

COMPLIANCE & LABELLING GUIDE

Leave - On Cosmetics

Great Britain + European Union

Mandatory label elements, pre-market checks and raw label templates

Before you design the label

This document is written for leave-on cosmetics intended to remain on the skin, lips, nails or hair after application.

Scope assumption

This guide assumes the product is a cosmetic presented as a leave-on product, such as a cream, lotion, balm, serum or cosmetic body / massage oil. If the product is marketed with medicinal, therapeutic or other non-cosmetic claims, a different regulatory route may apply.

WHAT THIS GUIDE COVERS

- What must appear on the leave-on cosmetics label or packaging before sale.
- The Responsible Person, product notification and Product Information File / safety documentation that sit behind the label.
- Ingredient-list rules, including INCI naming and fragrance-allergen declaration thresholds for leave-on cosmetics.
- A practical raw label example for Great Britain and a separate raw label example for the EU.

IMPORTANT LIMITS

- Do not copy the sample ingredient list onto a real product. Use the exact formula and allergen data from the approved product documentation.
- Warnings and directions must match the Cosmetic Product Safety Report (CPSR) and any ingredient-specific restrictions.
- EU language requirements vary by Member State. Translate the mandatory consumer information required by the country of sale.
- “UK” in this guide means Great Britain (England, Scotland and Wales). Northern Ireland follows the EU cosmetics regime.

Great Britain: mandatory label elements

Article 19 of the GB cosmetics regime sets out the information that must appear on the container and packaging, unless a specific exception applies.

MANDATORY ITEMS

- Name and address of the **UK Responsible Person**.
- **Country of origin** if the product is imported into Great Britain from outside the UK.
- **Nominal content** by weight or volume in metric units.
- **Date of minimum durability** ("Best before end") where the product has a minimum durability of 30 months or less, or **PAO** where applicable.
- **Particular precautions for use** and any warnings required by the safety assessment or ingredient restrictions.
- **Batch number** or another reference allowing traceability.
- **Function of the product**, unless it is obvious from its presentation.
- **Ingredient list** headed "Ingredients", using INCI names.

GOOD PRACTICE NOTES

- Keep mandatory wording clear, indelible and easy to read.
- If the immediate container is too small, some information may be moved to an enclosed or attached leaflet, label, tag, tape or card where the law allows it.
- Check whether any specific warnings from the CPSR need to appear prominently on the principal packaging.

Artwork sign-off rule

Label artwork should be approved against the exact CPSR, formula, specification and final packaging format before print. A generic template is useful for layout, but it is not a substitute for product-specific compliance review.

Great Britain: what sits behind the label

A compliant label depends on product documentation and notification work completed before the leave-on cosmetic is placed on the market.

BEHIND-THE-LABEL REQUIREMENTS

- A completed **Cosmetic Product Safety Report (CPSR)** for the finished product.
- A **Product Information File (PIF)** kept available at the Responsible Person address.
- Notification submitted on the **Submit Cosmetic Product Notifications (SCPN)** service before the product is made available in Great Britain.
- Evidence supporting any cosmetic claims used on the label or in marketing.
- Final label wording that matches the approved formula, fragrance profile, allergens and use instructions.

IF YOU ARE REPACKING OR RELABELLING

- Any change to packaging format, mandatory wording, fragrance description, claims or warnings must be checked against the safety documentation.
- If you alter the formula, presentation or role you play in the market, you may trigger additional responsibilities and may need a new assessment and/or notification.

Great Britain: Responsible Person, ingredients & allergens

These points are especially important when selling AW Aromatics leave-on cosmetics in Great Britain.

RESPONSIBLE PERSON

For AW Aromatics products supplied **unpackaged, or where the original product is not changed**, **AW Aromatics remains the Responsible Person for the product in Great Britain**. As the Responsible Person, AW Aromatics is responsible for ensuring the product meets the applicable GB cosmetic safety and regulatory requirements.

If you change the product, its formulation, its label positioning or market it under arrangements that make you the Responsible Person, additional regulatory responsibilities may apply to your business. Always use the Responsible Person details provided for the specific product unless you have independently assumed that role.

INGREDIENT-LIST RULES

- List ingredients in descending order of weight at the time they are added to the product.
- Ingredients present at less than 1% may be listed in any order after those above 1%.
- Use INCI names. Colourants are usually declared by CI number where applicable.
- **For leave-on cosmetics, fragrance allergens must be declared when present above 0.001% in the finished product.**

CLAIMS

- Avoid medicinal, disinfectant or therapeutic claims unless the product is regulated under a different legal route.
- Cosmetic claims must be truthful, supported by evidence and must not imply properties the finished product does not have.

European Union: mandatory label elements

Article 19 of Regulation (EC) No 1223/2009 sets out the information that must appear on the container and packaging of cosmetic products in the EU.

MANDATORY ITEMS

- Name and address of the **EU Responsible Person**. If several addresses are shown, the address where the PIF is readily accessible should be highlighted.
- **Country of origin** if the product is imported into the EU.
- **Nominal content** by weight or volume in metric units.
- **Date of minimum durability** ("Best before end") where the product has a minimum durability of 30 months or less, or **PAO** where applicable.
- **Precautions for use** and warnings required by the safety assessment or ingredient restrictions.
- **Batch / lot number** or another reference allowing traceability.
- **Function of the product**, unless clear from presentation.
- **Ingredient list** headed "Ingredients", using INCI names.

