



Labeling Cosmetic Products

Many Aromatherapy students and graduates prepare cosmetic products (including body lotions, shampoos, and soaps) using natural ingredients and essential oils. You may prepare these for your own use, for friends and family, or for resale.

General Labeling Requirements

If you sell your products, you must comply with FDA regulations. These are set out online at:

<http://www.cfsan.fda.gov/%7Edms/cos-toc.html>

The following is the general information from that site at <http://www.cfsan.fda.gov/~dms/cos-labl.html> but we strongly recommend that you read the full handbook. Read this link to ensure that you understand the difference between a cosmetic and a drug: <http://www.cfsan.fda.gov/~dms/cos-218.html>

All cosmetics, whether they are sold on a retail basis to consumers or marketed exclusively for salon or workplace use, are subject to the FD&C Act. This law and regulations enacted under its authority require the cosmetic label to state the name and place of business of the manufacturer, packer or distributor; an accurate statement of the quantity of contents; and any appropriate directions for safe use and/or warning statements. This information must comply with additional regulatory requirements. It must be prominent and appear in the proper location on the label.

Regulations enacted under the FPLA require ingredients to be listed on the labels of cosmetics sold on a retail basis to consumers -- even if the label states "For professional use only." Consumers can use the ingredient declaration to identify ingredients they wish to avoid. Ingredients are listed in descending order of predominance, that is, with the ingredient present in the greatest amount listed at the beginning and those present in the smallest amounts listed at the end.

Special rules apply to the ingredient declaration on products that are both cosmetics and over-the-counter drugs. An example of such a product is an anti-dandruff shampoo: A shampoo is a cosmetic, while an anti-dandruff treatment is a drug. Regulations enacted in 1999 require such combination products to have the drug ingredients listed separately as "Active Ingredients," in alphabetical order, followed by the cosmetic ingredients, which are listed as "Inactive Ingredients" in descending order of predominance.

In addition to the immediate label, FDA regulates all cosmetic product "labeling". The definition of labeling includes all written, printed, or graphic matter that appears on the product, its containers, or its wrappers, as well as any such matter that accompanies the product. Typically,

materials such as promotional literature, product catalogs, and flyers fit this definition of labeling. FDA also has considered promotional statements appearing on Internet sites to constitute labeling, especially on those sites where the promoted product can be purchased. However, unfair or deceptive advertising that appears in magazines, in newspapers, or on television generally falls under the authority of the Federal Trade Commission.

Contraindications

You are required to list "appropriate directions for use and/or warning statements" on your "label". How, you might ask, can you list these on a small label? After all, each essential oil or herbal formula may have several specific contraindications.

The answer lies in what the FDA considers to be "labeling". You will see that labeling includes flyers and, in most cases, websites. The most efficient way to include all the warnings relevant to your product is to asterisk the items in question on the ingredients list, and include under the list, after the asterisk, a reference to the directions for use and warnings information on the product flyer. On your product flyer, you can list your information easily. For your protection, you should include all warnings and contraindications for the ingredients in your product, even if you are using only a very small amount. This way, the consumer can decide whether they want to risk a reaction, not you!

For example, my essential oil massage blend might say:

Ingredients: Organic sweet almond oil, organic lavender Lavandula angustifolia essential oil, organic clary sage Salvia sclarea* essential oil. *This ingredient should not be used if you are pregnant or nursing. Additional restrictions may apply, please refer to the product brochure or www.thebestnaturalproducts.com before use. Keep out of reach of children.

At the website or in the product brochure, a simple list of contraindications for the ingredients will suffice. If you have more than one product, you may wish to include a chart listing all the essential oils you use in alphabetical order.

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Attention RAs

Log onto <http://www.aromatherapycouncil.org/arcregister.html> to check your listings and make any necessary changes to your contact information. This will ensure that you continue to receive valuable information from ARC concerning reregistration information, newsletters, and more!



MARKETING YOURSELF NOW THAT YOU ARE AN RA: The Power of the Press Release

Press Release
City, State
Date

FOR IMMEDIATE RELEASE

Contact: First name Last_Name
Phone: Work_Phone
Email: Email

Street Address: «Street»
City, State, Zip

«First_Name» «Last_Name» has recently completed the Aromatherapy Registration Council Registration Examination sponsored by the Aromatherapy Registration Council and has been awarded the trademarked designations of RA and Registered Aromatherapist.

The Aromatherapy Registration Council (ARC) endorses the concept of voluntary, periodic registration by examination for all individuals practicing aromatherapy. Registration focuses specifically on the individual and provides formal recognition of a professional level of knowledge in the field of Aromatherapy.

A Registered Aromatherapist has demonstrated a core body of knowledge through successfully passing the Aromatherapy Registration Council Registration Examination. The Aromatherapy Registration Council Registration Examination is designed to test the candidate's knowledge of a range of areas of Aromatherapy, but with a particular emphasis on generally accepted safety standards for the industry.

Registration is a mark of the candidate's dedication to the Aromatherapy field and to the safety of his or her clients and customers. It is an exciting demonstration of the development of the Aromatherapy industry in the US and Canada.

The Aromatherapy Registration Council Registration Examination has been offered since 2000, with examinations held twice yearly in thirty testing centers across the USA, Canada, and overseas. The examination is administered by the Professional Testing Corporation of New York who can be contacted at 212-356-0660.

