

MARKET *SHIFT*



The story of the Compact for Safe Cosmetics
and the growing demand for safer products

The Campaign for Safe Cosmetics

www.SafeCosmetics.org

Acknowledgements

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For more information, please visit www.safecosmetics.org.

Who We Are

The Campaign for Safe Cosmetics is a broad-based national coalition of more than 170 nonprofit health, environmental, environmental justice, worker, women's, student, consumer and faith organizations. Our key partners include: Clean Water Action, the Breast Cancer Fund, Commonweal, Environmental Working Group, Friends of the Earth, the National Council of Churches and Women's Voices for the Earth. The Breast Cancer Fund, a national 501(c)(3) organization focused on preventing breast cancer by identifying and eliminating the environmental links to the disease, serves as national coordinator of the Campaign. The Campaign's mission is to protect the health of consumers, workers and the environment by securing the corporate, regulatory and legislative reforms necessary to eliminate dangerous chemicals linked to cancer, reproductive harm and other adverse health impacts from cosmetics and personal care products.

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Overview

This report documents how the Campaign for Safe Cosmetics (the Campaign), a national coalition of nonprofit women's, environmental, health, faith, consumer and worker safety organizations, worked with cosmetics industry leaders between 2004 and 2011 to raise the bar for product safety and grow demand for personal care products that are free of harmful chemicals. Consumer demand for safer alternatives has made it the fastest growing sector of the cosmetics market, even during the economic downturn.¹

Congratulations are in order: 321 of the companies the Campaign worked with have achieved Champion status by meeting all the goals of our Compact for Safe Cosmetics (Compact), a pledge to avoid chemicals banned by health agencies outside the U.S. and to fully disclose product ingredients – a pioneering practice in the cosmetics industry. An additional 111 companies achieved Innovator status, indicating that these companies made significant progress toward meeting the goals. These 432 companies truly broke the mold. They are leading the personal care products industry by showing that it is possible to make safe, effective products without using the hazardous chemicals that are all too common in conventional personal care products.

The Compact was a project of the Campaign between 2004 and 2011. A lot has changed since we started this process, and it is time for the forward momentum to be taken in new directions. In August 2011, the Campaign brought the Compact to a close. We will continue our work in other ways. We'll keep advocating for the removal of harmful chemicals from personal care products and educating the public about how to find safer alternatives until we shift the industry to safer, sustainable products. While the

closing of the Compact represents a major step forward, there is still a lot of work to be done to ensure products are safe and companies are transparent about their ingredients. To that end, we invite businesses to join our newly formed Safe Cosmetics Business Network (see page 12). We also invite consumers and organizations to join us by signing up for our email list, joining us on social media (Facebook and Twitter), and endorsing the Campaign (via www.safecosmetics.org).



The Campaign wants to underscore that in the absence of adequate government oversight of cosmetics to ensure their safety and full ingredient disclosure, consumers must remain vigilant about researching product safety and asking companies questions about ingredients and transparency. As always, we recommend that consumers read ingredient labels, avoid undisclosed "fragrance" and other proprietary ingredients, and check the Environmental Working Group's (EWG) [Skin Deep database](#),² the world's largest personal care product safety guide, for scores on particular products and companies to determine the safest choices.

Many newer companies that are making safer products did not get a chance to participate in the Compact since new signers were not accepted after early 2011. It is impossible to say if they or other companies that do not appear on the lists

of Champions or Innovators are fulfilling the principles of safe ingredients and full transparency. On the other hand, if a product is marketed as "natural," "organic" or "free of" a certain ingredient, it is not necessarily safe. This ambiguity is yet another reason regulatory reform of the industry is so important.

Consumer demand for safer personal care products has made it the fastest growing sector of the cosmetics market, even during the economic downturn.

A Broken System

In the United States, cosmetics and personal care products is a \$50 billion industry, yet currently there is no meaningful regulation that ensures these products are free of chemicals linked to cancer, reproductive harm and other serious health problems. The Food and Drug Administration (FDA) oversees the safety of personal care products in the U.S., but lacks the basic authority needed to ensure that products are actually safe.

Major loopholes in federal law allow the industry to put virtually any chemical into cosmetics with no pre-market safety assessment, no monitoring of health effects and inadequate labeling requirements.³ In the absence of government authority, the safety of personal care product ingredients is evaluated through an industry-funded and self-policing body, the Cosmetic Ingredient Review (CIR) Panel. In the 30 years since its creation, the CIR has evaluated fewer than 20 percent⁴ of the more than 12,500 ingredients used in cosmetics⁵ — meaning that the vast

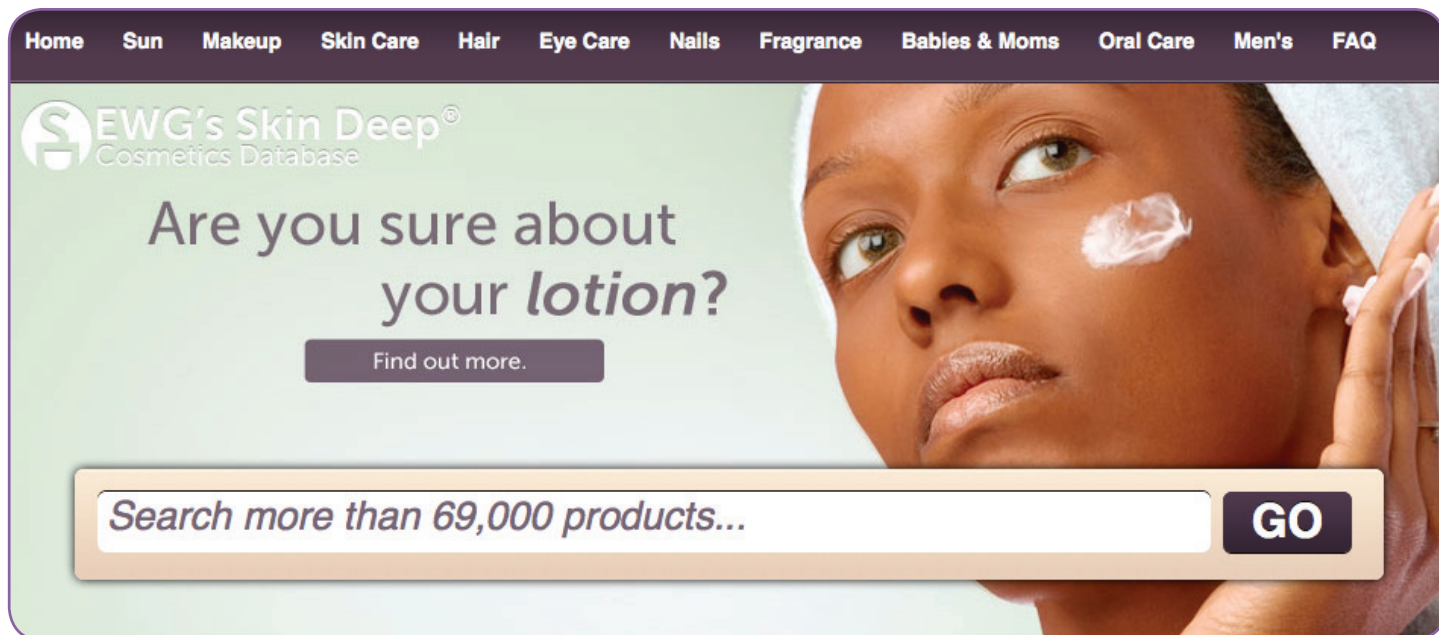
majority have not been assessed for safety by the FDA, CIR or any other body.

