

COMPLIANCE & LABELLING GUIDE

Soaps

Great Britain + European Union

Mandatory label elements, pre-market checks and editable examples

Before you design the label

This document is written for soaps marketed as cosmetic products.

Scope assumption

This guide assumes the soap is presented as a cosmetic product for cleansing the skin. If the product is marketed with medicinal, biocidal, disinfectant or therapeutic claims, a different regulatory route may apply.

WHAT THIS GUIDE COVERS

- What must appear on the soap 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 rinse-off cosmetics.
- A practical editable label example for Great Britain and a separate editable 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 under the Windsor Framework.

GB: before the soap goes on sale

The label is only one part of cosmetic compliance.

1

Appoint a GB Responsible Person

A cosmetic product placed on the GB market must have a Responsible Person established in the UK. For imported products, the importer is the Responsible Person by default unless another eligible person is formally appointed.

2

Complete the safety assessment

A suitably qualified safety assessor must complete the Cosmetic Product Safety Report (CPSR). Product-specific warnings and use restrictions identified by the assessor must feed into the label.

3

Maintain the Product Information File

Keep the PIF readily accessible to the competent authority. It includes the product description, CPSR, manufacturing method/GMP information, evidence for claimed effects and animal-testing information.

4

Notify via SCPN

The Responsible Person must notify the product through the UK Submit Cosmetic Product Notification service before first placement on the GB market.

5

Finalise compliant artwork

Check the final artwork against Article 19 requirements, the CPSR, the exact INCI list, fragrance-allergen data and declared weight.

Practical recommendation

Future-proofing: although transitional provisions can allow EU/EEA Responsible Person details to satisfy certain GB labelling requirements until 31 December 2027, this guide recommends using the correct UK Responsible Person details now for new GB artwork.

GB: mandatory label information

Information must be clear, visible and indelible; some items have specific placement rules.

■ Responsible Person	Name and address of the UK Responsible Person. Where several addresses appear, highlight the address where the PIF is readily accessible.
■ Country of origin	Required for imported cosmetics. State a country, e.g. "Made in Spain"; "Made in the EU" is not a country of origin.
■ Nominal content	State weight or volume at the time of packaging, normally e.g. "200 g". Limited exemptions exist, including some packs sold by number or products normally sold individually.
■ Durability	If durability is 30 months or less: minimum durability date. If more than 30 months: PAO where applicable. Some single-use / non-deteriorating products may not need PAO.
■ Warnings / precautions	Use the exact mandatory warnings and precautions required by the CPSR and applicable ingredient restrictions. In GB, required consumer warnings are in English.
■ Batch number	A code enabling the batch to be identified. If size makes it impossible to mark both container and outer packaging, it may appear on outer packaging alone.
■ Product function	Required where the function is not obvious from presentation. "Soap" will usually make the function reasonably clear, but directions can still improve safe use.
■ Ingredients	Precede with "Ingredients". Use recognised cosmetic ingredient names / INCI. List in descending order by weight at addition; ingredients below 1% may follow in any order. "Parfum" / "Aroma" may represent perfume compositions; report declarable fragrance allergens separately.

Fragrance-allergen threshold

Soaps are treated as rinse-off products for fragrance-allergen declaration. Under the GB guidance, relevant listed fragrance allergens must be named in the ingredient list when present above 0.01% in the finished rinse-off product.

Soap 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

PRODUCT NAME

SOAP

Function / product description
e.g. Cleansing

NET WT. 180 g

Directions
Instructions for safe and intended use.

Warnings
Safety precautions required by the Cosmetic Product Safety Report.

Best before / PAO
MM/YYYY - for products with minimum durability of 30 months or less.

Batch
XXXXXXXX

Responsible Person
Company name and UK address of the GB Responsible Person.

Ingredients
INCI ingredient list, including fragrance allergens where required.

