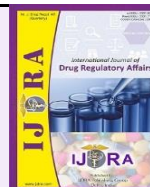


Available online on 15 Dec, 2024 at <https://ijdra.com/index.php/journal>**International Journal of Drug Regulatory Affairs**Published by Diva Enterprises Pvt. Ltd., New Delhi  
Associated with RAPS & Delhi Pharmaceutical Sciences & Research University  
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## Review Article

Open Access

**Comprehensive Cosmetic Regulations comparison of selected Emerging markets with US**

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**Abstract**

A comprehensive analysis of cosmetic rules in selected emerging markets, specifically the Gulf Cooperation Council (GCC), the Association of Southeast Asian Nations (ASEAN), the Commonwealth of Independent States (CIS), and the East African Community (EAC), and compared them with those of regulations in United States of America. The historical context of cosmetics emphasises its long-standing function in society, as well as the dual character of cosmetic items as both beauty enhancers and possible sources of health hazards due to hazardous substances. The US regulatory frameworks are distinguished by severe regulations for consumer safety, ingredient transparency, and ethical manufacturing practices, which are principally implemented by the Food and Drug Administration. Although emerging markets are working towards harmonised guidelines that are consistent with international standards, there are still significant disparities in enforcement and compliance. This study dives into significant regulatory issues such as cosmetic definitions, production procedures, safety regulations, and labelling laws. Understanding these regulatory landscapes is critical for firms navigating the intricacies of the global cosmetics market.

**Keywords:** Cosmetics; Emerging Markets; Safety requirements; Labelling; Manufacturing Standards; Ingredient Transparency; ASEAN; GCC; CIS; East African Community (EAC); GMP

**Article Info:** Received 05 Oct 2024; Review Completed 09 Nov 2024; Accepted 14 Nov 2024

**Cite this article as:**

Rebbaniboni N, Amarapalli D, Parveen A, Prasanthi D. Comprehensive Cosmetic Regulations comparison of selected Emerging markets with US. Int. J. Drug Reg. Affairs [Internet]. 2024 Dec15 [cited 2024 Dec 15]; 12(4):33-42. Available from:

<http://ijdra.com/index.php/journal/article/view/714>DOI: <https://doi.org/10.22270/ijdra.v12i4.714>

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**1. Introduction**

Cosmetics have been used for thousands of years for various purposes, including religious rituals, beauty enhancement, and health promotion. The word "cosmetics" is derived from the Greek word *kosmetikos*, which means "to adorn." (1) The first known cosmetics appeared in Egypt 5,000 years ago, with Egyptians using incense oils for skin care and black antimony-based paint as eyeliner.

Cosmetics can help prevent aging, protect skin, clear up issues like acne, and enhance facial features, contributing to higher self-esteem and improving social and professional impressions. However, the chemicals used in cosmetics may cause serious ill effects on the skin, and some can penetrate the skin and affect other organs, potentially leading to carcinogenicity. (2) Heavy metals in various cosmetic products, such as facial makeup, have raised concerns. These include mercury, lead, cadmium, arsenic, and other total heavy metals, additionally synthetic organic and natural organic colours. The Indian regulatory agency has examined the negative consequences of these drugs. (2) The global cosmetics

market was valued at USD 296.83 billion in 2022 and is projected to reach USD 474.00 billion by 2030, with a CAGR (Compound Annual Growth Rate) of 6.03% from 2023 to 2030.

The United States is well recognised as a highly regulated cosmetics sector, with strong frameworks that prioritise consumer safety, ingredient disclosure and ethical standards. In contrast, rising markets such as the Gulf Cooperation Council (GCC), ASEAN, the Commonwealth of Independent States (CIS), and the East African Community (EAC) are changing their regulatory frameworks to improve product quality and safety. While some of these regions are implementing international norms, there are still substantial disparities in enforcement and compliance. Understanding these distinctions is critical for firms attempting to negotiate the intricacies of global cosmetic laws effectively.

