Compliance Report

Radiance Face Serum

CPGShield automated compliance review. Automated checks are reported as passed, failed, or requiring manual verification; this document is not legal advice and does not certify the product as compliant.

These results are informational. They are based solely on the label text you provided and on the rules we screen, and they are not legal advice. The responsible person for this product retains the compliance determination.

CPGShield LLC provides independent screening. We are not affiliated with, endorsed by, or acting for any retailer, brand, agency or organization we name.

Where professional review still matters

CPGShield runs covered checks and organizes the records behind product decisions. Lab work and qualified scientific, legal, or regulatory judgment remain separate. Results are not a compliance certification or regulatory approval. Missing information, unsupported conclusions, and checks not performed stay visible.

Trace contaminants. Substances like 1,4-dioxane, asbestos in talc, and heavy-metal or PFAS impurities are almost never declared on a label because they are byproducts, not ingredients. We flag them when a label names them. Only a lab test finds them when it does not.

What is actually in the bottle. An ingredient list is in descending order and almost never prints percentages, so usually there is no concentration for us to check at all. If a percentage is printed on the label, or you enter one yourself, we check it against the limits that carry one. We cannot measure the real formula either way.

Lab testing and formula safety. Keep safety support, stability records, and microbiological testing in the Product File for professional review. A text scan cannot perform or replace this work.

Packaging composition. What your packaging is made of is supplier information. It is not printed on the label, so a label scan cannot reach it.

Whether your claims are true for your product. We flag wording that may be restricted or need supporting evidence. We cannot decide whether a claim is true for your formula; keep suitable evidence for professional review.

FDA records and deadlines (MoCRA). A label scan cannot verify facility registration, product listing, safety records, complaint handling, or manufacturing practices. Product Files separately organize those records and deadlines for review; CPGShield does not submit them to FDA or certify that they are complete.

Physical artwork, unless you upload a print-ready PDF. Type size, boldness, contrast, and panel placement are properties of the artwork, not of the text. Paste-in text cannot show them. Upload a print-ready PDF for supported measurements; unreadable or unsupported items remain unverified. PDF measurement costs one check credit; supported PDF correction costs one more.

Anything outside the United States. US federal, state, and retailer requirements are what we screen. No other market is covered.

BASIS AND LIMITATIONS OF THIS EXAMINATION

- This is an **automated screening of label TEXT** against a versioned rule set. It is not a legal opinion and not a substitute for qualified regulatory review.
- It examines what the submitted text says. It cannot see artwork, type size, contrast, panel placement, or the physical package.

- **Not covered:** safety substantiation, formula safety assessment, facility registration (MoCRA §607), country-of-origin labeling, and bilingual requirements.
- Absence of a finding is not certification of compliance. Where a rule bans a whole class of substances, a text scan cannot certify absence; those appear as advisories rather than passes.
- Scope is **US cosmetics**. The rule set is stated below and was fixed at the time of the scan; rules change.

`Rule set 2026.09.13 · engine 1473b00 · rules current as of 2026-08-04 · scan #2 v2 of September 15, 2026`

NO ISSUES, ITEMS TO CONFIRM

This scan found no violations or claims risks on Radiance Face Serum. The label passed all 157 checks that reached a determination, including mandatory identity statement, net quantity declaration, ingredient list, and manufacturer identification. No corrective action was identified in the completed checks. Review unresolved and not-checked items separately.

0	0	0	0	157	35
MAJOR VIOLATIONS 0 rules	INTERMEDIATE ISSUES 0 rules	PROGRAM retailer criteria, not law	CLAIMS RISKS	PASSED	MANUAL REVIEW items to confirm

HOW TO READ A FINDING

MAJOR VIOLATION	A blocking issue under a covered federal or state requirement. Review and resolve it before using the label. This screening category is not a legal determination about the product.
INTERMEDIATE ISSUE	A warning requiring review under the checks completed. It is not proof that the product is lawful to sell, and it does not alone establish a legal violation.
PROGRAM	A retailer's own criteria, not law. Affects eligibility for that retailer's program only, and each finding states whether the program is a condition of being sold there or an optional badge you can choose not to pursue.
ADVISORY	Not a finding against this label. A stated limit on what a text scan can determine - class-wide bans, trace contaminants, and requirements that can only be settled by supplier documentation. Advisories are never counted as findings.
NOT SCREENED	A check that did not run, always with the reason it did not run. A rule that was skipped is reported as skipped and never as passed.
CITATION	The CFR section, statute or published retailer program each finding rests on. Every finding carries one.

CPGShield Compliant: No MAJOR VIOLATION or INTERMEDIATE ISSUE findings were found in the completed checks. Review program findings and unresolved, unverified or not-checked items separately.

FINDINGS 0 FOUND

No violations found.

ADVISORIES 11 FOUND

⚠ **PFAS class bans: multiple states (13)**: California, Colorado, Connecticut, Illinois, Maine, Minnesota, New Hampshire, New Jersey, New Mexico, Oregon, Rhode Island, Vermont and Washington prohibit or restrict intentionally added PFAS in cosmetics; effective dates vary by state and each state's own finding gives its date. These are class-wide bans, so a label-text scan cannot certify the absence of all PFAS, many are undeclared or appear under trade names. No listed PFAS substance was detected on this label. Confirm with your formulator that no PFAS is intentionally added.

⚠ **Ortho-phthalate class bans: multiple states (3)**: Oregon, Vermont and Washington prohibit intentionally added ortho-phthalates in cosmetics; effective dates vary by state and each state's own finding gives its date. This is a class-wide ban and some ortho-phthalates are undisclosed under "fragrance", so a label-text scan cannot certify their absence. No phthalate was detected by name on this label. Confirm your formulation contains no intentionally added ortho-phthalates.

⚠ **Packaging heavy metals: 100 ppm limit on Pb/Cd/Hg/Cr(VI) in 19 states**: Nineteen states have adopted the CONEG/TPCH Toxics in Packaging model law (count per the Toxics in Packaging Clearinghouse fact sheet, rev. Nov 2023). These limit lead, cadmium, mercury and hexavalent chromium in a package or packaging component to 100 parts per million by weight, stated as a combined total in every one of them except Iowa, whose text says only 'the concentration levels'. Five are verified against primary text: Florida (Fla. Stat. 403.7191(3)), Iowa (Iowa Code 455D.19(3)-(4)), Missouri (RSMo 260.822), Pennsylvania (Safe Packaging Act, Act of Dec. 7, 1994, P.L. 797, No. 112, sec. 301), Wisconsin (Wis. Stat. 100.285(2)). Georgia (O.C.G.A. 12-8-162) is included on a secondary reproduction only, not the official code. The 100 ppm tier is in force in all six. NOTE Wisconsin attaches NO PENALTY to its limit (Wis. Stat. 100.285(5)). Only PENNSYLVANIA prohibits INTENTIONAL introduction outright regardless of concentration; Georgia and Iowa carry that clause but gate it on also exceeding the agency-set level, and Florida, Wisconsin and Missouri have no such clause at all. SCOPE: this regulates the PACKAGE, expressly including inks, labels, coatings and closures, NOT the product formula. It therefore cannot be verified or violated by label text, and this scan does not check it.

View regulation: https://www.toxicsinpackaging.org

⚠ **California Safe Cosmetics Program: registration may be required**: California Safe Cosmetics Program (CSCP): if your company's annual cosmetic sales exceed $1M AND this product contains any chemical on the CDPH Reportable Ingredients List (thousands of chemicals across 22 hazard lists, Prop 65, IARC, NTP, EPA, and EU classifications), you must report it to CDPH at cscpsubmit.cdph.ca.gov. This is a corporate reporting obligation, not an on-label requirement, and it cannot be determined from label text alone, it does not affect whether this label is compliant. Verify your reporting status with CDPH if the revenue threshold applies.

