Cosmetic Product Labelling - EU

June 2015
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Article 19 of the EU Cosmetics Regulation (EC) No. 1223/2009 specifies the labelling requirements for finished cosmetic products placed on the market anywhere in the EU.

Summary of the Labelling Requirements

<table>
<thead>
<tr>
<th>Labelling Requirement</th>
<th>Primary Container (Inner Packaging)</th>
<th>Secondary Container (Outer Packaging)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name and Address of the Responsible Person Country of Origin</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Declared Quantity of Contents</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Best Before Date/Period After Opening</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Warning Statements and Precautions</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Batch Code</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Function of the Product</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Ingredient List</td>
<td>no*</td>
<td>yes</td>
</tr>
</tbody>
</table>

* if outer packaging is not used (e.g. product is a stand-alone bottle or jar), the ingredient list must be on the primary container label

NOTES

Name and Address of the Responsible Person: The address can be abbreviated to company name and postcode if space is limited. If more than one address appears on the label, the address where the PIF is made available should be underlined. Country of Origin is not mandatory for all member states, but is recommended for all products to ensure global compliance.

Declared quantity of contents: Fill size can be declared by volume (ml) or weight (g). In practice liquids, creams and gels are declared by volume, solids and powders by weight. Not required for fills less than 5ml/g. The "e" symbol should follow the fill size, to indicate compliance with the Average Fill System. There are minimum text height requirements depending on the fill: ≤50ml: 2mm, 51-200ml: 3mm, ≥201ml: 4mm, ≥1L: 6mm. The "e" symbol should be a minimum of 3mm high.
Best Before Date: If the shelf life of the product is less than 30 months it must be labelled with a best before date (date of minimum durability). The “hourglass” symbol can be used to indicate best before date. If the shelf life is greater than 30 months best before is not required, and the Period After Opening (PAO) must be indicated using the “open jar” symbol. Note that PAO is not applicable to certain product types, such as anhydrous, single use packs, pressurised aerosols etc.

Best before: Period after opening (12 months):

Warning Statements and Precautions: If appropriate due to the nature of the product and its intended market. The presence of certain ingredients makes it mandatory to label a product with specified warning statements. These are detailed in annexes III to VI of the Regulation. Other products do not carry mandatory warnings, but may be recommended by the safety assessor.

Batch Code: The batch or lot number for identifying the cosmetic product and enabling traceability from raw materials through the manufacturing process to the finished product. The batch code will be applied to the product during production and is not required on label artwork.

The Product Function must be labelled, if it is not obvious from the presentation of the product. For example the function of a nail polish is generally obvious. A product name “Shampoo” or “Hand Wash” would clearly indicate function, whereas a product name such as “Elixir” would need to be labelled with a clear function.

Ingredient List: an “ingredient” is any substance or mixture intentionally used in manufacturing the cosmetic product. The following are not considered ingredients: impurities in the raw materials; subsidiary technical materials used in the mixture but not present in the final product.

Ingredients are listed in descending order of concentration. Ingredients present at concentrations below 1% may be listed in any order. By convention fragrance allergens are listed at the end, followed by any colourants which may be present.

**GENERAL GUIDANCE**

All labelling requirements must appear on both primary (e.g. bottles/tubes/jars) and secondary packaging (e.g. printed cartons), except that the ingredient list is not required on primary packaging when secondary packaging is used.

The language of fill size, PAO (or Best Before), precautions and product function should be in the national languages of the countries where the products are sold. In practice this means only the precautions and function should be translated, the other requirements are denoted by internationally recognised symbols. If instructions for use are included these should also be translated.

Note that French national language law requires ALL label text to be translated into French, in equal prominence to any other language.

Apart from fill size, there is no specified minimum font size for label text. All labelling information must be in indelible, easily legible and visible lettering. As a general guide anything less than a point size of 6 can be difficult to read.

For small products where space is limited, the ingredient list and warning statements can instead be enclosed on a “peel and read” label, a leaflet or attached on a swing tag. In this event the "hand in book" symbol is used on the primary container: