

A top-down view of various cosmetic products and fresh flowers arranged on a light pink background. The products include a white pump bottle, a small jar of cream, a tube of lip balm, and a clear bottle. The flowers are a mix of purple, yellow, and white daisies. A semi-transparent pink rectangle is centered over the image, containing the title text.

Introduction to Cosmetic Product Claims

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Content



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Classification

Substantiation & Types of Evidence

Claims in New Product Development

 Grab your favourite personal care product - or find it online!





How do you know if it is a cosmetic or a drug?

Cosmetic Products	Medicinal Products
Local activity	Systemic/local activity
Alleviation of conditions	Treatment/Healing of conditions
Used on healthy tissue	Used on diseased/damaged tissue
Physiological Effect	Pharmaceutical effect
Epidermal penetration only	Penetration, permeation and/or absorption is allowed

Cosmetic Claims: Regulation & Common Criteria

Article 20 of both the UK and EU Cosmetics Regulations states:

“in the labelling, making available on the market and advertising of cosmetic products, text, names, trademarks, pictures and figurative or other signs, shall not be used to imply that these products have characteristics or function that they do not have”

Legal Compliance

Honesty

Truthfulness

Fairness

Evidential Support

Informed Decision Making



Visual representations/graphics

Text (on package)



Images



MASQUE ME

Watermans Masque Me is the perfect answer for detangling and hydrating the hair and perfect for controlling that frizz.

Our unique hair growth formula intensive mask is an excellent addition to black hair care. Masque Me's regenerating formula melts into the hair to enrich the hair shaft from root to tip. Ideal for perfect moisturisation. Repairing and nourishing dry hair, leaving it soft with impeccable shine.

To be used once a week to deep condition, nourish, repair and restore curls.

Apply Masque Me to your hair after completing your shampooing process with Watermans Grow Me. Massage thoroughly into the hair and scalp from root to tip. This can be a 10 minute treatment, or an overnight treatment - the choice is yours! Rinse thoroughly.

[SHOP MASQUE ME](#)

Text
(in website,
advertisements
etc.)

Claim Criteria: Commission Regulation EU no. 655/2013

Legal Compliance

Claims which convey the idea that a product has a specific benefit when this benefit is mere compliance with minimum legal requirements should not be allowed.

Truthfulness

Neither the general presentation of the cosmetic product nor individual claims made for the product should be based on false or irrelevant information.

Evidential Support

Claims for cosmetic products, whether explicit or implicit, should be supported by adequate and verifiable evidence regardless of the types of evidential support used to substantiate them, including where appropriate expert assessments.

Honesty

Presentations of a product's performance should not go beyond the available supporting evidence.

Fairness

Claims for cosmetic products should be objective and should not denigrate the competitors, nor should they denigrate ingredients legally used.

Informed Decision Making

Claims should be clear and understandable to the average end user. Marketing communications should be clear, precise, relevant and understandable by the target audience.

