

## 1. Scope of application

This guide aims to provide the regulations, standards, requirements and differences between my country's cosmetics major export target countries (regions) in terms of cosmetics labels, and put forward suggestions and guidelines to meet the requirements of the target market.

Applicable to all cosmetics companies that export or prepare to export.

Guidelines for the management of cosmetic labels in various countries

## 2 II. Overview of the basic situation of imported and exported cosmetics

### 2.1 Terms and definitions

**Cosmetics:** refers to products that are applied to any part of the human body surface (skin, hair, nails, lips), teeth and oral mucosa by smearing, sprinkling, spraying or other similar methods to achieve the purpose of cleaning, fragrance, changing appearance, correcting human odor, maintenance, and maintaining good condition.

**Labeling:** refers to the words, numbers, symbols, patterns and explanatory materials placed in the sales packaging that are pasted, connected or printed on the sales packaging of cosmetics.

**Sales packaging:** refers to the packaging delivered to consumers together with the contents for the purpose of sales.

**Contents:** refers to the products contained in the packaging container.

**Display panels:** refers to the surface of the cosmetics that can be seen by consumers in their natural state when displayed.

**Visible panels:** refers to any surface of the cosmetics that can be seen by consumers without destroying the sales packaging.

**Net content:** refers to the actual mass, volume or length of the contents after removing the packaging container and other packaging materials.

**Shelf life:** refers to the period of time during which the quality of cosmetics is maintained under the conditions specified in the cosmetic product standards and labels. During this period, the cosmetics are completely suitable for sale and meet the quality specified in the product standards and labels.

**Expiration date:** refers to the best use date of cosmetics under the conditions specified in the cosmetic product standards and labels. During this period, the cosmetics are completely suitable for sale and meet the quality specified in the product standards and labels. After this period, the quality of the cosmetics may change and the cosmetics are no longer suitable for sale.

**Primary packaging product:** refers to cosmetics that are packaged once.

The commodities involved in this guideline are cosmetic products. The corresponding customs export catalog commodity codes of such products are shown in Table 2.1 (data from the "China Customs Statistical Yearbook" compiled by the General Administration of Customs of the People's Republic of China).

Table 2.1 List of corresponding customs codes for cosmetic products

Product name Commodity number (customs code)

Essential oils including extracts and absolutes; balms; extracted oleoresins 3301

Orange oil 33011200

Lemon oil 33011300

Lime oil (lime oil) 33011910

Other citrus essential oils 33011990

Peppermint oil 33012400

Other mint oils 33012500

Camphor oil 33012910

Citronella oil 33012920

Fennel oil 33012930

Cinnamon oil 33012940

Litsea cubeba oil 33012950

Eucalyptus oil 33012960

Geranium oil (geranium oil) 33012991

Non-citrus fruit essential oils 33012999

Iris gel 33013010

Other ointments 33013090

Extracted oleoresins 33019010

Terpene byproducts of deterpenization of citrus fruit essential oils 33019020

Products containing concentrated essential oils; other terpene byproducts and essential oil liquids 33019090

Perfumes and floral water 3303

Perfumes and floral water 33030000

Beauty products or cosmetics and skin care products; nail cosmetics 3304

Lip cosmetics 33041000

Eye cosmetics 33042000

Guidelines for the labeling management of cosmetics in various countries

4 (Continued table)

Product name Commodity number (customs code)

Nail cosmetics 33043000

Powder, whether or not pressed 33049100

Other beauty products or cosmetics and skin care products 33049900

Hair care products 3305

Shampoo 33051000

Perm 33052000

Fixed hair 33053000

Other hair care products 33059000

Oral and dental cleaning products; yarn (dental floss) for cleaning between teeth 3306

Toothpaste 33061010

Other tooth cleaning products 33061090

Yarn (dental floss) for cleaning between teeth 33062000

Oral cleaning products 33069000

Aromatic products and cosmetics and toiletries; 3307

Shaving preparations 33071000

Deodorants and antiperspirants 33072000

Bath salts and other bath preparations 33073000

Depilatory agents and unlisted aromatic products and cosmetics and toiletries 33079000

2.2 Latest customs statistics

Statistical caliber: the annual total import and export value and quantity of such products.

2.3 Import and export statistics in the past five years

2.3.1 Statistics on China's cosmetics import and export value from 2007 to 2011

In the past five years, my country's cosmetics import and export have generally shown an upward trend, and have grown rapidly in the past two years.

According to statistics, in 2011, my country's cosmetics exports increased by 427,700 tons compared with 2007, an increase of

175.51%, export value increased by 1.493 billion US dollars, an increase of 145.17%; the number of cosmetic imports increased by 55,100 tons, an increase of 103.50%, and the import value increased by 1.474 billion US dollars, an increase of 214.34%.

my country's cosmetics trade is mainly export-oriented. With the adjustment of the structure, it has gradually tended to balance import and export trade in recent years. According to statistics, from 2007 to 2011, my country's cosmetics trade surplus fell from 341 million US dollars to 0 million US dollars, and then increased slightly to 360 million US dollars, and the trend gradually stabilized. During this period, my country's total import and export trade of cosmetics increased from 1.716 billion US dollars to 4.684 billion US dollars, an increase of 172.88%.

Compared with the rapid growth of trade value, my country's cosmetics still have a great disadvantage in terms of quality. In 2007, the average unit price of imported cosmetics was \$12.92/kg, and the average unit price of exported cosmetics was \$4.22/kg, accounting for 32.66% of the import unit price; in 2011, the average unit price of imported cosmetics was \$19.96/kg, and the average unit price of exported cosmetics was \$3.76/kg, accounting for 18.84% of the import unit price. It can be seen that the gap is still widening. This price disadvantage shows that the gold content of my country's exported cosmetics is low, and maintaining trade growth is based on a large amount of exports, which is achieved at the cost of sacrificing value. This situation has raised a very serious issue for my country's cosmetics manufacturers, and they should improve product quality as soon as possible and vigorously increase added value. Table 2.2 List of the quantity and value of my country's cosmetics exports from 2007 to 2011

Year Quantity

(10,000 tons) Growth

(10,000 tons) Growth rate

(%) Amount

(US\$ billion) Growth

(US\$ billion) Growth rate

(%)

2007 24.37 ? ? 10.29 ? ?

