

DARK REACH STUDY • BEAUTY • OCTOBER 2026

A Watchword study. Watchword is creator compliance monitoring for regulated brands on TikTok Shop.

On TikTok Shop, creator videos can run as a beauty brand’s own ads. Here’s what 1,051 of them say.

Dark Reach is the exposure your brand gets from creator videos nobody at your brand has seen, reviewed, or approved, including as the brand's own paid ad through GMV Max. 698 of the videos came from paid creators. 610 of those linked a TikTok Shop product, the kind GMV Max can use as the brand's own paid ad. Inside them we found three risks.

DRUG-TYPE CLAIMS

17%

of paid creator videos made a drug-type claim, like regrowing hair or clearing acne, about a product sold as a cosmetic.

116 of 698 • 9 in 10 were about hair growth, dark spots, acne or dandruff

DISCLOSURE GAP

93%

of paid creator videos had no paid creator disclosure in the creator's own words. Most relied on TikTok's label alone.

651 of 698

BRAND SAFETY

4%

of paid creator videos put a brand-safety risk next to the product, such as explicit audio or children in commercial content.

27 of 698

1,051 US creator videos about 12 brands • posted June 28 to September 25, 2026 • scanned and reviewed by AI using review rules built from FDA and FTC guidance • every drug-type claim checked against the product itself

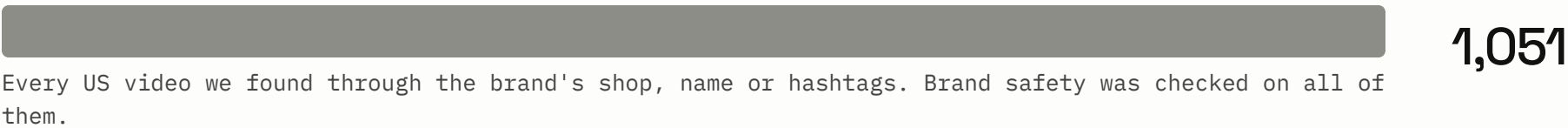
- Get a free Dark Reach Check
- How we counted
- Download the PDF

HOW THE STUDY NARROWS

From 1,051 videos to the ones that sell the brand.

We started wide and narrowed at each step, so every number in this report shows what it was counted out of.

Creator videos reviewed



From paid creators



698

Each had a visible commercial connection to the brand, such as TikTok's commission or paid-partnership label (692 of the 698). The other 353 showed no sign of a paid relationship, or were not about the brand. Claims and paid creator disclosure are counted on these 698.

Affiliate posts linking a TikTok Shop product



610

The kind of video GMV Max can use as the brand's own paid ad. 87% of the 698.

KEY FINDINGS

- We reviewed 1,051 US TikTok creator videos about 12 beauty brands, posted June 28 to September 25, 2026. 698 came from paid creators: creators with a visible commercial connection to the brand.
- 610 of those 698 (87%) were affiliate posts linking a TikTok Shop product, the kind GMV Max can use as the brand's own paid ad. None came from a brand's own account.
- Drug-type claims: 17% of paid creator videos (116 of 698) made a drug-type claim about a product sold as a cosmetic. 90% of those (104 of 116) were about hair growth, dark spots, acne or dandruff. 8 of the 12 brands had at least one.
- In 45 of those (6% of all paid creator videos), the creator went past the brand's own TikTok Shop listing. We call this Claim Drift. 43 of the 45 (96%) linked a TikTok Shop product, the kind of video GMV Max can use as the brand's ad if the brand runs GMV Max and the video is authorized. In the other 71 (10%), the claim was already on the brand's own listing.
- Disclosure Gap: in 93% of paid creator videos (651 of 698), the creator never said in their own words that they were paid. Those videos drew 96% of views on paid creator videos. In 11, the creator said nothing at all or said it was not an ad.
- Brand safety: 4% of paid creator videos (27 of 698) put a brand-safety risk next to the product, including two videos with 6.7 million views between them. 1 was high severity.
- Skincare had the most drug-type claims (97 of 477, 20%), then haircare (19 of 109, 17%). Makeup had none in 112.

87% of paid creator videos were the kind GMV Max can use as the brand’s ad when authorized.

610 of the 698 paid creator videos were affiliate posts: a creator video with a TikTok Shop product link that earns the creator commission. That is the kind of post GMV Max, TikTok Shop's automated ad campaign, can use. TikTok says GMV Max "automatically includes authorized affiliate videos that feature your selected products."

We call this Dark Reach: the exposure your brand gets from creator videos nobody at your brand has seen, reviewed, or approved, including as the brand's own paid ad through GMV Max. We cannot see a brand's GMV Max settings, which videos were authorized or which videos the brand reviewed, so we do not claim any of these ran as ads. We also do not know which of the 12 brands run GMV Max. TikTok gives brands filters to exclude videos from GMV Max ads, but a brand has to know which videos to exclude, and TikTok says excluded videos may still appear in regular, unpaid traffic.

Most came from small accounts: 59% of paid creator videos (409 of 698) were from creators with under 10,000 followers.

WHAT THIS MEANS FOR A BRAND

Nearly 9 in 10 paid creator videos are the kind GMV Max can use as your ad. If one is authorized, a claim or a missing #ad in a small creator's video can run in your paid media.

Our sample was found partly through brand shops, so a high affiliate share is expected. None of the 698 came from a brand's own account. How GMV Max uses creator videos: our GMV Max guide.

87%

of paid creator videos were affiliate posts linking a TikTok Shop product · 610 of 698



Left: affiliate post linking a product, 610 · Right: other, 88

The brand may be responsible for what its paid creators say.

Three sets of public guidance are relevant to the risks in this report. Each one is linked so you can check it.

1 · Liability

What paid creators say may count against the brand.

The FTC's Endorsement Guides say: "Advertisers are subject to liability for misleading or unsubstantiated statements made through endorsements or for failing to disclose unexpected material connections between themselves and their endorsers." The same rule says advertisers should "monitor their endorsers' compliance." FDA regulations say a product's intended use can be shown by labeling claims, advertising, and statements by the people legally responsible for the product, or their representatives. The FTC has sent Notices of Penalty Offenses to hundreds of companies: on endorsements in 2021 (more than 700 companies) and on backing up product claims in 2023 (about 670). A company that received a notice and then engages in the practices it describes can face civil penalties of up to \$53,088 per violation. We did not check whether any brand in this study received a notice.

[16 CFR 255.1\(d\) and \(d\)\(2\)](#) · [21 CFR 201.128](#) · [FTC notice, 2021](#) · [FTC notice, 2023](#) · [16 CFR 1.98](#) · [Is a brand responsible?](#)

2 · Paid creator disclosure

A platform label may not be enough.

Asked whether influencers can rely on a platform's built-in disclosure tool, the FTC answers "Not necessarily." It says "the ultimate responsibility for clearly and conspicuously disclosing a material connection rests with the influencer and the brand," and "it's always best to add your own disclosure even if a platform offers its own disclosure tool." TikTok's label is added by the platform, not said by the creator. The ad industry's self-regulator has gone both ways on it: in one 2025 case ([NAD #7472](#)) it said TikTok's "Creator earns commission" label "could be easily missed by consumers," and in another ([NAD #7521](#)) it found the label enough for creators whose only tie to the brand was free product and the affiliate program.

[FTC, What People Are Asking](#) · [Our disclosure guide](#)

3 · Platform and industry action

TikTok and the ad industry's self-regulator have acted on similar issues.

TikTok: its TikTok Shop rules, dated September 2, 2026, say "Medical claims are prohibited for non-Over-the-Counter (non-OTC) products." TikTok says violations may trigger "enforcement actions, including but not limited to content removal, listing suppression, or account-level penalties." The ad industry: in 2025, the National Advertising Division, the industry's self-regulation group run by BBB National Programs, recommended that a beauty brand "make a good-faith attempt to request that the influencer remove the TikTok video," even though the influencer was unpaid and had only received free product.

[TikTok Shop, Responsible Health-Related Content](#) · [NAD Case #7453](#) · [TikTok Shop policy updates](#)

A paid creator video can carry a drug-type claim, a Disclosure Gap or a brand-safety risk. If it is authorized for GMV Max, that same video can run as the brand's own ad.

A summary of public rules, not legal advice.

1 in 6 paid creator videos made a drug-type claim about a product sold as a cosmetic.

@creator_01 · spoken

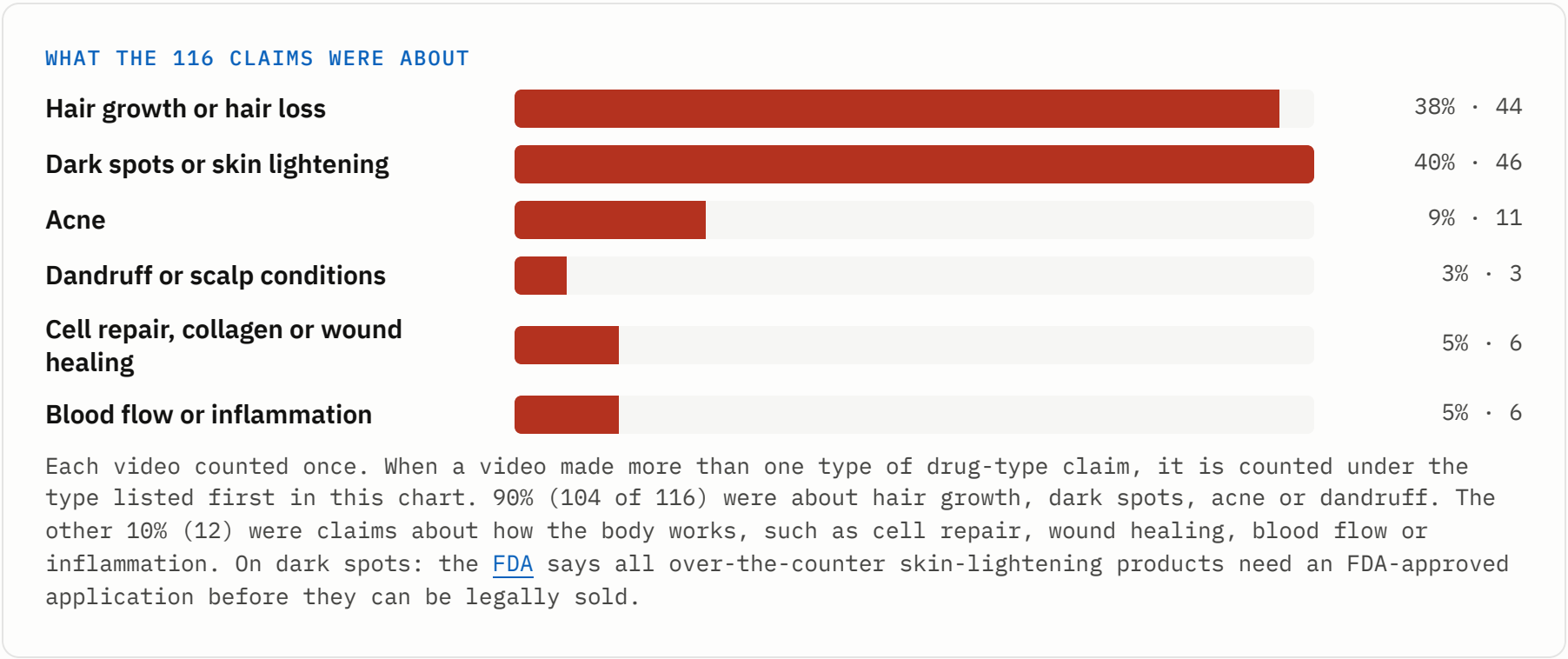
CLAIM DRIFT

"Essentially a faster working [hair-loss drug] without all the side effects."

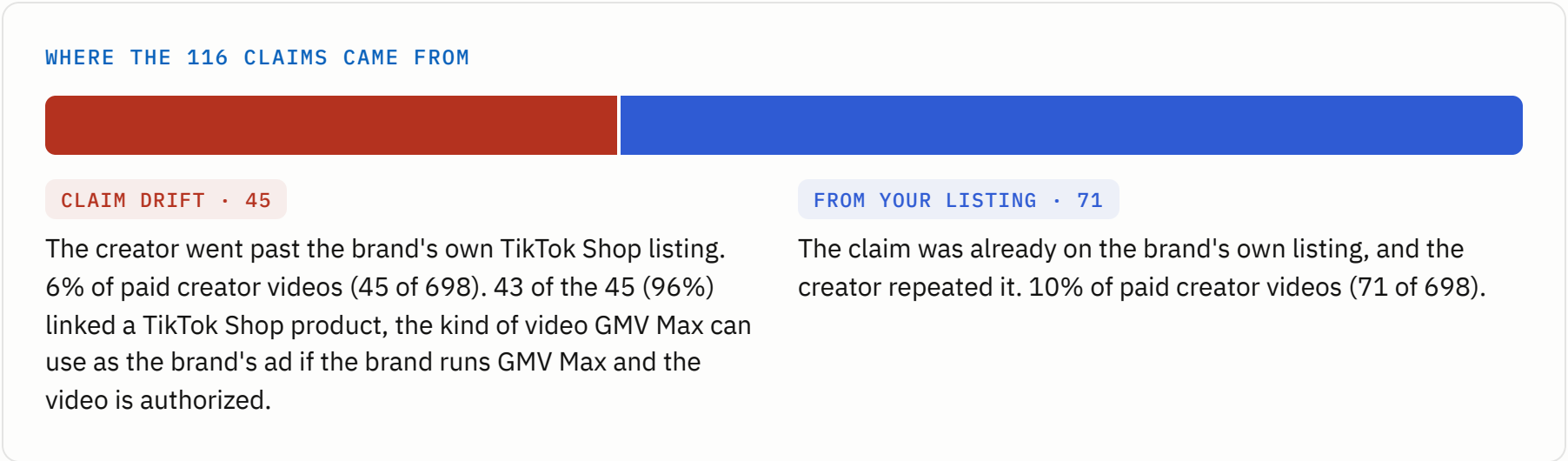
Said about a shampoo sold as a cosmetic. Its listing makes no hair-regrowth claim.

A drug-type claim says a product treats a condition or changes the body, like regrowing hair or clearing acne. On a cosmetic, the FDA may treat that as a drug claim. 17% of paid creator videos (116 of 698) made one. Every one of the 116 carried TikTok's commission or paid-partnership label.

We checked each claim against the product itself: its TikTok Shop listing, the brand's own site and major retailers, and the FDA's drug label databases. Claims about an over-the-counter drug that matched its labeled use are not counted, and neither are videos we could not verify.



A drug-type claim can be allowed when the product is sold as an over-the-counter drug that meets FDA's rules for that use, for example an acne or dandruff product with an approved active ingredient and a Drug Facts label. None of the products behind these 116 videos was sold that way.



CLAIM DRIFT: THE CREATOR WENT FURTHER

THE BRAND'S LISTING

A mask whose listing talks about brightening the look of dark spots.

Cosmetic. "The look of" describes appearance.

FROM YOUR LISTING: THE BRAND SAID IT FIRST

THE BRAND'S LISTING

A scalp ampoule whose listing promises reduced hair loss and shedding and enhanced growth.

The drug-type claim starts here.

A CREATOR, ABOUT THE SAME MASK

"Not only does this brighten, but this also helps remove dark spots."

Spoken. "Brighten" stays cosmetic. "Remove dark spots" is the kind of claim we count as drug-type.

A CREATOR, ABOUT THE SAME AMPOULE

Points to baby hairs growing back.

Typed caption, paraphrased. Counted under From your listing, not Claim Drift. The creator still made the claim in a paid video.

COUNTED AS DRUG-TYPE

Growing or regrowing hair or lashes. Stopping hair loss. Removing or lightening dark spots or melasma. Treating or preventing acne. Boosting collagen or repairing cells. Blood flow, inflammation, killing germs, dandruff or dermatitis.

NOT COUNTED • COSMETIC

Brightening. "The look of." Hydrating, nourishing, smoothing. Makeup coverage. Claims about an OTC drug that match its label.

IT DEPENDS WHAT YOU SELL

Skincare20% · 97 of 477

Haircare17% · 19 of 109

Makeup0% · 0 of 112

Drug-type claims as a share of paid creator videos, by each brand's main category: 6 skincare, 3 haircare, 3 makeup brands. Some skincare brands also sell hair and lash products.

IT DEPENDS ON BRAND SIZE

Large brands: 55 of 229 paid creator videos (24%). 50 of the 55 repeated the brand's own listing.

Small brands: 59 of 293 (20%). 38 of the 59 were Claim Drift.

Mid-size brands: 2 of 176 (1%).

With 4 brands per size group, treat these as patterns, not precise rates.

How spread out it is: 8 of the 12 brands had at least one drug-type claim. The largest single brand accounted for 32 of the 116; without it, the rate is 84 of 583 (14%). Claim Drift is more concentrated: one brand had 23 of the 45, and without it the Claim Drift rate is 22 of 595 (4%). The three makeup brands had none.