The Aromatherapy Registration Council is independent from any membership body, organization, or educational facility. This assures an impartial and unbiased body distinct from a body where members pay to belong to it and from one that accredits or endorses specific schools. Independence from any paid membership organization is essential for objectivity and credibility from both within the industry and externally.

To locate an RA in your area visit <http://www.aromatherapycouncil.org/>

The Aromatherapy Registration Council is a non profit corporation registered in the state of Oregon and is recognized by the IRS as a tax exempt organization under s501(c)(6) of the US Tax Code.

For more information on the Aromatherapy Registration Council, including upcoming examination dates and a candidate handbook, and a list of current Registered Aromatherapists, visit www.aromatherapycouncil.org

Upcoming Test Date

Application Deadline*

09/15/2007

Examination Date

11/10/2007

*Applications received after the deadline cannot be guaranteed acceptance.

Call PTC at (212) 356-0660 for a Handbook and Application.

REMINDER:

A condition of eligibility for and continued registration as a Registered Aromatherapist is compliance with the ARC Disciplinary Policy. To review the full Policy, visit www.aromatherapycouncil.org/arcnew.html



ARC Demographics: Active Certificants

N = 297

Note: The following data are from information provided with applications for examination and, therefore, do not reflect ARC's current demographics.

PERCENT OF TIME CURRENTLY SPENT

IN AROMATHERAPY:	N	%
Less than 25%	94	31.65
26 to 50%	74	24.92
51 to 75%	54	18.18
More than 75%	71	23.91
No response	4	1.35

EXPERIENCE IN AROMATHERAPY:

	N	%
Less than one year	26	8.75
One year	40	13.47
2 years	96	32.32
3 to 5 years	92	30.98
6 to 10 years	32	10.77
More than 10 years	9	3.03
No response	2	0.67

PRACTICE SETTING:

	N	%
Self-employed	150	31.51
Hospital/Clinic	53	11.13
Research Institute	11	2.31
Education	91	19.12
Retailers/Wholesalers	55	11.55
Industry	7	1.47
Government	1	0.21
Association	25	5.25
Other	80	16.81
No response	3	0.63

AROMATHERAPY TRAINING:

	N	%
Less than one year program	60	11.72
1 or 2 year program	188	36.72
Workshops or seminars	95	18.55
On-the-job training	56	10.94
Advanced continuing education	77	15.04
Other	34	6.64
No response	2	0.39

HIGHEST ACADEMIC LEVEL:

	N	%
High School Graduate	10	3.37
Some College	53	17.85
Associate Degree	22	7.41
Diploma in Nursing	12	4.04
Bachelor's Degree	128	43.10
Master's Degree	47	15.82
Doctoral Degree	16	5.39
Other	7	2.36
No response	2	0.67

PROFESSIONAL BACKGROUND:

	N	%
Massage Therapist	182	37.84
Registered Nurse	173	35.97
Esthetician	26	5.41
Naturopathic Medicine	8	1.66
Practical/Vocational Nurse	5	1.04
Veterinarian	2	0.42
Pharmacist	1	0.21
Physician	5	1.04
Chiropractor	3	0.62
Acupuncturist	1	0.21
Complementary Medicine	12	2.49
Other	54	11.23
No response	9	1.87

ARE YOU CURRENTLY A MEMBER OF NAHA:

	N	%
No	145	48.82
Yes	151	50.84
No response	1	0.34

RACE:

	N	%
African American	3	1.01
Asian	120	40.40
Hispanic	8	2.69
Native American	1	0.34
White	141	47.47
No response	24	8.08

AGE RANGE:

	N	%
Under 25	11	3.70
25 to 29	43	14.48
30 to 39	83	27.95
40 to 49	99	33.33
50 to 59	41	13.80
60+	6	2.02
No response	14	4.71

GENDER:

	N	%
Male	23	7.74
Female	228	76.77
No response	46	15.49



Attention RAs!

Do you have an article that you would like to see in an upcoming newsletter? If so, send it to:

ARC Newsletter
Professional Testing Corporation
1350 Broadway, 17th Floor
New York, NY 10018

**STATE/PROVINCE OF RESIDENCE:**

	N	%
Arizona	3	1.01
California	19	6.40
Colorado	11	3.70
Connecticut	2	0.67
Florida	7	2.36
Georgia	5	1.68
Illinois	18	6.06
Indiana	1	0.34
Iowa	4	1.35
Louisiana	2	0.67
Maryland	3	1.01
Massachusetts	19	6.40
Michigan	2	0.67
Minnesota	6	2.02
Missouri	3	1.01
Nevada	1	0.34
New Hampshire	1	0.34
New Jersey	5	1.68
New York	13	4.38
North Carolina	3	1.01
Ohio	1	0.34
Oklahoma	3	1.01
Oregon	9	3.03
Pennsylvania	18	6.06
Puerto Rico	2	0.67
Rhode Island	2	0.67
Tennessee	2	0.67

Texas	5	1.68
Utah	1	0.34
Vermont	1	0.34
Virginia	1	0.34
Washington	5	1.68
Wisconsin	5	1.68
British Columbia	2	0.67
Nova Scotia	1	0.34
Ontario	1	0.34
Wyoming	1	0.34
Foreign (other than US and Canada)	109	36.70

COUNTRY:

	N	%
Canada	4	1.35
Croatia	1	0.34
Hong Kong	1	0.34
Korea	103	34.68
Taiwan	4	1.35
United States	184	61.95

To advertise a course, program, or continuing education offerings in future editions of the newsletter, contact ARC at (503) 244-0726 or info@aromatherapycouncil.com.



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