REMEMBER

- The consumer-facing information must be in the language(s) required by the Member State where the product is sold.
- Make sure the label, notification and Product Information File all describe the same finished product.

Fragrance allergens

EU fragrance-allergen rules have expanded. Always use the current approved ingredient and allergen declaration supplied from the formula and safety documentation rather than relying on older artwork.

European Union: what sits behind the label

A compliant EU label depends on the supporting compliance file and notification process being completed before sale.

BEHIND-THE-LABEL REQUIREMENTS

- A completed **Cosmetic Product Safety Report (CPSR)** for the finished product.
- A **Product Information File (PIF)** kept accessible at the EU Responsible Person address.
- Notification submitted via the **Cosmetic Products Notification Portal (CPNP)** before the product is placed on the EU market.
- Evidence supporting the cosmetic claims used on the label or in any connected marketing.
- Final language versions checked for each Member State where the product will be sold.

ALLERGEN THRESHOLD FOR LEAVE-ON PRODUCTS

- For leave-on cosmetics, individually regulated fragrance allergens are generally declared when their concentration exceeds **0.001%** in the finished product.
- Because the EU allergen list has expanded, use current supplier allergen declarations and the current Annex III when preparing artwork.

EU: language, symbols & country-specific requirements

EU-wide cosmetics rules are harmonised, but some practical labelling obligations still depend on the Member State where the product is sold.

LANGUAGE

- Translate the product function, durability wording, precautions, directions and any other mandatory consumer-facing text into the official language(s) required by the country of sale.
- Ingredient names use INCI form and generally remain the same across markets.
- For multi-country distribution, a multilingual label is often the most practical route, provided legibility is maintained.

SYMBOLS & PRACTICAL SPACE

- The open-jar PAO symbol may be used with a duration such as 12M where PAO applies.
- The “hand and book” symbol can direct the consumer to information provided on an enclosed or attached leaflet, tag, tape or card where the Regulation allows it.
- Do not use limited space as a reason to omit mandatory information without checking the specific Article 19 exceptions.

CHECK EACH COUNTRY

- In addition to cosmetics law, check each target country for **packaging, recycling and waste-sorting information** requirements.
- Review any local producer-responsibility, environmental or packaging-marking obligations that may apply to your pack format.
- Do not assume one EU label will automatically satisfy every Member State.

Artwork sign-off rule

Final artwork should be approved against the exact CPSR, PIF, CPNP details, current EU rules and the language / packaging requirements of every Member State where the product will be sold.

Leave-On Cosmetics Label Example - Great Britain

Illustrative raw label template - not finished artwork

Use this page as a placement guide. Replace all placeholder wording with your approved product-specific information.

FRONT PANEL

BACK PANEL

1 **PRODUCT NAME**
FACE / BODY CREAM

2 Function / product description
e.g. Moisturising leave-on cream

3 **NET WT. / VOL. XX**

7 **Directions**
Use as directed.

4 **Warnings / Precautions**
Required safety wording from the CPSR.

4 **Best before end / PAO**
MM/YYYY or 12M / 6M where applicable.

5 **Batch**
XXXXXXXXX

6 **Responsible Person**
Name and address of the UK RP.

8 **Ingredients**
INCI list + allergens where required.

1

Product name

Name under which the product is sold.

2

Function

State the product function unless obvious.

3

Net content

Nominal content in metric units.

4

Durability

Best-before date or PAO where applicable.

5

Batch

Reference for identification and traceability.

6

UK Responsible Person

Name and address of the UK RP.

7

Directions & warnings

Instructions and safety wording required for safe use.

8

Ingredients

INCI list and required allergen declarations.



Country of origin

Include country of origin if the cosmetic is imported.

IMPORTANT

This is a layout example only. Final artwork must follow the approved CPSR/PIF, notification details and current GB cosmetics rules.

Leave-On Cosmetics Label Example - European Union

Use this page as a placement guide. Replace all placeholder wording with your approved product-specific information.

FRONT PANEL

1 **PRODUCT NAME**
FACE / BODY CREAM
LOCAL LANGUAGE

2 Function / product description
LOCAL LANGUAGE
e.g. Moisturising leave-on cream

3 **NET WT. / VOL. XX**

BACK PANEL

Directions / LOCAL LANGUAGE
Use as directed in the language of sale.

Warnings / Precautions / LOCAL LANGUAGE
Required safety wording from the CPSR.

Best before end / PAO
MM/YYYY or 12M / 6M where applicable.

Batch / Lot
XXXXXXXXXX

Responsible Person
Name and address of the EU RP.

Ingredients
INCI list + allergens where required.

7

4

5

6

8

Illustrative raw label template - not finished artwork

- | | | |
|--|--|---|
| <p>1 Product name
Name under which the product is sold.</p> | <p>2 Function
State the product function unless obvious.</p> | <p>3 Net content
Nominal content in metric units.</p> |
| <p>4 Durability
Best-before date or PAO where applicable.</p> | <p>5 Batch / lot
Reference for identification and traceability.</p> | <p>6 EU Responsible Person
Name and address of the EU RP.</p> |
| <p>7 Directions & warnings
Instructions and safety wording.</p> | <p>8 Ingredients
INCI list and required allergen declarations.</p> | <p>9 Language
Translate consumer wording for the Member State of sale.</p> |
| <p>Country of origin
Include country of origin if the cosmetic is imported.</p> | | |

IMPORTANT

This is a layout example only. Final artwork must follow the approved CPSR/PIF, notification details and current EU cosmetics rules.