

COMPLIANCE & LABELLING GUIDE

Rinse-Off Cosmetics

Great Britain + European Union

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

Before you design the label

This document is for cosmetic products intended to be removed after application, including many cleansing, bathing and hair-washing products.

Scope assumption

This guide covers rinse-off products that meet the legal definition of a cosmetic product. Examples can include cosmetic soaps, bath bombs, shower gels, body washes, shampoos, facial cleansers and rinse-off scrubs. A product marketed as a biocide, disinfectant, medicine or for another non-cosmetic purpose may follow a different regulatory route.

WHAT THIS GUIDE COVERS

- What must appear on the label or packaging of a rinse-off cosmetic before sale.
- Responsible Person, safety assessment, Product Information File and notification requirements that sit behind the label.
- Ingredient-list rules, including INCI naming and fragrance-allergen requirements applicable to rinse-off cosmetics.
- Separate raw label templates for Great Britain and the European Union.

IMPORTANT LIMITS

- This is an umbrella guide. Product-specific warnings, directions, function wording and ingredient restrictions must come from the approved CPSR and product documentation.
- Do not copy a generic ingredient list onto a real product.
- EU language requirements vary by Member State. Translate the mandatory consumer information required in the country of sale.
- “UK” in this guide means Great Britain (England, Scotland and Wales). Northern Ireland follows the EU cosmetics regime.

GB: before a rinse-off cosmetic goes on sale

The label is only one part of cosmetic compliance.

PRE-MARKET STEPS

- **Responsible Person:** ensure an eligible GB Responsible Person arrangement is in place and use the correct details for the product.
- **Safety assessment:** a suitably qualified safety assessor must complete the Cosmetic Product Safety Report (CPSR).
- **Product Information File:** maintain the PIF and keep it readily accessible to the competent authority.
- **Notification:** notify the product through the UK Submit Cosmetic Product Notifications (SCPN) service before placing it on the GB market.
- **Artwork:** check final wording against Article 19 requirements, the exact formula, allergen data, declared content and CPSR.

PRODUCT-BY-PRODUCT CHECK

- A broad rinse-off guide cannot replace the specific CPSR. Shampoo, soap, bath products and facial cleansers may need different directions, warnings or function descriptions.
- If you change the formulation, fragrance, intended use, claims or packaging presentation, confirm whether the existing assessment and notification remain valid.

GB: mandatory label information

Information must be clearly visible, legible and indelible, subject to the specific placement exceptions in the legislation.

ARTICLE 19 ESSENTIALS

- **Responsible Person:** name and address of the responsible person for the GB market.
- **Country of origin:** required for imported cosmetic products.
- **Nominal content:** weight or volume at the time of packaging, subject to limited exemptions.
- **Durability:** minimum durability date when 30 months or less; for products lasting more than 30 months, PAO where relevant.
- **Warnings / precautions:** exact wording required by the CPSR and any ingredient restrictions.
- **Batch number:** code or reference enabling identification and traceability.
- **Product function:** required unless obvious from presentation.
- **Ingredients:** headed “Ingredients” and listed using recognised cosmetic ingredient names / INCI.

RINSE-OFF FRAGRANCE ALLERGENS

- For rinse-off cosmetics, relevant individually listed fragrance allergens are declared when they exceed the applicable rinse-off threshold in the finished product.
- For the commonly applicable Annex III threshold, this is **0.01%** for rinse-off products. Always use the current target-market rules and current supplier allergen declaration.

Function wording

Use the actual function of the specific product - for example “cleansing shampoo”, “facial cleanser”, “bath bomb” or “body wash” where appropriate. Do not use a generic rinse-off description if it would leave the consumer unclear about intended use.

GB: AW Aromatics Responsible Person & artwork changes

Apply the Responsible Person information supplied for the exact AW Aromatics product.

RESPONSIBLE PERSON - GREAT BRITAIN

For AW Aromatics products supplied **unpackaged, or where the original product is not altered**, **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, or market it under arrangements that make you the Responsible Person, additional regulatory responsibilities may apply to your business. A distributor can, for example, become the Responsible Person where they label a cosmetic product as their own.

Always use the Responsible Person details provided by AW Aromatics for the specific product unless you have independently assumed the Responsible Person role.