In 2003, the European Union banned more than 1,100 known, suspected and probable carcinogens, mutagens and reproductive toxins from personal care products.⁶ In contrast, the United States has only restricted or banned 11 chemicals.⁷ The idea that personal care product companies in the U.S. could sell products at lower safety standards than in Europe was so outrageous that it galvanized environmental, health, worker and justice organizations to launch the Campaign for Safe Cosmetics in 2004.⁸

Two of the earliest actions taken by Campaign members continue to have significant influence. First, a letter signed by more than 50 environmental, women's and health groups was mailed to 250 leading cosmetics companies in February 2004, asking them to sign the [Compact for Safe](#)

Harmful Chemicals in Personal Care Products

- The average American woman uses 12 personal care products a day, resulting in exposure to more than 120 chemicals, many of which are likely linked to cancer, birth defects, asthma, allergies and other health problems.⁹ Many of these chemicals end up in our bodies, our breast milk and our children;¹⁰ contaminate drinking water and wildlife; and build up in the food chain.
- More than 1 in 5 of all personal care products contain chemicals linked to cancer.¹¹
- As documented in the Campaign report [No More Toxic Tub: Getting Contaminants Out of Children's Bath & Personal Care Products](#), products often contain hidden carcinogens that are not listed on labels, such as formaldehyde and 1,4 dioxane that are found in children's bath products.¹²
- Chemicals with the potential to disrupt hormones are found in a large majority of personal care products. A study of teenage girls found an average of 13 hormone-disrupting cosmetics chemicals — including parabens, phthalates, triclosan and synthetic fragrance musks — in their urine.¹³
- Dangerous heavy metals such as lead, arsenic and cadmium have been found in a wide variety of cosmetics products, including lip gloss.¹⁴
- Campaign product tests documented in our report [Not So Sexy: The Health Risks of Secret Chemicals in Fragrance](#) revealed the widespread use of synthetic musks in perfume, cologne and body sprays.¹⁵ Some of the same musks identified in fragrances (Galaxolide and Tonalide) have also been found in the cord blood of newborn babies, as well as in blood, breast milk and body fat.¹⁶ These musks may interfere with normal hormonal functioning.¹⁷



The Skin Deep cosmetics database matches personal care product ingredients listed with nearly 60 databases from government agencies, industry experts and academic institutions to determine safety ratings and data gaps for 69,000 products. It was an important tool to assess Compact signers' compliance.

Cosmetics (Compact),¹⁸ a pledge to globally reformulate to meet the higher standards of the EU in all the markets they serve, replace all hazardous chemicals with safer alternatives and be transparent about what is in their products. Interest was beyond our wildest imagination. Within one year, 100 companies signed the Compact; within two years, 300 companies signed. By 2011, more than 1,500 companies from around the world had signed the Compact.¹⁹ In the absence of any real government regulation, the Compact has played an important role in shifting this industry toward safer cosmetics and giving consumers information they need to find healthier products for their families.

Second, EWG launched the Skin Deep cosmetics safety database, the world's largest personal care product safety guide, in spring 2004. This innovative online tool matches the ingredients listed on personal care products with nearly 60 databases from government agencies, industry experts and academic institutions to determine safety ratings and data gaps for each product. The database currently attracts 1 million page views per month as consumers use it to shop for safer alternatives and companies use it to assess their ingredients and products. The database has been searched almost 253 million times since 2004.²⁰

The idea that personal care product companies in the U.S. could sell products at lower safety standards than Europe was so outrageous that it galvanized environmental, health, worker and justice organizations to launch the Campaign for Safe Cosmetics in 2004.

Identifying Industry Leaders & Laggards

From the beginning, the Campaign knew that as a large national coalition of nonprofit health and environmental groups, we could play an important role in creating and increasing the demand for safer products. We also realized the importance of working on the supply side with the most forward-thinking companies to set a higher bar for transparency and accountability for personal care product safety. Our goal was to ensure that safer products are available to all consumers.

The Compact was a tool to help the public differentiate industry leaders from the laggards and to help the Campaign work with leaders in the industry to reach a higher level of safety and transparency. Since it was established, the Campaign and EWG have worked with Compact signers to assess their compliance with this pledge. Through a rigorous screening and analysis process conducted by EWG's Skin Deep database team (see The Process of Determining Compact Compliance), the Campaign determined that as of August 2011, 321 companies were fully compliant with the Compact (see Appendix A).²¹ We have dubbed these companies "Compact for Safe Cosmetics Champions" (Champions). An additional 111 companies, our "Compact for Safe Cosmetics Innovators," (Innovators) made significant progress toward meeting the goals of the Compact (see Appendix B).

In order to get the gold standard status of Champion, companies had to fulfill all tenets of the Compact, which include:

- Comply with the European Union's Cosmetics Directive, widely considered the current global gold standard of cosmetics safety regulation.
- Disclose all ingredients, including ingredients in "fragrance," which in the United States can be claimed as "trade secrets," even when they contain hormone disruptors, carcinogens and other harmful chemicals.
- Publish and regularly update product information in EWG's Skin Deep cosmetics database.

- Comply with any additional ingredient prohibitions and restrictions under the Compact and substitute ingredients of concern with safer alternatives.
- Participate in the Campaign for Safe Cosmetics.

Innovators made meaningful progress, but did not reach full Compact compliance. These companies entered at least 75% of their products into Skin Deep, participated in the Campaign within one calendar year of March 15, 2011, and may or may not have fully disclosed all constituents of proprietary ingredients.

Champions and Innovators include a range of companies – from small mom-and-pop businesses to some of the largest companies in the natural personal care products sector. Their ability and willingness to work toward the Compact requirements shows not only that it is possible to make products that far exceed the current safety standards in the United States, but also that making safe personal care products can be part of a successful business model.

Many of these companies are small- and medium-sized independent businesses. They create jobs and are one of the essential components in our economic recovery. They have shown that a new way of doing business is possible, even in these difficult times, to meet growing consumer demand for safer products. This is reflected by the fact that consumers, concerned about hazardous chemicals in cosmetics, are seeking safer alternatives among natural and organic personal care products, which is the fastest growing sector of this market, even during the economic downturn.²²

The Compact for Safe Cosmetics was a tool to help the public differentiate industry leaders from the laggards and to help the Campaign work with leaders in the industry to reach a higher level of safety and transparency.



While the Campaign was pleasantly surprised by how many companies wanted to sign the Compact, we were also disappointed by the lack of interest from the biggest multinational corporations. Below are reasons given by some of the companies that refused to sign.

