

CONVEYING BEAUTY THROUGH LANGUAGE: HOW TO STOP PRODUCT RECALLS AND INCREASE SPEED TO MARKET

WORD360



TABLE OF CONTENTS:

INTRODUCTION	03
LABELLING REGULATIONS	04
THE IMPACTS OF RECALLS	08
REDUCING LABELLING RECALLS	09
BEATING THE COMPETITION TO MARKET	10
APPEALING TO INTERNATIONAL MARKETS	11
SAFETY IN TRANSLATION	12
AVOIDING RECALLS AND REACHING NEW CUSTOMERS	13

INTRODUCTION

The beauty industry is subject to a long list of very stringent controls on the products it brings to market and how they are labelled, which vary from country to country. Meeting these regulations can be a headache but is not a stage of product launch that can be taken lightly.

To complicate matters further for the beauty and cosmetics world, Brexit is adding additional convolutions, with new regulatory standards. This is creating what may seem to be almost a moving target for companies looking to sell into or out of the UK, as many industries are experiencing already.

Mislabelling when reaching new markets is, in some cases, deadly, and in many others likely to lead to product recalls, which are expensive and damaging to trust.

By considering carefully how you label your products for new markets, you can get there quicker than the competition, outsell them by speaking your customers' languages, and make sure that your product doesn't end up hitting headlines in anger in a costly recall.



LABELLING REGULATIONS

Meeting labelling requirements is your first challenge with regards to communicating your product to consumers in a way that is both safe and informative. To complicate matters further, Brexit has created worry of something akin to a moving target with regards to international regulations of all kinds.

UP TO SCRATCH

Cosmetics and beauty products are subject to particularly stringent regulations under UK and EU law, because their application nature means applying products directly to skin and hair.

[The General Product Safety Regulations of 2005](#) cover labelling specifically as a part of their consumer protections.

Manufacturers are bound by law to [not mislead consumers about](#):

- Quantity or size
- Price
- What it's made of
- How, where, and when it was made
- What you claim it can do
- The people or organisations that endorse it

[The Cosmetic Products Enforcement Regulations of 2013](#) also set out specific requirements for the information that must be included on cosmetics labels.

These are:

- Name and address of the 'Responsible Person'
- Country of origin, for imported goods
- Nominal quantity of contents
- Date of minimum durability (best before date) or, where the minimum durability period is more than 30 months, a Period After Opening (POA)
- Warning statements and precautionary information
- Batch number
- Product function, when not obvious from its packaging or presentation
- List of ingredients

Meeting all of these requirements is a must when labelling your cosmetics products, and products that are found not to be liable to be recalled or prevented from going to market in the first place.

A MOVING TARGET

As of the 31st December 2020, the UK is no longer a member of the EU. This means new regulations surrounding products imported or exported to and from the UK.

As [some industries are learning](#) to their cost, Brexit has already caused disruption to our trade with the EU. This has created something of a moving target for those who need to adhere to import/export regulations.

Current regulations in force in the UK are modelled on an EU-wide initiative agreed during our membership of the Bloc, but as of the 1st January 2021, the UK operates its own UK Cosmetics Regulations, listed in [Schedule 34](#) of the UK Statutory Instrument Product Safety and Metrology et. (Amendment etc.) (EU Exit) regulation 2019. There are a few key changes to be aware of:

- **Responsible Person (RP):**

Each product to be sold on the EU market [requires the allocation of an RP](#), a legal entity that must be “established within the Community”.

