

2026-10-01 — Can You Private Label Essential Oils and Aromatherapy Kits for Amazon? Claims, Hazmat Review and Packaging

Draft for Product Management Group. Not on the website. Topic from real lead questions ("private-label aromatherapy kits and essential oils for Amazon"); not in the Blogs folder or sitemap.

For the website

Meta title: Private Label Essential Oils for Amazon: Rules | PMG (52 characters)

Meta description: Private label essential oils or aromatherapy kits for Amazon: how claims set the FDA category, what hazmat review needs, and when caps must be child-resistant. (159 characters)

Suggested URL slug: /blog/private-label-essential-oils-aromatherapy-kits-amazon

Images (Unsplash License, free commercial use; both pages verified today)

- **Hero:** amber glass dropper bottle and blank outer box (mockup, no brand). [Photo page](#). Credit: "Photo by Mockup Free on Unsplash". Alt text: "Amber glass essential oil dropper bottle next to a plain white product box".
- **After "Why do essential oils get flagged for Amazon hazmat review?" (or above the Five-Gate section):** warehouse aisle with shelving and boxes, worker small in the distance and not identifiable. [Photo page](#). Credit: "Photo by Russ Murray on Unsplash". Alt text: "Fulfillment warehouse aisle with stocked shelves and boxed inventory".

Original graphic to build

"The Five-Gate Amazon Launch Path": a horizontal 5-step diagram in PMG navy and orange. Gates left to right: 1 Claims (icon: speech bubble; "Label + listing checked against FDA examples"), 2 SDS (icon: document; "Flash point per oil vs 60 °C"), 3 Packaging (icon: child-resistant cap; ">5% methyl salicylate? 10% hydrocarbon rule?"), 4 Labels & filing (icon: tag; "Box + bottle labels; MoCRA listing owner"), 5 FBA prep (icon: box; "FNSKU, bundling, polybags, case packs"). Under it, one line: "Each gate is cheaper to fix before the next." 1216×640 so it also works as the share image. Also offer the checklist as a PDF download, styled like the existing OTC Acne and Sugar-Free Gummy checklists (/downloads/Aromatherapy_Kit_Amazon_Checklist.pdf).

Can You Private Label Essential Oils and Aromatherapy Kits for Amazon? Claims, Hazmat Review and Packaging

*By the Owner, Product Management Group · 30+ years in consumer product manufacturing
Published October 1, 2026*

Short answer: Yes. Most essential oil and aromatherapy kits can be private labeled and sold on Amazon, but three things decide how smooth it is: your claims (FDA treats "helps you sleep" as a drug claim), each oil's Safety Data Sheet (Amazon reviews essential oils as possible dangerous goods), and packaging (liquids with more than 5% methyl salicylate need child-resistant caps).

Definition: A private label aromatherapy kit is a set of scent products (essential oils, diffuser blends, roller balls, bath salts) made by a contract manufacturer and sold under your brand. Which rules apply to it depends mostly on what you say it does.

Is an aromatherapy product a cosmetic, a drug or a consumer product?

Calling a product "aromatherapy" doesn't decide how it's regulated. FDA says the category comes from the product's intended use: "If a product is intended only to cleanse the body or to make a person more attractive, it's a cosmetic," while a product intended "to affect the structure or function of the body" is a drug [1]. FDA lists claims that a product will "relieve colic, ease pain, relax muscles, treat depression or anxiety, or help you sleep" as drug claims [1]. Intended use is not only what's printed on the bottle. FDA also looks at claims in advertising and on the internet, consumer perception, and ingredients with a well-known therapeutic use [2]. For an Amazon brand, that includes the listing title, bullets, A+ content and images. FDA also notes that some fragrance products, such as air fresheners and scented candles, are regulated by the Consumer Product Safety Commission (CPSC) [1].

Claim-to-category table

Product and claim	Likely category	Source
Perfume oil "to smell good"	Cosmetic	FDA [1]
Massage oil "to lubricate the skin and impart fragrance"	Cosmetic	FDA [2]
Massage oil "relieves muscle pain"	Drug	FDA [2]
Scent "helps you sleep" or "helps you quit smoking"	Drug	FDA [1][2]

Product and claim	Likely category	Source
Lotion that moisturizes and "relieves colic"	Cosmetic and drug	FDA [1]
Scented candle or air freshener	Consumer product (CPSC)	FDA [1]

A kit can mix categories. A roller ball sits in FDA territory, while a candle in the same box is a CPSC product. Plan each item on its own.

Why do essential oils get flagged for Amazon hazmat review?

Amazon lists essential oils, along with perfume sprays and nail polish, as examples of everyday products that can be dangerous goods ("hazmat"), meaning they "could pose a risk if not stored, shipped, or handled properly" [3]. Sellers upload either a Safety Data Sheet (SDS) or an exemption sheet for review [3].

The number that usually decides the outcome is the flash point. Under U.S. transport rules, a liquid with a flash point of not more than 60 °C (140 °F) is a flammable liquid [4]. Under the Federal Hazardous Substances Act, a liquid is "flammable" if its flash point is above 20 °F and below 100 °F, and "combustible" from 100 °F up to 150 °F [5]. Each oil's SDS states its flash point, so ask your manufacturer for an SDS per oil and per blend before you create listings.

When do essential oils need child-resistant packaging?

Under the Poison Prevention Packaging Act rules, "liquid preparations containing more than 5 percent by weight of methyl salicylate" (other than pressurized sprays) must be in child-resistant packaging [6]. Wintergreen oil contains methyl salicylate. In December 2025, CPSC warned consumers to stop using a wintergreen essential oil sold on Amazon.com from May 2022 through August 2025 because it was not in child-resistant packaging [7].

A second rule covers some thin, oily liquids: non-emulsion liquid drugs or cosmetics with 10% or more hydrocarbons by weight and a viscosity under 100 SUS at 100 °F need child-resistant packaging too, with listed exemptions [6]. Ask your manufacturer to check every blend against both rules before you choose caps and droppers.

What does each label need?

For items sold as cosmetics, FDA's labeling guide lists, among other things: an identity statement, net quantity of contents, the name and place of business of the manufacturer, packer or distributor, an ingredient declaration in descending order of predominance, and any warning statements needed to prevent a health hazard [9]. A kit has two levels, the outer box and each bottle, so decide early which information goes where.

Under the Modernization of Cosmetics Regulation Act (MoCRA), the "responsible person" is the manufacturer, packer or distributor whose name appears on the label. That person must list

each marketed cosmetic product with FDA, report serious adverse events within 15 business days and keep safety substantiation records. Manufacturers and processors must register their facilities and renew every two years [8]. If your brand is the name on the label, those listing duties are yours, so agree in writing who prepares the filings.

The Five-Gate Amazon Launch Path

Use these five gates in order. Each one is cheaper to fix before the next.

1. **Claims gate:** Write the label, listing title and bullets first, and check them against FDA's cosmetic and drug examples [1][2].
2. **SDS gate:** Collect an SDS for every oil and blend, and note each flash point against the 60 °C transport line [4].
3. **Packaging gate:** Check each blend for methyl salicylate above 5% and the hydrocarbon rule. Choose child-resistant closures where required [6].
4. **Label and filing gate:** Finish cosmetic labels for the box and each item [9], and assign MoCRA product listing to the responsible person [8].
5. **Prep gate:** Plan FBA prep for the kit: unit labels, bundling, polybagging and case packing. Amazon rejects inbound shipments that don't meet its prep and labeling rules [10].

What are the minimums and timeline at PMG?

