

REGULATORY — EXECUTIVE BRIEFING

Claims Substantiation Briefing

Six claims on one pack — what the evidence carries, and where

DOCUMENT	PREPARED	OWNER	PAGES	STATUS
CSB-27-028	May 2027	Regulatory — Product	6	Illustrative sample

The read

Four of six claims are carried by the evidence we hold. One is carried in two markets and not in the third. One rests on consumer perception data and is worded as an efficacy claim, which is the only line on the pack that needs to change before artwork.

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Claims on the pack	Carried in all three markets	Carried in two of three	Worded above its evidence

CARRIED AS WORDED

- 01 Two hydration claims, instrumental data, named protocol.
- 02 One barrier claim, published and citable.
- 03 One sensory claim, consumer perception, worded as perception.

NOT CARRIED AS WORDED

- 01 One efficacy claim resting on perception data.
- 02 One claim permitted in two markets, not the third.



What is in it.

THE FORMULATION · MCLEUKER HOUSE SET

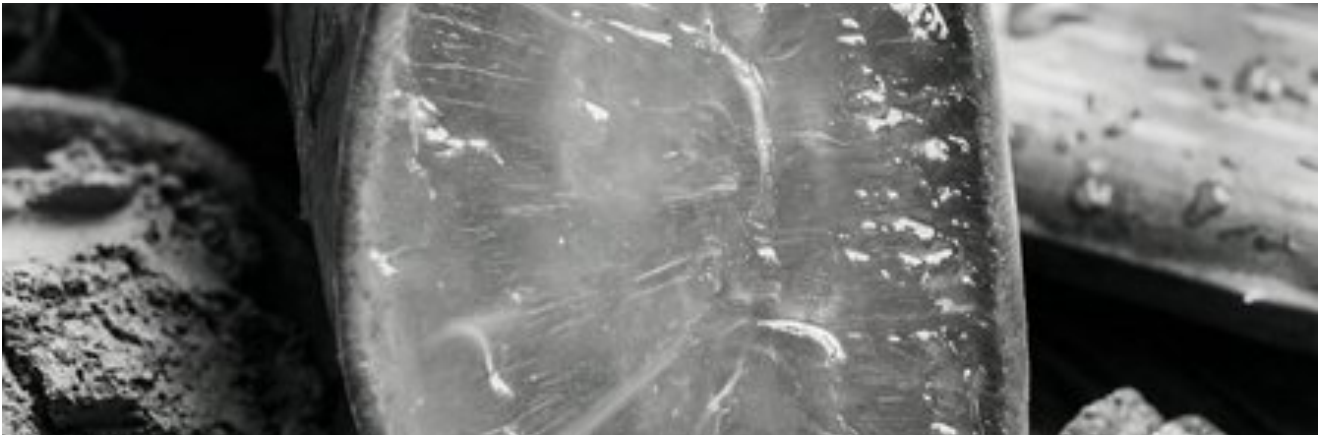
SO WHAT

The failing claim is not unsupported — it is over-worded. Bringing the wording down to the evidence class keeps the claim and removes the exposure, which is cheaper than removing either.

What each claim rests on

CLAIM BY EVIDENCE			
CLAIM	EVIDENCE CLASS	NAMED METHOD	CARRIES AS WORDED
Hydration, 24 hours	Instrumental	Yes	YES
Hydration, immediate	Instrumental	Yes	YES
Barrier support	Published	Yes	YES
Feels smoother	Consumer perception	n/a	YES
Reduces the look of lines	Consumer perception	n/a	NO
Suitable for sensitive skin	In vitro	Yes	TWO OF THREE

Evidence classes are not interchangeable. A panel saying skin felt smoother supports a perception claim and nothing stronger, whatever the panel size.



What may be said about it, and where.

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SO WHAT The claim that fails is the one where a perception result has been written as an efficacy statement. That is a wording decision made after the testing, and it is where most challenges start.



Every claim ends up here, at the distance a customer decides whether it was true.

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By market

THE SAME PACK, THREE MARKETS

CLAIM	MARKET A	MARKET B	MARKET C
Hydration, 24 hours	CARRIED	CARRIED	CARRIED
Barrier support	CARRIED	CARRIED	CARRIED
Reduces the look of lines	REWORD	REWORD	REWORD
Suitable for sensitive skin	CARRIED	CARRIED	SUBSTANTIATION REQUIRED

THE THIRD MARKET

What differs	Substantiation must be held before the claim appears, not on request
What we hold	In vitro data, which is mechanistic rather than confirmatory
Options	Hold a clinical study, or drop the claim in that market only
Artwork impact	A market-specific back panel, not a global change

SO WHAT	One market needs a different back panel or a different study. Discovering that at artwork stage is how a launch date moves, and it is discoverable now.
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Decisions

DECISIONS ARISING FROM THIS BRIEFING

DECISION	OWNER	BY	IF IT IS NOT TAKEN
Reword the efficacy claim to its evidence class	Regulatory Lead	30 May	The pack goes to artwork above its evidence
Decide clinical study or market-specific panel for market C	Product Director	13 Jun	The launch is made without a decision
Record the evidence class against every claim in the file	Regulatory Lead	30 Jun	The next pack repeats the same wording
Brief marketing on evidence-class wording before copy is written	Brand Lead	30 Jun	Copy is written first and checked last

SOURCES AND BASIS

Test results and methods — our own study reports, with protocol names as recorded.
Market permissions — published regulation and guidance current at the date of this document.
Claim wording — the artwork file as submitted.

ILLUSTRATIVE SAMPLE

This document is a rendered SAMPLE of the Claims Substantiation Briefing template, produced to show its structure, exhibit inventory and register. The figures in it are illustrative and are not market intelligence. A real run of this template researches and cites its figures with an as-of year for each, or marks them as modelled and states the basis — the rule the template itself carries.