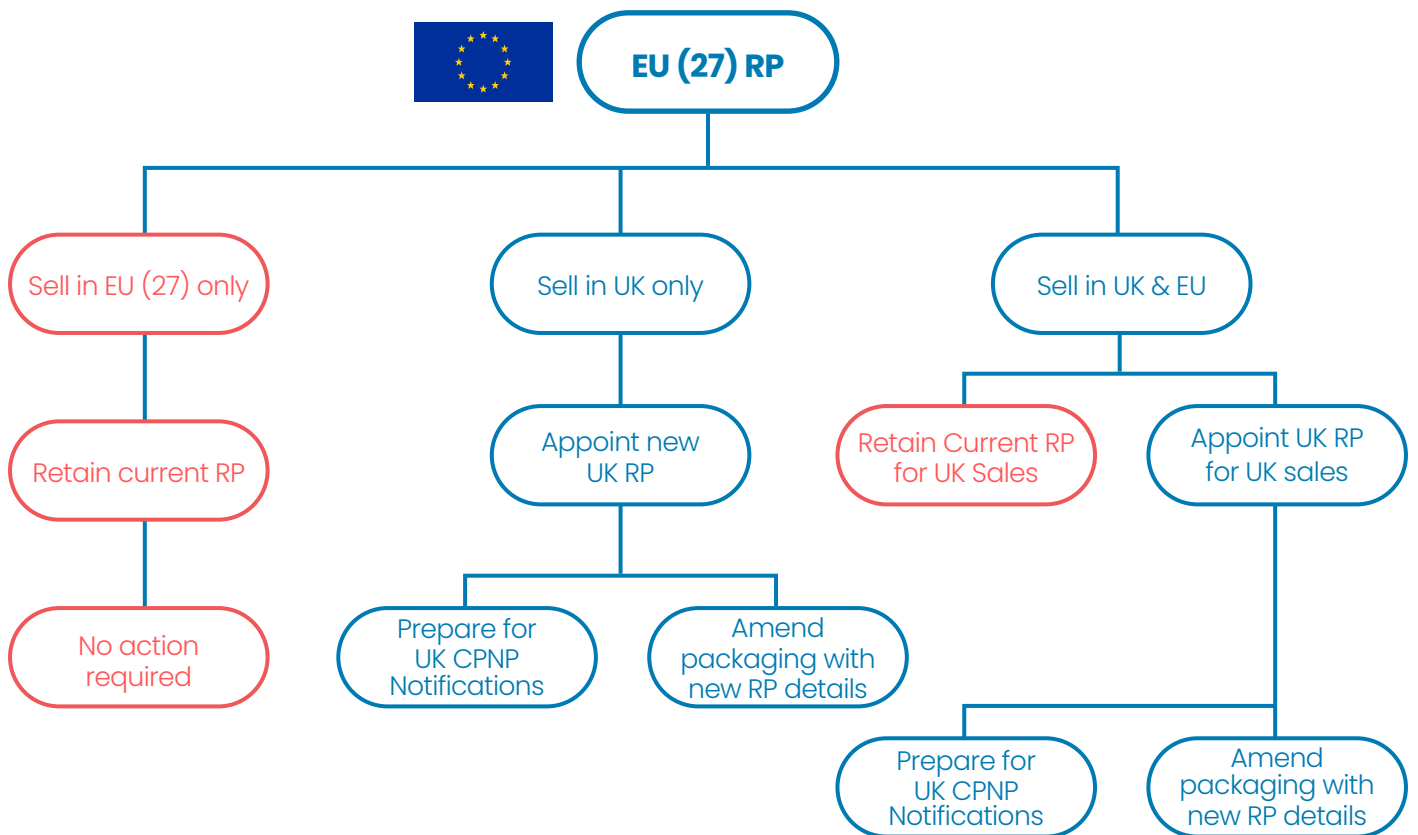
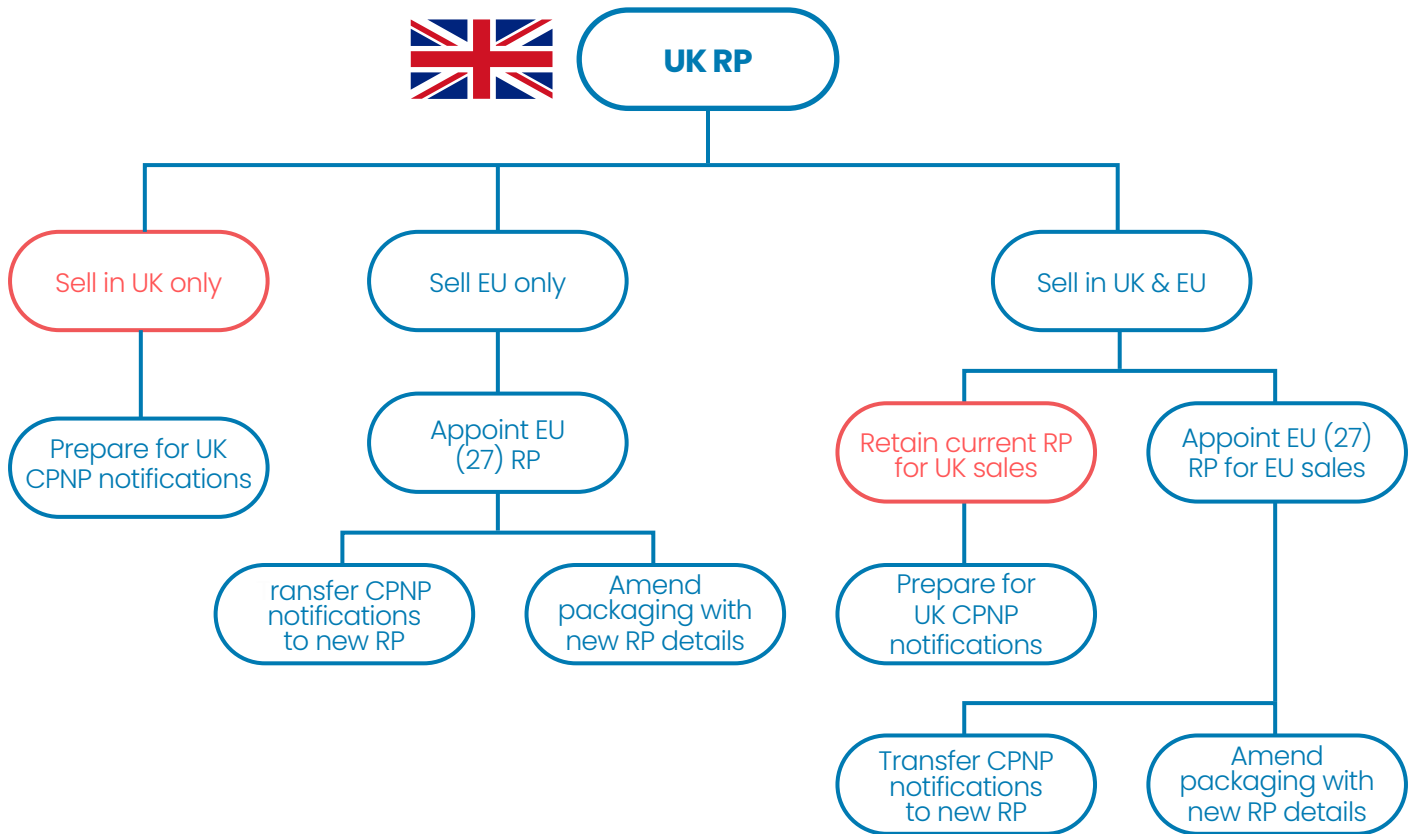
The RP is a significant responsibility and places the title holder in the position of liability with regards to ensuring product quality and safety, and they must be able to discuss technical and safety issues with the relevant Competent Authority. This person can also request sensitive product and company information as part of fulfilling their responsibility.

