

COSMETICS — EXECUTIVE BRIEFING

L'Odet Brand Identity Audit

From formula to feed: where the identity holds, where it drifts, and where it has become a compliance exposure.

DOCUMENT	PREPARED	SCOPE	PAGES	STATUS
BIA-26-LOD	October 2026	9 elements · 7 channels	8	Draft for validation

01

The read

L'Odet's identity is strongest exactly where regulation forces discipline. The pack, which passes through safety and claims review before it ships, is near-perfect. Everything that skips that review loop, like swatches, shade names, creator content and sustainability wording, has drifted. Since 27 September 2026, two of those drifts are also legal exposure.

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Elements that hold: specified and consistent	Elements that drift: described, not specified	Elements at regulatory risk under EU claims rules	Channels reviewed, from pack to marketplace

HOLDS

01 **Wordmark**: one lock-up, applied on every surface

02 **Colour**: values specified for print and screen

03 **Typography**: one family, one hierarchy

04 **Pack architecture**: brand, range, benefit, shade, in fixed order

DRIFTS

05 **Swatch & skin imagery**: shade on screen ≠ shade in hand

06 **Shade & range naming**: names are poetic, not navigable

07 **Tone of voice**: adjectives, no worked examples

AT RISK

08 **Efficacy claims**: rewritten per channel, losing their evidence

09 **Sustainability wording**: generic terms that are banned since Sept 2026

THE PATTERN

Consistency falls off with **distance from the review loop**. The pack is reviewed by the Responsible Person, the e-shop partly, and creators and marketplaces not at all. The fix is to extend the loop, not to redesign the brand.

SO WHAT

No redesign is needed. L'Odet needs the same specification discipline it already applies to the pack to cover swatches, shade names and claims. The claims piece is urgent, because the EU rules already apply to stock on shelf.

02

Why a cosmetics identity is different

In fashion, identity is a matter of taste. In cosmetics, every word and picture that says what a product does counts as a regulated claim, and the shopper judges the product on a screen before touching it. That puts identity work in three places at once: brand, product and compliance.

MARKET SIGNALS

$450bn Global beauty market McKinsey, 2025	**~5%** Expected annual growth to 2030, down from 7% in 2022–24
40% Skin care's expected share of sector value	**26→~33%** Online share of sales, 2024 to 2030

Slower growth and saturated paid media mean distinctiveness carries more weight. When around a third of sales close online, the swatch on the product page is the product, as far as the shopper can tell.

REGULATORY CLOCK

RULE	WHAT IT MEANS FOR IDENTITY
Reg. (EC) 1223/2009	The Responsible Person must hold evidence (in the Product Information File) for every claim made.
Reg. (EU) 655/2013	Six common criteria apply to claims made through *text, names, trademarks, pictures* and other signs, in any medium. A shade name or a swatch can be a claim.
Dir. (EU) 2024/825 (ECGT) LIVE 27 SEP 2026	Generic environmental claims are banned unless substantiated. There is no general transition period, and existing stock is in scope.

THE THREE LAYERS THIS AUDIT READS

LAYER A · CORE

Wordmark, colour, typography. These are shared with any brand and are the easiest to hold.

LAYER B · PRODUCT

Pack architecture, shade and range naming, swatch and texture imagery. These elements are specific to cosmetics.

LAYER C · VOICE & CLAIMS

Tone, efficacy claims, sustainability wording. This is where identity meets the law.

SO WHAT

A brand audit that stops at the logo misses most of a cosmetics brand. For L'Odet, the decisive layers are B and C, because that is where the shopper decides and where the regulator looks.

03

Element scorecard

Each element is scored on how precisely it is *specified*, not on how good it looks. A beautiful element that is only described will drift, while a plain one that is specified will hold.

Maturity scale 0 · Absent 1 · Described 2 · Partly specified 3 · Specified 4 · Specified + owned

#	ELEMENT	MATURITY	WHAT THE GUIDELINES SAY TODAY	VERDICT
	LAYER A · CORE			
01	**Wordmark & lock-up**	4 / 4	Clear-space, minimum size and embossing rules for pack	HOLDS
02	**Colour palette**	3 / 4	Pantone, CMYK and HEX values; no rule for tinted glass or pump caps	HOLDS
03	**Typography**	3 / 4	One family, hierarchy defined; INCI-list size not specified	HOLDS
	LAYER B · PRODUCT			
04	**Pack architecture**	3 / 4	Front-of-pack order fixed: brand, range, benefit, shade, volume	HOLDS
05	**Swatch & skin imagery**	1 / 4	"Luminous, natural, real skin": no lighting, colour or skin-depth standard	DRIFTS
06	**Shade & range naming**	1 / 4	Names chosen launch by launch; numbers don't encode depth or undertone	DRIFTS
	LAYER C · VOICE & CLAIMS			
07	**Tone of voice**	2 / 4	Four adjectives and a do/don't list; no channel examples	DRIFTS
08	**Efficacy claims**	1 / 4	Pack claims are reviewed; digital copy paraphrases them freely	AT RISK
09	**Sustainability wording**	0 / 4	Not covered. "Clean", "eco-conscious" and "green beauty" in use	AT RISK