2008 20.20 -4.17 -17.11 9.36 -0.93 -9.04

2009 31.37 11.17 55.30 11.66 2.30 24.57

2010 41.58 10.21 32.55 17.50 5.84 50.09

2011 67.14 25.56 61.47 25.22 7.72 44.11

Table 2.3 List of cosmetics import quantity and value from 2007 to 2011

Year Quantity

(10,000 tons) Increase

(10,000 tons) Growth rate

(%) Amount

(100 million US dollars) Increase

(100 million US dollars) Growth rate

(%)

2007 5.32 ? ? 6.88 ? ?

2008 6.11 0.79 14.85 9.36 2.48 36.05

2009 5.90 -0.21 -3.44 10.70 1.34 14.32

2010 7.55 1.65 27.97 15.00 4.30 40.19

2011 10.83 3.28 43.44 21.62 6.62 44.13

Figure 2.1 Analysis of the number of cosmetic imports and exports in my country from 2007 to 2011

Figure 2.2 Analysis of the value of cosmetic imports and exports in my country from 2007 to 2011

2.3.2 Composition of China's cosmetic exports from 2007 to 2011

In the past five years, my country's cosmetic exports have mainly been skin cosmetics, hair cosmetics, oral cosmetics and beauty cosmetics, accounting for more than 80% of the total export value. Among them, the growth rate of skin cosmetics ranked first, with an average annual growth of US\$142 million, and the proportion increased by 14%; followed by oral cosmetics,

The average annual growth reached 61 million US dollars, and the proportion increased by 8%; the next is beauty cosmetics, with an average annual growth of 36 million US dollars, and the proportion decreased by 23%; the growth rate of other categories is relatively low.

Table 2.4 List of the quantity and value of various cosmetics exports from my country from 2007 to 2011

Unit: 10,000 tons/US\$100 million

Cosmetics category 2007 2008 2009 2010 2011

Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount

Skin cosmetics 4.18 2.32 4.86 2.25 11.38 3.46 14.49 6.12 21.76 9.43

Hair cosmetics 6.09 1.23 5.53 1.19 6.97 1.41 10.06 1.90 10.21 2.26

Oral cosmetics 3.50 0.71 2.14 0.43 5.61 0.97 7.65 1.36 20.60 3.74

Beauty cosmetics 8.91 5.38 6.40 5.00 5.28 4.82 6.60 6.63 7.07 7.18

Perfume cosmetics 0.85 0.53 0.73 0.42 1.36 0.73 1.81 1.07 2.56 1.21

Special function cosmetics 0.78 0.11 0.44 0.07 0.68 0.26 0.77 0.26 0.82 0.33

Other cosmetics 0.05 0.01 0.10 0.01 0.08 0.01 0.21 0.17 4.11 1.06

Total 24.37 10.29 20.20 9.36 31.37 11.66 41.58 17.50 67.14 25.22

Figure 2.3 Analysis of the export value of various cosmetics in my country from 2007 to 2011

Figure 2.4 Analysis of the proportion of my country's cosmetics export value in 2007

Figure 2.5 Analysis of the proportion of my country's cosmetics export value in 2011

#### 2.4 Major export target markets in recent years

##### 2.4.1 Analysis of the quantity and value of China's cosmetics exports to five continents from 2007 to 2011

According to statistical data, Asia, America and Europe are the main export regions for my country's cosmetics. Compared with 2007, the volume and value of my country's cosmetics exports to Asia in 2011 increased by 130,300 tons and 614 million US dollars respectively, with the former decreasing by 3% and the latter increasing by 19%; the volume and value of exports to America increased by 82,500 tons and 276 million US dollars respectively, with the proportion decreasing by 5% and 10% respectively; the volume and value of exports to Europe increased by 98,700 tons and 388 million US dollars respectively, with the former increasing by 6% and the latter decreasing by 7%; the volume and value of exports to Africa increased by 26,300 tons and 53 million US dollars respectively, with the proportion increasing by 3% and 1% respectively; the volume and value of exports to Oceania increased by 6,100 tons and 1 million US dollars respectively, with the proportion decreasing by 1% and 3% respectively.



Table 2.5 Quantity and value of cosmetic exports to five continents from 2007 to 2011

Unit: 10,000 tons / US\$100 million

Continent

Year Asia America Europe Africa Oceania

Quantity Value Quantity Value Quantity Value Quantity Value Quantity Value

2007 9.60 2.93 7.40 3.35 4.36 1.97 0.78 0.20 0.91 0.44

2008 9.53 3.56 4.73 2.47 3.31 1.96 1.40 0.31 0.46 0.14

2009 14.38 4.83 6.96 2.71 6.52 2.61 1.67 0.35 0.70 0.19

2010 17.82 6.06 9.67 3.92 8.24 4.21 1.99 0.44 0.78 0.25

2011 22.63 9.07 15.64 6.11 14.23 5.85 3.41 0.73 1.53 0.45

Figure 2.6 Analysis of the proportion of cosmetics exported by my country to various continents in 2007

Figure 2.7 Analysis of the proportion of cosmetics exported by my country to various continents in 2011

Figure 2.8 Analysis of the proportion of cosmetics exported by my country to various continents in 2007

Figure 2.9 Analysis of the proportion of cosmetics exported by my country to various continents in 2011

#### 2.4.2 Analysis of the quantity and amount of China's cosmetics major export regions from 2007 to 2011

In the past five years, North America, the European Union and Hong Kong have always been the regions with the largest cosmetics exports in my country. In 2011, compared with 2007, the quantity and amount of exports to North America increased by 66,800 tons and US\$204 million, respectively, and the proportion decreased by 2% and 9% respectively; the quantity and amount of exports to the European Union increased by 45,200 tons and US\$300 million, respectively, and the proportion increased by 2% and 3% respectively; the quantity and amount of exports to Hong Kong increased by 58,200 tons and US\$275 million, respectively, and the proportion of quantity decreased by 3%, and the proportion of amount increased by 4%. In 2011, the volume and value of cosmetics exports to these three regions accounted for 60% of the total volume and value of cosmetics exports.

and above.

