URBAN OUTFITTERS INC.

USA Beauty Guideline

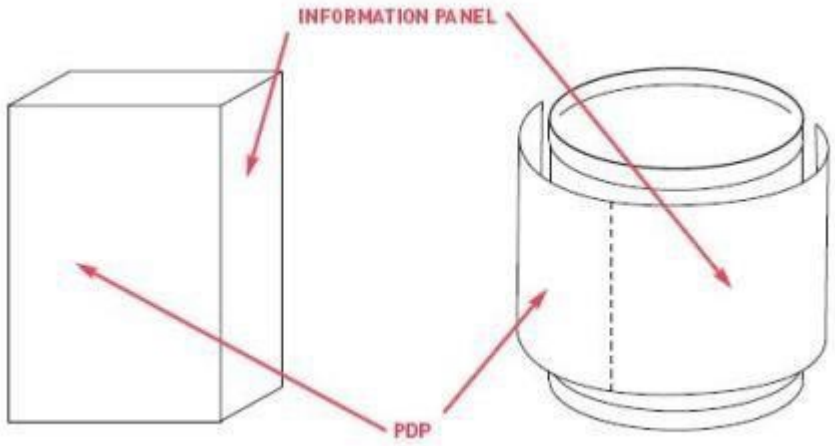
Contents

Background:

1. Cosmetic Packaging is any primary or secondary packaging used to protect and transport cosmetic products with the intended purpose of cleansing, beautifying, or enhancing a person's appearance.
2. Please follow the FDA guidelines to determine if your product falls under cosmetics regulations.
3. All cosmetics must adhere to FDA regulations.
4. Please visit https://www.fda.gov/Cosmetics/ for additional information.
5. We also recommend following California's Safe Cosmetics Act of 2005: https://archive.cdph.ca.gov/programs/cosmetics/Pages/default.aspx

Labeling Terms

1. Labeling: This term refers to all labels and other written, printed, or graphic matter on or accompanying a product [FD&C Act, sec. 201(m); 21 U.S.C. 321(m)].
2. Principal Display Panel (PDP): This is the part of the label most likely displayed or examined under customary conditions of display for sale [21 CFR 701.10].
3. Information Panel: Generally, this term refers to a panel other than the PDP that can accommodate label information where the consumer is likely to see it. The information on this panel must be prominent and conspicuous.



Principal Display Panel (PDP)

1. Identity Statement -in both English and French**,** indicating the nature and use of the product, by means of either the common or usual name, a descriptive name, a fanciful name understood by the public, or an illustration [21 CFR 701.11].
2. Net Quantity of Contents – in both English and French (metric and imperial units). An accurate statement of the net quantity of contents in terms of weight, measure, numerical count or a combination of numerical count and weight or measure [21 CFR 701.13].

Informational Display Panel (IDP)

1. Distributor statement: Name and address of manufacturer, packer or distributor. If the name and address are not those of the manufacturer, the label must say "Manufactured for..." or "Distributed by..." [21 CFR 701.12]. The name of the firm must be the corporate name, and the address may be that of the principal place of business. Stating also the name of a corporation's division is optional. The business address must include the street address, name of the city and state, and the ZIP code. The street address may be omitted if the firm is listed in a current city or telephone directory.

2. Country of origin.

3. Material facts: Failure to reveal material facts is one form of misleading labeling and therefore makes a product misbranded [21 CFR 1.21]. An example is directions for safe use if a cosmetic product has the potential to be misused.

4. Warning and caution statements: These must be prominent and conspicuous. The FD&C Act and related regulations specify warning and caution statements related to specific products [21 CFR part 700]. In addition, cosmetics that may be hazardous to consumers must bear appropriate label warnings [21 CFR 740.1]. Flammable cosmetics such as aerosols are an example of products that require specific warnings.

5. Ingredients: If a cosmetic product is sold on a retail basis to consumers, even if it is labeled "For professional use only" or words to that effect, the ingredients must appear on an information panel, in descending order of predominance. [21 CFR 701.3]. The ingredient declaration must be conspicuous so that it is likely to be read at the time of purchase. If the product is also an over-the-counter (OTC) drug, its labeling must comply with the FDA regulations for both OTC drug and cosmetic ingredient labeling. Cosmetics which are also drugs must first identify the drug ingredient(s) as "active ingredient(s)" before listing the cosmetic ingredients (21 CFR 701.3(d)). Ingredients must be listed only by their INCI (International Nomenclature of Cosmetic Ingredients) names. In the absence of an INCI name you may also use the name given in the United States Pharmacopeia, National Formulary, Food Chemical Codex, USAN, and the USP dictionary of drug names.

6. Directions – Directions, warnings or cautions, in English and French, where necessary for safe use (if hazardous to consumers when misused).

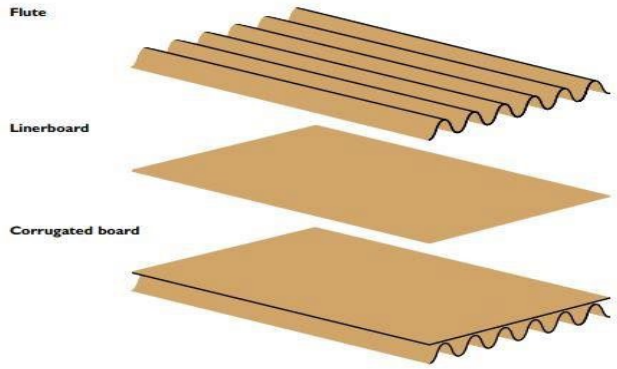
7. Batch Number

Examples of primary packaging:

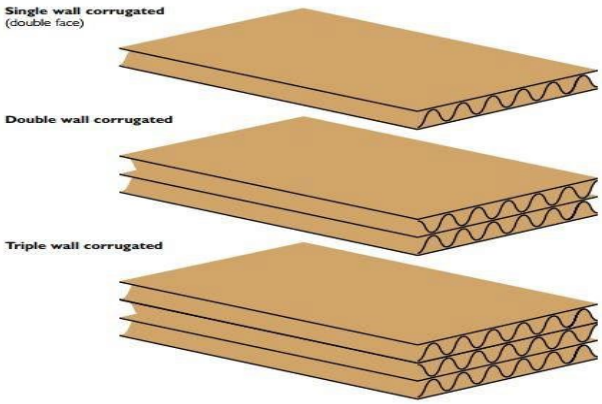
Plastic jars	Glass tubes
Glass jars	Airless bottles
Mist sprayers	Dispensers
Plastic bottles	Deodorant bottles
Glass bottles	Caps
Bamboo packaging	Foam bottles
Roll-on containers	Closures
Color packaging	Wooden packaging
Plastic tubes	Triggers
Perfume bottle	

Corrugate Boxes

1. Secondary packaging for the cosmetic and beauty category is traditionally corrugated boxes. Corrugated boxes are made of fiberboard that contains a linerboard, fluting, and another layer of linerboard.



2. Corrugate boxes typically come in single wall or double wall layers, but on the rare occasion, a vendor can use triple wall corrugate. Triple wall corrugate is not used as secondary packaging for beauty and cosmetic products.



3. Boxes should be rated as 32ECT or greater or 200lb burst or greater. All secondary packaging boxes should have a BMC (Box Manufacturer's Certificate) stamp certifying the quality of their boxes.