LAYER A AVERAGE	LAYER B AVERAGE	LAYER C AVERAGE
3.3	1.7	1.0

SO WHAT

Maturity drops layer by layer, from 3.3 to 1.7 to 1.0. That is the reverse of where a cosmetics brand earns and risks the most. The guidelines were written like a fashion brand's, and the product and claims layers were never written down.

04

Channel by channel

The nine elements were read across seven channels. Channels are ordered by distance from L'Odet's own review loop: reviewed first, uncontrolled last.

ON Consistent · MIXED Varies by asset · OFF Off-brand · RISK Off-brand and non-compliant · — Not applicable

◂ Reviewed by L'Odet — Controlled by partners and creators ▸

ELEMENT	PACK	E-SHOP	CRM	OWNED SOCIAL	RETAIL & PHARMACIE	MARKET-PLACES	CREATORS
Wordmark	ON	ON	ON	ON	ON	ON	ON
Colour	ON	ON	ON	ON	ON	MIXED	MIXED
Typography	ON	ON	ON	ON	ON	MIXED	—
Pack architecture	ON	ON	ON	ON	ON	MIXED	—
Swatch & skin imagery	—	MIXED	MIXED	OFF	MIXED	OFF	OFF
Shade & range naming	ON	MIXED	MIXED	MIXED	MIXED	OFF	OFF
Tone of voice	ON	ON	ON	MIXED	MIXED	OFF	OFF
Efficacy claims	ON	MIXED	MIXED	RISK	MIXED	RISK	RISK
Sustainability wording	MIXED	RISK	MIXED	RISK	RISK	RISK	RISK
Consistent	**7 / 8**	**5 / 9**	**5 / 9**	**4 / 9**	**4 / 9**	**1 / 9**	**1 / 7**

PACK

The pack holds on 7 of 8 elements because it goes through the Responsible Person's sign-off. The one miss is green wording, which nobody owns. The process works, but it stops at the box.

MARKETPLACES

Retailers rewrite titles and benefits to fit their own templates. Shade names are truncated, and claims are paraphrased without the evidence behind them.

CREATORS

Creators get product but no brief: no swatch rules, no claim list, no wording to avoid. Under the claims rules, their posts are still L'Odet's advertising.

SO WHAT

Consistency goes from 7/8 on pack to 1/9 on marketplaces. The drift isn't random: it tracks control. Partner and creator channels need a **kit** they can apply without interpreting, rather than more guidelines.

05

Three drifts, up close

These three elements are specific to cosmetics, they matter most for conversion or compliance, and the current guidelines say least about them.

DRIFT A · SWATCH IMAGERY

The shade on screen is not the shade in hand



Same shade, four channels: colour rendering as found (illustrative)

FINDING	Each channel shoots under its own light, retouches skin and product together, and mostly shows light-to-medium skin. Shade 220 reads warm on the e-shop and neutral on social.
WHY IT MATTERS	Online shoppers choose foundation by eye. A wrong swatch means the wrong shade, which leads to a return and a lost repeat customer. Under 655/2013, a picture that overstates the result also counts as a claim.
SPECIFY	5000 K daylight-balanced light, grey card in frame, and a master Lab/HEX value stored for each shade. Show at least three skin depths (fair, medium, deep). Never retouch the product layer.

DRIFT B · SHADE NAMING

Names are poetic, not navigable

Today	"Dune", "Sable", "Ambre"
System	**220W** Dune · **230N** Sable

FINDING	Each launch picks its own names. Numbers are sequential by launch date, not by depth, so a customer can't tell from "Ambre" whether it is lighter or warmer than "Sable".
WHY IT MATTERS	Shade finding is the main barrier to buying complexion products online. Marketplaces also truncate names, so the number is often all that survives.
SPECIFY	Use a three-digit depth number plus an undertone letter (W / N / C / O), then the evocative name. The name carries the brand and the code carries the information. Test: a shopper can place 240N between 230N and 250N without help.

DRIFT C · CLAIMS & GREEN WORDING

The claim loses its evidence as it travels

PACK	"Hydration +32% at 8 h*"
E-SHOP	"Hydrates all day"
CREATOR	"Fixes dry skin, so clean!"