PMG manufactures essential oils, diffuser blends, roller balls, bath salts, massage oils, candles, reed diffusers and room sprays, and sources essential oils with traceability documentation and GC/MS testing for purity and identity [11]. PMG's minimum order starts at 1,000 units on private label stock formulas and 5,000 units for custom formulations [12]. Private label puts finished product on the shelf in 60–90 days [13]. For a kit, confirm how the minimum applies to each item inside it.

On the Amazon side, PMG's fulfillment team handles FBA prep (FNSKU labeling, polybagging, suffocation warnings, bundling and case packing), kitting and FBM order processing [10]. See our [wellness and aromatherapy page](#), our [fulfillment and 3PL page](#), [private label vs custom formulation](#) and our guide to [MOQ and manufacturing volume](#).

Printable checklist: Aromatherapy Kit Amazon-Ready Checklist

- ☐ Every claim on the label, listing and images reviewed against FDA's cosmetic and drug examples
- ☐ Category decided for each item in the kit (cosmetic, drug, or CPSC consumer product)
- ☐ SDS on file for every oil and blend, with flash point noted
- ☐ SDS or exemption sheet ready to upload to Amazon for each listing
- ☐ Each blend checked for methyl salicylate above 5% (for example, wintergreen)
- ☐ Each blend checked against the 10% hydrocarbon and viscosity rule
- ☐ Child-resistant closures chosen where required; leak test on droppers and roller balls
- ☐ Identity, net quantity, name and place of business, ingredients and warnings on each label
- ☐ MoCRA product listing owner named in writing

- ☐ FBA prep plan: unit labels, bundling, polybags with suffocation warnings, case packs

Key numbers

- **5%:** methyl salicylate by weight above which liquids need child-resistant packaging [6]
- **10% / 100 SUS:** hydrocarbon content and viscosity that bring some liquid cosmetics under child-resistant rules [6]
- **60 °C (140 °F):** flash point at or below which a liquid is a flammable liquid for U.S. transport [4]
- **100 °F and 150 °F:** the upper limits for "flammable" and "combustible" liquids under the Federal Hazardous Substances Act [5]
- **15 business days:** deadline to report a serious cosmetic adverse event to FDA under MoCRA [8]
- **2 years:** how often cosmetic facility registrations must be renewed [8]

Glossary

- **SDS (Safety Data Sheet):** a standardized document listing a material's hazards and properties, including flash point.
- **Flash point:** the lowest temperature at which a liquid gives off enough vapor to ignite.
- **Dangerous goods (hazmat):** Amazon's term for products that could pose a risk if not stored, shipped or handled properly [3].
- **Exemption sheet:** a document a seller can upload to Amazon instead of an SDS for review [3].
- **PPPA:** the Poison Prevention Packaging Act, under which CPSC sets child-resistant packaging rules.
- **MoCRA:** the Modernization of Cosmetics Regulation Act of 2022.
- **Responsible person:** under MoCRA, the manufacturer, packer or distributor whose name appears on the label [8].
- **FNSKU:** Amazon's fulfillment barcode for an FBA unit.
- **FBM:** fulfilled by merchant; the seller (or its 3PL) ships Amazon orders.

Frequently asked questions

Can I call my blend "relaxing" or "for sleep"?

FDA lists "help you sleep," "relax muscles" and "treat depression or anxiety" as drug claims [1]. Words that describe the scent itself carry less risk than words about what it does to the body. Have every claim reviewed before you print labels or publish the listing.

Will Amazon accept essential oils through FBA?

Amazon reviews essential oils as possible dangerous goods, and you upload an SDS or exemption sheet for each listing [3]. The result depends on the review. Have each SDS ready before you create the listing, and plan for seller-fulfilled shipping (FBM) if a product can't go through FBA.

Do candles in the kit follow the same rules?

No. FDA lists scented candles and air fresheners among the fragrance products regulated by CPSC [1]. Treat each item in a mixed kit on its own.

Who registers with FDA under MoCRA, me or the manufacturer?

Manufacturers and processors register their facilities. The responsible person (the name on the label) lists each product and reports serious adverse events [8]. Agree in writing who prepares each filing.

