

The Case for Natural Personal Care Standards

The growth in natural and organic personal care products has resulted in a need for logical, practical and achievable standards

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Conventional wisdom would tell us that the name of a product and the ingredients used to make that product are meaningful and truthful as reflected on the product label. But the fact is labeling cosmetics often depends entirely on the manufacturer.

A Bit of (Truthful) History

The Federal Food, Drug and Cosmetic Act of 1938 was signed by Franklin Delano Roosevelt amidst a burgeoning public outcry for consumer protection from quack cures and cosmetic products that caused harm rather than cured or enhanced the user. The act was designed to protect the public from products that made unsubstantiated or fraudulent claims, or that caused harm due to inclusion of harmful ingredients. The act covered the broad scope of both what is consumed or ingested as food and those ingredients that are used to treat, cure or enhance cosmetically.

Though this new law made it illegal for manufacturers to include potentially harmful ingredients in products, it wasn't until it was amended to include the Pesticide Amendment of 1954, the Food Additives Amendment of 1958 and the Color Additive Amendments of 1960, that the law became more specific, requiring manufacturers to use only ingredients (including additives and color) in manufacturing that prior research revealed to be safe for public consumption. Additionally, the Fair Packaging Act of 1967 introduced strict labeling guidelines, which required manufacturers to own up to ingredients used in the manufacturing and processing of their products, and to this end to be accountable to a certain standard and disclosure to the buying public.

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What this act did more than anything else was to usher in the era of "truth in labeling," which held manufacturers responsible for ensuring that products brought to the marketplace were safe for consumers, assuring that ingredients used in products were tested and deemed safe. Additionally, it ensured that the manufacturing process

did not expose product ingredients to contaminants by requiring manufacturers to submit a listing of all ingredients, along with company contact information, that are used for food, drug and cosmetic purposes.

The US Food and Drug Administration (FDA) classifies cosmetics and personal care products, but does not regulate them. The FDA granted self-regulation to the Personal Care Products Council (formerly the CTFA), the self-appointed industry organization. What this means is that the cosmetic/personal care industry does not have to account to anyone—not even the FDA. The direct result of industry self-regulation is that many products on the market today can be toxic.

The lack of accountability at the manufacturer level often results in dubious marketing and labeling claims that confuse consumers and hurt the credibility of the personal care industry. According to Treehugger.com, "major loopholes in US federal law allow the \$35 billion cosmetics industry to put virtually unlimited amounts of chemicals into personal care products with no required testing, no monitoring of health effects and inadequate labeling requirements."¹

The "Green" Movement

Heightened awareness of our environment (who hasn't heard of the Academy Award-winning documentary *An Inconvenient Truth* by former vice president Al Gore?), sustainability, wellness and overall green interest has given personal care manufacturers and marketers a wonderful opportunity to distinguish their products in the marketplace. The interest in exploiting the green connection is simply "in the numbers." Consumer demand for personal care products based on natural ingredients is posting double-digit growth and is expected to reach about \$7 billion by 2012, according to a recent study by Kline & Co. A recent Packaged Facts report sees the trend growing even more drastically: "After growing more than \$2 billion to \$6.1 billion between 2002 and 2006, the natural and organic personal care products market is expected to rocket to nearly \$10.2 billion by 2012."²

This opportunity, though, has also led to abuses and confusion with respect to the terms "natural" and "organic." Government agencies that regulate drugs, food and personal care products have been warning consumers that "natural" is not synonymous with safe. However, studies by the National Consumers League (NCL) show that the government's message may not be resonating with consumers. While consumers may think that when they

buy natural they are buying unprocessed, pure and gentle products, natural products can be very powerful and have serious side effects.

Product labeling of personal care products continues to raise eyebrows and has become even more circumspect now that natural personal care products' popularity has exploded. Just take a look at some of the labels on the personal care products claiming to be natural. Read the labels and try to discern what actually is natural. The nebulous nature of the labeling has led to a proliferation of organizations, watch groups and consumer watchdogs calling for the development of clear regulatory definitions for both natural and organic cosmetics.

One such group that just recently formed in Belgium is NaTrue, a lobby group that represents the interests of the natural cosmetics industry. The group aims to represent the interests of manufacturers in all future regulatory developments in Europe and internationally, not just in the development of definitions and standards.