View regulation: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=111792

⚠ **New York 1,4-dioxane limits (cosmetics 10 ppm; personal care 1 ppm)**: New York caps 1,4-dioxane at 10 ppm in cosmetics and 1 ppm in personal care products (ECL Article 37 Title 1, § 37-0117(3)-(4); 6 NYCRR Subpart 352-1). It is a manufacturing impurity of ethoxylated ingredients (PEGs, -eth- surfactants, polysorbates), never a declared ingredient, so a label scan cannot verify the threshold. If your formula uses ethoxylated ingredients, obtain a 1,4-dioxane test report from your supplier, rinse-off personal care products face the tighter 1 ppm limit.

View regulation: https://dec.ny.gov/environmental-protection/pollution-prevention/household-personal-cosmetic-dioxane-limits

⚠ **Minnesota lead and cadmium limits in consumer products**: Minnesota caps lead at 90 ppm and cadmium at 75 ppm by total weight in cosmetics and personal care products (Minn. Stat. § 325E.3892). These are total-content limits, not declared-ingredient limits: colorant and pigment impurities can carry either metal below declaration level. No lead or cadmium compound is declared on this label, but a label scan cannot verify total content - obtain a heavy-metals certificate of analysis from your pigment and raw-material suppliers.

View regulation: https://www.revisor.mn.gov/statutes/cite/325E.3892

⚠ **Vermont Act 131: 1,4-dioxane and asbestos**: Vermont Act 131 (9 V.S.A. §2494b, eff. Jan 1, 2026) bans 1,4-dioxane (>=10 ppm) and asbestos. These are typically undeclared contaminants (dioxane an impurity, asbestos a talc contaminant), so a label scan cannot certify their absence and the 10 ppm dioxane threshold is not verifiable from text. Confirm via supplier documentation / testing that 1,4-dioxane is below 10 ppm and no asbestos is present.

View regulation: https://legislature.vermont.gov/statutes/section/09/063/02494b

⚠ **Oregon manufacturer website notice (operative Jan 1, 2027)**: If you manufacture a cosmetic sold or offered for sale in Oregon, review the website-notice duty operative January 1, 2027. ORS 431A.340 applies when the product contains a chemical on OHA's ORS 431A.335 list at or above the applicable de minimis level. Confirm the current OHA list, thresholds and required notice content, including the applicable intentionally added chemical disclosures. This scan does not check your website, concentrations or reporting eligibility.

View regulation: https://www.oregonlegislature.gov/bills_laws/ors/ors431a.html

⚠ **Oregon SB 546 formaldehyde-releasing agents class ban (takes effect Jan 1, 2027)**: Oregon SB 546 formaldehyde-releasing-agent ban (eff. Jan 1, 2027): SB 546 §4 bans this category generically (no statutory list). The scan checks a representative set of common formaldehyde donors; a no-match does not certify absence of every releasing agent. Before Jan 1, 2027 confirm your preservation system releases no formaldehyde (Oregon SB 546, §4).

View regulation: https://olis.oregonlegislature.gov/liz/2023R1/Downloads/MeasureDocument/SB546/Enrolled

⚠ **Phenoxyethanol: flagged for review, not restricted in the US**: Phenoxyethanol is on our watch list, but NO US federal or state rule we screen restricts it in cosmetics today, so this is not a violation and nothing on your label has to change because of it. Phenoxyethanol is flagged as a potential hazard (restricted preservative). Widely used cosmetic preservative. EU Annex V Entry 29: maximum 1.0%; no product-type restriction. Japan: 1.0% maximum in cosmetics under MHLW regulation. US: No 21 CFR prohibition. FDA issued a product-specific consumer warning in 2008 concerning Mommy's Bliss Nipple Cream containing phenoxyethanol + chlorphenesin, phenoxyethanol can depress the CNS and cause vomiting and diarrhea in infants via direct nipple-cream exposure. NOT a general FDA advisory on phenoxyethanol. Not Prop 65 listed. Flagged under some clean beauty retailer standards. Raise it with your formulator if the concern matters for your product or your retailer's own standards.

⚠ **Lot code and expiration or period-after-opening marking (Amazon)**: Amazon's cosmetics listing requirements ask that units display identifying codes such as lot or serial numbers, and an expiration date for products with a shelf life under three years or otherwise a period-after-opening symbol such as '12M'. A lot code is usually a fill-line inkjet or laser mark and the PAO symbol is a pictogram, so neither can be verified from label text; this note appears on every Amazon check rather than reporting a false absence. Amazon's own cosmetics help page is behind a Seller Central sign-in.

View source: https://sellercentral.amazon.com/help/hub/reference/external/200164470

MANUAL VERIFICATION RECOMMENDED 35 ITEMS

Automated checks stop here. Each item below is something CPGShield could not settle from the label text and a person must confirm. This section is not a pass and not a failure.

CLASS RESTRICTIONS A TEXT SCAN CANNOT CERTIFY ABSENT (11)

PFAS class bans: multiple states (13)

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either metal below declaration level. No lead or cadmium compound is declared on this label, but a label scan cannot verify total content - obtain a heavy-metals certificate of analysis from your pigment and raw-material suppliers.
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FORMAT REQUIREMENTS TO CONFIRM ON THE FINISHED PACKAGE (24)

Professional-use-only products must state they are for use only by licensed professionals
If this product is distributed for use only by professionals, add a clear, prominent statement that it is to be used only by licensed professionals (cosmetology, nail care, barbering, or esthetics). A label scan cannot certify whether a product is professional-distribution-only, so confirm this applies to your product.
https://uscode.house.gov/view.xhtml?req=(title:21%20section:364e%20edition:prelim)

Net quantity placement and lettering size

Put the net quantity on the front (principal display) panel, in the bottom 30% of that panel, parallel to the base. The bottom-30% placement requirement does not apply to panels of 5 square inches or less when the other requirements are met. Minimum letter height by panel size: 1/16" (≤5 sq in), 1/8" (>5, 25), 3/16" (>25, 100), 1/4" (>100 up to 400), 1/2" (>400). Add 1/16" if lettering is blown, embossed, or molded. We can't measure panel size or lettering from text, confirm this on your packaging.

https://www.law.cornell.edu/cfr/text/21/701.13

Clear space around the net quantity statement

Separate the net quantity from other printed label information above and below by at least the height of its lettering. Leave at least twice the width of its letter N to the left and right. Confirm this on the print artwork; the current PDF checks do not measure this clearance.

https://www.ecfr.gov/current/title-21/section-701.13

Statement of identity prominence and placement

Show what the product is (common name, descriptive name, or an illustration) on the front panel as one of its main features, in bold type, sized in proportion to the most prominent text on that panel. We can't verify size or panel position from text, confirm this on your packaging.

https://www.law.cornell.edu/cfr/text/21/701.11

Ingredients in descending order of predominance

List ingredients from most to least by amount. Exception: ingredients at 1% or less may appear in any order after those above 1%, and color additives may appear in any order at the end. We can't see your formula's concentrations from the label, so we can't verify the order, confirm it matches your formulation.

https://www.law.cornell.edu/cfr/text/21/701.3

Ingredient lettering size / small-package options

Ingredient lettering must meet the minimum height for your package size. Very small packages may place the ingredient list on a tag, tape, or card firmly affixed to the package, or on accompanying display material. We can't measure this from text, confirm on your packaging.