- **Estee Lauder** wrote “The Estee Lauder Companies Inc. and its brands fully support the position and statement attached from the Cosmetics, Toiletry, and Fragrance Association. Thank you for your understanding in this manner.” The attached statement from the CTFA said the E.U.’s new Cosmetics Directive “represents unnecessary change in the philosophy of regulations of cosmetics ingredients in the EU...The bottom line for American consumers is that they are just as protected as consumers in Europe and have products that are just as safe.”²³
- **Gap Inc.** would globally reformulate its products to remove chemicals banned in Europe but couldn’t sign the Compact because it relied “on government agencies to determine the safety of approved ingredients in a scientific and consistent manner.”²⁴
- **Coty Inc** would globally reformulate but “cannot assume third party timelines and substitution plans.”²⁵
- **Custom Esthetics Ltd** already was not using EU-banned chemicals, but “corporate policy discourages us from joining advocacy groups that solicit our alliance.”²⁶

In response to the Campaign’s activities over the years, some major mainstream companies, including L’Oreal and Revlon,²⁷ agreed to remove some chemicals banned in Europe from cosmetics sold in the United States and elsewhere around the world. Revlon said agreeing to comply with the EU directive in the United States wasn’t a problem for the corporation. According to a senior vice president, “No reformulations were necessary because all of the ingredients have been in compliance with the recently enacted EU regulations as well as all applicable FDA requirements.” At L’Oreal USA, a senior vice president said that over the last few years, as the EU was developing its list, the company had been reformulating its products to



**Putting on makeup
shouldn't be like playing
with matches.**

**Which cosmetics company do you
trust with your daughter ?**

When it comes to cosmetics, we shouldn't be forced to choose between health and beauty. Personal care products should be free of chemicals linked to cancer and birth defects.

Read our lips:

No More Toxic Chemicals in Cosmetics.

Paid for by the Safe Cosmetics Coalition www.SafeCosmetics.org

Calling on major companies to stop using toxic chemicals linked to cancer and birth defects in their products, this ad in USA Today resulted in announcements from L'Oréal and Revlon confirming that they had eliminated certain toxic chemicals from their U.S. products.

remain in compliance: “Our goal is to be compliant around the world.” However, neither of these companies signed the Compact, nor have they met all the criteria for safer ingredients or full transparency.

Since its inception, more than 1,500 companies signed the Compact for Safe Cosmetics. As of August 2011, 321 companies were fully compliant. Congratulations to these Champions!

Changing the Face of the Beauty Industry

Since we started our work in 2004, the Campaign has educated millions of people in the United States and around the world about the problem of toxic chemicals in cosmetics and the availability of safer alternatives. We wrote numerous reports on harmful chemicals in personal care products.²⁸ We released an online film, *The Story of Cosmetics*, which has been viewed more than 850,000 times.²⁹ We have conducted extensive public speaking and grassroots education, and currently have a grassroots network of more than 130,000 people. Through these and other efforts, our media outreach has resulted in thousands of news stories globally, including coverage in the Associated Press, Washington Post, New York Times, Glamour, Vogue and others.³⁰ (See Appendix C for more history of the Campaign's accomplishments.)

The strength and duration of this public campaign has visibly increased demand for safer personal care products. The popularity of EWG's Skin Deep database helps to demonstrate this trend. Skin Deep is searched more than a million times per month and a growing number of consumers are using it to make choices about which

products to buy. Skin Deep ranks more than 69,000 cosmetic products using the best available science from government and academic sources about chemical hazards. Consumers are now actively researching information about products rather than being passive observers of the advertising strategies that worked so well in the past. Consumers' increasing use of Skin Deep to find safer products also shows a growing understanding that government is not adequately regulating this industry to ensure that cosmetics and personal care products do not contain harmful chemicals.



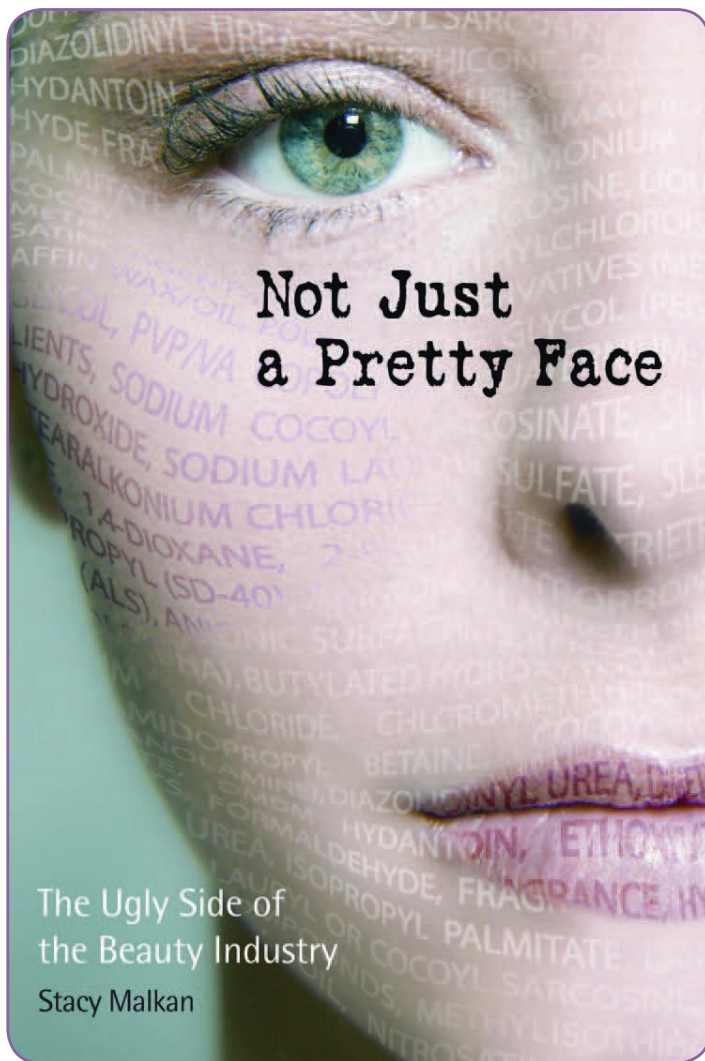
*In 2010 The Campaign released *The Story of Cosmetics*. This short film illustrates the ugly truth about "Toxics In, Toxics Out." It has been viewed more than 850,000 times since its release.*

The combination of growing public awareness of the presence of hazardous chemicals in cosmetics and the availability of user-friendly tools to find safer and more sustainable products is helping to drive consumer demand and create an industry surge. A 2009 study by Mintel³¹ found that sales of "green" personal care products:

- increased 18% between 2006 and 2008,
- recorded positive growth despite the economic downturn while other segments declined, and
- is expected to outperform the market for conventional personal care products in terms of sales growth.

Lessons from the Compact for Safe Cosmetics:

- Hundreds of leading companies are already making safe, effective products without using hazardous chemicals that are commonly found in personal care products.
- Hundreds of leading companies are already disclosing all ingredients, including those that make up "fragrance," showing that it is not necessary for these ingredients to be kept secret from the public.
- More than one thousand companies were eager to work with the Campaign to raise the bar for safer personal care products. Business-nonprofit organization partnerships such as this are an excellent model for driving markets to safe, sustainable products and practices.
- Making healthier products is good for business. Companies do not have to choose between having a strong business and using safer chemicals.