SMALL CREATORS

62%

of drug-type claims (72 of 116) came from creators under 10,000 followers.

REAL REACH

23.2M

views on 11 drug-type claim videos that passed 100,000 views each. 2 passed 1 million. Both repeated the brand's own listing.

Views as collected in late September 2026

WHAT THIS MEANS FOR A BRAND

These claims show up in paid creator videos whether or not the brand wrote them. Most come from small creators, and a small video can still run as your ad through GMV Max if it is authorized. Checking only your biggest creators misses most of them.

What paid creators said, beyond what the listing says.

Each of these is Claim Drift: the claim is not on the product's own TikTok Shop listing, and the product is not sold as a drug. Each passed the second review and the product check. Creators anonymized; product and brand names removed.

@creator_02 • spoken

CLAIM DRIFT

"It helps increase blood flow to the area."

PRODUCT

A body cream, sold as a cosmetic.

LISTING

Talks about the look of cellulite.

Changing blood flow is a claim about how the body works, which we count as drug-type.

Skincare

@creator_03 • spoken

CLAIM DRIFT

"I've noticed a lot of baby hairs coming back on my hairline. My hair feels a lot thicker and fuller."

PRODUCT

A hair serum, sold as a cosmetic.

LISTING

Talks about the look of thinning hair, not regrowth.

"Thicker and fuller" can be cosmetic. Hair "coming back" is a regrowth claim, even as a personal result.

Hair care

@creator_04 • spoken

CLAIM DRIFT

"It helped out with my dandruff and flakiness all over my scalp."

PRODUCT

A hair rinse, sold as a cosmetic.

LISTING

Talks about moisture, detangling and breakage, not dandruff.

The FDA treats an anti-dandruff product as a drug. This product is not sold as one.

Hair care

@creator_05 • spoken

CLAIM DRIFT

"Studies show that this peptide helps with wound healing and skin regeneration."

PRODUCT

A face ampoule, sold as a cosmetic.

LISTING

Makes no wound-healing claim.

We count wound healing and skin regeneration as drug-type claims. "Studies show" is also a claim that may need proof.

Skincare

In 11 videos the paid relationship was hidden. In 640 more, only TikTok’s label disclosed it.

A Disclosure Gap is when the paid creator disclosure is missing from the creator's own words: no #ad, no "I earn commission," nothing a viewer would hear or read from the creator. Together, 93% of paid creator videos (651 of 698) had one, and those videos drew 96% of views on paid creator videos. They fall into two groups.

ACT NOW

11 videos

hid the paid relationship. In 7, the creator said it was not an ad while TikTok's commission label was on the post; one said they bought the product with their own money. 4 had no disclosure of any kind.

UNSETTLED

640 videos

relied on TikTok's commission or paid-partnership label alone, with nothing from the creator. Whether that is enough is an open question.

DOING IT RIGHT

1 in 17

videos (42) had the creator say it in their own words as well as carry TikTok's label.

On the label-only group: TikTok's label is added by the platform, not said by the creator. Asked whether a platform's built-in tool is enough, the FTC answers "Not necessarily," and says "it's always best to add your own disclosure even if a platform offers its own disclosure tool." The ad industry's self-regulator has gone both ways. In 2025 it said TikTok's "Creator earns commission" label "could be easily missed by consumers" in one case, and that a TikTok Shop product link on its own does not disclose the relationship, and in another found it enough for creators whose only tie to the brand was free product and the affiliate program. Either way, the FTC recommends a creator's own clear disclosure, such as #ad. See our [creator disclosure guide](#).

HOW THE CREATOR DISCLOSED THE PAID RELATIONSHIP	VIDEOS	SHARE
TikTok label plus the creator's own words	42	6.0%
Said it was not an ad while TikTok's commission label was on the post (Disclosure Gap)	7	1.0%
Not disclosed at all (Disclosure Gap)	4	0.6%
TikTok label only, nothing from the creator (Disclosure Gap)	640	91.7%
Partial: said the product was sent or given, no mention of commission	5	0.7%
Total	698	100%

Disclosure Gap = said not an ad, plus not disclosed, plus label only: 651 of 698 (93.3%). 692 of 698 videos carried TikTok's commission or paid-partnership label. Paid creator videos drew about 77.2 million views in all. The 640 label-only posts drew about 71 million of them (92%). Views as collected in late September 2026: total views to date, organic and paid combined. Older videos had more time to collect views.