As US is a regulated market consists of stringent provisions for cosmetic products. the Emerging markets have been formed to improve economy and also have harmonized guidelines. In the present study we are discussing about the regulations of cosmetic preparation in

US and Emerging markets (ASEAN, GCC, CIS, EAC) and also comparison of the emerging market cosmetic regulations with US cosmetic regulations

Emerging market countries, including several regional groups with significant economic potential, are noteworthy. Six member countries make up the Gulf Cooperation Council (GCC): Saudi Arabia, Kuwait, the United Arab Emirates, Qatar, Bahrain and Oman. (3)

Kenya, Rwanda, Somalia, South Sudan, Uganda, Tanzania, Burundi, and the Democratic Republic of the Congo are the eight member countries of the East African Community (EAC). In the area, this group forms a significant customs union. (4)

The Association of Southeast Asian Nations (ASEAN) is made up of the following 10 nations: the Philippines, Singapore, Thailand, Vietnam, Brunei, Cambodia, Indonesia, Laos, Malaysia and Myanmar. This diverse and dynamic group of economies plays a significant role in the area. (5) Armenia, Azerbaijan, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Russia, Tajikistan, Turkmenistan, Ukraine, and Uzbekistan are among the twelve members of the Commonwealth of Independent States (CIS). This group reflects the economic integration of countries from the former Soviet Union. (6)

### 1.1 Definition of Cosmetic

#### *United States-US*

“Articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body for cleansing, beautifying, promoting attractiveness, or altering the appearance”. (7)

#### *East African Community-EAC*

“Any substance or preparation intended to be placed in contact with the various 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 and/or correcting body odours and/or protecting them or keeping them in good condition”. (8)

#### *Gulf Cooperation Council - GCC*

According to GSO(Gulf Cooperation Council standardization Organization) “Cosmetic and Personal Care Products 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 odours”. (9)

#### *ASEAN*

A "cosmetic product" shall mean “any substance or preparation intended to be placed in contact with the various external parts of the human body (epidermis, hair system, nails, lips and external genital organs) 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, and/or correcting body odours and/or protecting them or keeping them in good condition”. (10)

### *CIS*

“Cosmetics are substances or mixtures intended to be applied to external parts of the human body (such as the skin, hair, nails, lips, and external genital organs), or to teeth and mucous membranes of the oral cavity, with the primary purpose of cleansing, perfuming, changing appearance, correcting body odours, protecting, or keeping these areas in good condition”. (11)

## 2. Manufacture

### 2.1 ISO 22716:2007

The definition of Good Manufacturing Practice (GMP) is “part of Quality Assurance which ensures that products are produced and controlled consistently with quality standards in accordance with their intended use and as required by international product specifications”.

An independent, non-governmental global organisation called ISO creates and disseminates worldwide standards for a range of sectors, including the cosmetics industry. ISO has a number of cosmetics-related standards, including ISO 22716 for GMP and ISO 16128 for natural and organic cosmetic ingredients. (12)

### 2.2 USA

The Federal Food, Drug, and Cosmetic Act (FD&C act) and the Fair Packaging and Labelling Act govern cosmetics in the US. The United States Food and Drug Administration (USFDA) is the agency responsible for enforcing these acts. However, the FDA does not preapprove cosmetic products before they are marketed, except for colour additives. Herbal cosmetics are also subject to the same regulations. In U.S., cosmetics are regulated primarily under two federal laws: The Federal FD&C act and the FPLA.

The U.S. FDA is the agency responsible for overseeing and enforcing these laws. Here are some of the important elements of cosmetic regulations in the U.S.: The FPLA is a U.S. federal law enacted in 1966 to protect consumers and provide standardized information on product packaging and labels.

The FPLA aims to facilitate value comparisons and prevent unfair or deceptive packaging and labeling of consumer commodities. The U.S. FDA and the Federal Trade Commission (FTC) are responsible for enforcing the FPLA. (13)

The Federal Food, Drug, and Cosmetic (FD&C) Act of 1938 gave the FDA the most major increase of regulatory authority over cosmetics until “The Modernisation of Cosmetics Regulation Act of 2022 (MoCRA)”. With the passage of this new law, the safety of cosmetics, which a lot of customers use daily. (14)

### 2.3 CIS

The Eurasian Economic Union's (EAEU) technical norms, which include requirements for cosmetic safety, are adhered to by the CIS nations. Prior to being marketed,

these rules guarantee that cosmetic items fulfil safety and health standards. Manufacturers are required to undergo a conformity evaluation, either via a Declaration of Conformity or State Registration, depending on the product type. If the product satisfies the requirements of the regulation, it must be marked with the EAC emblem (11)