“Not Just a Pretty Face: The Ugly Side of the Beauty Industry,” the award-winning book by campaign co-founder Stacy Malkan, tells the inside story of how and why the Campaign for Safe Cosmetics and the Compact got started.

Another 2009 [industry report by Packaged Facts](#)³² supports these findings, citing that the rapid growth in the naturals market reflects “a consumer reaction to concerns about the health and safety of chemicals used.” This report goes on to state that the rapid growth in the natural products sector that used to be known as the “alternative”

market in cosmetics could now be called the “second mainstream.” A 2011 [Deloitte survey](#)³³ found that 57% of people responding said that safety was the number one concern when buying personal care products.

The Compact has been a key element in shifting the personal care products sector toward safer production and greener solutions. Fundamentally, the Compact helped bring the power of innovative companies – from micro-businesses to nationally known green brands – together with leading environmental and health groups to raise the bar for safer products and provide consumers with safer options. These options allowed consumers to make purchasing choices based on full disclosure of ingredients and formulations free of chemicals that are banned by health agencies outside the U.S.

The Campaign is proud to have worked cooperatively with so many outstanding companies. Through our collective efforts of promoting awareness of chemicals in personal care products, we have helped expand the demand and the expectation for safer products.

Equally as important, the dedication of the Champion and Innovator companies has resulted in greater access for consumers to healthier, safer, high quality products – they are showing it can be done.

An important part of our work together has been the bi-annual Compact meetings held at the Natural Products Expos. The Campaign held more than 10 meetings at these events, providing an opportunity for face-to-face exchange of ideas and discussions, which helped to build this partnership with companies and ensure that the Compact was a meaningful pledge.

Products that reach these higher standards are no longer available only in niche markets. Mainstream retailers are dedicating more room on their shelves to safer products in response to consumer demand for “chemically-clean” cosmetics and personal care products.³⁸ This symbiosis

Natural Replacement of Controversial Ingredients is Widespread

On October 31, 2011 [CosmeticsDesign.com](#), an online news source about the cosmetics industry, posted an article³⁴ documenting “that raw material and ingredient suppliers have jumped on the consumer driven natural bandwagon. There is now a multitude of natural replacements for the most popular and most common ingredients. Suppliers are generating new ways for using natural ingredients which increase functionality of ingredients in a multitude of applications...With all the natural ingredients being made available for formulation, the next wave of consumer driven natural products will have spectacular ingredients at a marketable price, a coup d’état for all consumers.” A coup d’état indeed. Thanks to all of the Champion, Innovator and other Compact-signer companies that have led the way to meet the consumer demand for safe products and helped push the industry toward safer production.

The Process of Determining Compact Compliance

As part of the Compact, companies were required to enter ingredient information for all their products currently available for sale into EWG's [Skin Deep database](#).³⁵ The database provided a mechanism to publicly reflect progress in meeting this pledge. Companies were able to view their status and compliance with each of the provisions by logging into the database. When companies logged into their password-protected "manufacturer's pages" on Skin Deep, they were able to see each of the six provisions for compliance, along with details about any gaps they needed to address to meet the provisions.

Because the Campaign and many of the Compact signing companies shared the same vision of expanding the market for safer, healthier personal care products, the Campaign worked closely with these companies to identify areas for improvement.

Staff members at EWG verified the information submitted to Skin Deep, and Campaign staff provided Compact signers with technical support and guidance on their efforts to meet the benchmarks for complying with the Compact. Additionally, the companies that entered their data dedicated a great deal of staff time to participating in the process, giving the Campaign feedback on how to improve the process so that it better matched the realities of their businesses and sharing their insight on what was possible in developing safer alternatives for the marketplace.

Tracking the safety of cosmetics products was a complex task. Every product in the Skin Deep database contains anywhere from a few to a few dozen ingredients. Some of the contents are hidden, either through the trademark-protected category of fragrance³⁶ or as contaminants.³⁷ In addition, companies were continuously reformulating products or introducing new products to the market, which required them to be constantly updating their ingredient submissions to Skin Deep.

Companies that met Compact requirements maintained up-to-date product listings in EWG's Skin Deep database. EWG maintained up-to-date information on chemical hazards, ingredient safety assessments, and the regulatory status of ingredients in other countries, to allow for a complete review of Compact signer products against the criteria laid out in the Compact. See Appendix D for more details on being fully compliant.

between the Campaign's educational efforts and the growing number of companies offering safer alternatives has helped move the market and create a national dialogue on the need for industry-wide reforms.

The Compact helped to identify – and created a platform to help generate – industry leaders, show that safer production and transparency are possible and desirable from a business and consumer perspective, and give consumers the information they needed to find safer alternatives. We accomplished our goals and felt that the time was ripe to celebrate the accomplishments of these top-bar companies. We are evolving this work with industry to include an even broader swath of supportive businesses as well as professional salons and retailers. We believe our greatest impact can now come from working with these businesses to further educate the public, decision-makers and industry laggards about the need for safe cosmetics, and from continuing to push the market in the right direction.

For this reason, the Campaign officially ended its program running the Compact in August 2011. This represents the end of one phase of our work, but it is opening new doors for how the Campaign can work with business leaders to continue to shift the market to safer products. The closure of the Compact will allow these leading companies to put more emphasis on pushing the national dialogue forward – in the halls of Congress and throughout the supply chain (see "Natural Replacement of Controversial Ingredients is Widespread" for evidence of this already happening).

The willingness of the Champion and Innovator Compact signers to be leaders in distinguishing their products from others demonstrates their commitment to improving product safety and pioneering new directions in the overall personal care products market. These companies recognize that using safer ingredients is core to customer loyalty and, at this time, to distinguishing themselves in the market. As the green personal care products market continues to expand, these companies will always be recognized as the vanguard of a new way of doing business.

The Safe Cosmetics Business Network

With the Compact for Safe Cosmetics, the Campaign succeeded in moving the market toward safer cosmetics – a big victory for consumers, the environment and responsible businesses. The Compact served as a prime example of what can be accomplished when the business and nonprofit sectors work together toward common goals. While we have come a long way together, clearly, there is still work to be done. The Campaign remains dedicated to working with all types of businesses in the health and beauty industry to continue to grow the market for safer personal care products until it is not a segment, but rather the norm.

To that end, the Campaign recently launched the Safe Cosmetics Business Network. The Business Network is an alliance of businesses that helps educate others in the industry, consumers and policymakers and calls for a stronger, greener market. Members of the Safe Cosmetics Business Network agree to do their part to:

- stimulate the innovation of safe, non-toxic personal care products;
- protect consumers, workers and the environment from exposure to chemicals linked to cancer, reproductive harm and other adverse health impacts; and
- ensure everyone in the U.S. has access to safe personal care products, regardless of geography or income.

Business Network members will help achieve these goals by educating people throughout the supply chain – from consumers to ingredient suppliers to fellow businesses – about the importance and availability of safer personal care products and the need for safety data and transparency about cosmetics ingredients. This can happen through writing emails, newsletters, OpEds, blog posts and social media updates; having personal conversations and participation in panels, webinars, and events ranging from health fairs to Congressional hearings.



As consumers continue to become better educated about product safety, the market for safer cosmetics is likely to continue to grow. The Safe Cosmetics Business Network can help expand this market.