WHAT THIS MEANS FOR A BRAND

In this study, almost all views on paid creator videos came from videos that relied on TikTok's label alone. Asking for #ad in the brief is the fix. Knowing which creators skipped it is the hard part.

4% of paid creator videos put a brand-safety risk next to the product. Two of them drew 6.7 million views.

Brand safety here means what surrounds the product in the video: the sound, the language, who appears in it. 4% of paid creator videos (27 of 698) had a brand-safety risk, and 1 was high severity. Together they drew 7.2 million views, 9% of views on paid creator videos. Most of that came from two videos, with 4.3 million and 2.3 million views. We counted only clear cases and left out borderline content. The creator has to change the video, or the brand keeps it out of its ads.

WHAT WE FOUND

The two most common types were explicit words in a borrowed song (10 videos) and children in commercial content (6 videos; a brand-safety concern, not a rule violation). The rest were explicit language, hate or discrimination, sexual content and body image.

A video can have more than one type. Not counted as risk: TikTok's AI-generated label, and product claims (counted once, under drug-type claims). Views as collected in late September 2026: total views to date, organic and paid combined. Older videos had more time to collect views.

WHAT THIS MEANS FOR A BRAND

Few videos, but two of them reached millions of people. If one is authorized and runs through GMV Max, it runs as your ad, explicit audio and all.

Scanned and reviewed by AI using Watchword's review rules. 1,051 US TikTok videos, 12 beauty brands.

About 1 in 3 paid creator videos made a specific claim that may need proof.

CLAIMS THAT NEED PROOF

32%

of paid creator videos made a specific claim that goes beyond the listing: a number, a result in a set time, "clinically proven," or "better than" another brand. These are not drug-type claims, but the FTC says advertisers should have proof for the claims made for them. If a regulator, a retailer or a competitor asks for the proof behind one of these lines, it helps to have it on file.

225 of 698 · treat as a pattern, not a precise rate

WHAT THIS MEANS FOR A BRAND

In this study, about 1 in 3 paid creator videos made a specific claim the brand may need to back up.

07 • WHAT IT MEANS FOR YOUR TEAM

REGULATORY AND LEGAL
TEAMS

You approve what the brand says. Paid creators say more.

17% of paid creator videos made a drug-type claim about a product sold as a cosmetic, most about hair growth or dark spots. For many brands, review covers what the brand writes, not what paid creators say.

SOCIAL AND CREATOR TEAMS

You recruit, brief and pay the creators. Most fixes are one line, not a creator to drop.

Each Claim Drift example was a single spoken line. Most Disclosure Gaps close with one #ad in the brief. Most of these creators are small accounts.

ECOMMERCE TEAMS

You run the TikTok Shop listing and the GMV Max budget. Know which creator videos it can use.

87% of paid creator videos linked a product, the kind GMV Max can use as your ad, including 43 of the 45 Claim Drift videos. TikTok's health rules can mean removed videos or a suppressed listing.

AGENCIES

You run creator programs for brands and answer for the results. Your clients will ask who was watching.

8 of 12 brands had at least one drug-type claim. In 7 videos, a paid creator said it was not an ad while TikTok's commission label was on the post. A daily check lets you show a client the problem was caught and fixed before they heard about it.

You can’t watch every video. You can check every one.

The FTC says "Your company is ultimately responsible for what others do on your behalf," and that advertisers "need to have reasonable programs in place to train and monitor members of their network," including to "periodically search for what members of your network are saying." Watchword does the first pass. You make the call.

01

Scan every day

New creator videos about your brand are checked daily for drug-type claims, Disclosure Gaps and brand safety, using the same review rules as this study.

02

Sort what matters

Each finding shows the exact line and the rule it touches, sorted into Act now, Remind, From your listing and Doing it right. Claims that start on your own listing are shown separately, so you fix the listing once.

ACT NOW

REMIND

FROM YOUR LISTING

DOING IT RIGHT

03

Act on it

Send the drafted message to the creator (edit first, takedown if needed), add the video to your GMV Max exclusion list, or close it out. Thank the creators doing it right.

[FTC, Endorsement Guides: What People Are Asking](#)

Creator videos are where these brands sell. They are also where the risk is.