Classification of claims

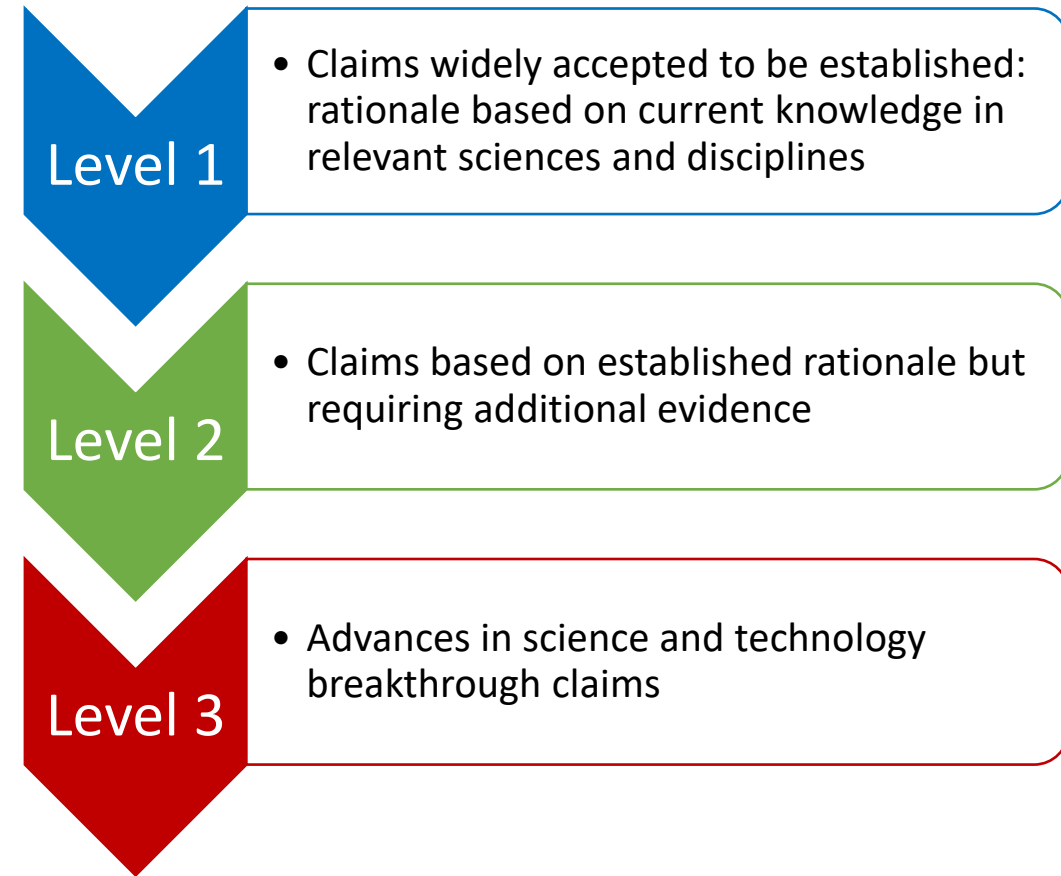
PERFORMANCE	INGREDIENT	SENSORY/ AESTHETIC	COMBINATION	COMPARISON
<p>Explain to the consumer:</p> <ul style="list-style-type: none"> • performance • efficacy • mode of action <p>Include the intensity, mode of action, or duration of the effect</p>	<p>Inform the consumer that the product contains a particular ingredient.</p> <p>! If implication that specific ingredient imparts benefit, any claim associated with an action will become linked to a performance claim !</p>	<p>Sensory: consumer's expectation of sensorial attributes of the product:</p> <ul style="list-style-type: none"> • olfactory, • tactile • visual effect(s) <p>Aesthetic: may refer to the appearance, packing or format of a product</p>	<p>Claims are usually more complex, use a combination of the different claims types</p> <p>Most common example is that specific ingredient(s) help deliver an aspect of product performance</p>	<p>Claims may be comparative:</p> <p>limits and rules govern how far this comparison can be made</p>
<p>Examples:</p> <p>“moisturising” “long-lasting” “broad spectrum UV protection” “48-hours hydration”</p>	<p>Examples:</p> <p>“with Vitamin E” “contains fluoride”</p>	<p>Examples:</p> <p>“gently fragranced” “softening” “shine-enhancing” “2-phase bubble bath” “flip-top cap for easy action”</p>	<p>Examples:</p> <p>“With moisturising Glycerin” “with Vitamin E to protect against free-radical damage” “contains Aloe vera to soothe”</p>	<p>Examples:</p> <p>“New improved formula” “longer-lasting effect compared to market leading product”</p>

