



Cosmetic product labelling in the EU



Continuing our series on what to know when breaking into the EU cosmetic products market, **Tadej Feregotto** looks at what information to include on labels.

Labelling is the first aspect of the product that the consumer sees, so this is obviously a very important part of the product when it comes to sales. However, the product label is also the first thing that an inspector would see on a product, so it is also vital from the regulatory point of view.

The EU cosmetics legislation (regulation 1223/2009) contains some very specific labelling requirements, which are described in article 19 of the regulation. Labelling is also a part of the product information file and it has to be uploaded to the CPNP (Cosmetic Products Notification Portal) to complete the product notification.

According to the regulation, the container and the outer packaging of cosmetic products have to bear the following information in indelible, easily legible and visible lettering: the name and address of the responsible person; the country of origin, if the product is imported from countries outside of the EU; nominal content of the product at the time of packaging, given by weight or volume; date

of minimum durability or period after opening; precautions for use; batch number of manufacture or the reference for identifying the cosmetic product; function of the cosmetic product, unless it is clear from its presentation; list of ingredients (which may be indicated on the outer packaging alone).

Some of these elements may also be mentioned on an enclosed or attached leaflet, label, tape, tag or card if it's impossible to list them on the labels. In that case an open book symbol should be placed on the label, which indicates that some information about the product can be found elsewhere.

Certain information on the labels needs to be translated into different languages, depending on where you intend to sell your cosmetic products. The EU consists of 28 different countries, and it has 24 official languages. Some countries even have more than one official language (for example Belgium and Finland), which complicates things even further. The information that has to be translated on the labels is the following: product function,

precautions for use, nominal content of the product, and date of minimum durability if the symbol to indicate the date of minimum durability or period after opening isn't used.

As already mentioned in some previous articles, claims are also an important part of the product, and they mostly appear on cosmetic product labels. The EU has published a separate regulation that deals specifically with cosmetic product claims, but let's just emphasise here once again that each claim made on the cosmetic product label (unless obvious or a clear exaggeration) should be substantiated, and that claims should be in line with the definition of the cosmetic product in the EU. **PB**

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