- Most paid creator videos are built to sell. 87% linked a TikTok Shop product, the kind GMV Max can use as the brand's ad, and most came from small accounts.
- 17% made a drug-type claim about a product sold as a cosmetic. 9 in 10 of those were about hair growth, dark spots, acne or dandruff.
- 45 went past the brand's own listing. That is Claim Drift, and only checking the videos catches it. 43 of the 45 were the kind of video GMV Max can use.
- 93% had no disclosure in the creator's own words. Those videos drew 96% of views on paid creator videos.
- Most fixes are small: one creator line edited, one #ad added. The hard part is knowing which videos need it.

ACROSS THIS 12-BRAND SAMPLE, PER 100 PAID CREATOR VIDEOS

17

with a drug-type claim

93

with a Disclosure Gap

4

with a brand-safety risk

Based on 116, 651 and 27 of 698 paid creator videos in this study. Your brand's numbers will differ. A Dark Reach Check shows them.

FREE DARK REACH CHECK

8 of 12 brands had at least one drug-type claim. See your brand’s numbers.

The same check as this study, run once on your brand's recent creator videos.

Your drug-type claim count, split into Claim Drift and From your listing, next to the study's 17%.

Your Disclosure Gap and brand-safety counts.

The exact videos and lines behind each one.

A one-page summary you can forward to your regulatory team.

An optional 20-minute walkthrough.

No login and no access to your accounts. Just your brand name and work email.

Brand

Brand name

Work email

you@brand.com

Your role

Select your role



Request my check

For brands selling on US TikTok Shop. Free. Limited each week. Not legal advice. We use what you share only to reply to you. [Privacy](#)

ABOUT WATCHWORD

Watchword is creator compliance monitoring for regulated brands on TikTok Shop.

- Checks creator videos about your brand every day for drug-type claims, Disclosure Gaps and brand safety.
- Shows the exact line, the rule it touches and the next step for each finding.
- Built for brand regulatory teams, social and creator teams, eCommerce teams and their agencies.
- Independent of the brands studied: none of the 12 is a Watchword customer.

Watchword is not a law firm and does not give legal advice. Findings flag possible issues for a brand's own review, measured against public FDA, FTC and TikTok guidance. A brand's own counsel makes the final call.

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Common questions about this study.

What is Dark Reach?

The exposure your brand gets from creator videos nobody at your brand has seen, reviewed, or approved, including as the brand's own paid ad through TikTok's GMV Max. Mostly creator and affiliate videos. More on the [Dark Reach page](#).

What is a paid creator?

A creator with a visible commercial connection to the brand, such as TikTok's commission or paid-partnership label on the post. 692 of the 698 paid creator videos in this study carried one of those labels.

What is Claim Drift?

When a creator makes a claim about a product that the brand's own TikTok Shop listing does not make. This study counted drug-type claims only, such as regrowing hair, treating acne or removing dark spots, on products sold as cosmetics. 45 of 698 paid creator videos (6%) had Claim Drift.

What does "From your listing" mean?

The creator repeated a drug-type claim that is already on the brand's own TikTok Shop listing. 71 of 698 paid creator videos (10%). The creator still made the claim in a paid video, so it counts the same.

What is a Disclosure Gap?

When the paid creator disclosure is missing from the creator's own words. That includes videos that rely on TikTok's label alone, videos that say they are not an ad while earning commission, and videos with no disclosure at all. In this study, 651 of 698 paid creator videos (93%) had one.

Are these legal violations?

No ruling is made here. The findings are possible issues for a brand's own review, described against public FDA and FTC guidance. This is not legal advice.

Is this every video the brands run?

No. It is a sample of each brand's newest creator videos. Read the shares, not the totals.

Which brands and creators were studied?

We do not name any brand or creator. The 12 brands were drawn at random across skincare, haircare and makeup, and large, mid-size and small.

Is a brand responsible for what TikTok Shop affiliate creators say?

We can't answer that for any brand; that is a question for counsel. The FTC's Endorsement Guides say advertisers can be subject to liability for statements made through endorsements, and its FAQ says advertisers "need to have reasonable programs in place to train and monitor members of their network." In this study, about 1 in 6 paid creator videos made a claim we count as drug-type about a product sold as a cosmetic. More in [Is a Brand Responsible for What TikTok Shop Affiliate Creators Say?](#).