https://www.law.cornell.edu/cfr/text/21/701.3

Correct panel placement (front panel vs. information panel)

Net quantity goes on the front (principal display) panel; the ingredient list and the manufacturer/distributor name and address may go on an information panel. We check that this information is present in your text but can't tell which physical panel it's on, confirm panel placement on your packaging.

https://www.law.cornell.edu/cfr/text/21/701.12

Conspicuousness, contrast, and English

All required statements must be in English and easy to find and read under normal shopping conditions, adequate type size, good contrast, not crowded. If any required statement also appears in another language, all required statements must appear in that language too. We can't assess size, contrast, or prominence from text; confirm on your packaging.

https://www.law.cornell.edu/cfr/text/21/701.2

Safety-substantiation warning (if applicable)

If your product's safety has not been adequately substantiated, the front panel must bear, word for word: "Warning—The safety of this product has not been determined." We can't tell from the label whether your safety data is on file, confirm whether this applies.

https://www.law.cornell.edu/cfr/text/21/740.10

Tanning / self-tanner warning (if applicable)

If your product is a suntanning preparation that does not contain a sunscreen, its labeling must display, word for word: "Warning-This product does not contain a sunscreen and does not protect against sunburn. Repeated exposure of unprotected skin while tanning may increase the risk of skin aging, skin cancer, and other harmful effects to the skin even if you do not burn." 21 CFR 740.19 defines "suntanning preparations" to include topical products that give a cosmetic effect on the skin while tanning under UV radiation and products that give the appearance of a tan with an approved colour additive such as dihydroxyacetone. We check this automatically when the label names the product as a tanning or self-tanning preparation, or declares dihydroxyacetone. If your product is one and uses wording we did not recognise, confirm this yourself.

https://www.ecfr.gov/current/title-21/section-740.19

Aerosol / pressurized-container warnings (if applicable)

If your product is in a pressurized (aerosol) container, it must bear, word for word: "Warning—Avoid spraying in eyes. Contents under pressure. Do not puncture or incinerate. Do not store at temperature above 120 °F. Keep out of reach of children." (Glass: use "break" for "puncture"; non-spray: omit "Avoid spraying in eyes"; children's: add "except under adult supervision.") If it uses a halocarbon or hydrocarbon propellant, also: "Warning-Use only as directed. Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal."

https://www.law.cornell.edu/cfr/text/21/740.11

Warning-statement conspicuousness (type size, bold, contrast)

Every warning statement must appear prominently and conspicuously compared to other words and designs, in bold type on contrasting background, likely to be read under customary conditions of purchase and use - and never in letters or numbers under 1/16 inch in height (unless FDA has granted a small-package exemption by regulation). We can verify a warning's TEXT is present but not its size, weight, or contrast; confirm these on your packaging artwork.

https://www.law.cornell.edu/cfr/text/21/740.2

Tamper-resistant packaging for cosmetic liquid oral hygiene and vaginal products (if applicable)

If this product is a cosmetic liquid oral hygiene product or a cosmetic vaginal product, and it is accessible to the public while held for sale, it must be packaged in a tamper-resistant retail package. Except for aerosol products, the retail package must also bear a statement, prominently placed, that alerts consumers to the specific tamper-resistant feature. (An oral-hygiene product marketed with a therapeutic claim is an OTC drug, not a cosmetic, and is covered by 21 CFR 211.132 instead.) A label-text scan cannot verify packaging, so confirm whether this applies to your product.

https://www.law.cornell.edu/cfr/text/21/700.25

No prohibited cattle (BSE) materials in the formulation (if applicable)

No cosmetic may be manufactured from, processed with, or otherwise contain prohibited cattle materials: specified risk materials, the small intestine of all cattle (unless the distal ileum has been removed by the procedure the regulation specifies), material from nonambulatory disabled cattle, material from cattle not inspected and passed, or mechanically separated beef. The definition expressly EXCLUDES tallow containing no more than 0.15 percent insoluble impurities, tallow derivatives, gelatin, hides and hide-derived products, and milk and milk products, so most common bovine-derived cosmetic ingredients fall outside the ban. If your formula uses any other bovine-derived ingredient, confirm its sourcing with your supplier. A label scan cannot verify ingredient sourcing.

https://www.law.cornell.edu/cfr/text/21/700.27

Ingredient declaration on multiunit and multicomponent packages (if applicable)

21 CFR 701.3(q): the inside containers of a multiunit or multicomponent package need no ingredient declaration when the outer package bears one that meets this section and the inner units are not sold separately. Separately, 701.3(i)-(k) let a package with less than 12 square inches of label surface carry its declaration on a firmly affixed tag, tape or card, or in leaflet labeling on a display unit or chart; such a display unit must carry the words "Federal law requires ingredient lists to be displayed here" in letters not less than 3/16 inch high, conspicuous when no lists remain. Not applicable if the individual

units' ingredient declarations are already visible through or on the display package. A label-text scan of a single product panel cannot tell whether this product is sold as part of such a display package.
https://www.law.cornell.edu/cfr/text/21/701.3

"New ingredient list" overlabeling notice on formulation changes (if applicable)
21 CFR 701.3(n) is a permission, not a general overlabel duty: when a shortage of a cosmetic ingredient forces a formulation change, packages already printed with the old declaration may still be used if the revised declaration appears either on a firmly affixed tag, tape, card or sticker bearing the conspicuous words "new ingredient list" in letters not less than 1/16 inch high, or on labeling inside an unsealed package whose outside bears "new ingredient list inside". Not applicable to a label being printed for the first time. A label-text scan cannot tell whether this PDF is such an overlabel.
https://www.law.cornell.edu/cfr/text/21/701.3

"May contain" color additive declaration for batch color-matching (if applicable)
If a color additive is added to only SOME batches of this product for the purpose of color matching, you may declare it using the phrase "may contain" (e.g. "May Contain: Red 33") instead of listing it as though every batch contains it. This is an OPTIONAL labeling accommodation - a label that lists every color additive unconditionally is also compliant. A label-text scan cannot tell whether a given batch actually varies this way; confirm with your formulator which additives are batch-variable before using this declaration style.
https://www.law.cornell.edu/cfr/text/21/701.3

Composite color-additive list for an assortment sold in one package (if applicable)
If this product ships as part of an assortment of cosmetics sold together in the same package, you may declare the COLOR ADDITIVES of the whole assortment in a single composite list - instead of a separate color-additive declaration for each product - as long as the listing is not misleading and makes clear it covers every product in the package. This applies to color additives only; the rest of the ingredient declaration follows the ordinary rules. A label-text scan of one product panel cannot tell whether it ships packaged together with others.
https://www.law.cornell.edu/cfr/text/21/701.3

Cumulative ingredient list for an assortment of similar products (if applicable)
If this product is sold as part of an assortment of products similar in composition and intended for the same use (FDA's example is an eyeshadow palette), you may declare the ingredients common to all of them in a single cumulative list, together with a statement identifying which products contain the other, non-common ingredients - or, if the package's labelable surface is under 12 square inches, in one combined list with no separate non-common statement required. A label-text scan of one product panel cannot tell whether it ships as part of such an assortment.
https://www.law.cornell.edu/cfr/text/21/701.3

Shared label declaration for a branded shade line (if applicable)
If this product is one item in a branded shade line sold under a common trade name with no other brand appearing on any item (FDA's examples: one lipstick in a line of lipsticks, or one compact in a line of compacts), the line may share a single label declaring the ingredients common to all shades, plus a statement identifying the other, shade-specific ingredients and which product(s) contain them; shade-specific color additives may use the "may contain" declaration under 701.3(g)(2). A label-text scan of one shade's panel cannot tell whether it is part of such a line.
https://www.law.cornell.edu/cfr/text/21/701.3

Direct-mail alternative ingredient declaration (if applicable)
If this product is sold to consumers by direct mail, the ingredient declaration may appear (letters not less than 1/16 inch high) in the accompanying mailing, sales catalog, or brochure instead of on the package, PROVIDED the mailed package itself carries a notice - visible on opening, letters not less than 3/16 inch high - that states where the declaration is located, promises a copy will be mailed promptly on request, and gives the mail-order distributor's name and place of business; the

distributor must then actually fulfill that promise when asked. A label-text scan of the package panel cannot tell whether this product is sold by direct mail or whether the required catalog/brochure declaration exists.
https://www.law.cornell.edu/cfr/text/21/701.3

Off-package leaflet ingredient declaration for small/compartmented display units (if applicable)
If this product's package has under 12 square inches of labelable surface (and is not enclosed in an outer carton), the ingredient declaration may instead appear (letters not less than 1/16 inch high) on an accompanying leaflet attached to a compartmented display tray or rack - or, for a shade-matched assortment, attached to a display chart bearing shade samples - rather than on each unit. Strict conditions apply: the leaflet must be visible per specific placement rules (fully readable from the front, or accompanied by a 3/16-inch notice if partially visible or on a side); all copies used with one display must be identical; the unit must ship together with its labeling; the display must show "Federal law requires ingredient lists to be displayed here" (3/16 inch minimum) whenever no declaration is currently attached; a formulation change requires the leaflet to be dated and to distinguish old vs. new formula; sufficient copies must be provided for every purchaser; and the firm named on the product must mail a copy to anyone who requests one. A label-text scan of one product's panel cannot tell whether it is sold this way or whether the display unit meets these conditions.
https://www.law.cornell.edu/cfr/text/21/701.3

CPSIA lead and phthalate limits for children's cosmetics/packaging (if applicable)
If this product, its packaging, or an accessory (e.g. an applicator) is a children's product as defined by the CPSIA, or has any paint or similar surface coating, two federal chemical limits apply: (1) total lead content in any accessible substrate material may not exceed 100 ppm (15 U.S.C. § 1278a), and lead in paint or similar surface coatings may not exceed 0.009% / 90 ppm (16 CFR 1303.2); (2) a children's toy or child care article may not contain more than 0.1% of any of eight prohibited phthalates - DEHP, DBP, BBP, DINP, DIBP, DPENP, DHEXP, or DCHP (16 CFR 1307.2-.3) - applying equally to toys and child care articles, no mouth-contact or age distinction. DIDP and DnOP, part of the ORIGINAL 2008 interim ban, are NOT on the current permanent list and are not restricted by this rule today. These are formula/material composition facts a label-text scan cannot see - confirm testing with your supplier if this product is marketed to or usable by children.
https://www.law.cornell.edu/cfr/text/16/1307.3

Country-of-origin marking for imported product (if applicable)
If this product is of foreign origin, the ARTICLE itself - not merely the shipping carton - must be marked in a conspicuous place, as legibly, indelibly and permanently as the nature of the article will permit, with the English name of the country of origin, for example "Made in France". We raise a specific finding automatically only when the label carries a non-US address and we find no origin mark on it. Whether the product is in fact imported, and whether the physical marking is conspicuous, indelible and permanent enough, are facts about the finished package that a label-text scan cannot determine, so confirm both with your manufacturer. If the article is made in the United States, this statute requires no marking.
https://www.law.cornell.edu/uscode/text/19/1304

RISK SUMMARY

REGULATORY RISK	FTC CLAIMS EXPOSURE	RETAIL READINESS
LOW	LOW	LABEL TEXT CLEAR
No major violations in the checks we ran on this label. Each check that ran is listed in the appendix with its own authority.	No drug or structure-function claims detected. Claims language appears cosmetically appropriate.	No issues found in the completed checks. Prepare the label and suppo documents for review. Supplier documents, testing evidence, and packet contents are outside this sca

WHAT CPGSHIELD CHECKED

Federal FDA rules	21 CFR 701 labeling requirements: identity statement, net quantity, ingredient list and heading, manufacturer/distributor name and address, warning statements
State regulations	CA Prop 65 & AB 2762 · WA Toxic-Free Cosmetics · NY Fragrance Disclosure · HI Reef Protection · multi-state PFAS bans · covering 20 jurisdictions (AR, CA, CO, CT, HI, IL, LA, MD, ME, MN, NH, NJ, NM, NY, OR, RI, VA, VT, WA, WI)
Retailer programs	Amazon Beauty · Sephora · Target · Walmart · Ulta Conscious Beauty · Whole Foods Market Body Care
Claims screening	Drug claims, structure-function claims, and misleading or unsubstantiated marketing language
MoCRA label provisions	Adverse-event contact statement (21 U.S.C. §364e(a)) and the professional-use statement; counted under Federal above
Ingredient hazards	124 named substances screened against the declared ingredients (prohibited, restricted, state-banned, retailer-restricted); matches appear as IH findings above
California Proposition 65	13 listed chemicals screened by name against the declared ingredients; a match is reported at warning severity with the safe-harbor warning text. Absence of a match is not a certification that no listed chemical is present as a contaminant.
Print artwork	Type size and warning prominence are measured only from a print-ready PDF through the separate Artwork check. This report examines label TEXT and makes no measurement claim.
Input examined	Label text as pasted by the account holder, 511 characters (SHA-256 468f2b0dd868e721…). Findings apply to that text exactly.
Not covered	Safety substantiation, formula safety assessment, facility registration (MoCRA §607), country of origin labeling, bilingual requirements

DOCUMENTS TO CONFIRM WITH YOUR RETAILER 11 DOCUMENTS

Suggested records to review against the retailer's actual request. the next relate to your selected retailer program(s), and the rest are baseline records to assess for applicability. Contaminants and fragrance contents are your and your supplier’s responsibility — a label scan cannot verify them; review the supporting records. Incomplete or mismatched testing data can be a reason onboarding stalls, so check that each document names this exact product.

☐ **Supplier or manufacturer invoice dated within the last 180 days**

Amazon requires a recent invoice to establish an authentic chain of custody for the product.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Certificate of Analysis (COA) from an accredited lab**

Provides test evidence for the substances and limits actually tested. Check the lot, method, scope and retailer request; it is not a blanket compliance certificate.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Good Manufacturing Practice (GMP) certificate**

Provides evidence about the manufacturing practices covered by the certificate or audit. Confirm its scope, validity and the retailer's requirements.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Full INCI ingredient list matching the corrected label**

Amazon cross-checks the declared ingredients against its restricted-substances list.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Safety Data Sheet (SDS) for the finished formulation**

Standard safety documentation reviewers request for cosmetics.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Clear photos of the corrected packaging and label (all panels)**

Restricted-products reviews accept corrected-label photos as primary evidence that the issue is fixed.

`Triggered by: your selected retailer program(s) · Amazon Beauty`

☐ **Proof of California Safe Cosmetics Program (CSCP) reporting**

Requested when the product is sold into California and contains a reportable ingredient.

`Triggered by: your selected retailer program(s) (if applicable) · Amazon Beauty`

☐ **Cosmetic product facility registration and FEI number**

MoCRA requires the facility that manufactures or processes the product to be registered with FDA unless exempt. An FEI identifies a facility; it alone does not prove current registration. Confirm filing status and applicability.

`Applies to: where registration or listing applies · MoCRA / retailer requirements to confirm`

☐ **Cosmetic product listing confirmation**

MoCRA requires each marketed cosmetic product to be listed with FDA by its responsible person, subject to applicable exemptions.

`Applies to: where registration or listing applies · MoCRA / retailer requirements to confirm`

☐ **Safety substantiation dossier**

The responsible person must hold records adequate to substantiate that the product is safe under its labeled conditions of use. A label scan cannot produce or replace this.

`Applies to: every cosmetic product · MoCRA §608`

☐ **Certificate of insurance**

Standard onboarding requirement; the limits and named-insured wording are set by each retailer's vendor agreement.

> Applies to: where the vendor agreement requires it · selected retailer agreements

SCAN HISTORY FOR THIS LABEL

Every scan run against this label, in order. A finding that was raised and then resolved stays visible here.

VERSION	SCAN	DATE	MAJOR VIOLATIONS	INTERMEDIATE ISSUES	PROGRAM
v1	#1	2026-09-15	5	3	2
v2 (this report)	**#2**	**2026-09-15**	**0**	**0**	**0**

This report describes v2, the current version. The label first reached a pass-family verdict at v2 on 2026-09-15, which is the current version.

METHODOLOGY

What is matched	Declared ingredient names and their synonyms, plus label statements (identity, net quantity, warnings, claims, responsibility statement). Synonym coverage is sourced from PubChem and filtered: entries that are product names or non-chemical synonyms are dropped at load rather than matched.
What cannot be seen	Concentrations that are not declared, contaminants, artwork, type size, contrast, panel placement and the physical package. A text scan cannot certify the ABSENCE of a substance that was never declared, which is why class-wide bans are reported as advisories rather than as passes.
Rule sources	Federal rules cite the CFR or the statute itself, never a guidance document. State rules cite the state's own statute or code section. Retailer rules cite the retailer's published program document, and each is classified by the force that document actually carries: a condition of sale, or an optional badge program.
Versioning	Every scan records the rule set version, the engine build, and the date the rules were last confirmed current. Those three values appear on this report. A re-scan produces a new version rather than overwriting the old one, and the scan history above lists them.
What this is not	This is a screening record, not a legal opinion, and not either record MoCRA requires a responsible person to maintain: it is not the §608 safety substantiation: the tests, studies and analyses relied on to support that the product is safe under its labeled conditions of use, without which a product may be deemed adulterated. It is not the §605 adverse event records, which must be kept for six years, three for a small business. Note also the deadline those records sit behind: a responsible person must submit a serious adverse event report to FDA “no later than **15 business days** after the report is received”, *accompanied by a copy of the label on or within the retail packaging*, and must submit any new and material medical information received within a year of that report on the same 15-business-day clock (21 U.S.C. §364a(b)(1) and (b)(2)). Nothing in a label scan can discharge that duty.

APPENDIX A: LABEL TEXT AS SUBMITTED

The exact text this scan examined, reproduced verbatim so every finding above can be checked against it. SHA-256 468f2b0dd868e721cde8c8d918ea73e3b3f8c346e6b738bb7f845a9434e7831b over 511 characters.

```
Radiance Face Serum
Soothes and improves the look of skin.

Net Contents 1 fl oz (30 mL)

Ingredients: Water, Glycerin, Phenoxyethanol, Caprylyl Glycol.

Directions: Apply a small amount to clean skin.

Warnings:
Keep out of reach of children.
Avoid contact with eyes. If contact occurs, rinse thoroughly with water.
For external use only.
Discontinue use if irritation or rash occurs.

Manufactured by Example Beauty, 100 Example St, Austin, TX 78701

Questions or adverse event reports: safety@example.invalid
```

APPENDIX: EVERY CHECK PERFORMED 208 CHECKS

The complete examination, passed and failed, in the order the engine ran it. Included so the scope of this report can be verified rather than taken on trust. 208 rows: 157 passed, 0 raised a finding, 24 not applicable, 0 not screened, 27 advisory.

Ingredient hazard screening: 124 substance entries evaluated, 1 matched. Entries that do not match are not listed individually.

STATUS	RULE CODE	TITLE	Category
PASS	701.11.identity_present	Identity statement present	Federal
PASS	701.13.net_quantity_present	Net quantity of contents present	Federal
PASS	701.3.ingredients_heading	Ingredient declaration present	Federal
PASS	701.12.manufacturer_present	Manufacturer or distributor present	Federal
PASS	warnings.eye_contact	Eye-contact warning (best practice)	Federal
PASS	warnings.children_best_practice	Children safety warning (best practice)	Federal
PASS	701.2.english_required	Required information appears in English	Federal
PASS	warnings.flammable	Flammability warning if applicable	Federal
PASS	FDA.aha_warning	AHA sun sensitivity warning recommended	Federal
PASS	FDA.unapproved_drug.prostaglandin_lash	Prostaglandin analog in a lash or brow product: unapproved prescription drug	Federal
PASS	FDA.unapproved_drug.salicylic_acid_acne	Salicylic acid above 2% in an acne product: unapproved new drug	Federal
PASS	FDA.unapproved_drug.anesthetic_active	Anesthetic active declared without a Drug Facts panel	Federal
PASS	FDA.prohibited.kohl_kajal_surma	FDA prohibited: kohl, kajal, al-kahal or surma	Federal
PASS	FDA.prohibited.marine_mammal_derived	Cetacean-derived ingredient: prohibited from US commerce	Federal
PASS	MBFWA.microbeads_prohibited	Plastic microbeads prohibited in rinse-off cosmetics	Federal
PASS	FDA.prohibited.bithionol	FDA prohibited ingredient: Bithionol	Federal
PASS	FDA.prohibited.chloroform	FDA prohibited ingredient: Chloroform	Federal
PASS	FDA.prohibited.halogenated_salicylanilides	FDA prohibited ingredient: Halogenated salicylanilides	Federal
PASS	FDA.prohibited.methylene_chloride	FDA prohibited ingredient: Methylene chloride	Federal
PASS	FDA.prohibited.vinyl_chloride	FDA prohibited ingredient: Vinyl chloride	Federal
PASS	FDA.prohibited.cfc_propellants	FDA prohibited ingredient: Chlorofluorocarbon propellants	Federal
PASS	FDA.restricted.zirconium_aerosol	FDA restricted ingredient: Zirconium compounds in aerosol cosmetics	Ingredient_restrictions
PASS	FDA.restricted.hexachlorophene	FDA restricted ingredient: Hexachlorophene	Ingredient_restrictions

PASS	FDA.restricted.mercury	FDA restricted ingredient: Mercury compounds	Ingredient_restrictions
PASS	COLOR.unapproved_additive	Color additive not on the FDA approved lists	Color_additives
PASS	COLOR.fdc_red_3_terminated	FD&C Red No. 3 - cosmetic listing terminated	Color_additives
N/A	warnings.external_use_only	'For external use only' warning recommended (best practice) Not applicable. This rule applies to products containing chemical actives that warrant an external-use statement. None is declared on this label. This does not affect your compliance result.	Federal
N/A	warnings.discontinue_if_irritation	'Discontinue use if irritation occurs' warning recommended (best practice) Not applicable. This rule applies to products containing strong actives (retinol, salicylic acid, benzoyl peroxide and similar). None is declared on this label. This does not affect your compliance result.	Federal
N/A	warnings.hair_dye_warning	Coal-tar hair dye caution required (FD&C Act § 601 / 21 U.S.C. § 361) Not applicable. This rule applies to coal-tar hair dye products. No hair dye ingredient (p-phenylenediamine, resorcinol, aminophenol) is declared on this label. This does not affect your compliance result.	Federal
N/A	detergent_label	Eye contact warning recommended for surfactant-based product Not applicable. This rule applies to surfactant-based products. No surfactant (SLS, SLES, cocamidopropyl betaine) is declared on this label. This does not affect your compliance result.	Federal
N/A	FDA.feminine_deodorant_caution	Feminine deodorant spray mandatory caution (21 CFR 740.12(b)) Not applicable. This rule applies to feminine deodorant sprays (21 CFR 740.12). This label does not represent the product as one. This does not affect your compliance result.	Federal
N/A	FDA.feminine_hygiene_term	"Hygiene" wording barred on feminine deodorant sprays (21 CFR 740.12(c)) Not applicable. This rule applies to feminine deodorant sprays (21 CFR 740.12). This label does not represent the product as one. This does not affect your compliance result.	Federal
N/A	FDA.foaming_bath_caution	Foaming/bubble bath mandatory caution (21 CFR 740.17(b)) Not applicable. This rule applies to foaming/bubble bath products (21 CFR 740.17). This label does not represent the product as one. This does not affect your compliance result.	Federal
N/A	FDA.tamper_evident_statement	Tamper-resistant packaging statement (21 CFR 700.25) Not applicable. This rule applies to cosmetic liquid oral hygiene products (mouthwash, oral rinse) and vaginal products (21 CFR 700.25), and only when they are cosmetics. Either this label does not represent the product as either -- toothpaste is not a LIQUID oral hygiene product and is outside the regulation -- or the label carries a Drug Facts panel, in which case the product is an OTC drug and the equivalent tamper-evident packaging duty sits at 21 CFR 211.132 instead. That is the authority to work from. This does not affect your compliance result.	Federal

N/A	FDA.sunscreen_term_qualifier	"Sunscreen" terminology on a cosmetic must be qualified (21 CFR 700.35) Not applicable. This rule applies to cosmetic labels that use the term "sunscreen" or similar sun-protection terminology without SPF/Drug Facts labeling. This label does not. This does not affect your compliance result.	Federal
N/A	FDA.suntanning_warning	Suntanning preparation warning without a sunscreen (21 CFR 740.19) Not applicable. This rule applies to suntanning and self-tanning preparations (21 CFR 740.19). This label does not represent the product as one and declares no dihydroxyacetone. This does not affect your compliance result.	Federal
N/A	FDA.self_pressurized_warning	Self-pressurized (aerosol) container warning (21 CFR 740.11(a)) Not applicable. This rule applies to cosmetics packaged in a self-pressurized (aerosol) container (21 CFR 740.11). Nothing on this label indicates a pressurized container or a propellant. This does not affect your compliance result.	Federal
N/A	FDA.aerosol_propellant_misuse_warning	Aerosol propellant intentional-misuse warning (21 CFR 740.11(b)) Not applicable. This rule applies to self-pressurized products whose propellant is a halocarbon or a hydrocarbon (21 CFR 740.11(b)). No such propellant is declared on this label. This does not affect your compliance result.	Federal
PASS	701.13.parenthetical_restatement	Net quantity ≥ 1 lb / 1 pt needs a parenthetical restatement (21 CFR 701.13(j)(1))	Federal
PASS	701.13.fraction_form	Net quantity fraction denominator (21 CFR 701.13(d))	Federal
PASS	701.13.abbreviation_form	Net quantity abbreviation form (21 CFR 701.13(n))	Federal
PASS	701.13.exaggerating_qualifier	Net quantity exaggerating qualifier (21 CFR 701.13(q); 15 U.S.C. § 1453(b))	Federal
PASS	701.2.english_required_elements	Required label element appears in Spanish but not English (21 CFR 701.2(b)(1))	Federal
PASS	701.12.manufacturer_address_incomplete	Manufacturer place of business complete: street, city, state, ZIP (21 CFR 701.12(d))	Federal
PASS	FPLA.net_quantity_format	Net quantity states both US customary and metric units (15 U.S.C. § 1453(a)(2))	Federal
PASS	701.3.ingredients_comma_separated	Ingredient list uses the standard comma-separated format (21 CFR 701.3(a))	Federal
PASS	701.2.foreign_language_consistency	Required label information appears in any foreign language used (21 CFR 701.2(b))	Federal
PASS	EPA.hcfc_ozone_warning	Ozone-depletion warning present for HCFC-containing products (40 CFR 82.106)	Federal
PASS	CA.prop65.required	California Prop 65 warning may be required	State
PASS	CA.prop65.warning_format	Prop 65 warning does not match the safe-harbor format	State
ADVISORY	CA.cscp.registration	California Safe Cosmetics Program: registration may be required	State

ADVISORY	CA.pfas_restriction	California PFAS prohibition in cosmetics (AB 2771)	State
PASS	CA.ab2762.sale_ban	Banned for sale in California: Toxic-Free Cosmetics Act (AB 2762)	State
PASS	MD.hb643.named_ban	Banned for sale in Maryland: Cosmetic Products Ingredient Prohibition (HB 643)	State
PASS	CA.hsc108980b	Banned for sale in California (2027): Toxic-Free Cosmetics Act expansion	State
PASS	CA.hsc108980b.monomers	Banned for sale in California (2027): styrene / vinyl acetate monomer	State
PASS	CA.hsc108980c.musk_ketone	Musk ketone capped in California (2027): concentration limits by product type	State
PASS	CA.hsc108980b.boron	Banned for sale in California (2027): boron compounds (boric acid / borates)	State
PASS	CA.hsc108980b.laurus_seed	Banned for sale in California (2027): Laurus nobilis seed oil	State
PASS	WI.mercury_prohibition	Wisconsin mercury prohibition in cosmetics, toiletries and fragrance products	State
PASS	LA.mercury_limit	Louisiana mercury limit in cosmetics (10 ppm)	State
PASS	NY.mercury_restriction	New York mercury prohibition in cosmetics	State
ADVISORY	NY.dioxane_limit	New York 1,4-dioxane limits (cosmetics 10 ppm; personal care 1 ppm)	State
N/A	NY.hair_relaxer_warning	New York hair-relaxer carcinogen warning (takes effect May 21, 2027)	State
ADVISORY	MN.pfas_restriction	Minnesota PFAS restriction in cosmetics	State
ADVISORY	MN.heavy_metals_limit	Minnesota lead and cadmium limits in consumer products	State
PASS	MN.mercury_prohibition	Minnesota mercury prohibition in cosmetics, toiletries and fragrances	State
N/A	MN.childrens_formaldehyde_ban	Minnesota formaldehyde ban in children's products (under age 8)	State
PASS	WA.toxic_free_cosmetics	Washington Toxic-Free Cosmetics Act	State
ADVISORY	WA.toxic_free_cosmetics.ortho_phthalate_class	Washington ortho-phthalate class ban in cosmetics	State
ADVISORY	WA.pfas_restriction	Washington PFAS restriction in cosmetics	State
ADVISORY	NJ.pfas_restriction	New Jersey PFAS class ban in cosmetics (takes effect Jan 12, 2028)	State
ADVISORY	CT.pfas_restriction	Connecticut PFAS restriction in cosmetics (label-and-notify since Jul 1, 2026; full ban Jan 1, 2028)	State
ADVISORY	RI.pfas_restriction	Rhode Island PFAS class ban in cosmetics (takes effect Jan 1, 2027)	State
PASS	WA.formaldehyde_releasers	Washington formaldehyde releaser ban in cosmetics (takes effect Jan 1, 2027)	State

