
ASSAYHOUSE

TESTED, NOT TAKEN ON TRUST



THE FIELD GUIDES

VOLUME SIX

HYGIENE & CLEANSING

Six questions for reading any personal-care label, and four materials read against them — plus, one honest boundary the method doesn't reach.

FIRST EDITION • ISSUE 01 • 09.2026

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.

Examples the FDA gives directly: *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.

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.

4. True Soap (Sodium Tallowate) — the flagship profile

INCI NAME · Sodium Tallowate — the alkali salt of tallow's fatty acids; sodium cocoate, sodium olivate, and similar salts of other fats and oils qualify identically · **FORMULA** A mixture of sodium salts of the fatty acids present in the parent fat; no single molecular formula · **FUNCTION GROUP** · True soap — a distinct legal category, not a cosmetic function group

Origin. The earliest documented evidence of soap-like production dates to roughly 2800 BC in Babylon, with a specific recipe — water, alkali, and cassia oil — recorded on a clay tablet around 2200 BC. Egyptian, Phoenician, and Celtic traditions developed the same basic chemistry independently in the centuries that followed, and for most of that long history, soap's primary use was industrial and medicinal — cleaning wool and cotton in textile production — not personal hygiene, which became common only much later. The chemistry itself wasn't formalized until 1823, when French chemist Eugène Chevreul described saponification in precise chemical terms: fat, treated with an alkali, splits into fatty acids that combine with the alkali to form soap, releasing glycerin as a byproduct. This is the same Chevreul who isolated cetyl alcohol from spermaceti in 1817, profiled in Volume One — and the byproduct he described in 1823 is the same material that opened this entire series: Volume One's very first profile was glycerin, and glycerin is, historically and chemically, what's left over when this material is made.

Why it's classified this way — the exact test, word for word. The FD&C Act excludes soap from the definition of "cosmetic" but never defines the word itself. The FDA's interpretation, at 21 CFR § 701.20, applies only when a product meets both of two conditions: first, that the bulk of its nonvolatile matter consists of an alkali salt of fatty acids, with its detergent properties coming from that alkali-fatty-acid compound itself; second, that the product is labeled, sold, and represented *only* as soap. Meet both, and the product falls outside FDA's cosmetic jurisdiction entirely, regulated instead by the Consumer Product Safety Commission under general hazardous-substance law — the lightest regulatory touch of any category in this entire series.

Why so few bars on a shelf actually qualify. Two things routinely disqualify a product. First, ingredients: adding a synthetic detergent, or removing the glycerin saponification naturally produces — commercially valuable, and often extracted and sold separately into the exact creams and lotions this series has spent five volumes on — changes what the bar is made of. Second, and far more common: a single claim. "Moisturizing," "deodorizing," a fragrance claim, an antibacterial claim — any of these reclassifies the product as a cosmetic or a drug, regardless of what it's actually made from. A 2022 update to federal law (the Modernization of Cosmetics Regulation Act) added a further wrinkle: a product can now be classified as a cosmetic simply for containing ingredients commonly recognized as having cosmetic properties, even with no claim made at all.

Elsewhere. For most of its five-thousand-year history, soap's dominant application was industrial — textile processing — rather than personal hygiene, which is itself worth holding against a modern shelf where "soap" is presented as inherently a personal-care product.

What the framework sees — Question Zero, finally made concrete. Every volume in this series has named true soap as one of three possible answers to the first question a label ever needs to answer, illustrated with the same hypothetical: a bar with no ingredient list at all, because none is legally required. This is that bar. If it says nothing more than "soap," and nothing has been added or removed to change what it fundamentally is, this is the one product on the entire six-volume shelf the FDA was never asked to regulate in the first place.