The Business Network is free to join, and it is not a certification or seal of approval. Rather, it is a vehicle to move the safe cosmetics conversation forward, share resources, and show collective support for the mission of the Campaign for Safe Cosmetics.³⁹ The Business Network needs strong public support to thrive and to ensure that cosmetics are safe for everyone. When businesses join, they send a clear message that they are dedicated to reaching the Business Network's goals. The growing number of educated consumers will undoubtedly favor companies that join the Business Network, and they will also undoubtedly scrutinize businesses to ensure that the commitment is authentic.

So far, 325 companies have joined the Business Network, including retailers, salons, beauty professionals and manufacturers. We invite your business to join as well. Please see the web page for more information: www.safecosmetics.org/business.

So far, 325 companies have joined the Safe Cosmetics Business Network, including retailers, salons, beauty professionals and manufacturers. We invite your business to join as well.

Looking Ahead

The demand for safer personal care products is strong and growing. All signs indicate that innovative companies will continue to be responsive to this demand. The Campaign will continue to educate the public on the importance of using safer products and continue our work to change the regulatory system responsible for the safety of personal care products.

After many years of building a grassroots base and educating leaders in government and society, the Safe Cosmetics Act was introduced in the U.S. House of Representatives in 2010. The bill has been re-introduced in 2011, and aims to:

- restrict or phase out chemicals linked to cancer, birth defects and developmental harm;
- create a health-based safety standard for cosmetics that includes protections for children, the elderly, workers and other vulnerable populations;
- close labeling loopholes by requiring full ingredient disclosure on product labels and company websites, including the constituent ingredients of fragrance and salon products;
- require data-sharing to avoid duplicative testing and encourage alternatives to animal testing; and
- provide the FDA Office of Cosmetics and Colors the resources it needs to ensure effective oversight of the cosmetics industry, including recall authority for cosmetics.

Combining market change and legislative change is critical to ensuring that all products sold in the U.S. meet high safety standards. When a significant number of companies break away from the norm of using harmful chemicals and instead formulate with the highest quality, safest ingredients, both companies and consumers win. The more successful companies there are, the more obvious it is to the public and elected officials that a socially responsible safe cosmetics business model is possible. It is simply a matter of will.

The Campaign is proud to have worked so extensively with so many business leaders to grow the safe cosmetics market. The Compact Champions and Innovators are helping show that making safer products and fully disclosing ingredients is not only possible, but is good for business and is the wave of the future.

The Campaign is proud to have worked so extensively and in-depth with responsible companies. The Compact Champions and Innovators are helping show that making safer products and fully disclosing ingredients is possible, good for business and the wave of the future.



Appendix A: Champion Companies

The companies below met all of the Compact for Safe Cosmetics compliance requirements. For requirements see Appendix D.

1. Acquarella LLC
2. African Earth Skincare
3. Agape & Zoe Naturals
4. Aguacate & Co.
5. Ajara Ayurvedic Beauty
6. Alaska Glacial Mud Co.
7. Alchemilla
8. Alexami Cosmetics
9. Alima Cosmetics, Inc.
10. All Natural Creations
11. Alpha Skincare
12. AlphaZelle LLC
13. Amazon Drops
14. Amurie Toxic Free Products
15. Amy Bergman Cosmetics LLC
16. Anagallis Herbs
17. Anarres Natural Health
18. Apriori Beauty
19. Arganat Inc.
20. Aromaland Inc.
21. Authentic Skin Remedies
22. Ava Anderson NonToxic
23. Avalon Organics
24. Awaken My Senses
25. B.SOAPURE LLC
26. Babo Botanicals
27. BABYBEARSHOP, LLC
28. babybellies Health and Wellness
29. Bare Organics Inc.
30. Base Natural
31. Bath Petals, Inc.
32. Be Genki
33. Be Green Bath and Body
34. BECAuses Skin Care, LLC
35. Becoming Baby / Pediatric Essentials, Inc.
36. Belle's Botanicals
37. Best On Earth Products, LLC
38. Beyond Coastal
39. Blossom Organics, Inc.
40. BNONE, Inc.
41. Body Essentials
42. Body Sense
43. Bodyceuticals
44. Bottoms Up Pty Ltd
45. Brew City Botanicals
46. Brittanie's Thyme LLC
47. Bubble and Bee Organic
48. Buddha Nose Ltd
49. Bum Boosa Bamboo Products
50. Buttercup Naturals LLC
51. By Valenti
52. California Baby
53. Canary Cosmetics
54. Castle Baths
55. Cedar Spring Herb Farm
56. Celtic Naturals
57. Chartreuse, Inc.
58. Cheeky Cosmetics
59. Clean George
60. CleanWell Company
61. Cleure Grace Products
62. Coastal Classic Creations
63. Cocoon Apothecary
64. Colorganics, Inc
65. Cosmic Tree Essentials Ltd.
66. Creating Harmony LLC
67. Creo Care
68. Crush Groove Cosmetics
69. Dale Audrey
70. Dancing Dingo Luxury Soap
71. Dead Sea Warehouse, Inc.
72. Destiny Boutique
73. Divina Veritas
74. Divine Response
75. Doctor T's Supergoop!
76. Doozle
77. Dr. Bronner's Magic Soaps
78. Dropwise Essentials
79. Druide
80. Earth Mama Angel Baby
81. Earthlight Organics
82. Eco Skin Care
83. EcoDenT Oral Care
84. EcoGlo Minerals
85. ECOPLANET Inc.
86. Ecostore USA
87. Edamame, Inc.
88. Elegant Minerals
89. Elemental Herbs
90. Elements Naturals
91. Emily Skin Soothers, Inc
92. Enkido
93. EO Products/Small World Trading Co Inc.
94. Episencial
95. Erin's Essentials
96. Erth Minerals
97. Essence of Wellbeing
98. face naturals
99. Ferro Cosmetics
100. Fizz Bath Shop
101. Forever Eden Natural Skin Nourishment Collection
102. free of, inc.
103. Furless
104. Garden Girl Natural Skin Care
105. Garden of Eve
106. Generation to Generation
107. GeoTech Pharma Inc.
108. GLACIER Suncare
109. Glam-Nation, LLC
110. Glengarry Gardens
111. Gluten Free Beauty
112. Goddess Garden
113. Golden Earth Inc.
114. Golden Essence Skin Care
115. Golden Path Alchemy
116. Golden Sol
117. Good Clean Love
118. Good for You Girls
119. Gourmet Body Treats
120. Graine de Vie LLC/SEED+
121. Green Beauty Cosmetics
122. Green Body Basics
123. Green Envee Organics
124. Greenbody Greenplanet
125. Heal My Hands
126. Healing Anthropology
127. Hemple Soaps
128. Herbal Choice Mari
129. Herbaliz
130. Herban Lifestyle
131. Holistic Body Care
132. Honeybee Gardens, Inc.
133. ibody science
134. ILIA Cosmetics Inc.
135. Impex International Corp.
136. Inara Organic Body Care
137. Indochine Natural Co. Ltd.
138. Inky Loves Nature
139. Innocent Oils
140. Intelligent Nutrients
141. InviCible Scars
142. Iredale Mineral Cosmetics, Ltd.
143. JaDora Cosmetics
144. JAMU Asian Spa Rituals, Inc.
145. Janika International Pty Ltd
146. Jaydancin Inc
147. Jes Organics
148. Jess' Bee Natural
149. Jordan Samuel
150. Juice Beauty, Inc.
151. Just the Goods
152. Kahina Giving Beauty
153. Kaia Naturals
154. Keeki Pure and Simple, LLC
155. Keys, Inc.
156. Khushi Spa Products
157. Kimberly Parry Organics
158. Kokokahn, Inc.
159. La Mav Pty Ltd