Symbols only where applicable:
[best-before] [PAO if applicable] [refer-to-info]

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

- | | | |
|---|--|--|
| <p>1 Product name
Name under which the product is sold.</p> | <p>2 Function
State the product function unless obvious from presentation.</p> | <p>3 Net content
Nominal content by weight or volume in metric units.</p> |
| <p>4 Durability
Best-before date when minimum durability is 30 months or less.</p> | <p>5 Batch code
Batch or reference for identification and traceability.</p> | <p>6 GB Responsible Person
Name and UK address of the GB Responsible Person.</p> |
| <p>7 Ingredients
INCI list and required fragrance-allergen declarations.</p> | <p>8 Directions & warnings
Instructions and safety wording required for safe use.</p> | <p>! Country of origin
Include country of origin if the cosmetic is imported.</p> |

IMPORTANT

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. GOV.UK guidance confirms that, for example, a distributor can become the Responsible Person where they label a cosmetic product as their own.

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

EU: before the soap goes on sale

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

1

Appoint an EU Responsible Person

The Responsible Person must be established within the EU. For imported cosmetics, the importer is the Responsible Person by default unless an eligible EU person is designated in writing.

2

Complete the CPSR and PIF

A compliant Cosmetic Product Safety Report must be completed before placing the product on the market, and the Product Information File must be maintained and accessible at the Responsible Person address.

3

Manufacture under cosmetic GMP

Manufacture must comply with good manufacturing practice. The PIF must describe the method of manufacture and GMP compliance.

4

Notify through CPNP

The Responsible Person must submit the cosmetic product notification through the EU Cosmetic Products Notification Portal (CPNP) before placing the product on the EU market.

5

Adapt the label by market

Mandatory consumer information must meet the language requirements set by the Member State where the product is made available. Do not assume one English-only label is sufficient across the EU.

2026 EU fragrance update

EU rules on individually labelled fragrance allergens were expanded by Regulation (EU) 2023/1545. The transition is now operational for newly placed products, so the formula and supplier allergen data should be checked against the current EU Annex III rather than relying only on the historic allergen list.

EU: mandatory label information

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

■ EU Responsible Person	Name and address of the Responsible Person established in the EU. If several addresses are shown, highlight the one where the PIF is readily accessible.
■ Country of origin	Required for cosmetic products imported into the EU from a third country.
■ Nominal content	State the nominal content at packaging by weight or volume, subject to limited exemptions for small packs, free samples and certain unit-sale products.
■ Durability	For products with minimum durability of 30 months or less, show the date of minimum durability. For products lasting more than 30 months, show PAO where relevant.
■ Warnings / precautions	Include particular precautions for use, including mandatory wording arising from restricted ingredients and any product-specific CPSR precautions.
■ Batch number	Include the batch number or reference allowing identification of manufacture.
■ Product function	State the cosmetic function unless it is clear from presentation.
■ Ingredients	Use the heading "Ingredients". List ingredients using common cosmetic nomenclature / INCI. Ingredients are listed in descending order by weight at addition, with ingredients below 1% allowed in any order after those at 1% or more. Nanomaterials are followed by "(nano)".

Additional EU Country Requirements

In addition to the EU Cosmetics Regulation, individual EU Member States may have additional national requirements that must be considered before placing a product on their market. The EU Cosmetics Regulation is the main framework for cosmetic products, but other EU and national legislation can also apply.

Before creating your final label, always check the requirements for each country where the product will be sold, particularly for:

required local language(s);
packaging and waste-sorting / recycling information;
environmental or packaging symbols;
local producer or packaging-waste registration obligations;
any other country-specific consumer information.

Packaging and waste-labelling rules are also developing under the EU Packaging and Packaging Waste Regulation, so requirements should be checked against the rules applicable at the time the product is placed on the market.

Do not assume that one EU label will automatically meet the requirements of every EU Member State.

Soap ingredient-list check

For rinse-off cosmetics, individually regulated fragrance allergens are generally declared when their concentration exceeds 0.01% in the finished product. Because the EU list has expanded, use current supplier allergen declarations and the current Annex III when preparing artwork.

EU: language, symbols & small-pack issues

EU-wide rules are harmonised, but language obligations are applied at Member State level.