Start with the limit, and then the widest spread this series has shown

The familiar limit still opens this Part 3: an ingredient list can't separate formulation cost from marketing cost. What's genuinely new here is the range. Every prior volume's regulatory-compliance cost sat somewhere in a moderate middle. This volume contains the two opposite extremes found anywhere in this series, in the same five product types: **true soap, which carries close to zero regulatory compliance cost because none is legally required, and intimate lubricant, a medical device where a single 510(k) clearance can cost tens of thousands of dollars and take months to years before a product reaches a shelf at all.**

What this section does. Shows which materials carry price information, works through both cost extremes directly, addresses a term whose regulatory backing was formally withdrawn rather than never granted, and treats the four positionings with an honest note about where two of this category's five product types simply don't fit that framework.

Which materials actually carry price information?

MATERIAL	PRICE INFO?	ON LABEL?	WHAT ACTUALLY DIFFERS
Sodium Tallowate (True Soap)	Barely, and for a structural reason	Not required — no ingredient list mandated at all	Regulatory compliance cost is close to zero; price differences trace almost entirely to raw material, fat source, and brand
Triclosan	No longer relevant — banned from this use since 2017	N/A for new products	A reformulated product's price reflects whatever replaced the banned active, not the banned active itself
Ethanol	Somewhat	Yes — concentration typically stated	Price tracks alcohol concentration and format more than anything else; trustworthiness (whether the label is even true) is invisible to price entirely
Lactic Acid	Barely	Yes — name and position	Commodity pH adjuster; the unique labeling restriction on this category has nothing to do with price
Intimate Lubricant	Strongly, but through an entirely different mechanism	No ingredient list in the cosmetic sense; a 510(k) clearance number instead	Price reflects device clearance cost, formulation testing, and biocompatibility studies — costs with no cosmetic-industry equivalent

The pattern, stated plainly.

This category doesn't have one dominant price story the way most prior volumes did. It has two, and they point in opposite directions: one product type where regulatory absence keeps costs structurally low, and one where regulatory rigor is the largest cost driver by far.

Walkthrough 1 — A single bar of soap, all six questions, start to finish

The situation.

A plain bar, labeled only "soap," with an ingredient statement reading simply: sodium tallowate, water, sodium chloride.

Run every question, one at a time — the full method, on the one material this series named from its very first page and never showed you until now.

Question Zero. No "Active Ingredients" heading, no Drug Facts panel, and — check carefully — the label makes no claim beyond cleansing. That, plus a formula consisting of an alkali salt of fatty acids, is 21 CFR § 701.20's exact test. This is true soap. CPSC regulates it, not FDA.

Question 1. Sodium tallowate leads the list — consistent with what a true-soap formula actually is, not marketing positioning.

Question 2. There is no phenoxyethanol to find, and there doesn't need to be. True soap isn't required to carry any ingredient declaration under FDA rules at all; the fact that this one does is a courtesy, not a mandate. The question returns nothing, honestly, for a structural reason unique to this category.

Question 3. "Sodium Tallowate" is already about as specific as this material gets — no hidden grade or molecular-weight ambiguity to check.

Question 4. Nothing about this formula is light- or air-sensitive in a way packaging would need to address. Another honest nothing.

Question 5. No certification mark appears. Nothing to check.

What you now know.

Four of six questions returned a real, informative nothing — not a failure of the method, but the most complete demonstration in this entire series of what "true soap" actually means: a product so structurally simple, and so lightly regulated, that most of this method's tools have nothing left to find. Question Zero did the entire job by itself.

What you still don't know.

Whether this bar cleans better than any other bar on the shelf. That was never a question this method could answer, for this material or any other.

THE FIELD GUIDES · FIRST EDITION

Volume Six

Hygiene & Cleansing

€14

One PDF, A4, 41 pages.
Yours to keep, print and take shopping.

1 · BUY

Secure checkout on the Assayhouse site.

2 · CHOOSE

At checkout, pick when we send the download: now, or after 14 days.

3 · READ

The PDF link arrives by email. Print the checklist page and take it with you.

ALL SIX FIELD GUIDES

- I Facial Care
- II Makeup
- III Body Care
- IV Hair Care
- V Hand & Nail
- VI **Hygiene & Cleansing** · this volume

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

assayhouse.eu/volumes/vi-hygiene-cleansing