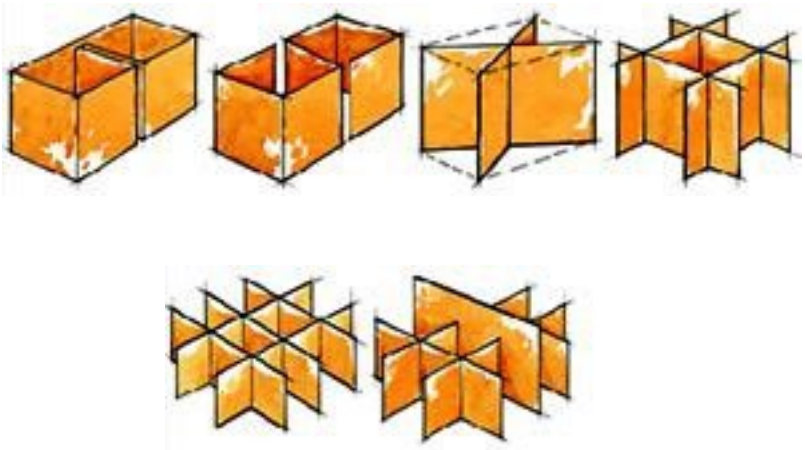
Burst Test

ECT (EDGE CRUSH TEST

Corrugate Partitions

1. Corrugate partitions can be used to separate and protect delicate and fragile packaged goods. Partitions should be minimum B-flute and able to adequately separate the product within the packaging container.

Example:



Seals and Closures

1. Plastic containers containing greater than 8 ounces must have an induction seal.
2. Product that cannot be sealed must pass ASTM D3078 Standard Test method for Determination of Leaks in Flexible Packaging by Bubble Emission.
3. To protect the induction seal, product intended to be dispensed via spray nozzle must be packed separately from the bottle.
4. Glass bottles do not have to have a induction seal.

Example

Box Filling

1. No packing peanuts are to be used
2. Items must be packed as individual units or set.
3. Items must be tightly packed within packaging.
4. All voids must be filled with dunnage.
5. Styrofoam is preferred. Minimum ½ inch foam on bottom of carton. Minimum ¼ inch on top and sides of carton.
6. Partitions (internal dividers) must be used in all boxes.
7. If possible, tightly pack glass pieces in individual boxes.
8. Bubble wrap can be used to cover individual items and fill voids inside the carton.

Taping Requirements

All corrugated containers must be securely closed. Methods may include: Tape, glue, or staples.

Closure reference guideline:

Method	Product Weight	Application
Tape	All	Flap closure
Glue	<50 lbs.	Manufacturers joint & flap closure
	>50 lbs.	Manufacturers Join
Staple	>50 lbs.	Bottom flap closure & manufacturers joint

Taping Specs:

Tape Width	Package Weight	Package Width
2in. (51mm)	<25lbs. (11.3kg)	<24 in (61 cm)
3 in (76 mm)	>25lbs (11.3 kg)	>24in (61 cm)

Toxins in Packaging

Vendors are encouraged to follow Toxins ins packaging legislation. This legislation promotes the reduction or elimination of **cadmium, lead, mercury,** and **hexavalent chromium** in product packaging.

Please reference www.toxinsinpackaging.org for additional information.

State Toxics in Packaging Laws	EU Packaging Directive (94/62/EC,	EU RoHS Directive	EU RoHS Directive
	Article 11)	(2002/95/EC)	(2002/95/EC)
Intentional Use of Any of the 4 Heavy Metals Identified Below	Prohibited at any level	Not addressed	Not addressed
Maximum Concentration Limit: Cadmium	< 100 ppm (0.01%) by weight for sum of 4 restricted metals in packaging or packaging components; applies only to incidental presence	< 100 ppm by weight for sum of 4 restricted metals in packaging or packaging components	< 0.01% by weight (100 ppm) in homogeneous materials
Maximum Concentration Limit: Hexavalent Chromium	< 100 ppm (0.01%) by weight for sum of 4 restricted metals in packaging or packaging components; applies only to incidental presence	< 100 ppm by weight for sum of 4 restricted metals in packaging or packaging components	< 0.1% by weight (1,000 ppm) in homogeneous materials
Maximum Concentration Limit: Lead	< 100 ppm (0.01%) by weight for sum of 4 restricted metals in packaging or packaging components; applies only to incidental presence	< 100 ppm by weight for sum of 4 restricted metals in packaging or packaging components	< 0.1% by weight (1000 ppm) in homogeneous materials
Maximum Concentration Limit: Mercury	< 100 ppm (0.01%) by weight for sum of 4 restricted metals in packaging or packaging components; applies only to incidental presence	< 100 ppm by weight for sum of 4 restricted metals in packaging or packaging components	< 0.1% by weight (1000 ppm) in homogeneous materials
Maximum Concentration Limit: Total of All 4 Metals	< 100 ppm (0.01%) by weight in packaging or packaging components; applies only to incidental presence	<100 ppm by weight in packaging or packaging components	Not addressed