*Objective:
instrumentation
measurements, grading*

*Subjective: consumer/home
tests*

Claims Substantiation

- Done **on an individual basis**, i.e. for each claim on a **product**
- Depends on:
 - > the claim itself,
 - > implied meanings the claim may have
 - > the understanding of the averagely well-informed consumer
- Must be **applicable to the final product** placed on the market
- **Substantiation = Evidence = Data and/or Scientific Rationale**
 - > How much evidence? Depends on the claim!
 - > What type of evidence? No list of specific tests that have to be used or performed, but there are certain methods that are widely used



Types of Evidence for Claim Substantiation

Published Information

Ingredient Data

Formulation Information

Clinical Trials: Instrumental

Clinical Trials: Trained/Expert Assessors

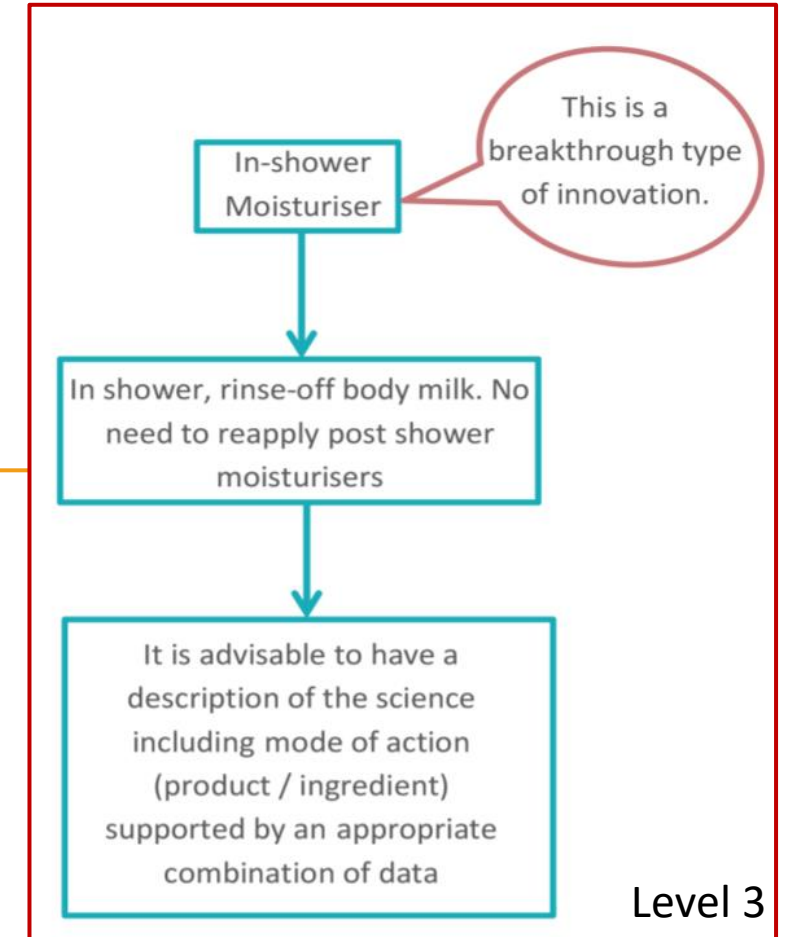
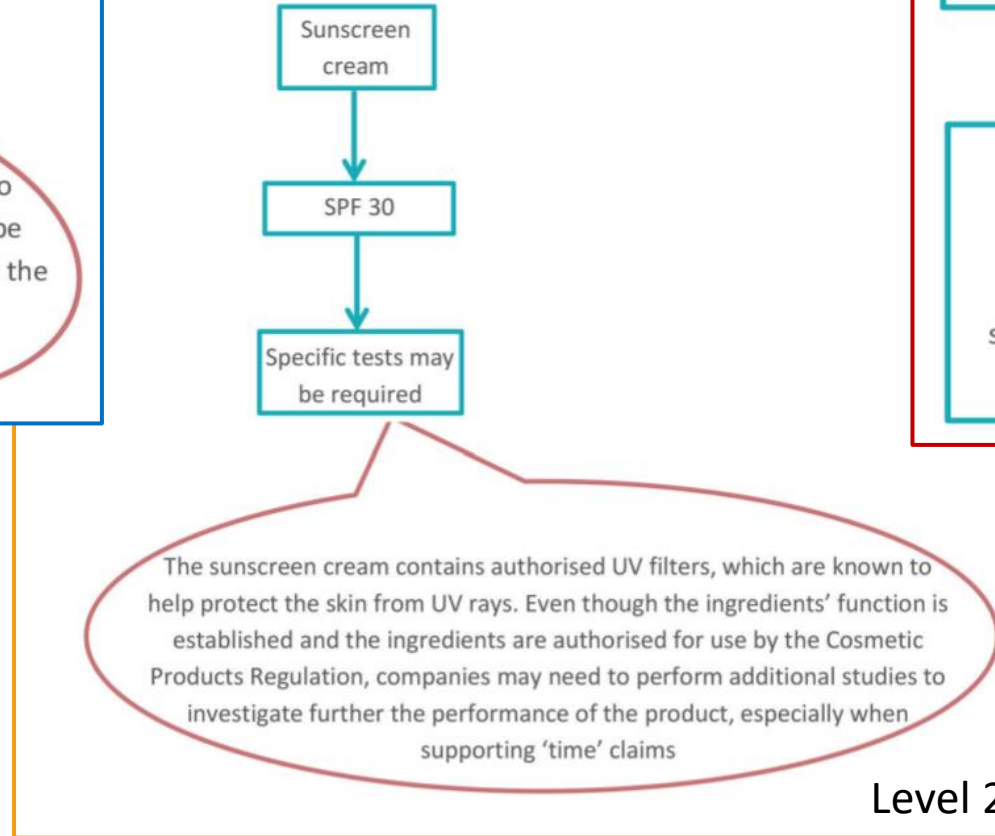
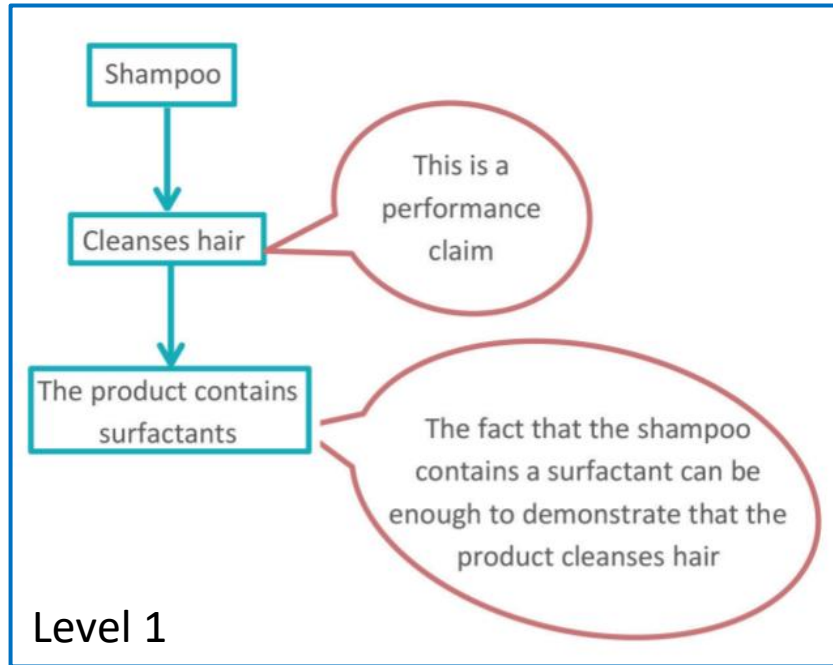
Sensory Studies

Consumer Self-evaluation

These formulations are less likely to represent a scientific breakthrough

- For formulations with scientific breakthrough, intensity/duration claims etc.
- Should follow good study design principles
- Statistical significance needed
- Use of control, benchmark etc.

Examples - Case Studies





Questions