



Interpretation of Articles Related to Cosmetic Full Ingredients Labeling in Instructions for Use of Consumer Products-General Labelling for Cosmetics

消费品使用说明《化妆品通用标签》
中化妆品全成分标注部分条款释义

Translated by Chemlinked


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【Standard article】

6.4 list of Ingredients

【Interpretation】

This article is a labeling requirement for the cosmetic Ingredient list.

This article is a specific requirement for marking the ingredients that are added to the product and the labeling methods. Its purpose is to protect the consumer's right to information, and to protect the health of consumers, facilitating supervision and administration of government.

When labeling the cosmetics ingredients, if two or more languages exist, the Chinese label shall prevail.

【Standard Article】

1) Cosmetics manufactured within two years from the publish date of this standard shall comply with this article.

【Interpretation】

The Interpretation is the requirement to the implementation date of the article.

Cosmetics manufactured after two years from the publish date of this standard must label ingredients list. As for the time of "after two years", for domestic cosmetics the date of production shall prevail and for import cosmetics import inspection date shall prevail. This standard was promulgated on June 17, 2008, then domestic cosmetics produced before June 17, 2010 (excluding 17), and imported cosmetics inspected before June 17, 2010 (excluding 17) do not have to label full ingredients. The products can be sold until the end of the product shelf life.

【Standard Article】

6.4.1 The name of all cosmetic ingredients must be authentically marked on the visible panel of the sales packaging.

【Interpretation】

This article is the principle that should be complied with when labeling cosmetic ingredients and

is the general requirements of the range of ingredients and the location of the labeling.

(1) Cosmetic ingredients list labeling shall adhere to the principles of authenticity that all the ingredients added to the formulation shall be labeled authentically, and shall not conceal some of intentionally added ingredients, or label the ingredients do not truly existed.

(2) The cosmetic full ingredients refer to the ingredients that are purposefully added to the product formula by producer in accordance with the product design and play a certain role in the final product, such as thickeners, pH adjusters, preservatives, surfactants, and skin conditioning agents, sunscreens, moisturizers, etc. Some ingredients, although will reacted with other ingredient after added in, the composition before the reaction should be labelled. For example: adding sodium hydroxide and carbomer , ‘sodium hydroxide ‘and ‘carbomer’ shall be labeled instead of ‘carbomer sodium.’ For the mixture, the each ingredients before mixing shall be labeled. For the extract, extract and the extraction solvent remaining in the extract, and the solvent diluted should be labelled separately.

When cosmetics manufacturer add a raw material, may bring other substances. These substances can mainly divided into two categories, one is added by the raw material manufacturers in order to ensure the quality of raw materials in production, like stabilizer, antioxidants, preservatives or sunscreen ,etc.; the other are trace impurities which are technologically inevitable or bring by raw material itself, and these trace impurities are not added in intentionally. Cosmetic ingredients do not include the above two categories ,which is due to the use of a raw material or the other substances inevitably brought into, thus not have to be labelled in the list. In addition, manufacture auxiliary agents, which are added during manufacture process, but do not reacted with other ingredients and does not exist in the final product, do not have to be labelled.

For mask products, the paper and non-woven fabrics involved do not belong to the cosmetic ingredient.

Ingredients do not labelled if meet the following terms:

① The substance brought by the ingredient (including trace impurities), the content is very small, much less than the amount required to play its role, do not have to be labelled.

a) The moderate amount of preservatives, antioxidants and other ingredients added to protect the raw materials:

Example 1: Antioxidants such as " butylated hydroxytoluene" added to the grease.

Example 2: Preservatives such as "sorbic acid" added in the plant extract.

b) Trace impurities mixed in the ingredient (these trace impurities are inevitably under the current technical conditions and the presence of these trace impurities does not affect the safety evaluation

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