What is the minimum order for a private label aromatherapy line at PMG?

PMG's minimum starts at 1,000 units on private label stock formulas and 5,000 units for custom formulations [12], and private label typically takes 60–90 days to reach the shelf [13]. [Request a consultation](#) to confirm how it applies to the items in your kit.

Sources

1. [FDA, "Aromatherapy" \(updated Sep 8, 2023\)](#)
2. [FDA, "Is It a Cosmetic, a Drug, or Both? \(Or Is It Soap?\)" \(updated Sep 11, 2024\)](#)
3. [Amazon, "What Amazon FBA sellers should know about dangerous goods \(hazmat\)" \(Jan 4, 2025\)](#)
4. [49 CFR 173.120, Class 3 flammable and combustible liquids](#)
5. [16 CFR 1500.3\(c\)\(6\), FHSA flammability definitions](#)
6. [16 CFR 1700.14\(a\)\(3\) and \(a\)\(32\), substances requiring special packaging](#)
7. [CPSC warning on a wintergreen essential oil sold on Amazon \(Dec 11, 2025\)](#)
8. [FDA, "Modernization of Cosmetics Regulation Act of 2022 \(MoCRA\)" \(updated Aug 10, 2026\)](#)
9. [FDA, "Cosmetics Labeling Guide"](#)
10. [PMG, Fulfillment & 3PL](#)
11. [PMG, Wellness & Aromatherapy](#)
12. [PMG homepage, "Built for startups, scaled for retail"](#)
13. [PMG, Private Label vs Custom Formulation](#)

Who might link to this (internal note, not for the email)

- Amazon seller education blogs and podcasts covering hazmat/dangerous goods for beauty and wellness products
- Aromatherapy and essential oil associations' member resource pages and newsletters
- Candle, soap and small-batch maker communities that move into essential oil kits
- Packaging and closure suppliers (child-resistant caps, droppers, roller balls) with compliance resource pages
- Small-business incubators and e-commerce accelerators with launch checklists

Linkable assets in this post

- Quotable definition (top)
- Claim-to-category table
- "The Five-Gate Amazon Launch Path" framework
- Printable "Aromatherapy Kit Amazon-Ready Checklist" (suggest as PDF)
- Key numbers box (6 cited figures)
- Glossary (9 terms)

JSON-LD (Article + FAQPage)

Swap the Article "image" for the hosted hero image URL once it's added. Strip the [n] source markers from the FAQ answers if the visible FAQs drop them.