Can creator videos run as a brand's GMV Max ads?

They can. TikTok says GMV Max "automatically includes authorized affiliate videos that feature your selected products." 610 of the 698 paid creator videos in this study were affiliate posts linking a TikTok Shop product, the kind GMV Max can use. We cannot see any brand's settings. More in [our GMV Max guide](#).

Do TikTok Shop affiliate creators have to disclose commissions?

TikTok Shop's Creator Terms of Use (section 3.2(f)) require creators to disclose the commercial relationship in accordance with applicable laws and guidelines, which the terms say include the FTC's Endorsement Guides, and the FTC says "it's always best to add your own disclosure even if a platform offers its own disclosure tool." The ad industry's self-regulator has gone both ways on whether TikTok's label alone is enough. In this study, 92% of paid creator videos relied on TikTok's label alone. More in [our guide to what TikTok's terms ask of creators and brands](#) and [our creator disclosure guide](#).

Sample

We started from Kalodata's estimates of US TikTok Shop beauty store sales, July 7 to August 5, 2026, and kept the brand's own stores (not resellers) that earn at least half their sales through affiliates. 179 stores qualified. We split them by category (skincare, haircare, makeup) and by sales into thirds (large, mid-size, small), then drew brands at random within each group: 6 skincare, 3 haircare, 3 makeup. Brands owned by a company we were in active talks with were left out. For each brand we took up to the 150 newest creator videos we could find over 90 days. 1,051 US videos in any language, posted June 28 to September 25, 2026, were found through the brand's shop, name or hashtags. 698 came from paid creators, with a visible commercial connection to the brand: 692 carried TikTok's commission or paid-partnership label, 4 linked a TikTok Shop product with no label, and in 2 the creator said the product was gifted. The other 353 showed no sign of a paid relationship, or were not about the brand. We checked those for brand safety only, so claims, paid creator disclosure and brand-safety shares count only the 698. This is a sample, not a count of every video a brand runs.

Review

Scanned and reviewed by AI, using review rules built from FDA and FTC guidance by an experienced product developer and marketer. First pass: the scan read every video (speech, caption and on-screen text) and flagged high-priority claims, the ones most likely to be drug-type. Second pass: every high-priority claim was read again against the FDA drug-versus-cosmetic line and the brand's own TikTok Shop listing. Product check: every claim that went past the listing was then checked against the product itself, using the brand's site, major retailers and the FDA's drug label databases (DailyMed and the National Drug Code Directory). In the first review, 27 of these claims had been counted as Claim Drift because the creator's wording went further than the listing (for example, hair "coming back" against a listing that promises enhanced growth). For this report we used a stricter test: a claim counts as Claim Drift only if no TikTok Shop listing for that product makes a similar drug-type claim. 26 failed that test and moved to From your listing; in 1 more, the creator read the brand's own website copy word for word, so it moved too. 2 claims about an over-the-counter drug that matched its labeled use, and 3 we could not verify, were left out of every drug-type count. Borderline cases are left out. Claim types: each drug-type video was counted once; a video with more than one type is counted under the first in this order: hair growth or loss, dark spots or lightening, acne, dandruff, germs, cell repair or collagen or wound healing, blood flow or inflammation. Views as collected in late September 2026: total views to date, organic and paid combined. Older videos had more time to collect views. Non-English videos were translated first. Scans ran October 15 to 16, 2026; the product check ran October 18.

Limits and who we are

Claims were judged against the brand's TikTok Shop listing; the product check also looked at brand sites, retailers and FDA drug databases, but not at packaging or studies. Findings are possible issues for a brand's review, not legal conclusions. AI review can make mistakes. Some videos could not be fully checked (audio or visuals) and stay in the totals. Videos were collected in late September 2026 and scanned in mid-October; some may have changed or been removed since. Twelve brands is a small sample, so group numbers are patterns, not precise rates. Watchword is creator compliance monitoring for regulated brands on TikTok Shop. None of the 12 brands is a Watchword customer.

SOURCES

[16 CFR 255.1, FTC Guides Concerning the Use of Endorsements and Testimonials](#)
[FTC, FTC's Endorsement Guides: What People Are Asking](#)
[21 CFR 201.128, Meaning of "intended uses"](#)
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[Is a Brand Responsible for What TikTok Shop Affiliate Creators Say?](#)

[The risk of Dark Reach](#)

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