160. Lalabee Bathworks
161. LaMari
162. Lash Advance
163. Lauren Brooke Mineral Cosmetiques
164. LEAP Organics
165. Les Parfums d'Isabelle
166. LIDO Skin Care
167. Life Skin Care
168. Lila Natural Cosmetics, Inc
169. Lily Organics, Inc.
170. Little Twig
171. Live Native
172. Living Nature
173. Iolo levu
174. Loriannz
175. Lotus Brands, Inc.
176. LotusSkin
177. Loving Naturals
178. LuSa Organics
179. L'uvalla Certified Organic
180. LUVU Beauty
181. Ma Mi Skin Care, LLC
182. Made Just for You, LLC
183. Mae Minerals
184. Maia's Mineral Galaxy
185. Marie Veronique Organics
186. Max Green Alchemy Ltd.
187. Mere' Minerals
188. Mexitan Products
189. Mineral Concepts
190. Mineral Hygienics
191. Mineralz.biz
192. Mixaroma Inc
193. Mixology Makeup
194. MoniMay, Inc.
195. Montana Emu Ranch Company
196. Moor Spa Inc.
197. Morning Indigo, LLC
198. Morrocco Method, Int'l
199. Motherlove Herbal Company
200. Mountain Girl Botanics, Ltd.
201. mubeauty
202. MuLondon Natural Organic Skincare
203. Musq
204. My Lip Stuff
205. My Mama's Love
206. Naikid, Inc.
207. Naked Soapworks
208. Natural Family Botanicals
209. Natural Formulations
210. Natural Spas Canada
211. NaturalCurls
212. Naturale Science Inc.
213. Nature Clean
214. Nature's Alchemy
215. Nature's Boundaries
216. Nature's Pharma
217. Naturity LLC
218. Naturoli
219. Naturopathica Holistic Health
220. non toxic skin care
221. Nourish Baby Organics, LLC
222. NovAurora, LLC
223. Novena Cosmeceuticals Inc
224. Nurture My Body
225. Nuvo Cosmetics
226. NYR (Neal's Yard Remedies) Organic
227. Oblige by Nature
228. Olives Organic Botanicals LLC
229. Opas Soap
230. Osmosis Nature
231. Pharmacopia
232. Pink Horizons Botanical Skin Care
233. Pink Quartz Minerals
234. Planet Botanicals
235. Plant Devas, Inc.
236. Pomega, Inc.
237. Poof's Closet
238. Punky Business, Inc.
239. Purist Company
240. Purple Prairie Botanicals
241. Rare Natural Care, Inc.
242. Raw Elements USA
243. RAW-SFX
244. Rejuva Minerals
245. Rhone Botanicals & Skin Care
246. RJ Mineral Cosmetics
247. rms beauty
248. Rocky Mountain Soap Company
249. Rose of Sharon Acres
250. Rosemira Organics
251. Roxanna Mineral Cosmetics
252. Salon Naturals, LLC
253. Samantharoma LLC
254. Sappho Cosmetics
255. Scotch Naturals
256. SCOUT Cosmetics (SAXX Mineral Makeup and Organics)
257. See the Dawn
258. Serenity Skincare
259. Sevani
260. Shan Image Consulting
261. Shea Butter Market
262. Shea-Janee
263. SheAyurvedics Skin Care
264. Shelissa's Lip Balm Company
265. Signature Minerals
266. Sircuit Cosmeceuticals Inc
267. Skin LLC
268. Skin Perfection
269. Skin QR Organics
270. Smallbones Studio of Home Arts & Sustainable Living
271. So Seductive
272. Soap for Goodness Sake
273. Soapwalla Kitchen
274. Solay Wellness
275. Soleo Organics, Skin Elements USA, LLC
276. Sound Earth, LLC
277. Sparklehearts
278. Subversive Apothecary
279. suki clinically proven natural solutions
280. Sun Putty
281. SunCat Natural Mineral Makeup
282. Suntegrity Skincare
283. Suuthe by Mari
284. Sweet Knee
285. Sweetsation Therapy
286. Swissclinical
287. TawnaHillBaby
288. Tea Maria
289. Tea Naturals Skin Care
290. Terressentials
291. The Answer for Skin LLC
292. The Jojoba Company
293. The Long Rose
294. The Organic Spa GmbH
295. Théra Wise/Derma Wise Skin Care Ltd.
296. thinkbaby and thinksport
297. Tilvee
298. Tozai Group, LLC
299. True North Organic, LLC
300. Trukid
301. U.P. Bathworks
302. UV Natural International PTY LTD
303. Vapour Organic Beauty
304. Verdure Botanoceuticals Skin Care
305. Vitale Skin
306. Vitamoor Products International
307. W.S. Badger Company
308. Welstar
309. White Witch
310. Whole Truth Holistic Health Solutions
311. Wholistic, Inc
312. World Artisan Guild
313. WWBE
314. XANGO, LLC
315. Yellowstone Bees Inc.
316. Yes Pure Intimacy
317. Yes To Carrots
318. YOREGANICS
319. Zia Natural Skincare
320. Zoe Organics
321. Zosimos Botanicals, LLC

Appendix B: Innovator Companies

The companies below made meaningful progress, but did not reach full Compact compliance. These companies:

- 1) entered at least 75% of their products into Skin Deep,
- 2) participated in the Campaign within one calendar year of March 15, 2011, and
- 3) may or may not have fully disclosed all constituents of proprietary ingredients.