BEFORE CHANGING ARTWORK

- Check product name, function, claims, warnings, directions, nominal content, ingredient list and allergens against the approved documentation.
- Do not assume the same wording is appropriate across every rinse-off product family.
- If the final packaging is too small for direct labelling, check the specific legal exceptions before moving information to a leaflet, tag, tape or card.

EU: before a rinse-off cosmetic goes on sale

EU cosmetic products are governed by Regulation (EC) No 1223/2009, as amended.

PRE-MARKET STEPS

- **EU Responsible Person:** appoint a Responsible Person established in the EU.
- **CPSR and PIF:** complete the safety assessment and maintain the Product Information File.
- **GMP:** manufacture in accordance with cosmetic good manufacturing practice.
- **CPNP:** submit the cosmetic product notification before placing the product on the EU market.
- **Market adaptation:** ensure mandatory consumer wording meets the language requirements of each Member State where the product is sold.

2026 FRAGRANCE-ALLERGEN UPDATE

- Regulation (EU) 2023/1545 expanded the individually labelled fragrance allergens in Annex III.
- From 31 July 2026, newly placed products must comply with the expanded requirements. Products placed on the market before that date may benefit from the applicable transitional period for continued availability.
- Use current supplier allergen data and the current Annex III rather than relying on older artwork.

EU: mandatory label information

Article 19 sets the core information that must appear on the container and packaging, subject to stated exceptions.

ARTICLE 19 ESSENTIALS

- **EU Responsible Person:** name and address of the Responsible Person established in the EU.
- **Country of origin:** required for cosmetics imported into the EU from a third country.
- **Nominal content:** weight or volume at the time of packaging, subject to limited exemptions.
- **Durability:** date of minimum durability when 30 months or less; for products lasting more than 30 months, PAO where relevant.
- **Warnings / precautions:** product-specific CPSR precautions and mandatory ingredient restrictions.
- **Batch / lot:** reference allowing identification of manufacture.
- **Product function:** state the cosmetic function unless clear from presentation.
- **Ingredients:** use the heading “Ingredients” and common cosmetic nomenclature / INCI.

RINSE-OFF FRAGRANCE ALLERGENS

- For individually regulated fragrance allergens, the rinse-off declaration threshold is generally **0.01%** in the finished product.
- Because Annex III has expanded, artwork should be prepared from the current formula and current supplier allergen declaration.

EU: language, symbols & country-specific requirements

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

LANGUAGE

- Translate the nominal content, durability wording, precautions, directions and product function as required by the Member State of sale.
- Ingredient names use common cosmetic nomenclature / INCI and generally remain in that form.
- For multi-country distribution, multilingual artwork can be practical provided legibility is maintained.

SYMBOLS & PRACTICAL SPACE

- Use the open-jar PAO symbol with a duration such as 12M only where PAO applies.
- The “hand and book” symbol can direct consumers to information on an enclosed or attached leaflet, tag, tape or card where the Regulation permits it.
- Do not omit mandatory information because the pack is small without checking the specific Article 19 exceptions.

ADDITIONAL EU COUNTRY REQUIREMENTS

- Check each target country for **packaging, waste-sorting and recycling information** requirements.
- Review local environmental, producer-responsibility and packaging-registration obligations that may apply.
- Do not assume one EU label automatically satisfies every Member State.

Artwork sign-off rule

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

Ingredient lists, warnings & claims

The broad rinse-off classification affects some rules, but the final label must still be product-specific.

INGREDIENT LIST

- Use the exact approved formula and recognised cosmetic ingredient names / INCI.
- List ingredients in the required order. Ingredients below 1% may follow the higher-concentration ingredients in any order, subject to the applicable rules.
- Add individually declarable fragrance allergens when the relevant target-market threshold is exceeded.
- Colourants and nanomaterials must be declared in the form required by the applicable cosmetics legislation.

WARNINGS & DIRECTIONS

- Do not invent generic precautions. Use the exact product-specific warnings required by the CPSR and ingredient restrictions.
- Directions should make intended use clear where needed - particularly where misuse could affect safety.
- A rinse-off cosmetic intended for hair, face, body or bathing may need different wording even when the same broad guide is used.

CLAIMS

- Claims must be truthful, supportable and consistent with the cosmetic function of the product.
- Avoid medicinal, therapeutic, disinfectant or biocidal claims unless the product is regulated under the appropriate non-cosmetic framework.

