July 2026

REPORT FOR INTERNATIONAL COOPERATION ON COSMETIC REGULATION (ICCR)

ICCR General Principles for E-labelling and Provision of Digital Information for Cosmetic Products

JWG Member Authors:

Coroama, Manuela# (18), Jacques, Maxime# (18), Mokry, Roman# (4), Ali, Roba (23), Aljallal, Mohammed (12), Ayumi, Hayashi (6), Ceballos, Gabriel (9), Charaslertrangsi, Siripen (13), Daisuke, Araki (19), Elsheikh, Radwa (23), Fang, Yun-Shu (Elaine) (3), Gadallah, Ghada Ahmed Abbas (10), Geffken, Carl (21), Hicks, Jon (22), Huang, Jo (8), Inokuma, Yasuko (6), Kim, Donguk (7), Ko, Chien-Pang (17), Kyoungok, Kim (20), Ladin, Inna (5), Li, Ji Young (20), Mehandale, Sameer (14), Montemayor, Beta (16), Morais, Ariadne (15), Oliveira, Simone (1), Omata, Tomoki (19), Saikali, Nibal (2), Shaw Nuñez, Nicholas (25), Sherif, Rana Elsayed Yusef (10), Suvanaphen, Preecha-korn (24), Takahiro, Fujimoto (6), Touchette, Sophie (2), Villemor, Rafaella (15), Wang, Xueshuo (11), Yim, Sunhee (7)

1. Brazilian Health Regulatory Agency (ANVISA), Brazil
2. Health Canada (HC), Canada
3. Taiwan Food and Drug Administration (TFDA), Chinese Taipei
4. European Commission (EC), European Union
5. Ministry of Health (MOH), Israel
6. Ministry of Health, Labor and Welfare (MHLW), Japan
7. Ministry of Food and Drug Safety (MFDS), Republic of Korea
8. US Food and Drug Administration (US FDA), United States
9. Public Health Institute (ISP), Chile
10. Egyptian Drug Authority (EDA), Egypt
11. National Institutes for Food and Drug Control (NIFDC), People's Republic of China
12. Saudi Food and Drug Administration (SFDA), Saudi Arabia
13. Ministry of Public Health (MOPH), Thailand
14. Office for Product Safety and Standards (OPSS), United Kingdom
15. Brazilian Association of the Cosmetic, Toiletry and Fragrance Industry (ABIHPEC), Brazil
16. Cosmetics Alliance Canada (CAC), Canada
17. Taiwan Cosmetics Industry Association (TWCIA), Chinese Taipei
18. Cosmetics Europe (CE), European Union
19. Japan Cosmetic Industry Association (JCIA), Japan
20. Korean Cosmetics Association (KCA), Republic of Korea
21. Independent Beauty Association (IBA), United States
22. Personal Care Products Council (PCPC), United States
23. Chamber of Pharmaceutical Industries, Cosmetics and Medical Devices, Federation of Egyptian Industry (CPCMD), Egypt
24. Thai Cosmetic Manufacturers Association (TMCA), Thailand
25. Cosmetic, Toiletry and Perfumery Association (CTPA), United Kingdom

#: Co-Chair

Preamble

This document establishes general principles to support jurisdictions that wish to explore or implement digital labelling approaches for cosmetic products. These principles are designed to guide the implementation of digital labelling initiatives in a manner that supports consumer safety, promotes transparency, and enables innovation.

This document is non-legally binding; it is designed to preserve flexibility for regulatory authorities and companies to tailor implementation to local legal and practical realities.

Table of Contents

1. Background and definitions

Digital technologies, shifting consumer behaviour and evolving regulatory frameworks are increasingly shaping global access to, and dissemination of, cosmetic product information.

The ongoing digital transformation of product information is driven by the expanding use of smartphones and other connected devices, which significantly enhance the consumers' ability to acquire product-related details through digital channels.

There are numerous benefits of communicating product information digitally. Some illustrative examples are:

- for consumers: improved legibility, availability at any time before/at purchase, during use and post-use (i.e., after the packaging has been discarded), access to more detailed information beyond what can fit on the on-pack label
- for regulatory authorities: time/cost-saving online control activities, reduced administrative burdens
- for distributors: optimisation of supply chain communications
- for cosmetics companies: reduction of costly on-pack re-labelling (due to changes to information that is not about safe use), and inserts
- for the environment: reduction of packaging waste due to on-pack re-labelling.