## 2.5 GCC- gulf cooperation council

The Gulf Standards Organisation (GSO) has set recommendations for the safety and quality of cosmetic goods in the Gulf region. These recommendations cover ingredient safety, labelling, and manufacturing methods while encouraging strict health standards. By coordinating rules across member nations, the GSO improves consumer protection, transparency, and confidence in cosmetics, while also aligning with global standards to ensure a responsible and competitive industry. Technical Guidelines of GCC are given in Table-1 (9)

**Table 1.** GCC Technical Guidelines

Guidelines	Description
GSO ISO 22716	“Good Manufacturing Practices (GMP) - Guidelines on Good Manufacturing Practices”
GSO ISO 18416	“Microbiology - Detection of <i>Candida albicans</i> ”
GSO ISO 18415	“Detection Of Specified and Non- Specified Microorganisms”
GSO ISO 10130	“Nitrosamines: Detection and determination of N-nitroso diethanolamine (NDELA) in cosmetics by HPLC, post-column photolysis and derivatization”
GSO ISO 16212	“Enumeration of yeast and mould”
GSO ISO 21149	“Cosmetics — Microbiology — Enumeration and detection of aerobic mesophilic bacteria”
GSO ISO 21150	“Detection of <i>Escherichia coli</i> ”
GSO ISO 22717	“Detection of <i>Pseudomonas aeruginosa</i> ”
GSO ISO 22718	“Detection of <i>Staphylococcus aureus</i> ”
GSO 917	“Metal Aerosol Dispensers”
GSO 918	“Methods of testing Metal Aerosol Dispensers”
GSO ASTM 640 06	“Standard Test Method for Preservatives in Water-Containing Cosmetics”
GSO ISO 17516	“Microbiology--Microbiological limits”
GSO ISO 24443	“Determination of sunscreen UVA photoprotection in vitro”
ISO 17280:2015	“Surface active agents “Determination of 1,4-dioxan residues in surfactants obtained from epoxyethane by gas chromatography”
ISO 21148	“General Instructions for microbiological examination”
ISO 29621	“Guidelines for the Risk Assessment of Microbiologically Low-risk Finished Products”
ISO 11930	“Evaluation of the antimicrobial protection of a cosmetic product”
ISO 24442	“Cosmetics-Sun protection test methods -In vivo determination of sunscreen UVA protection”
ISO 24444	“Cosmetics -Sun protection test methods -In vivo determination of the sun protection factor (SPF)”

## 3. Safety requirements

The significance of cosmetic safety criteria varies greatly between countries, reflecting varied legal frameworks and cultural views towards health and beauty. This difference emphasises the important need for international cosmetic safety standards to safeguard customers from harmful substances and allergic reactions. As the cosmetics industry expands all over the world, manufacturers must understand and adhere to these safety regulations in order to develop trust and ensure the well-being of consumers worldwide.

### 3.1 USA

The use of bithionol in cosmetics; the use of mercury compounds in cosmetics, including their use as skin bleaching agents in cosmetic preparations that are also considered drugs; the use of vinyl chloride as an ingredient, including as a propellant in cosmetic aerosol products; the use of certain halogenated salicylanilides as ingredients in cosmetic products; the use of zirconium-

containing aerosol cosmetic products; the use of chloroform, methylene chloride, and chlorofluorocarbon propellants in cosmetic products; the requirement for tamper-resistant packaging for cosmetic products; the use of cattle materials that are prohibited in cosmetic products; and the use of sunscreen ingredients in cosmetic products are all strictly forbidden under US cosmetic regulations. (15)

### 3.2 GCC

Cosmetics and personal care products should not contain pork or its derivatives. All cosmetic products must ensure safety and protect human health. There should be stability, uniformity, and consistency throughout their shelf life. According to regulations, cosmetics should be free from contamination, filthy or deteriorated substances. Products should avoid any illustrations, similarities, or expressions incompatible with Islamic culture and Gulf Cooperation Council ethics. The materials specified in the appendices shouldn't be utilised in these items, although if some

chemicals must be employed during production, they should only be utilised in trace levels. Products with sunscreen are specified in GSO 2237:2012, and all manufacturing must comply with GMP standards as described in GSO ISO 22716. There is evidence supporting exemptions when necessary. The finished product must remain within safe limits for lead (10 ppm), arsenic (3 ppm), cadmium (3 ppm), mercury (3 ppm), antimony (5 ppm), and dioxane (10 ppm). (16)

