doterra — EUROPE —

Europe Label FAQs

1. WHY IS dÖTERRA GETTING NEW LABELS?

Currently, dōTERRA sells products to consumers as "NFR" in Europe. NFR stands for Not For Resale. This means that any product that is ordered must come directly from dōTERRA to the end consumer. It is sold for personal use only. We are working on qualifying for the next level in Europe, which is OTG, or On The Ground. This would mean that dōTERRA Wellness Advocates can resell* dōTERRA products in their market (where available). In order to qualify for this, dōTERRA is creating labels unique to the European market to be eligible for OTG status.

*Italy regulations prohibit retailing products.

2. WHY ARE WE MAKING CHANGES TO OUR EXISTING PRODUCT LABELS?

The changes are necessary to ensure that we are compliant with current legislation in Europe.

3. IF THE LABELS ARE DIFFERENT, HOW CAN WE BE SURE THAT THE CONTENTS ARE STILL THE SAME?

dōTERRA is dedicated to delivering consistently high-grade products across the range. We are committed to transparency; essential oils continue to have batch numbers, which can be checked for quality on the dōTERRA Source To You website. All ingredients are listed on all products.

4. WHAT IF THE PRODUCT INGREDIENTS APPEAR TO HAVE DIFFERENT NAMES THAN BEFORE?

On a small number of products, in order to comply with EU regulation we now have to use the botanical or less common name, however the product and actual ingredient is the same as before, unless we have advised separately of a product re-formulation.

5. WE KNOW THAT WE CAN USE OUR ESSENTIAL OILS IN LOTS OF DIFFERENT WAYS. PREVIOUSLY WE HAD MULTIPLE METHODS OF USE BUT NOW OUR LABELS SAY WE CAN ONLY USE THEM IN ONE METHOD. WHY IS THIS?

In order to be compliant with current legislation in Europe, we must be clear on a single method of use to avoid conflicting messages and usage instructions. For example, a cosmetic-use product must say "For topical use only," therefore it would be contradictory to also show it for flavouring or internal use. However, customers can continue to enjoy the products as they always have.

6. OUR ESSENTIAL OILS ARE NOW GROUPED INTO THREE DIFFERENT CATEGORIES, WHAT ARE THEY?

- a. Food Flavouring (previously Internal)
- b. Cosmetic (previously Topical)
- c. Chemical (previously Diffusion)

7. HOW DID WE DECIDE WHICH CATEGORY EACH OIL SHOULD BE REGISTERED TO?

The oils have been categorised in a way which we feel they are most commonly used.

8. WHICH OILS ARE IN EACH CATEGORY?

Click *here* for details.

9. I UNDERSTAND SOME OF THE NAMES HAVE CHANGED. WHICH ARE THESE AND WHAT ARE THE NEW NAMES?

Some of the product names will be changing as the new labels arrive in-market and a complete list can be found <u>here</u>.

10. HAS A REGULATORY BODY APPROVED OR CERTIFIED THE NEW LABELS AND CATEGORIES?

It is not a requirement to licence or register the oils, but it is a requirement to label in line with the labelling legislation applicable to the product category

11. WHEN AN OIL HAS BEEN CATEGORISED AS A COSMETIC OIL, IT IS LABELLED AS A SKIN CARE OIL. HOW DO WE EXPLAIN TO OUR CUSTOMERS WHEN THERE ARE MANY USES OTHER THAN FOR SKIN CARE?

By labelling it as a Skin Care Oil, it means that it is suitable for putting on the skin and can therefore be used for the many uses and benefits of topical application.

12. WILL THE PIPS AND MARKETING MATERIALS BE RESTRICTED TO SINGLE CATEGORY APPLICATION?

PIPs and Marketing Material will contain compliant, multi-usage information.

13. WHY COULDN'T WE JUST LABEL ALL OUR OILS 'PURE ESSENTIAL OIL'?

We have relabelled our products following regulatory guidance to ensure we are compliant with current European legislation. It was necessary on the cosmetic category products to sub divide the category to make it obvious what type of cosmetic product it is (ie. to go on the skin). The food flavouring label regulation doesn't have specific requirements that the function be listed, whereas the cosmetic regulation 1223/2009 does.

14. THE FLAVOURING OILS NOW STATE, "ONLY USE ONE DROP PER DAY." IS THIS THE TOTAL DAILY CONSUMPTION BEING RECOMMENDED PER DAY?

This is purely an EU labelling requirement to place on bottles that have been categorised for internal flavouring use. Different oils have a different number of drops, but for simplicity and consistency, the smallest number across the whole range was used. It is per oil per day, so multiple essential oils can be used throughout the day.

15. HOW CAN SMART & SASSY BE LABELLED AS RECOMMENDING ONE DROP PER DAY WHEN A SOFTGEL CONTAINS FIVE DROPS?

As stated above some oils can be recommended over one drop a day and Smart & Sassy is one of those oils.

16. WILL THE OILS STILL BE MARKED CPTG?

Yes.

17. WHY DOES MY ESSENTIAL OIL LABEL NOW SHOW EXTRA INGREDIENTS?

Essential oils are complex compounds made up of a number of naturally occurring chemical constituents. Labelling regulations require some of these constituents to be listed in addition to the oil itself.

For example, Pure Eucalyptus oil is made up of a number of constituents including Citronellol, Eugenol, Geraniol, Limonene and Linalool which we are required to list separately on the bottle label. These are shown, marked with an asterisk, as naturally occurring oil compounds. They are not extra ingredients added to the oil, but the constituent parts of the oil itself.