

- **Warning and caution statements.** These must be prominent and conspicuous. Cosmetics that may be hazardous to consumers must bear appropriate label warnings. Flammable cosmetics are an example.
- **Ingredients.** If the product is marketed on a retail basis, the ingredients must appear on an information panel, in descending order of predominance. The names of ingredients need to follow the INCI (International Nomenclature of Cosmetic Ingredients) rules. This is the scientific or agreed-upon standard name for the ingredient.

All labeling information must be in English.

For more information about labeling your soaps and/or lotions, balms, etc., visit these web pages:

How to label soap:

[www.soapqueen.com/bath-and-body-tutorials/cold-process-soap/how-to-label-cold-process-soap/](http://www.soapqueen.com/bath-and-body-tutorials/cold-process-soap/how-to-label-cold-process-soap/)

Is it a cosmetic, a drug, or both? Or is it soap?:

<http://www.fda.gov/Cosmetics/GuidanceComplianceRegulatoryInformation/ucm074201.htm>

FDA: Navigate the Cosmetics Section:

<http://www.fda.gov/Cosmetics/default.htm>

Cosmetic labeling:

<http://www.fda.gov/Cosmetics/CosmeticLabelingLabelClaims/default.htm>

“How to” guide for cosmetic labeling:

<http://www.fda.gov/Cosmetics/CosmeticLabelingLabelClaims/CosmeticLabelingManual/default.htm>



## Labeling Your Homemade Soaps, Lotions or Lip Balms



### HARRISON COUNTY HEALTH DEPARTMENT

241 Atwood Street, Suite 200  
Corydon, Indiana 47112  
Phone (812) 738-3237  
Fax (812) 738-4292

[www.harrisoncountyhealth.com](http://www.harrisoncountyhealth.com)



## Is labeling required for my handmade soaps?

Believe it or not, most of the “soap” we buy at the store to clean our bodies with is not technically “soap” at all; it is detergent made from synthetic ingredients. That’s why it’s labeled as a “beauty bar” or “cleansing bar” and not as “soap”. A growing number of people have decided they want to get back to more natural products to put on, and in, their bodies. One such product is homemade soap.



Making soap

The US Food and Drug Administration (FDA) defines “soap” as a product where most of the matter consists of an “alkali salt of fatty acids”. The product’s detergent properties are due to the alkali-fatty acid compounds.

The simplest homemade soap can be made from only three ingredients: a liquid (usually water or milk), lye, and various melted oils. The resulting product is the “alkali salt of fatty acids”... soap.

Homemade soaps can be very simple, or they can be as elaborate as the maker wishes. They can be plain and odorless, or colored and highly scented. They can contain water, goat’s milk, coconut milk, yogurt, honey, animal fats, or plant oils and butters.



They can have natural colorings or lab-made colorings. They can be unscented, scented with natural essential oils or scented with man-made fragrance oils. They can contain herbs, flowers, coffee, oatmeal... the possibilities are endless!

But regardless of what your soap contains, according to the FDA, **as long as no “claims” are made about your soap, such as “moisturizing”, “acne treatment”, “deodorizing”, “sleep inducing”, etc., no labeling is required. NONE.**

If claims are made, your product could be considered to be a drug. This is also true for “essential oils.” A fragrance marketed with certain “aromatherapy” claims, such as the assertion that the scent will help the consumer sleep, meets the definition of a drug. Similarly, a massage oil that is simply intended to lubricate the skin and impart fragrance is a cosmetic, but if the product is marketed as relieving muscle pain, it’s a drug.

Here is the link to the FDA’s web page about it: [www.fda.gov/cosmetics/productandingredientsafety/ProductInformation/ucm115449.htm](http://www.fda.gov/cosmetics/productandingredientsafety/ProductInformation/ucm115449.htm).

So you may elect to put no label on your soap at all. That being said, most people are at least interested in what goes into homemade soap. Some people even have allergies or sensitivities to certain ingredients. They may be sensitive to certain colorings, fragrances, or oils. Even if it’s not legally required, it may benefit you to go ahead and list the ingredients on the product’s back panel. People appreciate information and transparency.

If nothing else, shouldn’t you have your contact information on the soap? What if the purchaser loved it and wants to buy more? How can they do that if they don’t know how to contact you?



Soap label showing back ingredient panel and front identity panel. Note that this soap label makes no claims. It simply states what it is.

## What about labeling homemade lotions, lip balms, or similar products?

While true soap does not require labeling (as long as no health or beauty claims are made), lotions and lip balms are considered by the FDA to be cosmetics and proper labeling is required.

There are at least two panels on a label; the *principal display panel* and the *information panel*.

The principal display panel must contain:

- **An identity statement** indicating what the product is.
- **An accurate statement of the net quantity of contents**, in terms of weight, measure, or numerical count.

The following information must appear on the information panel:

- **Name and place of business.** This may be the manufacturer, packer, or distributor. You need to list an address, not just a website.
- **Distributor statement.** If the name and address are not those of the manufacturer, the label must say “Manufactured for...” or “Distributed by”...
- **Material facts.** Failure to reveal material facts is one form of misleading labeling and therefore makes a product misbranded. An example is directions for safe use, if a product could be unsafe if used incorrectly.