### 3.3 ASEAN

According to Article 6 of the ASEAN Cosmetic Directive (ACD), anyone putting a product on the market is required to keep a Product Information File (PIF), which must be "easily reachable by the oversight regulatory authority of the Member State concerned at the address given on the label." This ASEAN Product Information File (PIF) Guideline's main objective is to provide guidance to companies who are putting cosmetics on the market about how to compile and organise the PIF using a recommended format. It also outlines who is in charge of PIF maintenance and offers rules for PIF audits. (17)

PIF Format, it is advised that the PIF be divided into the following four parts are given below in Table-2

**Table 2.** PIF Format

Part I	Administrative Documents and Product Summary
Part II	Quality Data of Raw Materials
Part III	Quality Data of Finished Product
Part IV	Safety and Efficacy Data

### 3.4 EAC

Cosmetics must to be safe to use in typical or fairly anticipated situations. Specifically, a danger to human health should never be justified by a risk-benefit analysis. Based on knowledge of the safety of the substances in final cosmetic goods, their safety can already be guaranteed. This East African Standard is based on European Regulation (EC) No 1223/2009 on cosmetics, which attempts to guarantee the safety of cosmetics.

The EU Directive (EC) No 1223/2009 on Cosmetics from Annex IV, V, and VI has been modified to create EAS 377-3, which reduces risk and ensures the safety of cosmetic items in the area. (18)

### 3.5 CIS

The technical regulation TR CU 009/2011 of the Eurasian Economic Union (EAEU) serves as the foundation for

**Table 3.** PART 701—cosmetic labeling of US

<b>SUBPART A: GENERAL PROVISIONS</b>
§ 701.1 Misbranding.
§ 701.2 Form of stating labelling requirements.
§ 701.3 Designation of ingredients.
§ 701.9 Exemptions from labelling requirements
<b>SUBPART B- PACKAGE FORM 701.10 – 701.13</b>
§ 701.10 Principal display panel
§ 701.11 Identity labelling
§ 701.12 Name and place of business of manufacturer, packer, or distributor
§ 701.13 Declaration of net quantity of contents
<b>SUBPART C – LABELLING OF SPECIFIC INGREDIENTS</b>

most cosmetic safety rules in the Commonwealth of Independent States (CIS). The safety standards for cosmetics and fragrances are outlined in this regulation and are applicable to all items distributed in the EAEU member nations, such as Kazakhstan and Russia. TR CU 009/2011 encompasses important topics such as standards for labelling, microbiological and toxicological characteristics, and product composition restrictions. For instance, it identifies approved colourants, preservatives, and UV filters and prohibits specific ingredients from being used in cosmetics. In addition, cosmetics have to adhere to chemical and physical requirements, such as pH limitations, and toxicity evaluations are required for goods containing natural components. (11)

## 4. Labelling Requirements

Cosmetic labelling requirements are crucial for consumer safety. Clear labels provide crucial information about ingredients, usage, and allergens, allowing customers to make accurate choices. Standardised labelling increases transparency and accountability by preventing misleading statements and encouraging moral conduct. As the global cosmetics market expands, strong labelling requirements are necessary to protect public health and encourage customer trust, resulting in a more sustainable beauty industry.

### 4.1 USA

Cosmetic labels must be clear and accurate to avoid misinformation and misbranding. A proper label includes vital details such as an accurate declaration of net content, an identity statement describing the product's quality characteristics and uses, and the company name and address. Additionally, it should specify whether the product was manufactured or distributed by a specific entity. Important information, including caution and warning signs, cannot be omitted, as this might result in misbranding.

Ingredient listings in the US are required to provide 18 common or typical names in English, listed in descending order of prevalence. While this is one of those requirements, there are instances where the "International Nomenclature of Cosmetic Ingredients (INCI)" names differ from these common names, particularly for botanical components, which often use Latin names. Adhering to these regulations is crucial to ensure consumer safety and transparency. Cosmetic labelling of US is mentioned in 21 CFR Part 701-Cosmetic labelling as mentioned in Table-3. (19)

§ 701.20. Detergent substances, other than soap, intended for use in cleansing the body

§ 701.30. Ingredient names established for cosmetic ingredient labelling.