FINDING	The pack claim is precise and backed by a test. Each retelling stretches it a little further, ending in a promise that isn't supported plus a generic green term.
WHY IT MATTERS	Since 27 Sep 2026, generic environmental claims like "clean", "eco" or "green beauty" are banned unless substantiated, with no sell-through window. Retailers are also liable, so they will start removing listings.
SPECIFY	Keep one claim library. Every approved line links to its evidence in the Product Information File, and channels choose lines from it without rewriting them. Add a kill list of banned words.

SO WHAT

All three have the same root cause. Each is a **rule that needs interpreting**, so every photographer, retailer and creator interprets it differently. Turning each into a value, a code or a fixed line removes the interpretation.

06

What to specify

Each drifting element is rewritten from a description into a specification that two people could apply separately and get the same result.

ELEMENT	NOT	INSTEAD	TEST
Swatch imagery	*Luminous, natural, real skin*	5000 K light, grey card, master Lab per shade, 3 skin depths, product never retouched	Two studios shoot shade 220 separately, and both match the master within ΔE < 3
Shade naming	*Evocative names per launch*	Depth number + undertone letter + name, e.g. **230N Sable**	A shopper orders 240N correctly without the shade finder
Tone of voice	*Expert, warm, sensorial, honest*	Three worked examples per channel: PDP, caption, CRM subject line	Two writers draft the same PDP, and the brand team can't tell which is whose
Efficacy claims	*Paraphrase the pack*	Claim library: approved lines, each linked to its PIF evidence; use verbatim	Every live claim traces to a test in under 2 minutes
Sustainability	*Clean, eco, green beauty*	Only specific, substantiated statements, e.g. "bottle: 50% recycled glass"	No term from the kill list appears in any channel

KILL LIST: REMOVE NOW

- × "Clean beauty"
- × "Chemical-free"
- × "Eco-friendly"
- × "Non-toxic"
- × "Green beauty"
- × "Natural", unqualified
- × "Planet-friendly"
- × "Conscious"

KIT FOR PARTNERS AND CREATORS

- Swatch pack: master images per shade, all 3 skin depths
- Shade table: code, name, depth, undertone, HEX
- Claim card: 10 approved lines per hero SKU, verbatim
- One-page "say / never say" for creators

SEQUENCE

NOW · NOV 2026
Sweep green wording
ECGT already applies; audit every live listing

+2 WEEKS
Claim library v1
Hero SKUs first; signed off by the Responsible Person

+6 WEEKS
Swatch protocol & shade codes
Reshoot top 20 complexion SKUs

+1 QUARTER
Ship kit, re-audit
Marketplaces and creators, the two worst channels

SO WHAT

Start with claims, because they carry the legal exposure. Swatches and shade codes come next, because they drive conversion and returns. Tone can wait a quarter, since it costs consistency but carries no legal risk.

07

Decisions

Five decisions arise from this briefing. Each has one owner and a date.

#	DECISION	OWNER	BY	IF IT IS NOT TAKEN
D1	Remove all kill-list wording from live channels and listings	Head of Regulatory (RP)	13 Nov	Exposure to enforcement and retailer delistings
D2	Adopt the claim library as the only source of efficacy copy	Brand Director	27 Nov	Claims keep stretching as they travel
D3	Approve the depth + undertone shade code system	Head of Product Marketing	15 Dec	Shade finding stays the main barrier online
D4	Fund the swatch protocol reshoot (top 20 SKUs)	Creative Director	15 Dec	Returns from wrong-shade orders continue
D5	Make creator and partner kits a condition of seeding and listing	Head of E-commerce & Influence	31 Jan	The two worst channels stay unmanaged

BASIS OF ASSESSMENT

Channels: pack, e-shop, CRM, owned social, retail and pharmacie, marketplaces and creator content.
Standard: the current L'Odet guidelines where they specify, and dominant usage where they only describe.
Regulatory lens: Reg. (EC) 1223/2009, Reg. (EU) 655/2013 and Dir. (EU) 2024/825.
Not assessed: commercial impact of drift (returns, conversion), which needs L'Odet data, and full legal review of each claim.

SOURCES

McKinsey & Company, *State of Beauty 2025*: market size, growth to 2030, skin care share, online share.
Commission Regulation (EU) No 655/2013: common criteria for cosmetic claims, including pictures and names.
Directive (EU) 2024/825 (ECGT), applies from 27 Sep 2026: CIRS Group, COSMOS-standard and osapiens summaries.

STATUS: DRAFT FOR VALIDATION

Market and regulatory facts are sourced above. L'Odet's element scores, channel ratings, example claims and shade names are **working hypotheses** built on typical patterns in prestige cosmetics. They should be confirmed against L'Odet's actual guidelines and a sample of live assets per channel before the decisions are taken.