

Hotel Amenity Label & Launch Checklist

Complete before you approve labels or schedule a first run of guest bath and body products.

Brand / property

Date

LABEL

- ☐ Statement of identity on the front panel (for example, "Body Wash")
- ☐ Net quantity of contents, set apart from other printing on the front panel
- ☐ Ingredients in descending order of predominance
- ☐ Name and place of business of the manufacturer, packer or distributor
- ☐ U.S. address, phone number or electronic contact for adverse event reports (MoCRA)
- ☐ Warning statements where required, printed prominently
- ☐ Fragrance allergens: MoCRA requires disclosure once FDA sets the list by rule, so leave room on the label

CLAIMS AND REGISTRATION

- ☐ No antibacterial or medical claims, unless you are launching an OTC drug with a Drug Facts label
- ☐ Registration and listing: manufacturers and processors register facilities with FDA every two years; each marketed product is listed with its ingredients and updated annually. Certain small businesses (under \$1,000,000 in average U.S. cosmetic sales over the previous 3 years, adjusted for inflation) are exempt from registration and listing.

FORMAT AND LAUNCH

- ☐ Dispenser plan: confirm with your manufacturer how refill containers and dispensers will be labeled, and check state rules where you operate
- ☐ Format by location: dispensers or large bottles for rooms in restricted states; retail sizes for the spa or gift shop

Notes

SOURCES

FDA, "Cosmetics Labeling Guide"

FDA, "Modernization of Cosmetics Regulation Act of 2022 (MoCRA)"

FDA, "Guidance for Industry: Registration and Listing of Cosmetic Product Facilities and Products"

FDA, "Is It a Cosmetic, a Drug, or Both? (Or Is It Soap?)"

NY DEC; WA Department of Ecology; CBS News Sacramento (state small-bottle rules)

General planning aid, not legal or regulatory advice. Confirm requirements with your manufacturer and regulatory reviewer.