient in a product's formula identified using its International Nomenclature of Cosmetic Ingredients, a.k.a., an [\(INCI\)](#) list. Each ingredient is listed in descending of its predominance/quantity in the formula, with the exception of ingredients present in amounts of less than 1% which can be listed in any order, together with "active ingredients" if the product is an Over the Counter (OTC) medicine, such as an acne treatment, in which case its active ingredients are listed separately from the rest of the ingredients.
 - o Known allergens should be listed at the end of the INCI list, when present in the finished formula at certain thresholds.
 - o There are several apps available that allow consumers to ascertain the safety of a product's ingredients.
 - [EWG's Healthy Living](#) and [Think Dirty](#) apps allow one to scan the barcode of a product and receive easy-to-read information concerning the product and its ingredients.
 - [Ingred](#) and [Ingredients scanner](#) apps allow one to take a photo of the ingredients list on the product and receive information on the safety of each ingredient.
- **Material/Important Facts** provide directions on how to safely use a cosmetic product. Failure to include material facts could render the products misbranded and/or adulterated.

For those cosmetic products sold in the EU, they must comply with the [EU's Labeling regulations](#) which, in addition to the above-noted FDA information, also requires the inclusion of the following:

- **The name and address of the Responsible Person** which, as defined by [European regulation EC No. 1223/2009](#), is a legal or natural person based in the EU who serves as the marketing entity's representative throughout the European Union in the event an issue arises that is in some way associated with the product.
- **The Country of origin** if the product is imported from a country outside of the EU.



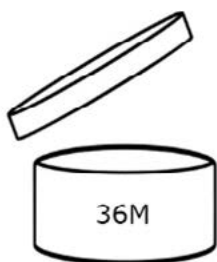
- **Date of minimum durability (DOMD) & Period after opening (PAO)** communicates a product's useful life prior to being opened, and after. An "hour-glass symbol" means that a product has a shelf-life (DOMD) of 30 months or less. If, however, has a shelf-life greater than 30 months, an "open-jar symbol" is provided along with a numerical designation such as, for example, a 6M or 12M which indicates that the product can be safely used for 6 months or 12 months after it has first been opened. Both DOMD and PAO are determined based on preservative stability and challenge testing results.
- **Batch number** is a numerical identifier corresponding to the batch of product made, analogous to a product's serial number whose purpose is to be able to track/identify the product in the event of a problem associated with a particular batch of product made.

As was touched upon above with regards to a product's shelf-life, a cosmetic label can also contain various types of symbols meant to communicate certain types of information concerning a product. Some symbols are official seals or logos that are given to a product by an external certification organization such as the COSMOS organic certification. Other symbols are created by the brand to give an impression of a specific quality. While non-official symbols may not necessarily be making false claims concerning a product, there is no way of knowing if they are truthful.

Official symbols one might find on skincare products are used to show:

- A product's DOMD or PAO.
- Important or legally required information.
- Whether the packaging can be recycled.
- Whether the product has been certified by a particular organization based on its standards.

Below is a list of some commonly used official symbols appearing on cosmetic products.



Is a PAO symbol indicating that the product must be used within the timeframe noted inside the jar symbol (in months) after it has been opened.



Is a DOMD symbol indicating that the product must be used before the marked date (regardless of when it has been open).



IMPORTANT OR LEGALLY REQUIRED INFORMATION



Is a symbol indicating that the product has important or legally required information that should be read by a consumer prior to use.



The 'e' mark (Europe) is used in Europe to indicate a brand complies with average fill requirements. "Packaged goods labelled with the 'e' mark are declaring their compliance with the requirements of the 'average system' under Directive 76/211/EEC" (Gov.uk).

RECYCLABLE

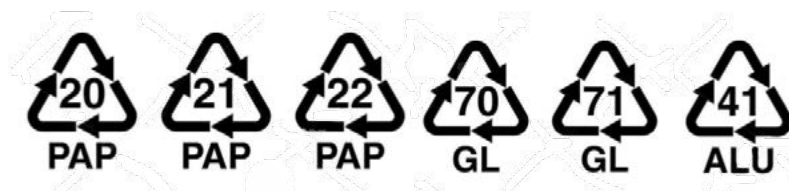


The Green Dot, widely recognized in many European countries, "signifies that for each piece of packaging, a financial contribution has been paid to a national packaging recovery organization" (Valpak.co.uk). It should be noted, however, that this symbol should not be interpreted as meaning the product is fully recyclable.