Table 2.6 Quantity and amount of cosmetics exported to major regions in my country from 2007 to 2011

Unit: 10,000 tons/US\$100 million

Region 2007 2008 2009 2010 2011

Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount

North America 6.56 3.04 3.90 2.14 6.07 2.36 7.93 3.26 13.24 5.08

European Union 2.89 1.60 2.85 1.81 3.56 2.09 4.79 3.58 7.41 4.60

Hong Kong 6.10 1.37 5.48 1.93 8.92 2.66 10.63 3.34 11.92 4.12

East Asia 0.96 0.66 0.82 0.74 1.06 0.82 1.79 1.01 2.93 1.51

ASEAN 0.96 0.80 0.65 0.86 0.99 0.90 1.37 1.29 2.33 1.70

Taiwan 0.82 0.31 0.81 0.36 1.23 0.47 1.41 0.56 1.57 0.62

Middle East 1.26 0.47 1.42 0.41 1.46 0.52 1.71 0.60 2.42 0.80

Latin America 0.83 0.31 0.82 0.33 0.86 0.33 1.71 0.65 2.37 1.02

Eastern Europe 1.43 0.36 0.44 0.14 2.93 0.50 1.37 1.29 2.33 1.70

Oceania 0.91 0.44 0.45 0.14 0.70 0.19 0.78 0.25 1.52 0.45

Africa 0.78 0.20 1.40 0.31 1.67 0.35 1.99 0.44 3.41 0.73

[Note] North America: United States, Canada, 2 countries in total;

European Union: France, Italy, Netherlands, Belgium, Luxembourg, Germany, Ireland, Denmark, United Kingdom, Greece,

Portugal, Spain, Austria, Finland, Sweden, Poland, Latvia, Lithuania, Estonia, Hungary, Czech Republic, Slovakia, Slovenia, Malta, Cyprus, Bulgaria,

Romania, a total of 27 countries; East Asia: Japan, South Korea, North Korea, Mongolia, a total of 4 countries; ASEAN: Indonesia, Singapore,

Thailand, Philippines, Malaysia, Brunei, Myanmar, Vietnam, Laos, Cambodia, a total of 10 countries; Middle East: Bahrain, Egypt, Iran, Iraq, Israel,

Jordan, Kuwait, Lebanon, Oman, Qatar, Saudi Arabia, Syria, United Arab Emirates, Yemen, Palestine, Algeria, Libya, Morocco, Tunisia, Sudan,

Mauritania, Somalia, a total of 22 countries; Eastern Europe: Russian Federation, Belarus, Ukraine, Moldova, a total of 4 countries.

Figure 2.10 Distribution of quantity and proportion of major export regions of cosmetics in my country in 2007

Figure 2.11 Distribution of quantity and proportion of major export regions of cosmetics in my country in 2011

Figure 2.12 Distribution of amount and proportion of major export regions of cosmetics in my country in 2007

Figure 2.13 Analysis of the distribution and proportion of the amount of cosmetics exported to major export regions in my country in 2011 Figure

## 2.4.3 Analysis of the number and amount of cosmetics exported to major export countries or regions in China from 2007 to 2011

In 2011, my country's cosmetics export trade involved more than 180 countries or regions. In terms of amount, the top ten countries or regions are: the United States, Hong Kong, the United Kingdom, bonded areas, Japan, Russia, France, Poland, Singapore and Taiwan. In 2011, they imported a total of 408,200 tons of cosmetics from my country, with a value of US\$1.758 billion, accounting for 60.79% and 69.70% respectively. Among them, the United States and Hong Kong far exceeded other countries or regions, with the export volume and amount accounting for more than 50%. However, from the perspective of the average export unit price, Singapore, Poland and France have obvious advantages and higher prices, while Russia has the lowest price, only US\$1.78/kg, which is about 1/10 of Singapore. Table 2.7 Quantity and amount distribution of my country's major cosmetics export countries (regions) from 2007 to 2011

Unit: 10,000 tons/US\$100 million

Country 2007 2008 2009 2010 2011

Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount Quantity Amount

United States 6.36 2.98 3.70 2.06 5.81 2.29 7.58 3.14 12.46 4.85

Hong Kong 6.10 1.37 5.48 1.93 8.92 2.66 10.63 3.34 11.92 4.12

United Kingdom 1.10 0.40 1.26 0.56 1.66 0.77 2.21 1.13 3.77 1.65

Bonded area 0.00 0.00 0.00 0.00 0.00 0.00 0.10 0.10 1.23 1.37

Japan 0.73 0.59 0.58 0.65 0.77 0.71 1.44 0.87 2.23 1.27

Russia 1.15 0.26 0.39 0.11 2.45 0.40 2.68 0.47 6.12 1.09

France 0.32 0.45 0.23 0.52 0.27 0.50 0.43 0.86 0.54 0.93

Country	2007	2008	2009	2010	2011					
Quantity	Amount	Quantity	Amount	Quantity	Amount	Quantity	Amount	Quantity	Amount	
Poland	0.03	0.02	0.14	0.13	0.11	0.13	0.40	0.69	0.49	0.85
Singapore	0.31	0.42	0.22	0.48	0.35	0.46	0.41	0.72	0.48	0.84
Taiwan	0.82	0.31	0.81	0.36	1.23	0.47	1.41	0.56	1.57	0.62

Figure 2.14 Analysis of the distribution of the quantity and proportion of my country's cosmetics exports to major countries or regions in 2011

Figure 2.15 Analysis of the distribution of the amount and proportion of my country's cosmetics exports to major countries or regions in 2011

Figure 2.16 Average unit price of cosmetics exported to major exporting countries in 2011

In addition, compared with 2007, the export trade of the above 10 countries or regions has shown different degrees of growth. According to the amount of statistics, the top three countries with the highest growth rate are Poland, Russia and the United Kingdom.

Figure 2.17 Analysis of the number of major exporting countries or regions of cosmetics in my country in 2007 and 2011

Figure 2.18 Analysis of the amount of cosmetics exported to major countries or regions in my country in 2007 and 2011

#### 2.4.4 Analysis of major export target markets

##### 2.4.4.1 The United States

The United States is a global giant in the cosmetics industry. In 2011, my country exported a total of 485 million US dollars of cosmetics to the United States, of which skin cosmetics exported 216 million US dollars, accounting for 44%; beauty cosmetics exported 179 million US dollars, accounting for 37%; other cosmetics exported 29 million US dollars, accounting for 6%; perfume cosmetics exported 28 million US dollars, accounting for 6%; hair cosmetics exported 27 million US dollars, accounting for 6%; special function cosmetics exported 4 million US dollars, accounting for 1%; oral cosmetics exported 2 million US dollars, accounting for less than 0.5%.

