
ASSAYHOUSE

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THE FIELD GUIDES

VOLUME THREE

BODY CARE

**Six questions for reading any personal-care label,
and seven materials read against them.**

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Question Zero

What kind of label am I holding?

Ask this before the other five. It decides which of them apply.

Not everything on a personal-care shelf is a cosmetic in law, and the difference is printed on the pack if you know what to look for. In the US, what a product legally is depends on what it is intended to do.

The three kinds

1 · Cosmetic.

Intended to cleanse or beautify. One ingredient list, in descending order of weight, no percentages disclosed. The FDA does not pre-approve cosmetic products or ingredients — with one important exception, color additives, which matters for Question 1.

Moisturizers, most shampoos, lipstick, nail polish, deodorant, perfume.

2 · Cosmetic and drug.

Intended to cleanse or beautify and to treat or prevent something or affect the body's structure or function. These carry both sets of obligations, and the label shows it.

The structural giveaway: under 21 CFR 701.3(d), a product that is both must identify the drug ingredients as "Active Ingredients" first, before the cosmetic ingredients. The list is split in two — actives at the top with their exact percentages stated, then the inactives in ordinary descending order.

Anti-dandruff shampoo, antiperspirant-deodorants, moisturizers and makeup sold with SPF claims, acne treatments, hand sanitizers.

The cleanest illustration is on one shelf. A deodorant is a cosmetic — it masks odor. An antiperspirant is a drug — it reduces sweating, which affects a function of the body. Same aisle, same format, two legal categories, two different labels.

3 · True soap.

A narrow legal category: consisting primarily of an alkali salt of fatty acids, making no claim beyond cleansing. Products, meeting that definition are not regulated by the FDA at all — they fall to the Consumer Product Safety Commission and are not required to carry a cosmetic ingredient list.

Most things sold as "soap" today aren't true soap in this sense; they're cosmetic cleansing bars, and they do carry a list. If a cleansing bar has no ingredient list, this is usually why — not an oversight.

7. Aluminum Chlorohydrate — the flagship profile

INCI NAME Aluminum Chlorohydrate · **Formula:** $\text{Al}_2(\text{OH})_5\text{Cl}$ (the empirical formula for the commercially standard "five-sixths basic" form) — though the actual substance is a complex, polymerized mixture of related aluminum-hydroxide-chloride clusters, not a single simple molecule · **FUNCTION GROUP** OTC drug active (antiperspirant)

Origin. Aluminum chloride, the parent chemistry behind this material, was first described in 1825 — often credited to the Danish physicist and chemist Hans Christian Oersted, a name better known for a completely unrelated discovery: he was the first to demonstrate that an electric current produces a magnetic field, the founding observation of electromagnetism. Nothing about that work had anything to do with sweat, sold products, or bodies. It took nearly eight decades before anyone connected an aluminum salt to antiperspiration at all: in 1903, a product called Everdry became the first commercial antiperspirant, and the first to use an aluminum salt as its active ingredient.

Why it's classified as a drug, not a cosmetic — this is Question Zero, made concrete. Both prior volumes used the deodorant-versus-antiperspirant pair as the clearest illustration of the line between cosmetic and drug, without either volume actually profiling the ingredient responsible. Here it is. Aluminum chlorohydrate is one of several aluminum salts recognized in the FDA's antiperspirant monograph, 21 CFR Part 350, and its recognized function — reducing the flow of sweat to the skin's surface — is exactly the kind of effect on a bodily function that makes a product a drug under Question Zero's own definition, not a cosmetic. A deodorant masking odor doesn't touch that line at all; this material sits squarely on the drug side of it.

What the monograph actually permits, and doesn't. The permitted indication is narrow: "reduces perspiration." Nothing about treating a medical condition — a product claiming to treat hyperhidrosis specifically would need separate prescription drug approval, a different regulatory pathway entirely. And because aluminum is excreted by the kidneys, 21 CFR 350.50 requires a specific mandatory warning on every product using it: "Ask a doctor before use if you have kidney disease." That warning exists because of how the body clears aluminum, not because of any claim this guide is in a position to evaluate — it's a regulatory fact about what must be disclosed, stated here as exactly that.

Elsewhere. Aluminum chlorohydrate and the closely related family of polyaluminum chlorides are also widely used as water-treatment flocculants — added to drinking water and wastewater to make suspended particles clump together and settle out, an application with no connection to personal care at all.

What the framework sees — this profile *is* Question Zero, the same way Volume Two's flagship *was* Question 1. Every other profile in this series illustrates a question about reading a label. This one illustrates the question that decides whether you're even reading a cosmetic label in the first place. Check for a Drug Facts panel; if aluminum chlorohydrate or a related aluminum salt is named there as an Active Ingredient with a stated percentage, you are holding a drug, governed by an entirely different set of disclosure rules than anything else in this book — and the deodorant sitting next to it on the shelf, with no such panel, is a cosmetic, regardless of how similar the two products look.

Start with the limit, not the promise.

The same limit opens this Part 3 as opened the last two: an ingredient list cannot separate formulation cost from marketing cost. What's new to this category is a cost driver neither prior volume had to account for at all.

A cosmetic deodorant and an OTC-drug antiperspirant can sit inches apart on the same shelf, and one of them carries a categorically different compliance cost than the other, before a single ingredient is counted. That's not a formulation difference — it's a regulatory one, and it's specific to this category.

What this section does. Shows which of Volume Three's seven materials carry price information, explains the drug-versus-cosmetic compliance cost split unique to this shelf, revisits the weight-versus-volume labeling rule from Volume Two where it applies here too, and works through what "budget," "premium," "eco," and "BIO" mean on a shelf that includes both cosmetics and OTC drugs — a genuine complication neither prior volume's four positionings had to handle.

Walkthrough 1 — A matching deodorant and antiperspirant

The situation. Same brand, same product line, nearly identical stick packaging — a deodorant and an antiperspirant sold as a matched pair.

Run the questions.

Q0 — first, always. Check for a Drug Facts panel on each. The antiperspirant has one: Aluminum Chlorohydrate listed as an Active Ingredient, stated at 15%. The deodorant has no such panel at all — Sodium Bicarbonate, if listed, sits in the ordinary cosmetic ingredient list, with a position but no stated percentage.

What you now know. This is the cleanest version of Question Zero's line in this entire series — not a hypothetical, not an edge case triggered by an optional claim, but two products from the same brand, marketed as a pair, sitting in categorically different regulatory worlds because of what each is chemically doing. One reduces a bodily function; one manages odor. That distinction alone decides everything else about how each label is built.

What you still don't know. Whether 15% aluminum chlorohydrate is "enough" for your own sweating, or how the deodorant's odor control compares to the antiperspirant's. Question Zero discloses categories and stated percentages. It doesn't rank outcomes, and neither does this guide.

THE FIELD GUIDES · FIRST EDITION

Volume Three

Body Care

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The same six questions run through every volume. Only the shelf changes.

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