- | | | |
|--------------------------------------|--|--|
| 1. A Mano Bath | 40. Hugo Naturals | 77. Olivier Soapery |
| 2. African Organics | 41. Inika | 78. Omved Lifestyle PVT Ltd |
| 3. Afterglow Cosmetics, Inc. | 42. Irie Star and Blissoma | 79. Organic and Natural Enterprise Group (ONE Group) |
| 4. Alba Botanica | 43. J. P. Durga, LLC | 80. OSEA International |
| 5. AromafloriA Natural Products | 44. J.R. Watkins Naturals | 81. Osmosis Skincare |
| 6. Aubrey Organics, Inc. | 45. Jason Natural Cosmetics | 82. Pangea Naturals, Inc. |
| 7. babyUV/kidsUV inc. | 46. Joli Natural Skin Care | 83. Parissa Labs Inc. |
| 8. BATHerapy | 47. Jonathan Product, LLC | 84. Planet Eve Organics |
| 9. Be Natural Organics | 48. Josie Maran Cosmetics | 85. Plantlife, Inc. |
| 10. Belli Cosmetics | 49. JUARA Skincare | 86. Pretty Natural, Inc. |
| 11. Belly Buttons & Babies | 50. Karen's Botanicals | 87. Pristine Recovery |
| 12. BienElla, LLC | 51. Kasia Organic Salon | 88. Pure & Basic |
| 13. Big Tub Botanicals | 52. Kasny Recon, Inc. - Shea Touch | 89. Pure Hearts & Clean Hands Soap Co |
| 14. Binda Baby Essentials | 53. Kaylala LLC | 90. Real Purity |
| 15. Blue Ridge Gypsy Studio | 54. Keshi Organics | 91. Return to Eden Cosmetics, LLC |
| 16. Botanical Earth | 55. Kettle Care | 92. Sally B's Skin Yummies |
| 17. Botanical Skin Works | 56. KINeSYS Inc. | 93. Sherrys Treasure Island |
| 18. CARA B Natural Products, Inc. | 57. Korres Natural Products Ltd. | 94. Skin Delicious Body So Fine |
| 19. Celadon Road, Inc. | 58. La Peau Couture | 95. SkinGenX |
| 20. Classy Minerals | 59. Levlad | 96. Spirit Earth LLC |
| 21. Clovertree Apothecary | 60. Lilly's Naturals | 97. Starflower Essentials |
| 22. Consonant Body Organic Skincare | 61. Lip-Ink International | 98. Sweet Beauty |
| 23. Cosmetics Without Synthetics | 62. Luna Organics, LLC | 99. Tata's Natural Alchemy, LLC |
| 24. derma e Natural Bodycare | 63. MadeOn Lotion Bars | 100.the formulaah |
| 25. Duchess Marden | 64. Maine Shave | 101.The Nurturing Place |
| 26. Earth Diva Cosmetics LLC | 65. MineralFace FX | 102.Tom's of Maine |
| 27. Earth's Best | 66. Montana Bentonite | 103.Trillium Herbal Company |
| 28. Ebelegy | 67. MoonEssence, Inc. | 104.Urban Naturals |
| 29. emerginC | 68. Mountain Ocean Ltd. | 105.Vysada Inc. Ayurvedic Natural Skin Care |
| 30. Essance | 69. My Earth Natural Cosmetics Pty Ltd | 106.W3LL PEOPLE |
| 31. Favor Care Organics | 70. Napa Valley Bath Co | 107.Weleda |
| 32. FOOTherapy | 71. Natural Magic Eco-Herbal Skin Care | 108.WellSpring Naturals, LLC |
| 33. French Transit, Ltd. | 72. Nature's Baby Organics | 109.Wilava |
| 34. Fresh Organics Inc. | 73. Nature's Genesis | 110.Wildwood Naturals |
| 35. Friendly Fumes Soaps and Candles | 74. Nature's Paradise | 111.Yellowstar*Essentials |
| 36. Hamadi Beauty | 75. Noli n Nali | |
| 37. Head Organics | 76. Obrien Organics, Inc. | |
| 38. Healing-Scents.com | | |
| 39. HollyBeth's Natural Luxury | | |

Appendix C: Campaign Victories & History⁴⁰

The Campaign for Safe Cosmetics grew out of concerns about phthalates,⁴¹ a set of industrial chemicals linked to birth defects and reproductive harm. It has since evolved to include many other chemicals of concern found in personal care products. The Campaign uses a science-based foundation and an engaged public to push companies to make safer products and convince the government to pass laws that protect our health. Some of our accomplishments so far include:

2011

- After more than two years of leading health and parents' groups asking Johnson & Johnson to reformulate its flagship baby shampoo to remove a chemical that releases formaldehyde, a known carcinogen, the company agrees to eliminate the harmful chemical.⁴²
- Major companies including L'Oreal and Johnson & Johnson⁴³ now have either phased out or have policies against the use of the toxic pesticide triclosan in their products.
- A study by Deloitte⁴⁴ finds more than two-thirds of the people they surveyed are more concerned about the personal care products they use now than they were five years ago. Safety is the number one concern for 57 percent of the people surveyed.
- After six years and more than 1,500 company signatures, the Campaign announces in January that the Compact for Safe Cosmetics⁴⁵ will sunset in June 2011. The Compact, a voluntary pledge to remove chemicals linked to adverse health impacts from personal care products and replace them with safe alternatives, helped push the market toward safe and healthy beauty products. The Safe Cosmetics Business Network⁴⁶ opens in its place.

2010

- The California Attorney General sues makers of Brazilian Blowout⁴⁷ hair straightening products under the 2005 California Safe Cosmetics Act,⁴⁸ a law authored by Campaign coalition leaders, after Oregon OSHA finds formaldehyde in the products. It's the first time the law is used to get unsafe products off the market.
- "Stop the Spray!" We team up with Teens Turning Green in the fall to tell Abercrombie & Fitch to stop dousing customers⁴⁹ and merchandise with "Fierce," a cologne with ingredients linked to sperm damage and asthma.⁵⁰
- The Safe Cosmetics Act of 2010,⁵¹ a bill supported by the Campaign for Safe Cosmetics, is introduced in Congress in July. Written to eliminate chemicals linked to cancer, birth defects and other health problems from the products women, men and children put on their bodies every day, the law also protects workers from toxic chemicals in cosmetics.
- Half a million views. That's how many times The Story of Cosmetics⁵² is watched in 2010 following its July release. The 8-minute video from the Campaign for Safe Cosmetics and The Story of Stuff Project tells the ugly truth about the cosmetics industry – and ways we can give the beauty industry a much-needed makeover.
- Our May "Not So Sexy"⁵³ report reveals that top-selling fragrance products – including Glow by JLO, Calvin Klein Eternity and Old Spice body spray – contain allergens and hormone-disrupting chemicals, many of which are not listed on ingredient labels and most of which have not been assessed for safety by either the beauty industry or the FDA.

2009

- The Campaign releases "Pretty Scary,"⁵⁴ a Halloween report that reveals some children's face paints are contaminated with lead, a neurotoxin, as well as nickel, cobalt and chromium, which can cause lifelong skin sensitization and contact dermatitis.
- Our partners at EWG expand the Skin Deep database⁵⁵ to include more than 52,000 products and close to 9,000 ingredients. Skin Deep also now lists companies that have signed the Compact for Safe Cosmetics and tracks their progress in meeting this pledge of safety and transparency.
- Campaign for Safe Cosmetics staff meet with elected officials and the FDA to discuss the public's growing concern about unnecessary exposure to toxic chemicals in personal care products.