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private label typically takes 60-90 days to reach the shelf. Request a
consultation to confirm how it applies to the items in your kit."}}
]
}

```

Fact-check log

29 claims checked in a second pass after drafting: 25 verified as written, 2 reworded, 2 removed. Every source was re-opened.

Claim	Source	Exact supporting phrase or page	Result
Products intended only to cleanse or make a person more attractive are cosmetics	[1]	"If a product is intended only to cleanse the body or to make a person more attractive, it's a cosmetic."	✓
Products intended to affect the structure or function of the body are drugs	[1]	"...or to affect the structure or function of the body, it's a drug."	✓
Relieve colic, ease pain, relax muscles, treat depression/anxiety, help you sleep = drug claims	[1]	"claims that a product will relieve colic, ease pain, relax muscles, treat depression or anxiety, or help you sleep are drug claims"	✓

Claim	Source	Exact supporting phrase or page	Result
Intended use can come from advertising, internet claims, consumer perception, ingredients	[2]	"Claims stated on the product labeling, in advertising, on the Internet..."; "Consumer perception..."; "Ingredients that cause a product to be considered a drug..."	✓
'Aromatherapy' is not a legal category	[1]	Page doesn't say this. Reworded to: calling it 'aromatherapy' doesn't decide how it's regulated; intended use does	✎
Fragrance products not applied to the body are CPSC products	[1]	Page names "air fresheners, scented candles, laundry detergents, and household cleansers". Narrowed to those examples	✎
Massage oil to lubricate/impart fragrance = cosmetic; to relieve muscle pain = drug	[2]	"a massage oil that is simply intended to lubricate the skin and impart fragrance is a cosmetic, but if... relieving muscle pain, it's a drug"	✓
Scent claimed to help sleep or quit smoking = drug	[2]	"assertions that the scent will help the consumer sleep or quit smoking, meets the definition of a drug"	✓
Lotion that moisturizes and relieves colic = cosmetic and drug	[1]	"a baby lotion marketed with claims that it both moisturizes the baby's skin and relieves colic would be both"	✓

Claim	Source	Exact supporting phrase or page	Result
Room spray in the CPSC table row	[1]	Not named by FDA	✗ removed
Amazon lists essential oils (with perfume sprays, nail polish) as dangerous goods examples	[3]	Bathroom examples: "perfume sprays, nail polish... essential oils"	✓
Dangerous goods 'could pose a risk if not stored, shipped, or handled properly'	[3]	Exact quote	✓
Sellers upload an SDS or exemption sheet	[3]	"safety data sheet or exemption sheet"	✓
Flammable liquid for transport: flash point not more than 60 °C (140 °F)	[4]	173.120(a)	✓
FHSA flammable: above 20 °F and below 100 °F	[5]	1500.3(c)(6)(ii)	✓
FHSA combustible: 100 °F to and including 150 °F	[5]	1500.3(c)(6)(iii)	✓
Liquids with more than 5% methyl salicylate need child-resistant packaging (except pressurized sprays)	[6]	1700.14(a)(3)	✓
Non-emulsion liquid drugs/cosmetics with 10%+ hydrocarbons and viscosity under 100 SUS at 100 °F need CR packaging, with exemptions	[6]	1700.14(a)(32); two exemptions (CR/permanent spray pumps; liquids that can't flow freely)	✓
CPSC Dec 2025 warning: wintergreen	[7]	Dated Dec 11, 2025; "sold online at	✓

Claim	Source	Exact supporting phrase or page	Result
oil sold on Amazon May 2022–Aug 2025, no CR packaging		Amazon.com from May 2022 through August 2025"	
Wintergreen oil contains methyl salicylate	[7]	"the oil contains methyl salicylate, which must be in child resistant packaging"	✓
Birch oil contains methyl salicylate (checklist)	—	No primary source opened	✗ removed
Cosmetic label elements: identity, net quantity, name and place of business, ingredients in descending order, warnings	[9]	21 CFR 701.11, 701.13, 701.12, 701.3, 740; worded "among other things"	✓
MoCRA responsible person = manufacturer, packer or distributor named on the label	[8]	Exact definition	✓
Responsible person lists products, reports serious AEs within 15 business days, keeps safety substantiation	[8]	Quoted requirements	✓
Facilities register and renew every two years	[8]	"register their facilities with FDA and renew their registration every two years"	✓
PMG makes essential oils, diffuser blends, roller balls, bath salts, massage oils, candles, reed diffusers, room sprays; GC/MS and traceability	[11]	Wellness page lists and "traceability documentation and GC/MS testing for purity and identity"	✓

Claim	Source	Exact supporting phrase or page	Result
PMG MOQ 1,000 private label stock / 5,000 custom	[12]	Homepage: "Our MOQ starts at 1,000 units on private label stock formulas and 5,000 units for custom formulations"	✓
Private label on shelf in 60–90 days	[13]	"Private label puts finished, retail-tested product on the shelf in 60–90 days at a 1,000 unit MOQ"	✓
PMG FBA prep list; Amazon rejects non-compliant inbound shipments	[10]	"Amazon FBA prep: FNSKU labeling, polybagging, suffocation warnings, bundling, case packing"; "Amazon has prep and labeling requirements that reject non-compliant inbound shipments"	✓