Figure 2.19 Analysis of the amount of each type of cosmetics exported to the United States in 2011



#### 2.4.4 .2 Japan

Japan is a relatively developed country in terms of cosmetics production and consumption, and its market size is second only to the United States. It has the largest cosmetics market and research and development center in Asia. After experiencing rapid development, it has now entered a mature stage. In 2011, my country exported a total of 127 million US dollars of cosmetics to Japan, of which skin cosmetics exported 0.47 billion US dollars, accounting for 37%; beauty cosmetics exported 0.40 billion US dollars, accounting for 32%; hair cosmetics exported 0.31 billion US dollars, accounting for 25%; special function cosmetics exported 0.05 billion US dollars, accounting for 4%; other cosmetics exported 0.02 billion US dollars, accounting for 1%; oral cosmetics exported 0.01 billion US dollars, accounting for 1%; perfume cosmetics exported were relatively small, less than 0.01 billion US dollars.

Figure 2.20 Analysis of the proportion of various cosmetics exports from my country to Japan in 2011

#### 2.4.4.3 EU

The EU is my country's largest trading partner, and its cosmetics manufacturing industry is particularly developed. The United Kingdom, France, Germany, and Italy are all traditional cosmetics manufacturing powers with many large cosmetics companies and long-standing leading cosmetics brands. In 2011, my country exported a total of 460 million US dollars of cosmetics to the EU, of which skin cosmetics exports were 212 million US dollars, accounting for 46%; beauty cosmetics exports were 169 million US dollars, accounting for 37%; perfume cosmetics exports were 53 million US dollars, accounting for 12%; hair cosmetics exports were 9 million US dollars, accounting for 2%; oral cosmetics exports were 8 million US dollars, accounting for 2%; other cosmetics exports were 6 million US dollars, accounting for 1%; special function cosmetics exports were 1 million US dollars, accounting for less than 0.3%.

Figure 2.21 Analysis of the proportion of various cosmetics exported from my country to the EU in 2011

#### 2.4.4 .4 Hong Kong

Hong Kong has a relatively developed domestic and re-export trade in cosmetics, and is one of my country's major export destinations. In 2011, my country exported a total of 412 million US dollars of cosmetics to Hong Kong, of which skin cosmetics exported 148 million US dollars, accounting for 36%; beauty cosmetics exported 84 million US dollars, accounting for 20%; hair cosmetics exported 72 million US dollars, accounting for 18%; oral cosmetics exported 56 million US dollars, accounting for 14%; other cosmetics exported 37 million US dollars, accounting for 9%; perfume cosmetics exported 9 million US dollars, accounting for 2%; special function cosmetics exported 5 million US dollars, accounting for 1%.

Figure 2.22 Analysis of the proportion of various cosmetics exported from my country to Hong Kong in 2011

#### 2.4.4.5 Other markets

With the establishment of the China-ASEAN Free Trade Area, ASEAN has become one of the important markets for my country's cosmetic exports. In 2011, cosmetic exports to ASEAN accounted for 8% of my country's total cosmetic exports, second only to North America, the European Union and Hong Kong. my country's cosmetic exports to ASEAN cover a wide range, including cosmetics, skin care products, aftershave and other advanced finished products, as well as raw material products such as essences and essential oils. This to a certain extent shows that my country's cosmetics industry has richer production technology and experience than ASEAN, and is in a certain competitive advantage. It is worthy of attention from domestic enterprises and they should actively explore the Southeast Asian cosmetics market. In addition, the reduction of cosmetics tariffs between China and ASEAN countries will also promote the growth of import and export trade of related products between the two sides to a certain extent.

### 2.5 Main advantages of Chinese products in the international market

#### 2.5.1 Price advantage

my country's cosmetics are mainly concentrated in low- and medium-end products with excellent quality, but simple packaging and simple product lines, which leads to low cost and low selling price. my country has abundant labor resources and low labor costs. my country has abundant natural resources, which provide raw material guarantee for the production of cosmetics. After my country joined the WTO, the import tariffs on chemical raw materials were lowered, reducing the cost of products.

#### 2.5.2 Technical advantages

The production and use of cosmetics in my country has a long history and a profound cultural connotation. my country's cosmetics companies such as Shanghai Jahwa and Tianjin Yumeijing have a long production history, advanced process equipment and strong technical force. They implement standardized production procedures, introduce scientific management methods, create skin care research centers, strictly monitor product quality, and develop a large number of high-quality skin care products; focus on the development of new products, apply modern high-tech means, fundamentally change product structure, and increase product added value and technical content.

Cosmetics are the crystallization of the intersection of multiple disciplines. In recent years, the rapid development of cosmetics-related industries in my country, such as machinery industry, packaging industry, chemical industry, pharmaceutical industry, traditional Chinese medicine industry and microelectronics industry, has provided cosmetics with more high-quality raw materials, packaging materials, equipment technology and expanded the traditional Chinese medicine needed for cosmetics, so that the cosmetics industry continues to progress in depth and breadth, presenting an unprecedented prosperity.

my country has unique resources of Chinese herbal medicines. Chinese herbal cosmetics have a long history, a wide variety of products, and a wide range of dosage forms.

20 The products are diverse and integrated with traditional Chinese medicine, and have obvious functionality. Cosmetics made of chemical synthetic substances are prone to toxic side effects and skin allergic reactions, while cosmetics made of natural plants are safe, reliable, and treat both the symptoms and the root causes. They are the best raw materials for biological functional cosmetics. In the thousands of years of application of traditional Chinese herbal medicines for external and internal use, many records and experiences of efficacy have been accumulated, and their dosage, safety and side effects have also been verified. This has opened up a vast resource for the exploration of raw materials for cosmetics and provided favorable conditions for the development of new cosmetics. Therefore, my country has a strong advantage in the development of natural nutritional and therapeutic cosmetics.

In addition, many multinational cosmetics companies have come to China to invest. They have technical advantages, product advantages, business management advantages, global cooperation advantages and information advantages. They produce world-class brands in China, which has promoted the development of the high-end cosmetics market; they have invested millions or even tens of millions of dollars in China to establish large-scale research institutions and research and development centers, which has promoted the vigorous development of my country's cosmetics industry. In addition, they are also participants in the research and formulation of relevant regulations and product standards of the international cosmetics industry. Relevant government departments propose measures and methods for the supervision and management of cosmetics and provide relevant information, which is more conducive to the faster integration of Chinese cosmetics with the international market.