#### 4.2 GCC

All cosmetic and personal care products must be named with simple and clear information, including product names and trademarks, manufacturer or distributor identification, country of origin, specified ingredients, and expiration or expiration date. Labels must include instructions for use, warnings, cautionary terms, batch numbers or batch codes, and operating elements. Ingredients must be listed on the box and packaging or on the packaging or label/card only. Information, including product names, characteristics, warnings, and storage instructions, must be displayed in Arabic and English. Special labelling requirements apply to loose soaps, gifts, hotel supplies, multipacks, and ampoules or vials; these must have instructions in two forms for external use: avoid eyes and open with care. (20)

#### 4.3 ASEAN

Cosmetic products must provide the following crucial information on their outer packaging, or on their immediate packing in the absence of an outside layer:

**Product Title and Purpose:** Indicate the product's purpose and nature clearly (unless this is obvious).

**How to Use This:** Provide detailed instructions on how to utilise the product (unless its name or appearance make it obvious).

**Ingredient List:** Provide an exhaustive inventory of ingredients arranged by weight. Less than 1% of an ingredient's contents should be stated after those that make up more than 1%, and colourants should be identified by their colour index number or marked with "may contain" or "+/-" for varying shades. Genus and species names should be used to identify botanical extracts.

The product's weight or volume, manufacturer's batch number, expiration date (if the product lasts less than 30 months), country of manufacture, name and address of the responsible company, and expiration date—which should be clearly marked and include either month/year or day/month/year—must also be included on the packaging.

If necessary, information about ingredients originating from animals as well as any special usage precautions and warnings must be given. If the package is too tiny to fit all the information, it must at least have the product name and batch number visible. Every piece of information ought to be durable, simple to read, and understand. It ought to be in English or a language the customer can comprehend. Certain nations might need more details in the native tongue. (10)

#### 4.4 EAC

Various rules have been enacted by governments to ensure package safety and to prevent misleading labels. Even while labelling regulations vary from nation to nation, there are some key parallels. For instance, the International Nomenclature of Cosmetic components (INCI) is used by most nations to list components and has comparable regulations for display and information. There are,

however, notable variations in the USA, particularly with regard to labelling and claims made for particular components (such as SPF).

As was previously discussed, packaging is essential for safeguarding the goods during storage and transportation in addition to serving as a means of information. It needs to be stable in a variety of temperatures and resistant to chemical, physical, and biological threats. Due to these factors, packaging is taken into consideration when evaluating the safety of cosmetics in the EU. (8, 18)

#### 4.5 CIS

Comprehensive product information including components, usage guidelines, and any particular warnings must be included on the label.

### 5. CASE STUDY:

#### 5.1 US Cosmetics exports to EAC countries

The East African Community (EAC), which includes countries like Kenya, Uganda, and Tanzania, has become an important market for U.S. cosmetics exports. Since COVID-19, U.S. cosmetics imports have grown significantly in Tanzania and Uganda, with Tanzania's imports increasing from \$1,093,748 in 2019 to \$2,082,226 in 2023. Protecting intellectual property is crucial in this region, and companies are encouraged to secure patents and trademarks before entering new markets. The U.S. essential oils, perfumery and cosmetics exports to the EAC countries in the year 2023 is represented in the figure-1.

In 2023, the U.S. exported cosmetics worth of \$ 2.5 million to Kenya, while Kenya imported \$ 13.8 million worth of cosmetics in 2022. This indicates the possibility of growth for U.S. companies in the Kenyan market. Kenya is a major economy in sub-Saharan Africa, with a worth of \$133.4 GDP and a population of over 50 million.

It acts a key hub for trade and business in East Africa. US companies are attracted in Kenya because of its market-based economy; regional hub; young and tech-savvy population and strong in US- Kenya regulations. while e-commerce is growing in areas like fashion, electronics and home goods, most of the Kenyan consumers spend on food and non-alcoholic beverages. Though Kenya is a part of world intellectual property (IP) organizations, implementing IP rights remains a challenge. The Kenyan Government is trying to improve this by working on the draft intellectual property bill of 2020. (21)

#### 5.2 CASE STUDY: US cosmetics exports to GCC countries

The Gulf Cooperation Council (GCC) region, comprising Saudi Arabia, the United Arab Emirates, and Kuwait, is a significant market for US cosmetics exports. In 2023, the United Arab Emirates is predicted to import \$1,307 million in cosmetics from the United States, making it the Middle East's leading importer. Saudi Arabia, with the region's largest GDP of \$1,108 billion, is a significant contributor to the cosmetics industry, importing \$201 million.

**Table 4.** Regulatory Authorities of Emerging Markets

GCC	ASEAN	CIS	EAC
<p><b>1.Kingdom Saudi Arabia-</b>Saudi Food and Drug Authority (SFDA)</p> <p><b>2.State of Kuwait-</b> Kuwait Food and Drug Authority (KuFDA)</p> <p><b>3.United Arab Emirates-</b>Ministry of health and prevention</p> <p><b>4.State of Qatar-</b>pharmacy and drug control department</p> <p><b>5.Kingdom of Bahrain-</b>National health regulatory authority (NHRA)</p> <p><b>6.State of Oman-</b>Directorate general of pharmaceutical affairs and drug control.</p>	<p><b>1.Brunei-</b> Ministry of Health</p> <p><b>2.Cambodia-</b>Department of drug, food and cosmetics</p> <p><b>3.Indonesia-</b>National agency of drug &amp; food control</p> <p><b>4.Laos-</b>Ministry of Health, food and Drug department</p> <p><b>5.Malaysia-</b>Drug control authority, NCE unit</p> <p><b>6.Myanmar-</b>Food and drug administration</p> <p><b>7.Philippines-</b>Philippines Department of health</p> <p><b>8.Singapore-</b>Health science authority (H)</p> <p><b>9.Thailand</b> –Thai Food and drug administration</p> <p><b>10.Vietnam-</b>Drug administration of Vietnam</p>	<p><b>1.Ukraine-</b>State service of Ukraine on Medicines and Drug Control</p> <p><b>2.Russia-</b>Ministry of health of the Russian Federation</p> <p><b>3.Uzbekistan-</b>Ministry of Health of Republic of Uzbekistan</p> <p><b>4.Kazakhstan-</b>The Ministry of Health of the Republic of Kazakhstan</p> <p><b>5.Belarus-</b>The Ministry of Health of the Republic of Belarus</p>	<p><b>1.Kenya-</b>Pharmacy &amp; Poisons Board</p> <p><b>2.Uganda-</b>National Drug Authority</p> <p><b>3.Tanzania-</b>Tanzania Drug &amp; Medical Device Authority</p> <p><b>4.Zimbabwe-</b>Medicine Control Authority of Zimbabwe</p> <p><b>5.Ghana-</b>Food and Drug Authority</p> <p><b>6.Botswana-</b>Botswana Medicines Regulatory Authority</p> <p><b>7.Zambia-</b>Zambia Medicines Regulatory Authority</p>

**Table 5.** Comparative Analysis of Cosmetic Regulations in the U.S. & Emerging Markets

S. No	PARAMETER	USFDA	GCC	ASEAN	CIS	EAC
1.	<b>Good Manufacturing Practices</b>	Although the FDA doesn't require GMP for cosmetics, it gives guidelines to guarantee the quality and safety of product's GMP is applied to cosmetics.	Cosmetics needs to adhere to GMP regulations in order to fulfil GSO standards, which are always based upon the ISO 22716 principles.	Requires adherence to GMP guidelines set forth by ASEAN, which are according to the ISO 22716 standard (this standard is similar to the European Union).	The EAEU also requires GMP for the production of cosmetics. It is according to the ISO 22716, which includes frequent audits and quality control assessments.	Comparable to that of the EU's GMP regulations, GMP compliance is enforced for cosmetics, guaranteeing that production procedures adhere to ISO 22716.

2.	<b>Labelling Requirements</b>	The FDA requires product name, manufacturer information, ingredient lists and warnings for particular allergies. Products have to show net content, but unless the claim is about a drug's effect, it is not previously confirmed.	GSO guidelines must be followed regarding Arabic language labels, ingredient list, batch numbers, expiration dates and manufacturer details.	The product name, usage directions, ingredient lists, batch number, manufacturing details and particular cautions in the case of special ingredients are all required on the labels that adhere to ACD requirements.	Use official language or the linguistic language on the labels of products. List of ingredients, date of expiration and manufacturer information have to appear on labels.	Labelling regulations similar to the EU and CIS must include details in the local language and provide transparency with re
3.	<b>Ingredients, Restrictions, Safety</b>	FDA do not maintain a comprehensive list of prohibited substances similar to the EU or ASEAN, but it continues to restrict some ingredients (such as mercury compounds) and require allergen labelling.	GSO implements ingredient limits identical to those in the EU, including that goods be free of hazardous additives and keeping an inventory stock of components that are illegal.	ASEAN Cosmetic Directive, similar to the EU's, outlines banned and restricted components and updates them regularly based on scientific research.	EAEU Technical Regulation on Cosmetics includes particular lists of banned and restricted ingredients that adhere with the European Union's rules.	Follows the EAEU's structure regarding ingredient limitations, which is similar to the EU model which includes lists of banned and restricted compounds.
4.	<b>Animal Testing</b>	FDA doesn't require animal testing, but it doesn't prohibit it either. Companies are encouraged to adopt alternate testing methods, though some still continue to do experiments animals.	Some GCC states prohibit animal testing, but not global restrictions are enforced. Alternatives are accepted wherever possible.	Follows the EU's policy of hindering animal testing; however, there is no official ban in all Member countries.	Animal experimentation is not officially banned but discouraged, following the EU's tendency to support alternative testing techniques.	Encourages substitutes for using animal experiments, in accordance with EU legislation, but practices differ by member states.
5.	<b>Claims and Advertising</b>	Cosmetic claims that indicate drug like benefits are liable to FDA review. False or misleading statements can result in enforcement action. Cosmetic claims such as "natural" or "organic" are not carefully controlled.	Cosmetic claims are strictly regulated and based on evidence, with rules resembling EU standards.	Local regulatory bodies thoroughly monitor cosmetic claims and excessive or unfound claims are strictly prohibited with EU regulations.	Cosmetics must not make claims regarding therapeutic or drug-like effects. Claims need to be acceptable, similar to EU advertising regulations.	All claims must be supported by evidence and advertising must not mislead consumers about the product's effects, according to EU standards.

The economic recovery after COVID-19 has varied across the GCC, with some economies, such as Bahrain, experiencing a decline in US imports beyond 2020. The U.S. essential oils, perfumery and cosmetics exports to the GCC countries in the year 2023 is represented in the Figure 2.

In 2023, the U.S. exported cosmetics worth of \$2.54 million to Bahrain, while Bahrain’s imported \$55.96 million worth of cosmetics in 2022 from all countries. This

indicates the potential growth of U.S. companies in Bahrain’s cosmetic market. Bahrain is one of the prosperous and open economies in “Middle East and North Africa (MENA) region”, with a “Gross Domestic Product (GDP)” of \$44,391 million and gross national income (GNI) of \$27,180. The Free Trade Agreement (FTA) between U.S. and Bahrain strengthens trade ties, providing access to Bahrain’s market and also ensure “Intellectual Property Rights (IPR)” protections.

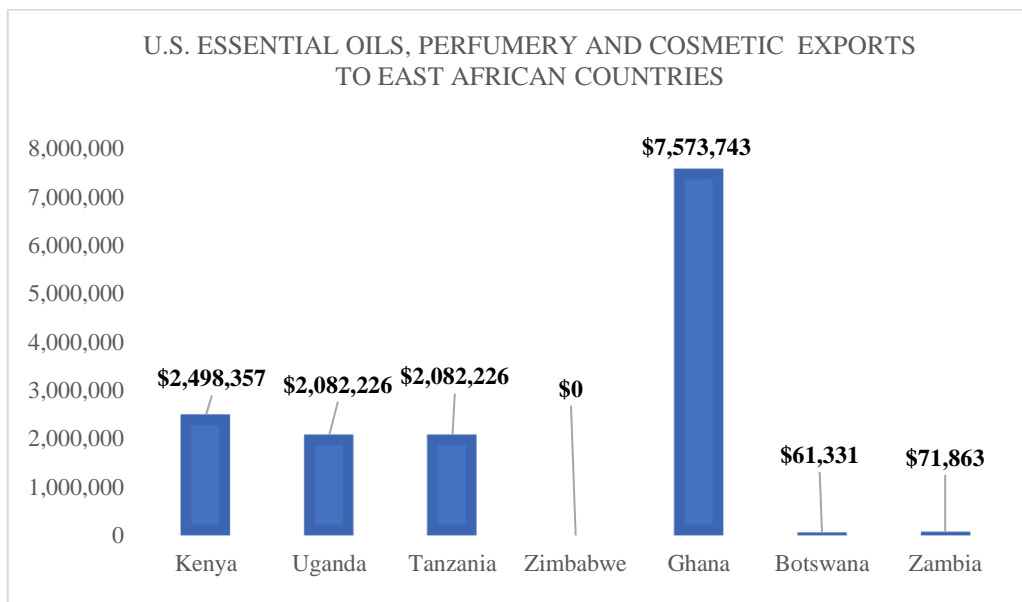


Figure 1. US exports to EAC countries in 2023

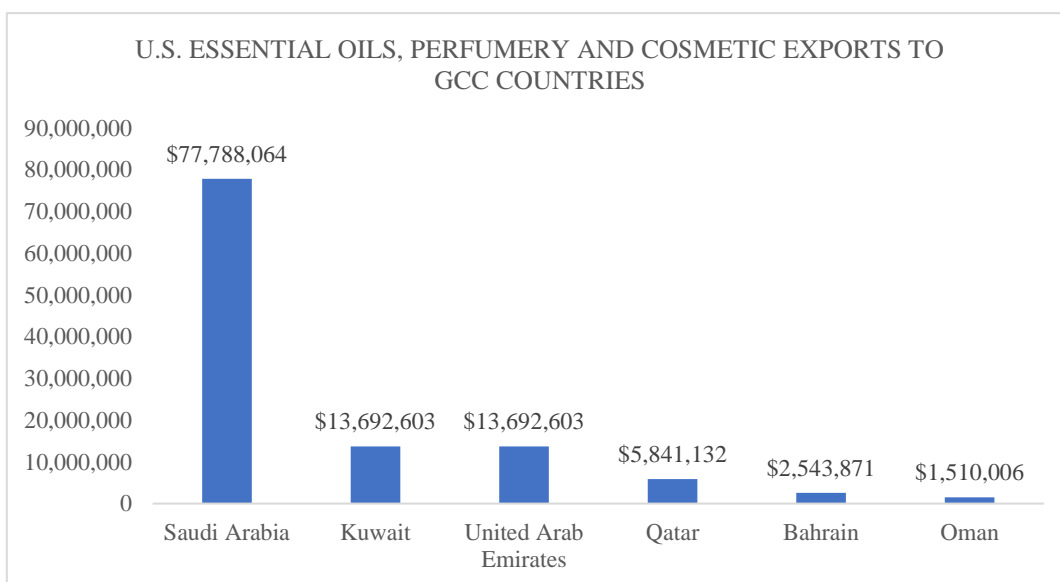


Figure 2. US exports to GCC countries in 2023

Though U.S. businesses are already well established in sectors like oil, gas, engineering and ICT (Information and Communications Technology), there is considerable opportunity for expansion in consumer goods such as cosmetics. Many Bahraini consumers shop the consumer goods online from GCC countries and other markets as the local traders have limited their goods in online platforms.

In conclusion, open economy of Bahrain, strong trade agreements and potential demand for cosmetics make it a booming market for U.S. companies looking to expand. (21)

**6. Conclusion**

Cosmetic regulation differs greatly between the United States and emerging economies, reflecting cultural values,

economic priorities and legal frameworks. The United States maintains stringent rules that emphasise consumer safety while demanding transparency and accountability from industry. Emerging markets, such as the GCC, ASEAN, CIS and EAC are evolving their rules to improve product safety and quality, while there are still issues in harmonising these standards and ensuring compliance.

By evaluating these regulatory frameworks, stakeholders can gain a better understanding of the global cosmetics scene, supporting safer practices and consumer trust. This comparative research emphasises the need for adopting international rules that safeguard consumers while meeting the different needs of global market places. As the global cosmetics business continues to expand, effective regulation will be critical in balancing safety, innovation and ethical practices.

### Acknowledgements

I would like to express my gratitude to International Journal of Drug Regulatory Affairs who gave me the opportunity to publish the article.

### Financial Disclosure statement:

The authors have no relevant affiliations or financial involvement with any organization or entity with a financial interest in or financial conflict with the subject matter or materials discussed in the manuscript. This includes employment, consultancies, honoraria, stock ownership or options, expert testimony, grants or patents received or pending, or royalties.

### Conflict of Interest

The authors declare that there is no conflict of interest regarding the publication of this article.

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