COMPARISON TABLE

REGION / COUNTRY	COSMETIC DEFINITION	INGREDIENTS/COMPOSITION	LABELLING
GHANA	“Cosmetic” refers to a substance or mixture of substances manufactured, sold or represented for use in cleansing, improving or altering the complexion, skin, hair, eye or teeth and deodorants and perfumes.	**Ghana standard GS 227-2:2017.** List of substances, which shall not form part of the composition of cosmetic products. 418 prohibited substances.+ Narcotic Drugs **Ghana standard GS 227-3:2017.** Restrictions and conditions of Chemical substances, coloring agents, preservatives and UV filters	***The information on a label shall include, but not be limited to, the following:*** (a) The name of the product, and the generic or INN/INCI (b) A list of the active ingredients using INN/INCI or IUPAC system, where applicable, showing the amount of each present in a dosage unit. (c) The net content of the container (d) The batch number (e) Date of manufacture and best before/expiry date (f) Directions for use, and any warnings or precautions that may be necessary (g) Any special storage conditions or handling precautions that may be necessary (h) Indications, frequency, route and conditions of use where applicable (i) The names of any excipients known to be a safety concern (j) Name, postal address and premises address of the manufacturer and Distributor (k) Country of origin
EUROPE	Any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odors	Ingredients are regulated under the Annexes of Regulation 1223/2009, periodically amended: • Annex II lists the prohibited substances, • Annex III lists the restricted substances and • Annexes IV to VI list the allowed colorants, preservatives and UV filters	Cosmetic products shall bear on packaging the following information: • Name and the address of the responsible person. • Nominal content at the time of packaging, • Date of minimum durability or PAO where applicable. • particular precautions • Batch number • Function of the cosmetic product unless it is clear from its presentation. • List of ingredients. preceded by the term 'INGREDIENTS”. The language will be determined by the Member States where the cosmetic product is made available to consumers
USA	"Articles, except soaps, intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body or any part thereof for cleansing, beautifying, promoting attractiveness, or altering the appearance, and articles intended for use as a component of any such articles" (Except soaps). The raw materials used as ingredients of cosmetic products are by law also cosmetics SOAPS: What it's made of What ingredients cause its cleaning action How it's intended to be used. OTC: A cosmetic is also a drug when it is intended to cleanse, beautify or promote attractiveness as well as treat or prevent disease or otherwise affect the structure or any function of the human body.	Cosmetic manufacturers have a legal responsibility for the safety and labelling of their products. Under U.S. law, cosmetic products and ingredients, other than color additives, do not need FDA approval before they go on the market. Color additives are permitted in cosmetics only if the FDA has approved them for the intended use. Prohibition of 12 ingredients. The rest are to be used only when considered safe.	The FDA does not approve cosmetic labelling. However, it does provide guidance documents for labelling, which cosmetics manufacturers and private labellers must make sure to comply with. **Cosmetic label has two parts:** • Main display panel • Information panel. *Declaration within each panel is described into the Guidance document.*
EMIRATES	Cosmetic: Any substance or mixture made for the use and contact of the external organs and parts of the body (such as the skin, hair, nails, lips, teeth, genitals or the mucosa of oral cavity) for the purpose of cleaning or perfuming them, changing their appearance, or enhancing their smell, or protecting or keeping them in the best shape.". PERFUMES: "any cosmetics and personal care products with a nice scent, composed of essential oils, fixatives, alcohol solution, water, permissible colorants, anti-oxidants and solvents."	Adapted version of the European Regulation. Total prohibition of pork derivatives. Special conditions for inclusion of alcohol. • Annex II lists the prohibited substances, • Annex III lists the restricted substances and • Annexes IV to VI list the allowed colorants, preservatives and UV filters. Ingredients is also very similar to that of the EU.	Emirati Standard No. UAE.S GSO 1943 has stipulated general requirements that must be satisfied by labels of products. Labelling requirements for UAE are remarkably similar to the ones in Europe. Certain parts of the label have to be translated into Arabic

COMPARISON TABLE

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REGION / COUNTRY	CLAIMS	SAFETY	ACCES TO THE MARKET	GMPs
GHANA	Advertising needs a preapproval application. FDA guidelines for the advertisement of drugs, medical devices, cosmetics and household chemicals	Products must be safe. Documentation needed not clearly detailed. Finish product is submitted to pre-market approval.	Pre-registration needed. FDA processes and grants market authorization for cosmetics and household chemical substances intended for export and/or sale on the Ghanaian market.	Manufacturing sites need a pre-approval. The Ghana Standards Authority has adopted the ISO 22.716 standard on GMP's.
EUROPE	Regulated by Regulation 1223/2009 and the "Common Criteria" Regulation. • Legal compliance. • Truthfulness • Evidential support • Honesty • Fairness • Informed decision-making	Detailed Product Information File (PIF) available to the competent authorities at the address of the RP. The PIF shall contain a Cosmetic Product Safety Report (Annex I Regulation 1223/2009)	No pre-registration is required to market cosmetics into the EU. Only a notification to the Cosmetic Products Notification Portal (CPNP) before placing the cosmetic product on the market. The RP will be located in the EU.	Compliance with good manufacturing practices shall be presumed where the manufacture is in accordance with the relevant harmonized standards. The harmonized standard for GMPs is the ISO 22716 Cosmetics — Good Manufacturing Practices
USA	FD&C Act prohibits the marketing of adulterated or misbranded cosmetics in interstate commerce.	The safety of a cosmetic can be considered adequately justified if experts qualified by scientific training and experience can reasonably conclude from the available toxicological data, tests, chemical composition, and other relevant information that the product is safe to consumers under normal or reasonably foreseeable conditions of use.	Imported cosmetics must comply with the same laws and regulations that apply to those produced domestically. Under the FD&C Act, cosmetic products and ingredients, with the exception of color additives, do not require FDA approval before they go on the market. The cosmetic product can be voluntarily registered with the FDA - VCRP Program. FDA might periodically purchase cosmetic products to analyze them for potential hazards or other issues.	ISO 22.716 cosmetics GMP recognized for compliance. The FDA may still inspect manufacturing facilities to make sure that proper controls and practices are in compliance with applicable laws.
EMIRATES	Graphics, images and phrases on the labels should be consistent with Islamic traditions and social values and have follow the common claims criteria: • Legal compliance • Truthfulness • Evidential support • Honesty • Fairness • Informed decision-making	Imported products must comply with the general safety requirements of Standard GSO 1943/2016 set by the Gulf Standardization Organization (GSO)	Pre-registration. ESMA conducts market surveillance and periodic review to ensure product compliance with current technical regulations.	Compliance with good manufacturing practice shall be presumed where the manufacture is in accordance with the relevant harmonized standards such as GSO ISO 22716 Cosmetics GMP's

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