YOUNG LIVING
ESSENTIAL OILS

GENERIC TOPICAL AND AROMATIC CLAIMS

It's important to share essential oils and blends according to their recommended use. So what are the best claims and usage suggestions to give others for either cosmetic or dietary supplement essential oils? Check out some general suggestions below that can apply to any essential oil, plus their hows and whys.

GENERAL CLAIMS FOR ESSENTIAL OILS LABELED AS AROMATIC AND TOPICAL (COSMETIC):

Aromatic

- Can be added to certain cleaning products to infuse the home with its clean, refreshing aroma
- Has a peaceful and relaxing aroma
- Has a powerful aroma when diffused
- Has a refreshing and uplifting fragrance
- Has an inspiring and uplifting fragrance when diffused
- Diffuse this oil for a pleasant, stimulating aroma that no home should be without.

Topical

- May be worn topically as a refreshing perfume or cologne
- Maintains the appearance of healthy, toned skin
- Great for a topical application to moisturize for healthy-looking skin
- Add to a Young Living lotion or moisturizer to beautify and enhance the appearance of the skin
- Add to Young Living Bath & Shower Gel Base as you unwind from a long day.
- May complement some of your favorite shampoos, lotions, or skin care products.

GENERAL CLAIMS I CAN MAKE ESSENTIAL OILS LABELED AS A DIETARY SUPPLEMENT:

Dietary Supplement

- Supports a healthy lifestyle regimen*
- Supports wellness*
- Add to food or beverages to enhance the flavor.

HOW DOES THE LAW DEFINE A "COSMETIC" AND WHAT TYPE OF CLAIMS ARE ALLOWED?

Essential oils labeled for topical or aromatic use are classified as a cosmetic product. The Federal Food, Drug, and Cosmetic Act (FD&C Act) defines cosmetics by their intended use, as "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" [FD&C Act, sec. 201(i)]. Cosmetic products included in this definition are skin moisturizers, perfumes, lipsticks, fingernail polishes, eye and facial makeup preparations, cleansing shampoos, essential oils and aromatherapy products, as well as any substance intended for use as a component of a cosmetic product.

If a product is intended for a therapeutic use, such as treating or preventing disease, or to affect the structure or function of the body, it counts as a drug. For example, claims that a product will relieve colic, ease pain, increase focus or cognitive function, relax muscles, treat depression or anxiety, or help you sleep are drug claims. Despite substantiation, no matter how sound, U.S. regulations clearly indicate that stating or implying that the intention of the product is to have a physiological effect on any function or body system, the product will be classified as a misbranded drug. (Sec 201 (g) and (i), FD&C Act, Sec. 509, FD&C Act.)

HOW IS A PRODUCT'S INTENDED USE ESTABLISHED?

Intended use may be established in a number of ways. The following are some examples:

- Claims stated on the product labeling, in advertising, on the Internet, or in other promotional materials: Certain claims may cause a product to be considered a drug, even if the product is marketed as if it were a cosmetic. Such claims establish the product as a drug because the intended use is to treat or prevent disease or otherwise affect the structure or functions of the human body. Some examples are claims that a product will restore hair growth, reduce cellulite, treat varicose veins, increase or decrease the production of melanin (pigment) in the skin, or regenerate cells.
- Consumer perception: Established through the product's reputation, consumer perception means asking why the consumer is buying it and what the consumer expects it to do.
- Product ingredients: Ingredients can cause a product to be considered a drug because they may have a well-known therapeutic use to both the public and industry. One example is the fluoride found in many toothpastes.

HOW DOES ESTABLISHING INTENDED USE APPLY TO ESSENTIAL OILS?

For example, a fragrance marketed for promoting attractiveness is classified as a cosmetic. However, a fragrance marketed with certain aromatherapy claims, such as statements or implications that the scent will help the consumer sleep or quit smoking,

meets the definition of a misbranded drug because of its intended use. Similarly, a massage oil that is simply intended to lubricate the skin and impart fragrance is a cosmetic, but if the product is intended for a therapeutic use, such as relieving muscle pain, it's a misbranded drug.

Under the law, cosmetic products are allowed to make claims involving their ability to cleanse, beautify, promote attractiveness, or alter the appearance of the user. Cosmetic products are not allowed to be marketed based on structure/functions claims.

WHAT IS A "STRUCTURE-FUNCTION CLAIM"?

U.S. regulations define a structure/function claim as statements claiming a benefit related to the healthy structure or function of any part of the body due to the consumption of a product or ingredient. This includes statements of nutritional support that are health-related but that do not mention names or characteristics of a specific disease (e.g., inflammation as a symptom of arthritis), as well as statements of general well-being.

WHY DO I NEED TO KNOW DIETARY SUPPLEMENT CLAIMS?

Companies and independent distributors of the company are responsible for all stated and implied product claims on labels, websites and any marketing collateral. Before a claim is made, the content should be reviewed to ensure it is truthful and not misleading, that no disease or implied disease claim is made, and that the company has adequate science on hand to support all statements that include allowable structure-function claims.

Both the FDA and the FTC require companies to have competent and reliable scientific evidence at the time statements/claims are made. This means that companies that produce wellness products should rely on objective tests, analyses, research, studies, and other evidence based on the expertise of professionals in the relevant area that is generally accepted among the scientific community. The "gold standard" is generally considered to be one or more double blind, placebo-controlled, well-designed clinical trials conducted on the specific product.