This symbol is also a bit misleading in that it does not signify that the packaging of the product can be recycled. There is significant greenwashing going on in the industry surrounding this symbol. While the universal plastic resin symbol (three chasing arrows forming a triangle) remains the same, the numbers one through seven inside have significance. More particularly, just because a product has the chasing arrows symbol, does not in and of itself mean that its packaging is recyclable – it merely indicates the type of plastic, glass, metal or paper from which the packaging is made. In many cases, less than 30% of the packaging materials can be recycled through recycling facilities. This is true of colored glass as much as plastic.

Material classifications symbols on plastic packaging communicate the type of plastic the packaging is made from so one can recycle it correctly. Similar symbols exist for glass and paper.



COMPOSTABLE VERSUS BIO-DEGRADABLE

There is also confusion between compostable and biodegradable materials. Compostable materials are those that decompose naturally into their natural elements without leaving any toxic substances in the soil. They add nutrients to the soil and are expected to decompose at a rate of ≤ 90 days. You can put compostable items in the compost bin – either your own, or the green bin in many parts of the world.

Bio-degradable materials break down into their natural elements so that microorganisms present in the soil can consume them. Unfortunately, there are no industry standards that have been established, to date, defining this term so there are many unsubstantiated, unscientific claims associated with its use. These materials are expected to decompose at a rate of ≤ 1 year. Note that the decomposing process requires more time and effort than compostable packaging.



PAPERBOARD

Paperboard is sustainable throughout its life cycle because it is made from renewable fresh fiber, sourced from sustainably managed forests, is lightweight to reduce transportation costs, and is both recyclable and compostable. Look for sustainable paperboard certifications. There are two that are globally recognized.

PEFC (Program for the Endorsement of Forest Certification) and FSC (Forest Stewardship Council) work throughout the entire forest supply chain to promote good practice in the forest and to ensure that forest-based products are produced with respect for the highest ecological, social, and ethical standards.



For papers that are made of 100% FSC-certified virgin fibre.



For papers that are made of a combination of FSC-certified virgin fibre mixed with controlled virgin fibre and/or recycled fibre.



From papers that are made with 100% recycled fibre, at least 85% of which is post-consumer recycled.



CERTIFICATION BODY SYMBOLS: ORGANIC/NATURAL



[USDA Organic](#): represents that the product is organic per United States standards.



[Cosmebio](#): is a French standard for natural and/or organic cosmetics.



[Australian Organic](#) is an Australian standard for organic products.



[EcoCert](#): is a France-based international standard for natural or organic foods and cosmetics.



[Soil Association](#): is a British standard for natural and/or organic cosmetics.



[Natrue](#): is a Belgian standard for natural and/or organic cosmetics.



CERTIFICATION BODY SYMBOLS: VEGAN



[Vegan:](#) is a US-based organization certifying vegan products.



[Vegan Society:](#) is a UK-based organization certifying vegan products.

CERTIFICATION BODY SYMBOLS: CRUELTY FREE



[Cruelty Free:](#) is a US-based organization that certifies products that have not been tested on animal nor contain ingredients tested on animals. It has certified over 600 companies.



[PETA's Beauty Without Bunnies:](#) is a US-based organization that certifies products that have not been tested on animals, nor contain ingredients tested on animals. It has certified over 1900 companies.



[Choose Cruelty Free:](#) is an Australian organization that certifies products that have not been tested on animals nor contain ingredients tested on animals. It has certified over 250 companies.

CERTIFICATION BODY SYMBOLS: FAIRTRADE



[Fairtrade:](#) is a UK-based organization certifying fair trade products.



Carbon Footprint

This term is defined as the total greenhouse gas (GHG) emissions caused by an individual, event, organization, or product, expressed as carbon dioxide equivalent. Although it cannot be calculated exactly because of inadequate knowledge of, and data about, the complex interactions between contributing processes, including the influence of natural processes, it is nevertheless estimated that over 36 billion tons of CO₂ are emitted each year, and rising. A large amount of this CO₂ is embedded in traded goods. Examples of the types of symbols that may be found on labels that reference a commitment to sustainability include the following:



IMAGINARY SYMBOLS

The following are a few examples of made-up (unofficial) symbols that may be found on cosmetic labels whose information has not been validated by a recognized certification authority having officially recognized standards for certification.



These symbols/logos, although they look like official, certification logos should be taken with a grain of salt and corroborated to ascertain their veracity.

