Beauty-Tech Evidence & Claims Preflight

Illustrative decision brief for an EU/DACH skincare concept

> **Decision:** Proceed to supplier evidence collection, but pause wound-healing, tissue-regeneration, DNA-repair, and disease-treatment language. Formula-specific evidence and qualified regulatory review are still required.

Concept and scope

Hypothetical PDRN-and-peptide recovery serum for EU/DACH consumers. Public evidence and invented client wording are used only to demonstrate the service; no real formula or supplier dossier is assessed.

Claim triage

1. "Regenerates damaged skin tissue"

RED	**Assessment:** The wording implies tissue repair or a therapeutic effect. Ingredient or delivery-system research does not prove that a finished cosmetic product achieves the same outcome. **Direction to explore:** Appearance, hydration, texture, or barrier-support language tied to suitable finished-product evidence.

2. "Clinically proven to improve skin firmness"

AMBER	**Assessment:** Unsubstantiated until the tested product, population, comparator, duration, endpoint, method, result size, and statistical analysis are verified. **Direction to explore:** Use "clinically tested" plus the exact measured result only when the complete study supports it and qualified review approves the context.

3. "Advanced polynucleotide and peptide technology for smoother-looking skin"

AMBER	**Assessment:** The appearance-oriented outcome is more compatible with cosmetic positioning, but the implied causal link still needs formula-specific support. **Direction to explore:** Retain only the exact benefit and technology wording that adequate, verifiable evidence can support.

Evidence traceability

The matrix separates contextual science from finished-product substantiation. It prevents ingredient-level evidence from being silently promoted into a product claim.

Evidence	Can support	Cannot support	Verification
Ingredient or delivery-system paper	Mechanistic context and research rationale	Finished-product efficacy or claim approval	Full paper and identifier verified
Supplier efficacy summary	Questions for due diligence	Independent proof without protocol and report	Full study report requested
Finished-product instrumental study	Exact measured cosmetic endpoint within study limits	Therapeutic or untested outcomes	Signed report and protocol
Consumer self-assessment	Accurate perception wording	Objective biological effects	Questionnaire and analysis

Supplier questions

1. Is the evidence ingredient-level or finished-product-specific?
2. What exact formulation, concentration, and delivery system were tested?
3. What were the sample size, population, comparator, duration, endpoints, and methods?
4. Are the complete protocol, signed report, statistical output, and adverse-event summary available?
5. Which proposed wording is supported, and on what exact page of which report?

Recommendation

Pause strong biological-effect claims. Continue with a bounded supplier-evidence request and qualified review of formula-specific cosmetic claims. If satisfactory evidence arrives, translate only the approved, tested endpoint into consumer language.

> **Boundary:** This sample demonstrates early scientific evidence triage. It is not a safety assessment, Product Information File, CPNP notification, legal opinion, medical assessment, Responsible Person service, or certification of compliance.

Regulatory evidence anchors

EU 655/2013: Cosmetic claims require adequate and verifiable evidence; ingredient properties must not be presented as finished-product properties without support. https://eur-lex.europa.eu/eli/reg/2013/655/oj/eng

EU 1223/2009: Defines cosmetic products and establishes the broader EU framework. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02 009R1223-20 240 404

European Commission technical document: Practical guidance on common criteria and claim substantiation. https://ec.europa.eu/docsroom/documents/24 847