#### 2.5.3 Scale advantage

At present, there are more than 3,300 cosmetics manufacturers in China, more than 2,500 product varieties, 14 Chinese famous brand production areas, 25 well-known Chinese trademarks and overseas sales areas in more than 150 countries and regions. my country's cosmetics industry has initially formed a huge cosmetics economic chain with cosmetics products as the core. In 2011, the total industrial output value (current price) of my country's cosmetics industry was RMB 79.033 billion, a year-on-year increase of 21.6%, and the sales-to-production ratio was 99%. In 2010, the total output value was RMB 69.507 billion, a year-on-year increase of 18.7%, and the sales-to-production ratio was 100.8%.[1]

### 2.6 Potential target markets

#### 2.6.1 Eastern Europe

Due to the entry of cosmetics companies from many countries at the end of the last century, the cosmetics market in Eastern Europe is now close to the mature Western European market. Many leading brands with large sales volumes, such as Oriflame, Dove and Nivea, dominate the entire market, mainly focusing on skin care and hair care products. However, the market segments in different regions are not the same. In Croatia, skin care products are the largest market, with a market value of 56 million euros in 2007, followed by hair care products.

In 2010, the cosmetics market was valued at 39 million euros; in the Czech Republic, the market value of hair care products exceeded that of skin care products by 150 million euros, reaching 195 million euros; in Estonia, the skin care market was valued at 30 million euros, while the hair care market was valued at only 19 million euros; in Slovenia, the skin care market accounted for the largest share, valued at 39 million euros, followed by hair care products, valued at 36 million euros, ranking first and second in the cosmetics market respectively [3].

#### 2.6.2 Latin America

In recent years, with the recovery of the global economy, some new dynamics have emerged in the cosmetics industry. In 2009, against the backdrop of the global financial crisis, Latin America bucked the trend and cosmetics sales increased by 15% [2]; in 2010, it increased by 20%, with BPC reaching US\$64 million, almost comparable to the North American market [1]. Industry insiders are optimistic about the future of the cosmetics industry market in Latin America. In 2009, the top ten cosmetics brands in Latin America were Avon, Natura, Colgate, Gillette, Botica, Sunsilk, L'Oréal, Nivea, Palmolive and Dove [5]. Brazil, as the sales regional center of the beauty and personal care products industry in Latin America, had a cosmetics market sales of US\$29 billion in 2009, accounting for 1.3% of Brazil's GDP. Euromonitor International's analysis report pointed out that in the future, driven by greater consumption, such as increased purchase frequency and changes in consumption concepts among low-income groups, sunscreen care products, baby care products, depilatories and color cosmetics will maintain dynamic growth [5]. At the same time, local Latin American companies such as Natura Cosmetics, Botica Comercial Farmaceutica Ltda, L'Oréal and Unilever-Yanbal Group are also growing stronger [1]. The cosmetics industry in Latin America is working hard to develop and improve natural and organic products, environmental themes, social responsibility, and trade between different countries in the region [5].

#### 2.6.3 Middle East

In recent years, with the increase in population and the development of local tourism, the Middle East has gradually become one of the fastest growing regions in the world for cosmetics and personal care products. The product categories are mainly beauty cosmetics and perfumes, with an annual sales growth rate of 10% to 15%. According to statistics from the Gulf Cooperation Council, in 2006, the luxury/high-end cosmetics market in the Middle East reached US\$800 million to US\$1 billion, with the UAE accounting for 28% of the market share, and Saudi Arabia, which has one of the largest number of cosmetics consumers in the Middle East, accounting for 45% of the market share. In 2007, Saudi Arabia's cosmetics and perfume sales were US\$1.32 billion and US\$238 million respectively; in 2008, Dubai's cosmetics and perfume sales increased by 39% and 34% respectively.

22 Among the cosmetics consumers in the UAE, 25%~30% are local Arab women, 25%~30% are foreigners, and 15%~20% are tourists. Compared with Saudi Arabia, the market management in the UAE and Dubai is relatively loose, and the development is relatively fast, and consumers are more mature and professional [4].

#### 2.6.4 Africa

In recent years, the demand for cosmetics in Africa has been growing rapidly, and the market potential is huge. In South Africa, the annual demand for cosmetics exceeds US\$1.15 billion, and the demand for moisturizers and shampoos in Cote d'Ivoire can reach US\$40 million per year. According to statistics, the annual growth rate of the demand for cosmetics in the entire African market is 30%.

Cosmetics companies from many countries have entered the African cosmetics market one after another. People in any region are unwilling to treat their skin badly, and Africans are no exception. Even in some poor countries, there are many fashionable girls on the streets, and there are countless cosmetics stores, supermarket cosmetics counters and various beauty salons.

Africans like to work hard on their distinctive hair. In African cosmetics stores, there are all kinds of cosmetics for shampooing, hair care, hair dyeing, and hairdressing. As the African continent is generally hot and dry, the skin is prone to lose moisture, so moisturizers, moisturizing oils, and toners are generally favored by consumers. In addition, Africans also prefer to wear lipstick, nail polish, and perfume with strong fragrance, and in this regard, African men are even more than women. African cosmetics are mainly imported. Due to high taxes and high profits, the smuggling of cosmetics is quite serious. French products have the highest market share in Africa, followed by the United States. Chinese cosmetics are still relatively rare in the African market. As Chinese cosmetics companies, we can expand and strengthen our cosmetics brands by participating in African trade fairs, online marketing, and participating in cosmetics exhibitions, so that Africans can understand Chinese cosmetics and enter the African cosmetics market as soon as possible and in a healthy way. Cosmetics produced by Chinese companies are generally not suitable for African skin and hair characteristics. Therefore, if Chinese cosmetics want to enter the African market, they should develop some products specifically for this market. The research and development of new products cannot be omitted.

### III. Cosmetics labeling requirements in major markets and differences with my country

#### 3.1 EU

##### 3.1.1 Legal documents

- Directive 76/768/EEC ("Directive 76/768/EEC"): "EU Cosmetics Directive" (repealed on July 11, 2013)
- Directive 95/17/EC ("Directive 95/17/EC"): Detailed provisions on whether one or more ingredients of cosmetics may not be marked in the label ingredient list

(EC) 1223/2009 ("Cosmetics Regulation of the European Parliament and of the Council"): It came into effect on July 11, 2013, and will replace the old Cosmetics Directive 76/768/EEC and its 67 amendments to date (Note: some of the requirements will be implemented before the above date).