But what about the United States? Will the FDA become more involved? Will another organization emerge that will work with consumers and manufacturers to develop meaningful standards and truthful definitions of natural so that the personal care products on the supermarket shelves are what they say they are? Ironically, work on organic personal care standards preceded work on a natural product standard.

Organic Standards for Personal Care

Interestingly enough, work on certified organic personal care standards has been going on for several years now. In fact, NSF International, a not-for-profit, nongovernmental organization involved in standards development, plans to introduce new organic personal care standards in the coming months to meet rising demand and offer a different level of certification. The organization was actually commissioned several years ago by the Organic Trade Association to take up the standards development process. While the NSF organic standard is identical to the United States Department of Agriculture's (USDA), the "made

with" standard differs in a way that enables manufacturers moving in an organic direction to become certified.³

According to David Bronner, the president of Dr. Bronner's Magic Soaps: "Several processes and ingredients banned in the USDA's equivalent will be permitted by the NSF, including certain synthetic preservatives and biodegradable surfactants. The new standard is very similar to the Soil Association's except that it does allow the sulfation process to produce surfactants."

The NSF Joint Committee on Personal Care took a final vote on the proposed draft standards in February. Fifteen of the 19 members voted, with eight voting for, four against and three abstaining. At press time, the vote was scheduled to be reviewed during a meeting of the Joint Committee on Organic Personal Care Products at the All Things Organic show on April 26. The hope is that the USDA would eventually embrace the NSF standard.

The Standards Challenge: Balancing Product Expectations with Available (Certified) Ingredients

Conceptually it would seem more logical to have had natural personal care standards precede organic personal care standards. Few people could have projected just a few short years ago the level of consumer interest and growth in the natural and organic personal care sector. The fact that there is a push for standards in natural personal care can be attributable to the fact that it is extremely difficult to develop substantive, consumer acceptable, organic personal care products based on the current USDA standards.

We have seen a proliferation of organic personal care products in the last couple of years and those companies that have tried to do the right thing and create products that follow the existing USDA standards have been sufficiently challenged. The NSF standard is a big improvement and should help promote the development of new and improved organic personal care products in the near future. But the development part is still a huge challenge.

Ask product developers or formulation chemists at a cosmetic or personal care manufacturing company who are involved in the creation of an organic fragrance, body wash, hair care or skin care product and they will tell how frustrated they are with the limited (and often expensive) ingredients they have to work with. They will go through a trial and error process to see what concentration of which compound will work best for a specific application.⁴

There are many aspects of chemistry present in any formulation of cosmetics or skin care. Some of the chemistry involved is thermodynamics of mixing, solutions, surface chemistry, colloids, emulsions and suspensions. Even more important is how these principles are connected to adhesion, weather resistance, texture, shelf life, biodegradability, allergenic response and many other properties.⁴

Lacking in the current standards are organic surfactants, preservatives, emulsifiers, humectants and foaming agents that are acceptable and actually work. There are many natural ingredients in these categories, but not all work as well as their synthetic counterparts. That is just the reality at this moment in time. For example, let's look at surfactants. A surfactant is a "surface-active-agent" or a substance capable of dissolving oils and holding dirt in suspension so it can be rinsed away with water. Surfactants can be either anionic (negatively charged ions) or cationic (with positive electrical charge). In the synthetic category we have:

Anionic surfactants:

- Ammonium Lauryl Sulfate (ALS)
- Ammonium Laureth Sulfate (ALES)
- Disodium Oleamide Sulfosuccinate
- Disodium Laureth Sulfosuccinate
- Disodium Dioctyl Sulfosuccinate
- Lauryl or Cocoyl Sarcosine
- Potassium Coco Hydrolysed Collagen
- Sodium Lauryl Sulfate (SLS)
- Sodium Laureth Sulfate (SLES)
- Sodium Methyl Cocoyl Taurate
- Sodium Lauroyl Sarcosinate
- Sodium Cocoyl Sarcosinate
- TEA (Triethanolamine) Lauryl Sulfate
- TEA (Triethanolamine) Laureth Sulfate

Cationic surfactants:

- Stearalkonium chloride
- Benzalkonium chloride
- Cetrimonium chloride
- Cetalkonium chloride
- Lauryl dimonium hydrolysed collagen

In the natural surfactant category we have saponins. These are natural detergents (natural soapy substances) with distinct foaming characteristics. They are found in many plants and function as the plant's immune system. Many plants produce saponins that have antifungal and antibacterial activity. Here are a few:

- Soybeans
- Soapwort

- Soap nut seed
- Sarsaparilla
- Yucca Extract
- Quillaja Bark Extract
- Christmas Rose (*Helleborus niger*)
- Horse Chestnut trees (*Aesculus hippocastanum*)
- Asparagus fern (*Asparagus officinalis*)
- Daisies (*Bellis perennis*)

Reviewing the list above, most cosmetic chemists or personal care formulators would likely choose one (or more) of the synthetic surfactants because they are: 1. easier to work with; 2. readily available; 3. affordable; and 4. perform better (then their natural counterparts). This illustrates the work that needs to be done to develop commercially viable natural and organic surfactants, preservatives, emulsifiers, humectants and foaming agents.

Because of the challenges discussed, many personal care manufacturers have elected to start their green product journey by making their products as natural as is practically possible. While they would love to develop and promote organic personal care products, current standards make that difficult. Consequently, there is an imminent need to develop logical, practical and achievable standards for natural personal care products.

Natural Personal Care Standards

As detailed so far in this article, the green movement has stimulated tremendous interest in environmentally friendly, sustainable and safe natural personal care products. The need for practical standards that benefit both manufacturers and consumers has been recognized by many organizations including The Campaign for Safe Cosmetics (www.safecosmetics.org) and the Natural Products Association (www.naturalproductsassoc.org).

Personal care manufacturers, including Burt's Bees, Aubrey Organics, California Baby and Farmaesthetics, have also reacted and have taken steps to insure that the natural personal care standards initiative takes hold. According to Mike Indursky, chief marketing and strategic officer for Burt's Bees: "Consumers are so confused right now on what is natural. We have developed a standard on what natural products should be. We will have a seal on all products and a section they will be housed in. The goal is by the end of this year to have a standard that will be nationally recognized."

Work on this standard is currently underway, and interestingly, those that are working together to develop the standard are members who normally compete heavily in the personal care arena, fighting aggressively for shelf space in supermarkets, drug chain stores or department stores. The fact that they have joined forces is admirable. However, it also points to the difficulties they are having trying to fight other brands that purposely mislead consumers with unsubstantiated natural claims.

According to an article in *The Natural Foods Merchandiser*, Burt's Bees is working within the natural personal care products industry to adopt the guidelines. The standard dictates that all products labeled natural must contain at least 95% natural ingredients that came from a renewable and plentiful source found in nature. It also sets parameters on which non-natural ingredients are appropriate and which should never be used. Retail-

ers can use the proposed standard as a guide, or create one for their own stores, so that customers know exactly what ingredients the products on their shelves will—and won't—contain.⁵

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The natural (Burt's Bees) standard initiative has taken hold. The standard has been completed and there are dozens of brands looking to join forces to be certified in accordance with the new, natural standard. In addition, the organization structure, certification processes and official seal are in the process of being finalized. The National Product Association board of directors met in April, where they unanimously approved the initiative. In May a public relations campaign was unveiled, kicking off a month-long promotional effort for the new "Natural Standard."

The Whole Foods Effect

And just when you thought you had heard enough about natural personal care standards, along comes the fastest growing retail supermarket chain in the United States with its own premium body care standard. On March 3, 2008, Whole Foods launched a body care standard to inform consumers of its high quality, truly natural products, as well as to encourage the industry to formulate more natural products with higher standards.

Aspects of this standard include only mild preservatives such as potassium sorbate and sodium benzoate, which have been shown to function well but are less likely to cause allergic reactions. Preservatives such as parabens and formaldehyde releasing compounds are not acceptable; only mild surfactants such as decyl polyglucose and sodium stearyl lactylate are allowed in products that will gain the standard. As far as fragrance, the standard will only be awarded to products that use essential oils and components of essential oils.⁶

In summary, the wellness movement has transcended personal care. The explosive growth in natural and organic personal care products over the last few years reflects our changing society and a concern not only about what we put into our bodies, but what we put onto our bodies. The proliferation of products entering the marketplace has generated a great deal of consumer concern with respect to product authenticity, product claims and truth in labeling. This growth has resulted in an absolute need for logical, practical and achiev-

able standards for natural personal care products.

A number of standards exist or are underway, with the most recognized being the USDA National Organic Program's (NOP) standard for organic products, the soon to be announced NSF organic personal care standard and the Natural Products Association natural personal care standard initiated by Burt's Bees.

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