- Following the “No More Toxic Tub” report release, which included tests of Johnson’s Baby Shampoo, the Campaign for Safe Cosmetics in May sends Johnson & Johnson a letter signed by 50 groups⁵⁶ representing more than 2 million members. The letter asks the company to reformulate their iconic baby shampoo and other products to remove hazardous chemicals. After receiving more than 6,000 consumer letters and our sign-on letter, the company agrees to meet with the Campaign to discuss our concerns. Throughout this dialog, we urge J&J to become an industry leader in product safety and transparency.
- In March 2009, the Campaign releases “No More Toxic Tub: Getting Contaminants Out of Children’s Bath and Personal Care Products”⁵⁷ with our allies in 13 states. We tested dozens of top-selling children’s bath products and found many to be contaminated with the cancer-causing chemicals formaldehyde and 1,4-dioxane. More than 1,000 media outlets across the globe cover the story, which prompts international government action and a bill in the U.S. Senate authored by Sen. Kirsten Gillibrand (D-N.Y.).⁵⁸

2008

- Product testing, a follow-up to the 2002 “Not Too Pretty”⁵⁹ report, reveals that some leading manufacturers are using fewer phthalates in 2008. Results of the 2008 testing are released in the report, “A Little Prettier.”⁶⁰ This positive step for consumer health is due to activist pressure from the Campaign for Safe Cosmetics and to policy changes in the EU and the U.S. However, some companies are still using high levels of phthalates, and none of the manufacturers of products tested admit that they’ve reformulated to remove the chemicals.
- The list of signers of the Compact for Safe Cosmetics⁶¹ surpasses 1,000 companies, four times the original outreach list. The Campaign assists Compact-signing companies as they work toward Compact compliance, transparency and strong standards for safe personal care products.
- CVS pharmacy⁶² starts taking steps toward creating standards for cosmetics carried in the chain’s stores.
- The Campaign initiates work with retailers, beginning with advising Whole Foods Market⁶³ on their Premium Body Care seal.
- Nine states consider legislation to ban toxic chemicals from personal care products, reflecting a nationwide movement to create new policies that protect our health. The Campaign works toward federal reform of cosmetics regulations, so that all products on the shelves, sold anywhere in the country, will be safe for our health.

2007

- Mass-market retailers⁶⁴ like Target, CVS and Walgreens jump on the natural and organic bandwagon as consumers become more aware of the dangers of some synthetic chemicals.
- Due to growing health concerns about chemical exposures, demand for natural and non-toxic products⁶⁵ becomes the fastest growing segment of the personal care products market.
- New Society Publishers releases *Not Just a Pretty Face: The Ugly Side of the Beauty Industry*, by Stacy Malkan. The award-winning⁶⁶ book chronicles the history and victories of the Campaign for Safe Cosmetics. Malkan, who helped found the campaign in 2002, travels the U.S. on a book tour.⁶⁷
- The Campaign for Safe Cosmetics tests 33 lipsticks for lead⁶⁸ and proves the urban myth true: lead is found in two-thirds of the samples.
- The Campaign for Safe Cosmetics releases the results of independent lab testing, which found a cancer-causing chemical called 1,4-dioxane in children’s bath products.⁶⁹ The chemical, a petroleum byproduct, is not listed on product labels.

2006

- Nail polish manufacturers, including global salon polish leader OPI,⁷⁰ Orly and Sally Hansen, remove three of the most toxic chemicals (the “toxic trio”) from nail polish – formaldehyde, toluene and dibutyl phthalate – due to pressure from the Campaign for Safe Cosmetics.

2005

- With leadership from the Breast Cancer Fund, Breast Cancer Action, National Environmental Trust and Teens for Safe Cosmetics, the California Safe Cosmetics Act⁷¹ is signed into law. The Act requires cosmetics companies to report publicly their use of chemicals linked to cancer and birth defects.

2004

- In response to the Campaign's letter request, some major mainstream companies, including L'Oreal and Revlon,⁷² agree to remove chemicals banned in Europe from cosmetics sold in the United States and elsewhere around the world.
- A letter signed by more than 50 environmental, women's and health groups is mailed to 250 of the largest cosmetics companies, asking them to remove phthalates and sign the Compact for Safe Cosmetics,⁷³ a pledge to replace all hazardous chemicals with safer alternatives. We broadened our outreach and within one year, 100 companies sign the Compact; within two years, 300 companies sign – though most major companies originally targeted do not.
- Campaign partner the Environmental Working group launches Skin Deep,⁷⁴ the world's largest database of chemicals in personal care products. This innovative online tool matches the ingredients listed on personal care products with 50 toxicity databases to determine safety ratings and data gaps for each product, brand or company.
- Widespread concern and growing questions about the safety of personal care products lead to the creation of a national coalition⁷⁵ of environmental, health and women's groups called the Campaign for Safe Cosmetics, led by the Breast Cancer Fund.

2003

- The European Union bans 1,100 toxic chemicals from personal care products, including some phthalates used in nail polish and other products, under the EU Cosmetics Directive.⁷⁶ In contrast, the United States sticks to its existing ban on only 11 chemicals. Some products sold in the U.S. still contain chemicals banned in Europe even though safer alternatives are available.

2002

- EWG, Health Care Without Harm and Women's Voices for the Earth test a wide range of personal care products and find phthalates in more than 70 percent of the products, including shampoos, deodorants, hair gels and fragrance. None of the products list phthalates on the label. They release results in a groundbreaking report, "Not Too Pretty."⁷⁷

2000

- Environmental Working Group reports that many nail polishes⁷⁸ contain phthalates. The U.S. Centers for Disease Control and Prevention reports that women of childbearing age have higher levels of phthalates in their bodies than other segments of the population.
- Researchers begin looking at cosmetics as a possible source of phthalate exposure.⁷⁹



Appendix D: Compact for Safe Cosmetics Compliance Requirements⁸⁰

Compliance Requirement	Description	Compliance Measured
Comply with the EU Cosmetics Directive.	Companies were required to comply with the requirements of the EU Cosmetics Directive upon signing the Compact.	Companies indicated they met this requirement upon signing. Products entered into Skin Deep were flagged if they contained ingredients with use restrictions in the EU.
Disclose all ingredients.	Companies were required to disclose all ingredients, including constituent ingredients of fragrance and other proprietary formulations.	The Skin Deep database flagged the use of proprietary ingredients. Companies were required to disclose the constituents of their proprietary ingredients in order to reach compliance. In some cases, suppliers of proprietary ingredients would not allow manufacturers to disclose constituents of proprietary ingredients. In order to achieve compliance, these companies were required to submit a non-disclosure letter from the supplier.
Publish and regularly update product information in EWG's Skin Deep database.	Companies were required to enter product details for all the cosmetics and personal care products they sold into EWG's Skin Deep database and to update their product listings annually.	In Skin Deep, companies were required to indicate the number of products they manufactured and the date of their last review. If the number of products indicated matched the number entered, and companies had both logged in and certified the date of their last product update, then companies were considered compliant.
Comply with ingredient prohibitions and restrictions under the Compact for Safe Cosmetics and substitute ingredients of concern with safer alternatives.	Companies were required to comply with restrictions and prohibitions outlined by the Campaign. These restrictions were a compilation of international restrictions for ingredients used cosmetics and personal care products.	Companies using ingredients deemed as prohibited were required to reformulate any products using those ingredients. Companies with restricted ingredients were required to either provide documentation proving that their product met the specific restriction or reformulate their products so that they would comply with the restrictions.
Substantiate the safety of all products and ingredients with publicly available data.	Companies were required to provide data that indicated the safety of their products and/or ingredients. This data could include any materials the company used to substantiate the safety of their products prior to putting them on the market. Examples include results of ingredient and/or product testing and Material Safety Data Sheets.	After a one-year trial period, this compliance requirement was discontinued.
Participate in the Campaign for Safe Cosmetics.	Companies were required to participate in the Campaign.	Activities that fulfilled this provision included logging into Skin Deep and participating in Campaign meetings.

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