##### 3.1.2 Competent authorities

Cosmetics are under the jurisdiction of the Cosmetic and Medical Department of the European Commission's Business Directorate, and each member state has its own official agency responsible for its own supervision and management, mainly focusing on post-market management.

The main work of the competent authorities of each government is in three aspects: auditing at the sales, production and distribution sites; reviewing labels; reviewing the documents provided.

There are three main ways of supervision:

- ? Health hazard or follow-up investigation;
- ? Special investigation according to product category;
- ? On-site inspection.

##### 3.1.3 Definition of cosmetics

Cosmetics refer to any external part of the human body (skin, hair, nails, lips and genitals) or teeth

#### Guidelines for the labeling of cosmetics in various countries

24 Substances or products that are applied to teeth and oral mucosa, mainly for cleaning, fragrance or protection, in order to achieve good condition, beautify or eliminate body odor.

##### 3.1.4 Classification of cosmetics

- (1) Creams, lotions, liquids, gels and oils (for hands, face, feet, etc.);
- (2) Facial masks (except chemical peeling products);
- (3) Color fixatives;
- (4) Make-up powders, after-bath powders, hygiene powders, etc.;
- (5) Toilet soaps, deodorant soaps, etc.;
- (6) Perfumes, toilet water, cologne;
- (7) Bathing and rinsing products (bath salts, bath bubbles, bath oils, gels, etc.);
- (8) Depilatories;
- (9) Deodorants and antiperspirants;
- (10) Hair products (hair dyes and bleaches, curling, straightening and setting agents, styling products, cleaning products (liquids, powders, shampoos), hair care products (liquids, creams, oils), hair styling products (liquids, brighteners, oils);
- (11) Shaving products (creams, foams, liquids, etc.);
- (12) Makeup and remover products for the face and eyes;
- (13) Products for the lips;
- (14) Products for the protection of teeth and the oral cavity;
- (15) Products for the protection and makeup of nails;
- (16) Products for external use on personal hygiene;
- (17) Products for sunbathing;
- (18) Products for non-sun tanning;



(19) Skin whitening products;

(20) Anti-wrinkle products.

### 3.1.5 Cosmetic labeling requirements

#### 3.1.5.1 General requirements for cosmetic labeling

Article 6 of the EU Cosmetics Directive stipulates the requirements for cosmetic labeling, which stipulates that the following must be indicated:

(1) Product name or type

(2) Address or registered office of the manufacturer or distributor in the EU

When multiple addresses are provided, the address where the product information is kept must be indicated, and the address can be underlined.

The EU Directive does not require the country of origin of imported cosmetics to be indicated, but some member states may require it;

(3) Net content

Indicated by weight or volume. It is mandatory to indicate SI metric units, and US customary units can also be indicated.

When both units are used, SI metric units must prevail. Dual labeling can only be used until 2009.

Directive 76/211/EC stipulates the labeling requirements for net content, and its amendment introduces a series of management of average volume or weight. The mark "e" next to the net content on the label indicates that the labeling of net content complies with the directive. The Aerosol Directive 75/324/EEC requires that aerosol products be labeled with both weight and volume.

(4) Cosmetic ingredient list

It is required to label the names of all cosmetic ingredients on the outer packaging. If this is not possible for practical reasons, it can be printed on the accompanying booklet, label, tape or card, but at the same time, a simple phrase or the symbol in Appendix VIII should be printed on the outer packaging to instruct consumers to refer to it. The ingredient list should be introduced with "INGREDIENTS" as the introduction at the beginning of the sentence.

The labeling order is:

? The names of the ingredients with a content higher than 1% are listed in descending order of the amount added, and the ingredients with a content lower than 1% can be listed in any order.

? Colorants can be marked after other ingredients in any order.

Guidelines for the labeling management of cosmetics in various countries

26 For cosmetics, all colorants within the scope of use should be listed and marked with the words "may contain" or the symbol "+/-".

Names of labeled ingredients:

? Ingredients must use the names specified or adopted by the following regulations: INCI name (International Nomenclature Cosmetic Ingredient), European Pharmacopoeia name, World Health Organization recommended non-proprietary name, European Inventory of Existing Commercial Chemical Substances (EINECS) index number, International Union of Pure and Applied Chemistry (IUPAC) index number, American Chemical Abstracts (CAS) index number, pigment index number and common name recommended in Article 7 (2).

The following are not considered ingredient substances:

- Impurities in raw materials;
- Excipients used in production but not contained in the finished product;
- Substances used as solvents or carriers for flavors or aromatic substances and the amount used is strictly controlled.

? Flavors and aromatic ingredients and their raw materials should be indicated by the word "fragrance" or "fragrance" ("perfume" or "aroma");

? Colorants must use the dye color index number (CI number). If there is no corresponding CI number, the INCI name should be used;

When containing substances mentioned in the requirements listed in the "Other restrictions and requirements" table in Annex III, regardless of their function, they should be marked in the ingredient list.

Sometimes, for reasons of commercial confidentiality, manufacturers will apply for not publishing one or more ingredients in the ingredient list. This must comply with the provisions of Directive 95/17/EC.

#### (5) Shelf life

The shelf life should be marked as: "best used before the end of...", and the date should be marked in one of the following ways:

- Date (in the order of "month, year" or "day, month, year")
- Place to indicate the date

For cosmetics with a shelf life of more than 30 months, it is not mandatory to label the shelf life, but it is necessary to indicate the time after opening that the product can be used safely. Label according to the symbol "Period After Opening (PAO)" given in Annex VIII (a), and indicate the expiration date after the symbol: "Number + M" indicates the number of months that the product can be used, and does not need to be translated into the native language of each member state; "Number + years" can also be used to indicate the number of years that the product can be used, but "years" must be translated into the native language of the country of sale.

(6) Production batch number or product identification number

If it is not possible to do so due to the small size of the product itself, it is allowed to be marked only on the outer packaging (secondarily, it can also be marked on the outer container).

(7) Necessary warning statements (precautions)

Products containing specific ingredients must be marked with warning statements in accordance with the Annex to the EU Cosmetics Directive. All member states require that warning terms be marked in their respective national languages, and must be marked on both the inner and outer packaging. If this is not possible for practical reasons, it may be marked on the instructions, labels or cards, but at the same time, a simple wording or the symbol in Annex VIII must be printed on the container or outer packaging to indicate to the consumer.