Prior to Brexit, products could be sold in both the EU and the UK under a single RP. Now, post-Brexit, such products are subject to the need for two separate RPs: one for the EU and one for the UK.

If you did not find an alternative RP for your products being sold to the EU, or vice versa, before the 1st January 2021, the RP for your products is now the importer. This means that this importer has the right to request sensitive information from you.

Additionally, the importer may not want to accept liability for your product’s safety, and may decide to stop importing your product until you can find an alternative RP.





- **CPNP Notifications:**

The EU Cosmetic Product Notification Portal (CPNP) deactivated all UK registered entities on the 31st December 2020. If you did not register a new EU RP before this date, your RP will now have been removed from the CPNP.

The UK now has its own alternative for products placed on the UK market, meaning that those looking to sell products across the EU and the UK will need to be registered with both the CPNP and the UK alternative with their separate RPs.

- **Re-labelling:**

As of 30th December 2020, products with an EU RP have 2 years to add their UK RP to their product labels. Additionally, products made in the EU to be sold in the UK will no longer be able to simply state 'Made in the EU' as their country of origin. They must now name the specific nation they were made in, such as 'Made in France'.

Similarly, products made in the UK to be sold in the EU must now state 'Made in the UK', as a pose to 'Made in the EU'.

Additionally, there will be changes to CE markings. [In most cases](#), companies are still permitted to use the CE mark until 1st January 2022, but after that date products sold in the UK which would otherwise have carried the CE mark will have to bear the UKCA mark instead.

This means that if you're looking to sell a product in both the UK and the EU, it now needs to display the CE and UKCA marks. To market a product in the EU, you'll also need to ensure that your consumers can read all the information presented to them, which means presenting it in their language too.



THE IMPACTS OF RECALLS

The likely result for products that have been mislabelled in the regulatory sense is a recall. In most cases this will happen for a relatively minor reason, but the worst case would be that you cause harm through not clearly labelling things such as allergens.

Recalls are also costly and cause your consumers to lose trust in your brand. In 2016, 9 cosmetic, personal care, and household products were recalled due specifically to labelling issues.

THE WORST CASE

The worst-case scenario if you don't make your labelling compliant, clear, and understandable in all relevant languages, is that someone is harmed using your product.

If a consumer were to miss an allergen warning or misunderstand the intended use of the product because it wasn't clear or wasn't in their language, they may be inadvertently harmed by your product.

COSTLY MISTAKES

According to Allianz, the average cost of a recall in the food industry for example, is £312,000 in direct costs alone. In 1982, Johnson and Johnson were forced to spend more than \$100 million (more than \$260 million today) on recalling 31 million bottles of Tylenol capsules and subsequently re-establish their brand.

The Johnson and Johnson example is of one of the worst recalls on record, but it demonstrates the potential impact of a recall, with costs stretching beyond the logistics of recalling the physical product and fixing the cause.

THE DEATH OF TRUST

On so many occasions, consumers will buy your product over another based on trust in your brand. Recalls are seldom kept quiet for long, and once consumers feel they can't trust you to deliver what they need, they'll drift.

Repairing trust takes time and yet more money, as Johnson and Johnson learned the hard way, all the while your sales are taking a hit as a result.

Average cost of a recall:

£312,000

1982: Johnson and Johnson spends more than

\$260 million recalling

31 million products

21% would never buy from your brand again

50% would switch brands temporarily

14% would never buy your product again

REDUCING LABELLING RECALLS

The key to reducing labelling recalls lies in language: both your own and that of your consumers.

LANGUAGE IS KEY

Language is your primary communication with your consumers when it comes to labelling, conveying not just what your product is, what it does, and how to use it, but also relevant safety information.