TRANSIT TESTING

1. All products are recommended to **pass** ISTA transit testing unless noted by your buyer. Samples must be sent to an ISTA certified labs and results should be shared with your buyers. Transit testing
2. Please contact the buyer or production coordinator for exceptions.
3. Certified labs can be found here: http://www.ista.org/members/labs.php
4. ISTA (International Safe Transit Association) is an organization focused on developing standards for packaged products. These standards challenge the capability of a package and product to withstand transportation hazards. These standards simulate packaging hazards but cannot account for all the various conditions during transportation.

ISTA benefits:

1. Shortened packaged development time and confidence in product launch.
2. Protection of products and profits with reduced damage and product loss.
3. Customer satisfaction and continued business.

Before Testing:

1. Determine what constitutes a damaged product.
2. Determine the tolerance level of damage – how much damage is allowable.
3. Determine the acceptable package condition at conclusion of test.

Samples should be in an untested package. If a package or product is not available, substitutes will be accepted. Substitutes must be identical as possible to actual items.

ISTA TEST	
ISTA 3A	For packages up to 150 pounds (70kg). For packages that could be shipped direct to DC or to customer.

3A	**Types of Packages**
Standard	• Traditional fiberboard cartons, as well as plastic, wooden or cylindrical containers.
Small	• Volume is less than 800in^3 (13,000 cm^3) • Longest dimension is 350 mm (14in) or less • Weight is 10lbs (4.5 kg) or less
Flat	• Shortest dimension is 200mm (8in) or less • Next longest dimension is four or more times larger than the shortest dimension • Volume is 13,000 cm^3 (800 in^3) or greater
Elongated	• Longest dimension is 900mm (36 in) or greater • Both of the packages other dimension (height) are 20% or less of the longest dimension

ISTA PROCEDURES:

3A Procedure Overview **Standard Package**			
Sequence Number	**Test Category**	**Test Type**	**For ISTA Certification**
1	Atmospheric	Ambient temperature and humidity preconditioning	Required
2	Atmospheric	Controlled temperature and humidity preconditioning	Optional
3	Shock	9 drops	Required
4	Vibration	Random vibration with and without top load	Required
5	Vibration	Random vibration under low pressure	Optional
6	Shock	8 drops	Required

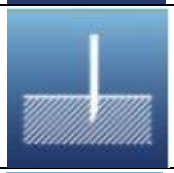
3A Procedure Overview Small Package			
Sequence Number	**Test Category**	**Test Type**	**For ISTA Certification**
1	Atmospheric	Ambient temperature and humidity preconditioning	Required
2	Atmospheric	Controlled temperature and humidity preconditioning	Optional
3	Shock	9 drops	Required
4	Vibration	Random vibration with and without top load	Required
5	Vibration	Random vibration under low pressure	Optional
6	Shock	7 drops	Required

3A Procedure Overview Flat Package			
Sequence Number	**Test Category**	**Test Type**	**For ISTA Certification**
1	**Atmospheric**	Ambient temperature and humidity preconditioning	Required
2	**Atmospheric**	Controlled temperature and humidity preconditioning	Optional
3	**Shock**	9 drops	Required
4	**Vibration**	Random vibration with and without top load	Required
5	**Vibration**	Random vibration under low pressure	Optional
6	**Shock**	8 drops	Required
7	**Shock**	Rotational edge drop	Required

8	**Shock**	Rotational flat drop	Required
9	**Shock**	Concentrated impact	Required

3A Procedure Overview Elongated Package			
Sequence Number	**Test Category**	**Test Type**	**For ISTA Certification**
1	Atmospheric	Ambient temperature and humidity preconditioning	Required
2	Atmospheric	Controlled temperature and humidity preconditioning	Optional
3	Shock	9 drops	Required
4	Vibration	Random vibration with and without top load	Required
5	Vibration	Random vibration under low pressure	Optional
6	Shock	8 drops	Required
7	Shock	Rotational edge drop	Required
8	Shock	Rotational flat drop	Required
9	Shock	Bridge impact	Required