There are special warning provisions for aerosol products and flammable products, see the Aerosol Directive 75/324/EEC and its amendment 94/1/EC. In addition, the European Cosmetic, Tioletry, and Perfumery Association (Colipa) Liaison Committee has issued a policy on the labeling of flammable products, defining the circumstances under which certain cosmetics are required or not required to be marked with this warning statement.

(8) The necessary instructions for use must be stated in the official language or the native language of the country of sale. This information can be marked on an accompanying booklet, tape or label strip, and printed with a simple wording or the symbol in Annex VIII to indicate to the consumer.

(9) Necessary storage conditions

(10) Product efficacy

If the appearance of the product can clearly show its efficacy, it does not need to be labeled.

The efficacy claims must not be misleading. When the competent authority believes that the description, label, or other information provided by the manufacturer or responsible organization of a product may make the product harmful to human health, it will be prohibited

Guidelines for the management of cosmetic labeling in various countries

28 Placed on the market. In addition, some member states have detailed national regulations.

"Misleading Advertising 84/450/EEC" and its revised version 97/55/EEC are directives specifically on comparative advertising. It stipulates that comparative advertising is allowed under the conditions specified in the directive.

Among them, the product name or type, the address or registered office of the manufacturer or distributor in the EU, the net content, shelf life, instructions for use, production batch number, necessary warning statements, product efficacy and storage conditions must be marked on both the inner and outer packaging.

All label content should be marked in at least the native language of each country or the official language of the EU or the above two languages.

There is no requirement for font size (except for the net content requirement in "Directive 76/211/EC"). However, it is recommended to use a font size that can ensure that people with normal vision can easily read it at a distance of about 30 cm.

(EC) 1223/2009 (Cosmetics Regulation of the European Parliament and of the Council) will replace the old Cosmetics Directive 76/768/EEC and its 67 amendments to date from July 11, 2013, and will be published in the form of EU regulations and implemented as national laws in 27 EU member states (as well as Norway, Iceland and Liechtenstein). At that time, cosmetics sold in the European Economic Area 1 (EEA) market must comply with the requirements of the newly promulgated EU Cosmetics Regulation (EC) No 1223/2009, some of which will be implemented before the above date, such as the provisions on CMR (carcinogenic, mutagenic or toxic to reproduction) and nanomaterials will be implemented on December 1, 2010 and January 11, 2013 respectively. The new regulation simplifies the requirements for cosmetics in the European Economic Area, making it a single law and eliminating the content that may cause differences in the enforcement process of member states. Cosmetics notifications only need to be submitted to a database jointly developed by the Central Committee and COLIPA (European Cosmetics Association), rather than to each member state as it is now. However, companies need to notify and keep relevant documents on their own, rather than having industry associations manage them. The definition of responsible persons in the Cosmetics Regulation of the European Parliament and the Council of the European Union has become clearer, stipulating that responsible persons specifically include: ? manufacturers within the EEA, ? importers who import products into the EEA, and ? distributors who use their own names or trademarks to put cosmetics on the market or whose changes to cosmetics may affect their regulatory compliance (excluding text translations only). According to the new requirements, responsible persons will bear more legal responsibilities, involving cosmetics manufacturing specifications (GMP), product safety reports, product information files (PIF), product notifications, product declarations, etc. The regulations on labels include:

(1) Country of origin;

Cosmetics imported into the EEA must be marked with the country of origin;

(2) Minimum shelf life

The text before the date "best used before the end of" can be replaced by the new egg timer symbol: If the expiration date after opening is irrelevant (confirmed by actual practice), there is no need to indicate the expiration date after opening.

Minimum shelf life egg timer symbol

(3) Before placing the product on the market, distributors should ensure that the following labelling requirements are met:

- Name or registered name and address of the responsible person;
- Batch number or identification information of the cosmetic product;
- Ingredient list; (the name of the nanomaterial in the ingredient list should be followed by the word "(nano)")
- Derogation for soaps, bath bombs and other small products;
- National regulations on cosmetics that are not pre-packaged, packaged at the time of sale at the request of the buyer, or pre-packaged for immediate sale.

3.1.5.2 Environmental Labels

The EU introduced the eco-label system in 1992 through Regulation EEC 880/92, which set minimum requirements for products claiming to be "environmentally friendly", and further amended and supplemented it through Regulation EU 1980/2000 in 2000. This regulation applies to all member states and provides a mechanism for how to grant eco-labels to products that meet the standards established by their respective industries. It evaluates the impact of a product from production to disposal. The label is voluntary and requires a user fee. Each member state has a designated entity to manage this matter within its own country. So far, no category of cosmetics has established complete standards for the granting of this eco-label. Some member states have their own mandatory environmental labeling laws.

Guidelines for the labeling management of cosmetics in various countries

### 30 3.1.5.3 Labeling of small-packaged products and other exemptions

The following situations do not require the labeling of net content: ? Samples with a packaging capacity of less than 5g or 5ml; ? Free samples; ? Individually packaged samples; ? Samples usually sold by quantity. However, other mandatory labeling requirements are still required. Warnings (precautions), instructions for use, and ingredient lists can be marked on accompanying instructions, labels, tapes or cards. In this case, symbols must be printed on the outer packaging to instruct consumers to refer to these accompanying information.

"Directive 1999/45/EC on Dangerous Preparations" mentions labeling requirements for cosmetics using hazardous raw materials and specific exemptions from labeling. Article 10 of the directive requires the establishment of safety data sheets (SDSs) at the site where this dangerous product is used. These guidelines are stipulated in "Directive 91/155/EEC", which also exempts cosmetics, but users can request that equivalent product information be given in other ways.

## 3.2 United States

### 3.2.1 Legal Documents

? The Food, Drugs and Cosmetics Act (FD&C Act): Main regulation for cosmetics

? The Fair Packaging and Labelling Act (FPLA): Regulations for labeling, packaging and advertising of cosmetics

? Cosmetic Labelling: 21 CFR 701

? Cosmetic Labelling Manual

? Labeling Requirements for Over-the-Counter Drugs: 21CFR201.66

### 3.2.2 Competent Authorities

The Food and Drug Administration (FDA) is responsible for cosmetics and drugs. The Center for Food Safety and Applied Nutrition (CFSAN) is responsible for the supervision and management of cosmetics from production to marketing. It can enter the production plant without notice to conduct inspections and conduct random inspections of products on the market.

products. Imported products must comply with the "Import Cosmetics Regulations". OTC drugs are managed by the Center for Drug Evaluation and Research (CDER). Products that are both cosmetics and OTC drugs are jointly managed by CFSAN and CDER. For overseas products imported into the United States, FDA can conduct inspections overseas.