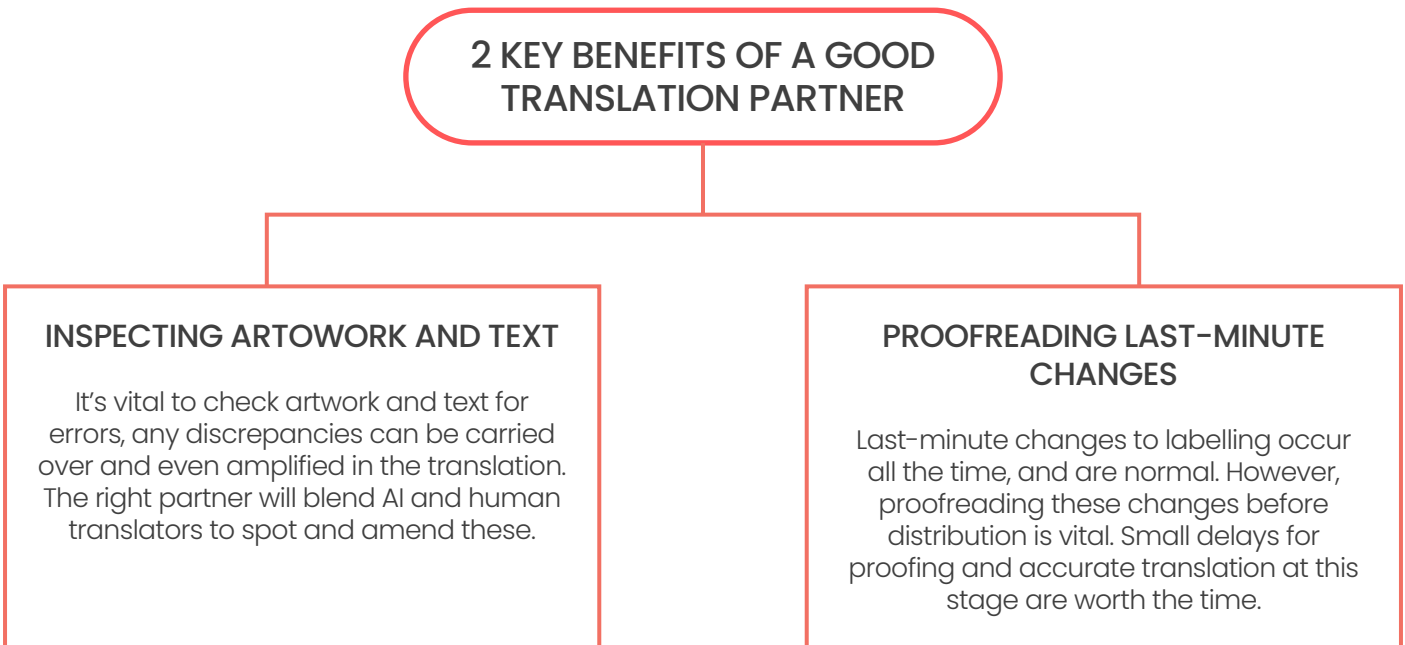
A mistake in the safety information, as we've discussed, can lead to recalls. This applies to every language that you sell in. Your label could be flawless in English, but if you then don't take the necessary care at the translation stage, it could be dangerously misleading in another language. Equally, the marketing aspect of your labelling could be just as perfect in English but concerningly similar to gibberish in another language.

The secret to avoiding labelling recalls in your own language then is to know your responsibilities when it comes to keeping consumers safe and ensure that all necessary information is included in your product labels.

Concerning the languages of your overseas markets, the answer to avoiding recalls due to faulty translations is to guarantee the accuracy of your English label is carried over to your translated edition. Achieving this kind of guarantee means employing the services of a professional translation partner.

It's important to weigh the necessary quality of the translation service against the severity of the consequences should your inaccurate translation lead to the harm of the consumer. This should help provide you with an equation that points you in the direction of the right translation partner.

The right translation services partner will be able to provide two key benefits above the simple translation of content:



BEATING THE COMPETITION TO MARKET

When it comes to selling abroad, being first to a new market, or first to an existing market with a new product can yield a number of benefits. In order to do this, you need to be able to translate your labelling with accuracy, at speed.

TRANSLATION AT SPEED

Being able to translate labelling copy accurately at speed contributes to [first mover advantage](#) when entering new markets or bringing a new product to market. First mover advantage is what allows you to dominate a market space and establish your brand before anyone else.

Hoover's first mover advantage is what's allowed the brand to become so synonymous with the product that you, like most, probably refer to a vacuum cleaner as a 'Hoover'.

Being a first mover provides a [number of other benefits too](#). First movers can take advantage of their head start to make their products harder to replicate for those who come next. By ensuring your products are patented, copyrighted and indisputably yours, you remove most of the competition for that product, and is an advantage often only available to first movers.