At the same time, it is important to recognise the potential challenges associated with access disparities, such as regions with limited internet connectivity, varying levels of digital literacy among consumers or of availability/access to smartphones. This underscores the importance of assessing digital access gaps and supporting consumer education about digital access across different areas or countries.

Definitions:

- Digital labelling / e-labelling: the provision of product information through digital means.
- Digital information: product information that is accessed through digital tools or platforms, regardless of the technology used or how the information is structured or displayed.
- Data carrier: a machine-readable element (such as a QR code, a 2D barcode, data matrix, etc.) affixed to a product, its packaging, or provided through other means at or adjacent to the point of sale, that enables access to the digital label / information.
- Physical labelling: product information printed on or otherwise physically affixed to the product or its packaging, including information made available through materials displayed or provided at points of sale where such approaches are permitted under applicable regulatory frameworks.
- Mandatory product information: information that is required for a cosmetic product under applicable regulatory frameworks, whether presented physically or digitally.
- Voluntary product information: information provided at the discretion of the manufacturer/responsible parties that is not required under applicable regulatory frameworks and may relate to product characteristics, brand communications or other optional content.
- Company: person or entity that is responsible for the products' compliance with the legal requirements, as defined in each jurisdiction.

2. Purpose of this document

This document aims to establish a set of general principles guiding the transition to digital labelling that can facilitate a common and globally compatible approach in the cosmetics sector, while recognizing that regulatory frameworks, statutory requirements, consumer expectations and technological environments may differ across regions.

It recognises the need to modernise cosmetics regulations globally through the gradual integration of e-labelling requirements aligning with the consumers' ever-increasing use of digital means for accessing information. While timelines may be different across jurisdictions, regulatory compatibility should be pursued to reduce regulatory burdens, avoid trade barriers and to benefit travelling consumers.

The general principles are for mandatory product information. This document does not apply to voluntary product information.

3. Types of mandatory product information in the scope of this document

The types of mandatory information that cosmetics are subject to, taking account of local implementation realities in the various jurisdictions, are:

- product identification,
- manufacturer / responsible party contact,
- product composition,
- warning statements and instructions for safe use,
- other use instructions,
- weight / net content, and
- any other legally required statements relevant to the region or country.

4. General principles for e-labelling and digital information

4.1 CONSUMER BENEFITS

4.1.1 Preservation of consumers' immediate access to information on the physical label to enable safe use of the product

- Cosmetic products are relatively small in size and subject to extensive information requirements, in addition to packaging reduction policies (mandatory in certain jurisdictions); on-package labels are, therefore, becoming increasingly difficult to read.
- However, access to on-pack information remains easy and immediate for all consumers.
- Therefore, it is recommended that information, necessary to ensure the safe use of the product, should continue to be printed on the package, or be available as an insert.
- With a view to ensuring that information is provided appropriately (e.g. by improving visibility and legibility for consumers), the use of alternative means such as e-labelling, may be considered.

This principle should be revised periodically as habits, practices, and preferences of consumers continue to evolve.

4.1.2 Clear delineation between digital mandatory and voluntary information

- Companies may choose to provide additional information to consumers through digital means, e.g. supplemental information on raw materials, sustainability or environmental aspects, social responsibility commitments.

- Consumers should be able to readily identify and find the mandatory information.
- Therefore, there should be a clear visual separation between the digital mandatory information and voluntary communications. For example, the mandatory information defined by the regulation should be displayed prominently and not interrupted or obscured by screens containing marketing or promotional material.

4.1.3 Ready accessibility of mandatory digital information

- Mandatory digital information should be viewable in the languages required for physical labelling in the countries where the products are intentionally placed on the market.
- Consumers should have easy and quick access to the mandatory digital information, without the need to register, enter personal details (e.g., name, contact information), or download an application (other than an internet browser, camera app, etc.). Access to mandatory information should not be conditional upon the provision of personal data.
- Additionally, companies may have the option to provide access to digital information for users who choose to register, enter personal details, open an application, etc. as doing so might provide additional utility to consumers, including the ability to compare and track digital information about products that are relevant to them.
- Consumers should not be directed away from the mandatory information without notification.
- Formats compatible with assistive technologies (e.g., audio screen readers) should be encouraged because they offer superior accessibility over physical labels for consumers who are visually impaired.

