

ASEAN Borderline Products – Decision History

Borderline area	Cosmetic	Rationale	Date of Decision accepted by ACC
Personal lubricants	No	No primary cosmetic benefit and intended site of application is outside the scope of the definition of a cosmetic product	(7 ACC Meeting) 08/12/2006
Intranasal cleansers	No	Nasal mucosa is not one of the specified sites of application in the definition of a cosmetic product	(7 ACC Meeting) 08/12/2006
Slimming	Yes	Products making body-contouring claims could be considered to be cosmetic. Products making weight-loss claims are not cosmetics.	(7 ACC Meeting) 08/12/2006
Leave on antimicrobial products	Yes	Can be considered to be secondary cosmetic claims provided that the products contain only permitted ingredients and are not intended for use on broken skin e.g. for wound cleansing	(7 ACC Meeting) 08/12/2006
Mouthwash	Yes	Can be a cosmetic product because the purpose is to clean the mucous membrane of the mouth.	(8 ACC Meeting) 14/06/2007
Skin Wash	Yes	Products intended for cleansing on skin are cosmetic products	(8 ACC Meeting) 14/06/2007
Anti-caries toothpaste	Yes	Can be a cosmetic product provided it is used as a secondary function	(8 ACC Meeting) 14/06/2007
Anti-dandruff	Yes	Can be a cosmetic product provided it is used as a secondary function	(8 ACC Meeting) 14/06/2007
Anti-bacterial	Yes	Can be a cosmetic product provided it is used as a secondary function	(8 ACC Meeting) 14/06/2007
Sunscreen	Yes	Sunscreen products are cosmetic products (Appendix 1)	(8 ACC Meeting) 14/06/2007
Skin whitening	Yes	Skin whitening is a cosmetic product (Appendix 1)	(8 ACC Meeting) 14/06/2007
Anti-acne	Yes	Can be a cosmetic product provided it is used as a secondary function	(8 ACC Meeting) 14/06/2007

Anti-hair-loss	Yes	Can be a cosmetic product provided it is used as a secondary function.	(8 ACC Meeting) 14/06/2007
Bust contouring cream	Yes	Bust-contouring cream is applied to improve the appearance of the bust.	(8 ACC Meeting) 14/06/2007
Breath freshener (liquid or spray)	Yes	Oral hygiene products can be considered as cosmetic products provided the primary purpose is to change the breath odour.	(8 ACC Meeting) 14/06/2007
Anti-cellulite		All countries except Thailand agreed to treat these products as cosmetic products. (with reference to the 8 th ACC Meeting Report)	(8 ACC Meeting) 14/06/2007
Bust creams	Yes	Individual claims should be assessed to ensure that they comply with the cosmetic claim guideline	(9 ACC Meeting) 13/12/2007
Fingernail paints	Yes	Paints applied to fingernails are cosmetic products	(9 ACC Meeting) 13/12/2007
Face paints	Yes	Paints applied to face are cosmetic products	(9 ACC Meeting) 13/12/2007
Temporary tattoos	Yes	This is a temporary colouring to change the appearance of skin	(9 ACC Meeting) 13/12/2007
Denture cleansers intended for use inside the mouth	Yes	Dentifrices intended for use in the mouth by denture wearers are cosmetic products	(9 ACC Meeting) 13/12/2007
The liquid component of wipes that make cosmetic claims	Yes	This is a cosmetic preparation applied to wipes.	(9 ACC Meeting) 13/12/2007
False eyelash glue	Yes	This is a cosmetic preparation that is applied to eyelashes to change the appearance.	(9 ACC Meeting) 13/12/2007
False eyelashes	No	It is not a substance or preparation.	(9 ACC Meeting) 13/12/2007
Denture cleansers intended for use outside the mouth	No	Products applied to dentures outside the mouth are not cosmetic products	(9 ACC Meeting) 13/12/2007

Permanent tattoos	No	Permanent, irreversible action and site of application is through the epidermis by injection.	(9 ACC Meeting) 13/12/2007
Vaginal douche products	No	The intended site of application, mucosa of the vagina, is not one of the designated target sites for cosmetic products.	(10 ACC Meeting) 26/06/2008
Eyelash perming products	Yes	Can be considered a cosmetic product as it is a permanent relaxer that shapes eyelashes.	(10 ACC Meeting) 26/06/2008
Dry mouth products	Yes	Can be considered as cosmetic products provided the primary purpose is moisturisation of the mucous membrane of the mouth and not stimulation of the salivary glands.	(11 ACC Meeting) 21/11/2008
Perineal massage products	Yes	the site of application is specifically the external skin and genitalia and that the product is not for internal application	(11 ACC Meeting) 21/11/2008
Products with antiseptic claims	Yes	Can be considered as cosmetic products provided they are secondary claims	(12 ACC Meeting) 23/06/2009
Products with antibacterial claims	Yes	Can be considered as cosmetic products provided they are secondary claims	(12 ACC Meeting) 23/06/2009
Products with germicidal claims	Yes	Can be considered as cosmetic products provided they are secondary claims	(12 ACC Meeting) 23/06/2009
Mesotherapy products	No	Intended site of application is under the epidermis	(14 ACC Meeting) 09/06/2010
Denture Adhesive	No	Non cosmetic, and most ASEAN Member States place it under Medical Devices	(18 ACC Meeting) 21/05/2013
Nail Glue	Yes	Cosmetic	(18 ACC Meeting) 21/05/2013
Nanometer Tooth Membrane Whitening Kit	No	Non-cosmetic as does not fit into cosmetic product's definition based on the known method of action	(29 ACC Meeting) 26/10/2018