

Labeling your Homemade Soaps, Lotions & Balms

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Soap does not require labeling under FDA codes. Soap is defined by the FDA as an “alkali salt of fatty acids”. The simplest soap can be made from only three ingredients: a liquid (usually water or milk), oils, and lye. As long as you do not make any claims about your soap: “moisturizing”, “acne treatment”, “sleep-inducing”, “deodorizing”- you do not have to label the soap at all. Many people add various fragrances and colorings, however, which consumers may be sensitive to, so it is advisable to label the ingredients for their sake.

<https://www.fda.gov/cosmetics/cosmetic-products/frequently-asked-questions-soap>

Lotions and lip balms are considered to be “cosmetics” by the FDA, so proper labeling is required.

The main 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.** (Manufacturer, packer, or distributor.) An address is required, not just the website.
- **Distributor statement.** If the name and address are not the manufacturer’s own, the label must state: “Manufactured for ...” or “Distributed by...”.
- **Material Facts.** You must make truthful statements or it is considered misbranding (using misleading labeling). If a product could be unsafe if used incorrectly, write directions for safe use.
- **Warning and caution statements.** These must be prominent and conspicuous and must bear appropriate warnings. i.e., flammable cosmetics. If the product resembles a food item, clearly mark it as “NOT FOR HUMAN CONSUMPTION”.
- **Ingredients.** If a product is marketed in retail, the ingredients must appear on an information panel in descending order of prominence. The names of the ingredients must follow the INCI rules, which are the scientific or standard names of the ingredients.

<https://www.personalcarecouncil.org/resources/inci/>

<https://www.fda.gov/cosmetics/cosmetics-labeling-regulations/summary-cosmetics-labeling-requirements>



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