Section 10: Ingredient and Allergen Labelling of Cosmetic Products

The purpose of ingredient labelling is to ensure product content transparency to the consumer, by providing information about the product to the consumer and enable the consumer to make an informed purchase decision.

As products are traded internationally, it is necessary that there is a uniform means of listing cosmetic ingredients. Globally cosmetics are labelled using INCI (International Nomenclature for Cosmetic Ingredients) nomenclature. Department of Health's Regulation relating to labelling, advertising and composition of cosmetics, No. R. 1469, 22 December 2017, clause 8 Labelling (h) states the requirement to list ingredients using the INCI nomenclature. Furthermore, in South Africa, the relevant National Standard that provides guidelines for this requirement is:

SANS 98:2006- *Ingredient Labelling of Cosmetic Products* https://ctfa.co.za/Standards/sabs/sans-98-2012/)

'Fragrances' are substances which are used for perfuming cosmetics (soaps, perfumes, creams, etc.) and other products. Some of the fragrances can cause allergic reactions that are called 'fragrance allergens'. According to Annex III (column 'Other') of the Cosmetics Regulation, fragrance allergens have to be individually labelled. Their presence has to be indicated in the list of ingredients if their concentration exceeds:

- 0.001% in leave-on products
- 0.01% in rinse-off products

In addition, it is mandatory that all products sold on the South African market, post December 2006, include on the label a listing of these allergens if present in the product. The presence of the allergen must be indicated in the list of the ingredients in INCI nomenclature.

This applies if these ingredients are present in the product for any reason – not just as constituents of fragrances.

In 2023 the EU Commission finalised the regulation regarding the addition of 56 new declarable allergens. South Africa will be following the same official dates as the EU. The transition periods have confirmed to be 3 years for products being placed on the market and 5 years for the withdrawal of non-compliant products.

Refer to Annex III of the Compendium and the CTFA Annex Change Document.