4.1.4 Collaborative consumer education

- Although many consumers are already familiar with accessing information digitally, this is not the case for all consumers.
- Where mandatory information is allowed to be exclusively available in digital form, consumers should be informed through clear non-digital cues about how to access it.
- Cooperation between regulators and industry should be encouraged to provide consumers with an explanation of the new means for accessing product information, including clear and transparent delineation as to how information on pack works together with digital information – and what information can be expected where.

4.2 REGULATORY FRAMEWORK EVOLUTION

4.2.1 Modernised interpretation of the term ‘labelling’

- When updating cosmetic product regulations, it should be recognised that digital labelling is emerging alongside physical labels, leading to the two forms of labelling working together. The term ‘labelling’ should be clearly defined.

4.2.2 Assessment (e.g. through pilots) of the potential impacts of regulatory measures before they are adopted

- The impact of regulatory measures should be assessed from the perspectives of, but not limited to: (i) authorities, e.g. resources, (ii) consumers, such as ease of access to information, (iii) companies’ operations.
- The outcome of the assessment should be considered when drafting the regulatory measures.

4.2.3 Adequate (adaptative and realistic) digital transition

- The transition from physical to digital information should be made gradually, for example by allowing companies the choice between communicating information that is not related to the safe use of the product either on the package or through a digital label.
- For any new mandatory requirements, transition periods should allow adequate time for companies to understand and implement new requirements, establish and test digital systems, update digital information, redesign and print physical labels, and manufacture and distribute products bearing the updated labelling.
- Cosmetic products already manufactured or imported should be allowed to be sold in commerce until existing stocks are depleted.

4.2.4 Allowed optimisation of on-pack labels

- The on-pack information should be streamlined:
    a) primarily to improve legibility of on-pack labels and to allow consumers to more easily identify the information that is relevant for them; and
    b) as a result, to reduce costs and administrative burdens; and
    c) as a result, to reduce environmental impacts of packaging waste.
- A single data carrier per product (formulation and its packaging) is sufficient to provide access to digital information.
- Use and placement of the data carrier should remain flexible to support consistent use of the same carrier within and across jurisdictions.
- Additional information next to the data carrier (text, pictograms, etc.) should be avoided as it would introduce operational complexities for companies and undermine the environmental benefits of digitalisation.
- Unnecessary duplication of mandatory information on the package and digital information should be avoided, if permitted by the jurisdiction.

4.2.5 Clarity of regulatory requirements

- The allocation of information between the on-pack and the digital label should be guided by a risk-based approach to ensure that information needed for the safe use of the product remains on-pack.
- Where certain information has been deemed appropriate for digital labelling, the legislation or formal guidance should be clear regarding the rationale for not repeating it on the package.

4.3 DIGITAL DATA AND TECHNOLOGY

4.3.1 Technological neutrality

- Regulatory requirements related to digital labelling should be formulated, to the extent feasible, in general terms with no references to specific technologies, as these are likely to continue to evolve at a faster pace than the regulatory requirements.
- Compatibility across existing and future systems should be ensured by not mandating specific technologies or vendors.
- The choice of the data carrier (QR codes, 2D barcodes, data matrix, etc.) should be at the discretion of the company who should be responsible for ensuring that it is present on the product's packaging.

4.3.2 Product data ownership and maintenance, generation of on-pack data carriers

- As with the current, on-pack product data, ownership and maintenance of all the digital data – updates, changes – should be the responsibility of the company.

- Consequently, the generation of on-pack data carriers (e.g., QR codes, 2D barcodes.) should also be done by the company. This is necessary to ensure that physical and digital labels can be shared between markets wherever possible.
- Digital information should remain accessible and functional during the period where the company reasonably believes that the product may be marketed or used by consumers.
- The company should be responsible for regularly checking its digital systems to ensure that information is accurate and complete; if the provision of digital information is interrupted due to any issue, action should be taken swiftly to minimize or resolve the disruption.
- The company should also implement appropriate cybersecurity measures to protect digital information from unauthorized access, data breaches, or other security threats.

4.3.3 Data protection and confidentiality

- Companies' intellectual property rights over the data they own should be safeguarded and the confidentiality of sensitive data should be protected.
- Consumer privacy and the security of any personal data collected through the digital labelling interface should be protected.

5. Final remarks

The intention of the principles listed above is to guide the evolution of digital labelling in a manner that supports consumer safety, promotes transparency and enables innovation, while preserving flexibility for regulatory authorities and companies to tailor implementation to local legal and practical realities.

The technological, societal, and regulatory evolution from a digital perspective means that this is a 'living' document that should be subject to periodic reviews.