Additionally, your first mover status might allow you to control a given crucial resource, whether that may be material, logistical or otherwise. Again, this makes it much more difficult for others to compete with your product.

Finally, by establishing a product ecosystem such as subscription services and product-specific accessories, you may be able to make moving away from your products to a competitor's is more costly to the consumer than staying with you.

The translation speed necessary to ensure first mover advantage is offered through professional machine translation. Professional machine translation differs from online translators by offering the level of precision that is necessary for regulatory concerns, as well as involving a crucial human element.

Professional machine translators use banks of learned words and phrases to conduct the time-consuming leg work involved in translation. This leaves the human translator free to focus on the precision element, meaning that the overall timescale of translation is reduced drastically.

Professional machine translation, therefore, is part of ensuring first mover advantage and beating the competition to market.

APPEALING TO INTERNATIONAL MARKETS

Selling your products into overseas markets and across language barriers is an aspiration for many, and a challenge that some know with familiarity. However, using language services makes this process a breeze.

In order to sell into new markets, you'll need to focus on two things primarily: speaking their language, and ensuring safety in translation.

SPEAK THEIR LANGUAGE

In a [10-country survey](#), 60% of respondents said they would rarely or never buy from an English language website. It's not too much of a leap to apply this same reasoning to your product labelling.

60% said they would rarely or never buy from English language sites

Reaching new customers in their own language vastly improves your chances of competing effectively. However, many choose to avoid translating their labelling or avoid new markets altogether, in the misplaced belief that translation would be prohibitively expensive or time-consuming.

With advances in machine learning and professional translation tools, it is now possible to translate huge swathes of information quickly, accurately, and cost effectively.

Using machine learning, professional translation tools conduct the repetitive legwork involved in the translation process, meaning that the role of the human interpreter is altered to performing an editorial and specialisation task.

In turn, this keeps costs to a minimum while ensuring quality remains high and, in many cases, improves. A key word here though is 'professional', and we'll discuss that next.



SAFETY IN TRANSLATION

Let's say you've spent time and money having the perfect product label developed, and you decide you'd like to show this label and the product to which it's attached to customers in Germany, for example. You decide that after spending all this time and money on creating the label, you'd like to save a little on the translation to German, so you run the label copy through an online translation tool.

You batch off your brilliant new product and it's translated label to eager German customers, and all is well. Then, you find out someone in Germany had an allergic reaction to your product, even though they read the label, because they were led to believe by the copy you translated that it was safe for them to use. Now you're on the countdown to a recall and possibly a lawsuit.

Online translation tools are great for simple conversational translations, but they are [woefully underequipped](#) to deal with complex translations such as legally regulated product labels.

The importance of taking your label to a professional to be translated cannot be overstated. When a professional translation partner carries out your translation, your information is [safe and secure](#), the translation is checked by an expert human translator, and there is accountability if mistakes are made.



AVOIDING RECALLS AND REACHING NEW CUSTOMERS

Making sure you're able to effectively sell to new customers in their own languages and avoid recalls means finding a professional translations partner who's accredited, trusted, and makes use of the latest in machine translation to deliver maximum efficiency whilst ensuring quality.

At Word360, we utilise our in-house software solution, Wordskii, to provide you with access to sector-specific translation services, at speed and at cost, with professional-level accuracy.

Using a blend of artificial intelligence and a thousands strong roster of sector-expert translators, we help clients reach new markets and avoid costly recalls. We are ISO 17001, 27001, and 9001 accredited. This means translation accuracy, security, and quality are all assured. We will help you reach new consumers quickly, efficiently, and safely.

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Celebrating 30 years in business, Word360 is the Midlands' leading translations and interpreting agency, working with major global clients to help remove language barriers where it matters most. Operational in over 55 countries through a network of more than 9,800 specialised linguists, they enable global conversations and provide award-winning support across multiple industries and sectors.