N/A	WA.formaldehyde_releasers.timonacic_straightener	Washington formaldehyde releaser (timonacic): heat-activated hair straighteners (takes effect Jan 1, 2027)	State
ADVISORY	CO.pfas_restriction	Colorado PFAS prohibition in cosmetics	State
N/A	CO.hair_relaxer_warning	Colorado hair relaxer carcinogen warning (takes effect July 1, 2027)	State
PASS	MD.pfas_restriction	Maryland PFAS prohibition in cosmetics (HB 643)	State
ADVISORY	ME.pfas_restriction	Maine PFAS prohibition in cosmetics (LD 1537)	State
ADVISORY	VT.pfas_restriction	Vermont PFAS prohibition in cosmetics (S.25 / Act 131)	State
PASS	VT.act131.sale_ban	Banned for sale in Vermont: Act 131 named substances	State
ADVISORY	VT.act131.ortho_phthalate_class	Vermont Act 131 ortho-phthalate class ban	State
ADVISORY	VT.act131.contaminants	Vermont Act 131: 1,4-dioxane and asbestos	State
PASS	VT.act131.2027	Banned for sale in Vermont (2027): Act 131 styrene / D4 / toluene	State
PASS	HI.environmental_disclosure	Hawaii reef-safe sunscreen law: oxybenzone and octinoxate prohibited	State
ADVISORY	OR.sb546.website_notice	Oregon manufacturer website notice (operative Jan 1, 2027) If you manufacture a cosmetic sold or offered for sale in Oregon, review the website-notice duty operative January 1, 2027. ORS 431A.340 applies when the product contains a chemical on OHA's ORS 431A.335 list at or above the applicable de minimis level. Confirm the current OHA list, thresholds and required notice content, including the applicable intentionally added chemical disclosures. This scan does not check your website, concentrations or reporting eligibility.	State
PASS	OR.sb546.sale_ban	Oregon SB 546 cosmetics sale ban: named substances (takes effect Jan 1, 2027)	State
ADVISORY	OR.sb546.ortho_phthalate_class	Oregon SB 546 ortho-phthalate class ban (takes effect Jan 1, 2027)	State
ADVISORY	OR.sb546.pfas_restriction	Oregon SB 546 PFAS class ban (takes effect Jan 1, 2027)	State
ADVISORY	OR.sb546.formaldehyde_releasers	Oregon SB 546 formaldehyde-releasing agents class ban (takes effect Jan 1, 2027)	State
ADVISORY	NM.pfas_restriction	New Mexico PFAS class ban in cosmetics (takes effect Jan 1, 2028)	State
PASS	IL.cosmetics_act.named_ban	Banned for sale in Illinois: Chemicals in Cosmetic Products Act (takes effect Jul 1, 2028)	State
ADVISORY	IL.pfas_restriction	Illinois PFAS ban in cosmetics (13 enumerated Jul 1, 2028; whole class Jan 1, 2032)	State
PASS	IL.mercury_prohibition	Illinois mercury prohibition in cosmetics, toiletries and fragrances	State
N/A	AR.hair_relaxer_warning	Arkansas hair-relaxer carcinogen warning (in force since 2025)	State
PASS	VA.toxin_free.named_ban	Banned for sale in Virginia: Humane and Toxin-Free Cosmetics Act (HB 122)	State

PASS	VA.pfas_restriction	Virginia PFAS prohibition in cosmetics (HB 122)	State
ADVISORY	NH.pfas_restriction	New Hampshire PFAS prohibition in cosmetics (2027)	State
PASS	CLM.drug_treats	Drug claim: 'treats' a condition	Claims
PASS	CLM.drug_cures	Drug claim: 'cures' or 'heals'	Claims
PASS	CLM.antibacterial	Drug claim: antibacterial / antimicrobial	Claims
PASS	CLM.antiseptic	Drug claim: antiseptic	Claims
PASS	CLM.antifungal	Drug claim: antifungal	Claims
PASS	CLM.pesticide_repellent	Pesticide claim: insect/pest repellent	Claims
PASS	CLM.pesticide_disinfectant	Pesticide/drug claim: disinfects or sanitizes	Claims
PASS	CLM.pesticide_mold	Pesticide claim: kills or prevents mold/mildew	Claims
PASS	CLM.anti_dandruff	Drug claim: anti-dandruff	Claims
PASS	CLM.spf_no_drug_facts	SPF claim requires Drug Facts panel	Claims
PASS	CLM.acne_treatment	Drug claim: acne treatment	Claims
PASS	CLM.dna_repair	Drug claim: DNA repair	Claims
PASS	CLM.prevents_hair_loss	Drug claim: hair loss prevention / regrowth	Claims
PASS	CLM.wound_healing	Drug claim: wound healing	Claims
PASS	CLM.collagen_stimulation	Drug claim: stimulates collagen or elastin	Claims
PASS	CLM.anti_inflammatory	Drug claim: anti-inflammatory	Claims
PASS	CLM.clinically_proven	Substantiation required: 'clinically proven / tested'	Claims
PASS	CLM.quantified_performance	Substantiation required: quantified performance claim	Claims
PASS	CLM.procedure_comparison	Substantiation required: comparison to a medical procedure	Claims
PASS	CLM.dermatologist_approved	Substantiation required: dermatologist claim	Claims
PASS	CLM.expert_professional_recommended	Substantiation required: physician / medical-professional endorsement claim	Claims
PASS	CLM.hundred_percent_natural	Advisory: '100% natural': no regulatory standard	Claims
PASS	CLM.organic_uncertified	Substantiation required: 'organic' claim	Claims
PASS	CLM.reef_safe	Substantiation required: 'reef safe'	Claims
PASS	MKT.green_general	Substantiation required: general environmental benefit claim	Claims
PASS	MKT.green_biodegradable	Substantiation required: 'biodegradable'	Claims
PASS	MKT.green_compostable	Substantiation required: 'compostable'	Claims
PASS	MKT.green_recyclable	Substantiation required: 'recyclable' / recycled content	Claims
PASS	MKT.green_nontoxic	Substantiation required: 'non-toxic'	Claims

PASS	MKT.green_ozone	Substantiation required: 'ozone-safe' / 'ozone-friendly'	Claims
PASS	MKT.green_carbon	Substantiation required: carbon-neutral / net-zero claim	Claims
PASS	MKT.green_sustainable	Substantiation required: 'sustainable' / renewable materials	Claims
PASS	MKT.green_certification_seal	Substantiation required: third-party certification / seal claim	Claims
PASS	MKT.certified_nontoxic_seal	Substantiation required: "Certified Non-Toxic" / safety-certification seal	Claims
PASS	MKT.safe_for_children	Substantiation required: "safe for kids/tweens/teens"	Claims
PASS	MKT.refillable	Substantiation required: 'refillable' claim	Claims
PASS	MKT.renewable_energy	Substantiation required: renewable energy claim	Claims
PASS	MKT.free_of_unassociated_substance	'Free-of' claim names a substance never associated with this product type	Claims
PASS	MKT.made_in_usa	Substantiation required: 'Made in USA'	Claims
PASS	MKT.cruelty_free	Substantiation required: 'cruelty-free' / 'not tested on animals'	Claims
PASS	MKT.vegan	Substantiation required: 'vegan'	Claims
PASS	CLM.gluten_free	Substantiation required: 'gluten-free'	Claims
PASS	CLM.gmo_free	Substantiation required: 'non-GMO' / 'GMO-free'	Claims
PASS	MKT.unscented	Substantiation required: 'unscented' (not the same as fragrance-free)	Claims
PASS	MKT.award_winning	Substantiation required: award / best-seller claim	Claims
PASS	MKT.usda_organic_seal	Substantiation required: 'USDA Organic' claim	Claims
PASS	MKT.fda_approved_cosmetic	False claim: 'FDA approved' for a cosmetic	Claims
PASS	MKT.eliminates_permanently	Drug claim: 'eliminates' or 'permanently' + skin condition	Claims
PASS	MKT.hypoallergenic	Substantiation required: 'hypoallergenic'	Claims
PASS	MKT.non_comedogenic	Substantiation required: 'non-comedogenic'	Claims
PASS	CLM.condition_eczema	Drug claim: names eczema / dermatitis	Claims
PASS	CLM.condition_psoriasis	Drug claim: names psoriasis	Claims
PASS	CLM.condition_rosacea	Drug claim: names rosacea	Claims
PASS	CLM.condition_melasma	Drug claim: names melasma / chloasma	Claims
PASS	CLM.condition_keratosis	Drug claim: names keratosis (incl. keratosis pilaris)	Claims
PASS	CLM.sf_barrier_repair	Drug claim: repairs / rebuilds the skin barrier	Claims
PASS	CLM.sf_cell_regeneration	Drug claim: regenerates cells / cell renewal	Claims
PASS	CLM.prescription_strength	Drug claim: prescription / Rx-strength	Claims