Rinse-Off Cosmetic Label Example - Great Britain

Illustrative raw label template - not finished artwork

Use this page as a placement guide. Replace every placeholder with the approved information for the specific product and market.

FRONT PANEL

BACK PANEL

1 2 3	PRODUCT NAME PRODUCT TYPE / FUNCTION e.g. Cleansing / rinse-off cosmetic <i>Use the product-specific function</i> NET WT. / VOL. XX	7 4 5 6 8	Directions Approved instructions for intended use. Warnings / Precautions Required safety wording from the CPSR. Best before end / PAO MM/YYYY or PAO, where applicable. Batch XXXXXXXXXX Responsible Person GB RP name + address. Ingredients INCI list + required fragrance allergens.
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|--|--|---|
| <div>1 Product name
Name under which the product is sold.</div> <div>4 Durability
Best-before date or PAO where applicable.</div> <div>7 Directions & warnings
Instructions and safety wording required for safe use.</div> | <div>2 Function
State the product-specific cosmetic function unless obvious.</div> <div>5 Batch
Reference for identification and traceability.</div> <div>8 Ingredients
INCI list and required fragrance-allergen declarations.</div> | <div>3 Net content
Nominal weight or volume in metric units.</div> <div>6 GB Responsible Person
Name and address of the responsible person.</div> <div> <div style="display: flex; align-items: center;"> <div style="font-size: 2em; margin-right: 5px;">!</div> <div> Country of origin
 Include country of origin if the cosmetic is imported. </div> </div> </div> |
|--|--|---|

IMPORTANT

This is a layout example only. Final artwork must follow the approved CPSR/PIF, SCPN notification details and current Great Britain cosmetics requirements.

Rinse-Off Cosmetic Label Example - European Union

Use this page as a placement guide. Replace every placeholder with the approved information for the specific product and market.

FRONT PANEL

BACK PANEL

1 **PRODUCT NAME**
LOCAL LANGUAGE

2 **PRODUCT TYPE / FUNCTION**
LOCAL LANGUAGE
e.g. Cleansing / rinse-off cosmetic
Use the product-specific function

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

7 **Directions / LOCAL LANGUAGE**
Approved instructions for intended use.

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

5 **Best before end / PAO**
MM/YYYY or PAO, where applicable.

6 **Batch / Lot**
XXXXXXXX

8 **Responsible Person**
EU RP name + address.

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

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-specific cosmetic function unless obvious.</p> | <p>3 Net content
Nominal weight or volume 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 responsible person.</p> |
| <p>7 Directions & warnings
Instructions and safety wording required for safe use.</p> | <p>8 Ingredients
INCI list and required fragrance-allergen declarations.</p> | <p>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, CPNP notification details, current EU cosmetics rules and target-country language requirements.

Rinse-Off Cosmetics artwork sign-off checklist

Use this checklist for every SKU, fragrance, formulation and target market.

- ☐ Correct market selected: Great Britain or the specific EU Member State(s).
- ☐ Correct Responsible Person name and address shown.
- ☐ Country of origin included where the cosmetic product is imported.
- ☐ Nominal weight or volume matches the packed-product specification.
- ☐ Durability marking / PAO matches the approved stability and safety documentation.
- ☐ Batch coding format is present and traceable.
- ☐ Warnings and directions match the CPSR and ingredient restrictions.
- ☐ Ingredient list matches the exact approved formula and uses correct INCI / common cosmetic ingredient names.
- ☐ Fragrance allergens checked against the rules applicable to the target market and current supplier declaration.
- ☐ For EU sale, mandatory consumer wording is translated for the Member State(s) concerned.
- ☐ All claims are supportable and remain cosmetic in nature.
- ☐ Final artwork is legible, visible and indelible at actual print size.

PRIMARY OFFICIAL REFERENCES

- **Great Britain:** GOV.UK guidance on making cosmetic products available to consumers in Great Britain and Article 19 labelling requirements.
- **Great Britain notification:** Submit Cosmetic Product Notifications (SCPN).
- **European Union:** Regulation (EC) No 1223/2009 on cosmetic products, Article 19.
- **EU fragrance allergens:** Commission Regulation (EU) 2023/1545 amending Annex III.

Compliance note

Regulations and annexes can change. Re-check the applicable official legal text, target-market requirements and the product-specific CPSR before printing or reprinting labels.