LANGUAGE

- Translate the nominal content, durability wording, precautions and product function as required by the Member State of sale. Ingredient names use the common cosmetic nomenclature and generally remain in INCI form.
- For multi-country distribution, a multilingual label is often the most practical route, provided legibility is maintained.

SYMBOLS AND 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 precautions or an ingredient list provided on an enclosed or attached leaflet, tag, tape or card where the Regulation permits this because direct labelling is impracticable.
- Do not use small packaging as a reason to omit mandatory information without checking the specific Article 19 exceptions.

CLAIMS

- Avoid medicinal or therapeutic claims such as “treats eczema”, “relieves anxiety” or “heals skin” unless the product is regulated under the appropriate non-cosmetic framework.
- Cosmetic claims must be truthful, supported by adequate evidence and must not imply properties the finished product does not have.

Artwork sign-off rule

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

Soap Label Example - European Union

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

The image shows a raw label template for a soap product, divided into a front panel and a back panel. The front panel includes a large area for the product name (1), a section for the soap type in the local language (2), a function/product description in the local language (2), and a net weight section (3). The back panel includes sections for directions in the local language (7), warnings in the local language (7), best before/PAO (4), batch/lot (5), responsible person (6), and ingredients (8). Symbols only where applicable are listed at the bottom of the back panel.

FRONT PANEL

PRODUCT NAME

SOAP / LOCAL LANGUAGE

Function / product description
LOCAL LANGUAGE
e.g. Cleansing

NET WT. 180 g

BACK PANEL

Directions / LOCAL LANGUAGE
Instructions for use in the required language(s) of the country of sale.

Warnings / LOCAL LANGUAGE
Safety precautions required by the safety assessment, in the required local language(s).

Best before / PAO
MM/YYYY - for products with minimum durability of 30 months or less.

Batch / Lot
XXXXXXXX

Responsible Person
Name and address of the EU Responsible Person.

Ingredients
INCI ingredient list, including fragrance allergens where declaration thresholds are met.

Symbols only where applicable:
[best-before] [PAO if applicable] [refer-to-info]

- | | | |
|---|---|--|
| 1 Product name
Name under which the product is sold. | 2 Function
State the product function unless obvious from presentation. | 3 Net content
Nominal content by weight or volume in metric units. |
| 4 Durability
Best-before date when minimum durability is 30 months or less. | 5 Batch / lot
Batch or reference for identification and traceability. | 6 EU Responsible Person
Name and address of the EU Responsible Person. |
| 7 Directions & warnings
Precautions and instructions required for safe use. | 8 Ingredients
INCI list and required fragrance-allergen declarations. | ! Language
Translate required consumer wording for the Member State of sale. |
| | | ! 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, CPNP notification details, current EU Cosmetics Regulation and the language rules of every Member State where the product is sold.

Soap artwork sign-off checklist

Use this checklist for every SKU / fragrance / formulation.

- ☐ Correct market selected: Great Britain or specific EU Member State(s).
- ☐ Correct Responsible Person name and address shown.
- ☐ Country of origin included where the product is imported.
- ☐ Nominal weight matches the packed-product specification and weights-and-measures controls.
- ☐ 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 ingredient names.
- ☐ Fragrance allergens checked against the rules applicable to the target market and the supplier declaration.
- ☐ EU label translated to the mandatory language(s) required by the Member State(s) of sale.
- ☐ All claims are supportable and remain cosmetic in nature.
- ☐ Final artwork is legible, visible and indelible at actual print size.

Primary official references used

- Great Britain: GOV.UK - Regulation 1223/2009 and Cosmetic Products Enforcement Regulations 2013: Great Britain.
- Great Britain legal text: legislation.gov.uk - retained/assimilated Cosmetic Products Regulation (EC) No 1223/2009 as it applies in GB.
- European Union: EUR-Lex - Regulation (EC) No 1223/2009 on cosmetic products, consolidated text.
- European Union fragrance allergens: Commission Regulation (EU) 2023/1545 amending Annex III.

Compliance note: Regulations and annexes can change. Re-check the applicable official legal text and product-specific CPSR before printing or reprinting labels.