PASS	CLM.comparative_prescription	Drug claim: compares efficacy to prescription products	Claims
PASS	CLM.medical_grade	Misleading: 'medical-grade' / 'cosmeceutical'	Claims
PASS	CLM.sf_detox	Misleading: 'detoxifies' skin	Claims
PASS	CLM.timeframe_results	Substantiation required: results within a stated timeframe	Claims
PASS	CLM.skin_bleaching	Drug claim: skin whitening / bleaching / lightening	Claims
PASS	CLM.condition_vitiligo	Drug claim: names vitiligo	Claims
PASS	CLM.condition_warts	Drug claim: names warts	Claims
PASS	CLM.condition_cold_sore	Drug claim: names cold sores / herpes	Claims
PASS	CLM.condition_fungal	Drug claim: names a fungal condition	Claims
PASS	CLM.condition_lice	Drug claim: head lice / pediculicide	Claims
PASS	CLM.oral_anticaries	Drug claim: cavity / tooth-decay / gingivitis prevention	Claims
PASS	CLM.pore_shrink	Misleading: shrinks / tightens pores	Claims
PASS	CLM.cellulite	Misleading: reduces / eliminates cellulite	Claims
PASS	CLM.uv_protection	Drug claim: UV / sun protection without sunscreen drug labeling	Claims
PASS	CLM.lash_growth	Drug claim: eyelash or eyebrow growth	Claims
PASS	CLM.scar_treatment	Drug claim: treats or removes scars	Claims
PASS	CLM.stretch_mark_treatment	Drug claim: removes or prevents stretch marks	Claims
PASS	CLM.topical_anesthetic	Drug claim: numbing or pain relief	Claims
PASS	CLM.reverses_aging	Drug claim: reverses aging or sun damage	Claims
PASS	MKT.chemical_free	Misleading: 'chemical-free'	Claims
PASS	MKT.clean_beauty	Advisory: 'clean' has no regulatory definition	Claims
PASS	MKT.anti_pollution	Substantiation required: anti-pollution / blue-light protection	Claims
N/A	FDA.unapproved_otc_drug	Not-GRASE active ingredient: unapproved new drug under FD&C 505(a) Not applicable. This rule applies to products containing an OTC drug active ingredient. None is declared on this label. This does not affect your compliance result.	Federal
N/A	FDA.sunscreen_not_grase	Not-GRASE sunscreen active: not legally marketable under OTC monograph Not applicable. This rule applies to OTC sunscreen products. No sunscreen active ingredient is declared on this label. This does not affect your compliance result.	Federal

N/A	FDA.sunscreen_cat3_pending	Chemical sunscreen actives with pending FDA GRASE determination Not applicable. This rule applies to sunscreens containing chemical UV filters with a pending FDA GRASE determination. No sunscreen active ingredient is declared on this label. This does not affect your compliance result.	Federal
N/A	FDA.broad_spectrum_test	'Broad Spectrum' claim requires documented Critical Wavelength test Not applicable. This rule applies to sunscreens making a “Broad Spectrum” claim. This label makes no sunscreen claim. This does not affect your compliance result.	Federal
N/A	FDA.water_resistance_label	Water resistance labeling: prohibited terms or missing required duration Not applicable. This rule applies to sunscreens making a water-resistance claim. This label makes no sunscreen claim. This does not affect your compliance result.	Federal
N/A	FDA.spf_skin_cancer_alert	Skin Cancer/Skin Aging Alert required for non-Broad-Spectrum or SPF < 15 sunscreens Not applicable. This rule applies to sunscreens with SPF below 15 or without Broad Spectrum protection. This label makes no SPF claim. This does not affect your compliance result.	Federal
PASS	MOCRA.adverse_event_contact	Domestic contact for adverse event reports present	Federal
PASS	mocra.responsible_person_non_us	Non-US distributor address: confirm MoCRA facility registration and US agent	Federal
N/A	mocra.professional_use_statement	Professional-use product carries the licensed-professionals statement (21 U.S.C. § 364e(c)) Not applicable. This rule applies to products the label restricts to professional or salon use (21 U.S.C. § 364e(c)). This label carries no such use restriction. This does not affect your compliance result.	Federal
ADVISORY	advisory.class.PFAS	PFAS class bans: multiple states (13)	Ingredient_restrictions
ADVISORY	advisory.class.ortho_phthalate	Ortho-phthalate class bans: multiple states (3)	Ingredient_restrictions
ADVISORY	PKG.toxics_in_packaging	Packaging heavy metals: 100 ppm limit on Pb/Cd/Hg/Cr(VI) in 19 states	Packaging
ADVISORY	IH.restricted_preservative.phenoxyethanol	Phenoxyethanol: flagged for review, not restricted in the US	Ingredient_hazards
PASS	AMZ.ingredients_present	Full ingredient list required	Retailer_amazon
PASS	AMZ.net_quantity	Net quantity required on listing	Retailer_amazon
PASS	AMZ.no_drug_claims	No drug or therapeutic claims permitted	Retailer_amazon
PASS	AMZ.manufacturer_info	Manufacturer or responsible party required	Retailer_amazon
ADVISORY	AMZ.unit_coding	Lot code and expiration or period-after-opening marking (Amazon)	Retailer_amazon
PASS	AMZ.no_formaldehyde	Formaldehyde and releasers restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.no_mercury	Mercury compounds restricted (Amazon Private Brand RSL)	Retailer_amazon

PASS	AMZ.spf_otc_compliance	SPF products must comply with OTC drug monograph	Retailer_amazon
PASS	AMZ.rsl_triclosan	Triclosan restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.rsl_parabens	Propyl- and butyl-parabens restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.rsl_phthalates	Phthalates restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.rsl_npe	Nonylphenol and NP ethoxylates restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.rsl_pfas	Perfluorinated chemicals restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.marketplace_concentration_caps	Concentration cap exceeded (Amazon marketplace policy)	Retailer_amazon
PASS	AMZ.rsl_misc	Other RSL substances restricted (Amazon Private Brand RSL)	Retailer_amazon
PASS	AMZ.rsl_microplastics	Microplastics restricted (Amazon Private Brand RSL)	Retailer_amazon

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Report CPG-2-468F2B0D · label text SHA-256 468f2b0dd868e721… · manual review items 35

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