Additional Tests

Closure torque	C losure Torque Testing is a measure of the torque force required to either apply or remove a twist cap, stopper or lid on a container.	
Torque to turn.	Torque to turn is what it takes to overcome friction and inertia in a rotating system.	
Top-load / Crush resistance.	Top-load and crush resistance testing reduces the risk of containers deforming or failing when subject to forces during filling, closure, storage and transport.	
Puncture resistance	Puncture resistance is a function of controlled stretch and tear at a point.	
Penetration Resistance	Penetration resistance testing involves the insertion of a probe into a material with thickness	
Flexure / Bend	Test to determining how something will react when it is put under opposing forces across a span.	
Pull-off / Pull-out test	Test to ensure that your product meets required standards and expected performance.	
Recommended Lab	Mecmesin http://www.mecmesin.com	

Resources:

3C Inc. - http://www.c3cinc.com/
ABA Packaging Corp. - http://www.abapackaging.com/
AIROPACK - http://www.airopack.com/
Alpha Packaging - http://www.alphap.com/
Anomatic - http://www.anomatic.com/
APC PACKAGING - http://www.apcpackaging.com/
Arkay Packaging - http://www.arkay.com/
Auber Packaging Co., Ltd - http://www.auberpackaging.com/
Baralan USA/Arrowpak - http://www.baralanusa.com/
Cameo Metal Products - https://www.cameometal.com/
Color Carton Corp. - http://www.colorcarton.com/
Corpack GmbH - http://www.corpack.de/en/
Cosmetic & Perfume Filling & Packaging, Inc. - http://www.cpfpi.com/
Cosmopak USA LLC - http://www.cosmopak.com/
Decotech - http://decotech-inc.com/
East Hill Industries, Inc. - https://www.packagingcosmetics.com/
EPOPACK Co. Ltd - http://www.epopack.com/
Federal Package - http://www.federalpackage.com/
Fusion Packaging - http://www.fusionpkg.com/
GAR Labs - http://www.garlabs.com/
GCC Packaging Group - https://www.webpackaging.com/en/portals/gccpackaginggroup/
Global Packaging Inc. - http://www.glopkg.com/
HCT Packaging, Inc. - https://hctgroup.com/
HLP Klearfold - http://www.hlpklearfold.com/
Holliston LLC - http://holliston.com/
ICMAD - https://www.icmad.org/
Inoac Packaging Group Inc. - https://inoacusa.com/
International Cosmetic Suppliers Ltd. - https://www.ics-world.com/
JFA-Flock Applikationen GmbH - http://www.jfa-flock.com/index.php/en/
JSN Cosmetic Packaging - http://www.jsn.com/
Kaufman Container - http://www.kaufmancontainer.com/
Kurz USA - http://www.kurzusa.com/
Label Technology - http://www.labeltech.com/
Libo Cosmetics Co., Ltd. - http://www.libocosmetics.com/en/
Lombardi Design & Manufacturing - https://lombardi.cc/
M C Packaging Corporation - http://www.mcpackaging.com/
Madeline Blondman & Co., Inc. - http://www.madelineblondman.com/
MJS Packaging - http://www.mjspackaging.com/
Neenah Packaging - http://www.neenahpackaging.com/
Nest-Filler USA - http://www.nest-filler.com/
New High Glass Inc. - https://newhighglass.net/#!/container/Home
Olcott Plastics - http://www.olcottplastics.com/
Oliver Printing & Packaging - http://www.olcottplastics.com/
Orlandi Inc. - http://orlandi-usa.com/

Paklab - http://www.paklab.com/
Screen Tech/Spray Tech, Inc. - http://screentech-nj.com/
TaikiUSA - http://taikibeauty.com/
Tap Packaging Solutions - http://tap-usa.com/
Tekni-Plex - http://www.tekni-plex.com/
Transparent Container Corp. - http://www.transparentcontainer.com/