### 3.2.3 Definition of Cosmetics

The FD&C Act defines cosmetics as two categories:

? Cosmetics

? Over-the-counter drugs

Whether a product is a cosmetic or a drug depends on its use, which is determined by the product's efficacy claims and consumer perception (through word of mouth or the therapeutic function of the ingredients). According to the FD&C Act, a product can be a drug, a cosmetic, or both a drug and a cosmetic (just the opposite of the EU).

The third situation only occurs when the product has two uses and meets both definitions, for example: anti-dandruff shampoo is a cosmetic because its claim indicates that the product is used to clean the hair; but it can also be considered a drug because it contains recognized anti-dandruff ingredients and its claim indicates that it is used to treat dandruff. Products determined to be both cosmetics and drugs must meet the regulatory requirements of both categories of products.

Definition of cosmetics: Products other than soaps containing alkaline salts of fatty acids that are applied to the human body (rubbed, poured, sprinkled or sprayed) or any part of it for the purpose of cleansing, beautifying, enhancing attractiveness or improving appearance without affecting the structure or function of the human body.

Definition of drug: Articles used to cure, mitigate, treat or prevent disease in humans and other animals and articles other than food that are used to affect the structure and function of the human or other animals.

Over-the-counter drugs are drugs that can be purchased without a doctor's prescription.

Some products that are classified as cosmetics in the EU are classified as new drugs rather than OTC drugs in the United States. New drugs are drugs that have not yet been widely recognized by experts as safe and effective for their intended use, or drugs that have not yet been used within a specific scope or time.

## Guidelines for the labeling management of cosmetics in various countries

### 32 3.2.4 Classification of cosmetics

#### (1) Classification of cosmetics:

- Skin care
- Perfumes
- Eye cosmetics
- Cosmetics outside the eyes
- Nail products
- Bath oils and foam baths
- Mouthwash
- Hair dye pretreatment
- Shampoo, perm or other hair care products
- Deodorants
- Shaving products
- Children's products
- Tanning products

#### (2) Classification of OTC drugs (cosmetics):

- Anticaries (fluoride) toothpaste
- Moisturizing products
- Sunscreen cosmetics
- Antiperspirants
- Anti-dandruff shampoo



### 3.2.5 Cosmetic Label Requirements

#### 3.2.5.1 General Requirements for Cosmetic Labels

Specifies the following information that must be marked on cosmetic labels:

(1) Product name and description: must be marked on the main display surface of the outer packaging.

Use the common name of the cosmetic or an appropriate descriptive name. If the nature of the cosmetic is obvious, a more exotic and interesting name may be used without causing misunderstanding or indistinguishability to the public.

(2) Name and address of the manufacturer, packer or distributor: marked on the inner and outer packaging.

For specific regulations, see Section 701.1.2 of Volume 21 of the Code of Federal Regulations (CFR). Imported cosmetics must be marked in English on the outside of the container with the country of origin and the manufacturer or agent (including the importer). The country of origin is marked with the following statement: "Made in ... (name of country in English)";

or "Product of ... (name of country in English)"; or other statements that clearly indicate the meaning of the country of origin.

If the country of origin is a NAFTA country, it can be in English, French or Spanish.

(3) Net content: marked on the main display panel of the inner and outer packaging.

It is mandatory to mark it in traditional U.S. customary units. In addition, it can also be marked in metric units. If the cosmetic is a liquid, the statement must be in volume units; if the cosmetic is a solid, semi-solid, viscous substance or solid mixture, the statement must be in weight units. Weight is expressed in pounds and ounces. Liquid volume is expressed in U.S. gallons, quarts, pints and fluid ounces. There are slight differences in volume calculations in the United States and in the United Kingdom and other countries. The specific provisions for net content labeling are found in 21 CFR 701.13.

(4) Cosmetic ingredient list: marked on the outer packaging.

See 21 CFR 701.3 for specific regulations. All ingredients of cosmetics must be listed on the cosmetic label for retail products for personal use. Cosmetics that are not generally sold for retail, such as hair products or makeup products that professionals use on customers in professional institutions, and cleansers and moisturizers for people to use in the workplace, and these products are not sold to consumers for their home use, do not need to indicate the ingredients. Perfumes and fragrances are exceptions, which can only list non-trademark names. In addition, for the purpose of commercial confidentiality, with the approval of FDA,

Guidelines for the labeling of cosmetics in various countries

34 Ingredients exempted from disclosure may not be listed on the label, but must be declared at the end of the label components: "and other ingredients". If there is not enough label space on the package or the container is decorative, an additional label (attached label, tape or card) may be used (for details, see the CTFA labeling manual (The Cosmetic, Toiletry and Fragrance Association, now renamed the Personal Care Products Council, the Personal Care Products Council of the United States)).

The labeling order is:

Ingredients with a content higher than 1% are arranged in descending order; ingredients with a content less than 1% can be arranged in any order; color additives are arranged in any order, and are introduced with the statement "Contains...", and the "+/-" symbol cannot be used; "and other ingredients".

The names of the ingredients must be listed in the following order: the designated names listed in 21 CFR 701.30, the CTFA Cosmetic Ingredient Dictionary (see INCI names for this specified name), the name in the United States Pharmacopoeia, the name in the National Formulary, the name in the Food Chemical Codex, the name in the United States Drug Proper Names and Pharmacopeia, the name recognized by consumers, the chemical or other technical name or description.

(5) Shelf life

It should state the period of time during which it is safe to use.

(6) Batch number

Cosmetics do not require batch identification, but it should be based on healthy commercial activities.

(7) Warning statement: marked on the inner and outer packaging.

The Warning Statements for Cosmetic Products (21 CFR 740) provides detailed regulations on warning statements. Some product labels must carry warning words. For example, cosmetics packaged in self-pressurized containers (such as spray products), women's deodorant sprays and children's foam baths. Once a specific warning is legally recognized, the wording cannot be changed and must be used in accordance with the relevant regulations. If the safety of a cosmetic product is not fully proven and the following clear statement does not appear on the main display panel of the label: "Warning - The safety of this product has not been determined", the cosmetic product will be considered mislabeled. In addition, it is necessary to pay attention to the laws of some states that have special requirements for warnings.

(8) Label storage conditions when necessary.