

QUICK GUIDE TO INGREDIENT LISTING

The purpose of ingredient labelling is to ensure consumer transparency and to provide adequate information to the consumer to make informed decisions based on safety or preference.

As products are traded internationally it is necessary that uniformity is used in labelling ingredients. Globally cosmetics are labelled using INCI (International Nomenclature for Cosmetic Ingredients) nomenclature. The Draft Regulations relating to the labelling, advertising, and composition of cosmetics and SANS 98- *Ingredient Labelling of Cosmetic Products* details the manner in which ingredients are to be listed on the label of a cosmetic product.

It is important to note that the CTFA cosmetic compendium contains the most updated Annexures of the draft regulations.

The intent of this document is to provide a quick overview of the ingredient listing requirements.

| CHECKLIST | CONTENT | REFERENCE | |
|-------------------------------------|--|---|--|
| 1. Cosmetic INCI name | ✓ Consult INCI dictionary handbook, EU inventory of Cosmetic Ingredients or request from supplier. | SANS 98, 6.1.1 | |
| 2. Select labelling system | <ul style="list-style-type: none"> ✓ EU (acceptable in SA) ✓ USA ✓ EU USA harmonised labelling (acceptable if SA companies have USA affiliates) ✓ Reference illustration (Annex 2) | SANS 98, 4.12 | |
| 3. Header | The ingredients must be easily distinguishable on the label. It must state INGREDIENTS and/or listed in a rectangular box. | SANS 98, 4.7 Draft reg. 8.8 | |
| 4. Non-declarable ingredients | Impurities in the raw materials used and Subsidiary technical materials used in the mixture but not present in the final product. | Draft reg. 8.11 | |
| 5. Order of declaration | <ul style="list-style-type: none"> ✓ ≥ 1% Ingredients listed in descending order. ✓ ≤ 1% Ingredients can be listed in any order. <p>If Parfum (Fragrance) or Aroma (Flavour) used has the presence has any substances from, Annex III (Other limitations and requirements) these shall then be indicated in list prior to colourants. Colourants may be listed in any order after all other ingredients.</p> | SANS 98, 5.1 Draft reg. 8.10.b - c | |
| 6. INCI nomenclature interpretation | Several INCI nomenclature interpretation variations between EU and USA: | | |
| | ✓ Colourants | <ul style="list-style-type: none"> ✓ CI number accepted in EU e.g. CI 42090 ✓ Harmonised name is accepted in EU and USA e.g. CI 42090 (Blue 1) | SANS 98, 6.1.2 and 6.2.1 SANS 98, 6.2.3 |
| | ✓ Decorative Cosmetics | ✓ For common base formulas marketed in several shades, all colouring agents may be listed on each product preceded by "[+/- ...] OR "MAY CONTAIN" followed by the relevant INCI colourant names. | SANS 98, 6.2.4 Draft reg. 8.10. d |
| | ✓ Botanicals | <ul style="list-style-type: none"> ✓ Latin name accepted in EU ✓ Harmonised name is accepted in both EU and USA | SANS 98, 6.2.5 |
| | ✓ Denatured Alcohol | <ul style="list-style-type: none"> ✓ For denatured alcohol the INCI nomenclature "ALCOHOL DENAT." shall be used ✓ For undenatured alcohol the INCI nomenclature "ALCOHOL" shall be used | SANS 98, 6.2.6 |
| | ✓ USA OTC drug ingredients | | SANS 98, 6.1.2d |
| | ✓ Trivial names | <ul style="list-style-type: none"> ✓ AQUA is EU accepted ✓ AQUA (WATER) is EU and USA accepted | SANS 98, 6.2.2 |
| | ✓ Perfume | <ul style="list-style-type: none"> ✓ Parfum is EU accepted ✓ Parfum (Fragrance) is accepted in EU and USA | SANS 98, 6.2.1a Draft reg. 8.10.a |
| | ✓ Flavourant | <ul style="list-style-type: none"> ✓ Aroma is EU accepted ✓ Aroma (Flavour) is EU and USA accepted | SANS 98, 6.2.1b Draft reg. 8.10. a |
| | ✓ Hydrocarbon propellants | ✓ Include hydrocarbon content in descending INCI nomenclature | SANS 98, 6.2.7 |
| ✓ Soap Ingredients | <ul style="list-style-type: none"> ✓ Ingredients should be declared as saponified ingredients eg. Coconut Oil and Palm Kernel Oil are saponified with Sodium Hydroxide- the ingredients should be declared as Sodium Cocoate and Sodium Palm Kernelate. | SANS 98, 6.2.8 | |
| 7. Nano materials | ✓ All ingredients present in the form of nanomaterials must be clearly indicated in the list of ingredients. The names of such ingredients must be followed by the word "nano" in brackets. | Draft reg. 8.12 | |
| 8. Allergen listing | <ul style="list-style-type: none"> ✓ Request from supplier ✓ Reference Annex III of CTFA compendium ✓ Calculate declarable allergens | SANS 98, 6.2.9, Compendium Annex III | |

ILLUSTRATION OF INGREDIENT LABELLING:

INGREDIENT LISTING A.1 "ACCEPTABLE IN THE EU ONLY" OF ANNEX A SANS 98



INGREDIENTS:

AQUA, ALCOHOL DENAT., HAMAMELIS VIRGINIANA, SODIUM PCA, MEL, PRUNUS AMYGDALUS DULCIS, PARAFFINUM LIQUIDUM, MELALEUCA ALTERNIFOLIA OIL, PARFUM, PHENOXYETHANOL, METHYLPARABEN, PROPYLPARABEN, LIMONENE, LINALOOL, CINNAMAL, ALPHA-ISOMETHYL IONONE, CI 17200, CI 42090

INGREDIENTS:

AQUA (WATER), ALCOHOL DENAT., HAMAMELIS VIRGINIANA (WITCH HAZEL), SODIUM PCA, MEL (HONEY), PRUNUS AMYGDALUS DULCIS (SWEET ALMOND OIL), PARAFFINUM LIQUIDUM (MINERAL OIL), MELALEUCA ALTERNIFOLIA OIL (TEA TREE), PARFUM (FRAGRANCE), PHENOXYETHANOL, METHYLPARABEN, PROPYLPARABEN, LIMONENE, LINALOOL, CINNAMAL, ALPHA-ISOMETHYL IONONE, CI 17200 (RED 33), CI 42090 (BLUE 1)

INGREDIENT LISTING A.2 "ACCEPTABLE IN THE EU AND USA" OF ANNEX A SANS 98