



TM

EWG's Licensing Criteria: Personal Care Products

EWG's research team has worked hard to develop a strict set of standards to be followed by all products that bear the EWG VERIFIED™ mark. The EWG VERIFIED™ mark demonstrates to consumers that a product meets our strictest criteria as outlined below.



Personal Care Product Criteria

Products bearing the EWG licensed mark must meet all of the following criteria:

a) Products must be in one of EWG’s personal care product categories approved for licensing (see Appendix III).

EWG will license only those personal-care products that fall within one of the following subcategories, as defined further herein:

- i. Baby products;
- ii. Hair products;
- iii. Makeup;
- iv. Nail products;
- v. Skin products (including moisturizers and lip balms with SPF); and
- vi. Oral care products.

NOTE: Concentrated and mix-in products are eligible for the VERIFIED program, however, they must meet the criteria as sold.

EWG will NOT license some specific personal care product types, including:

- i. Medical and semi-medical products, including any product making claims of a medical nature;
- ii. Product categories that tend to be caustic or harsh from a health perspective, such as hair straighteners;
- iii. Certain product categories of health concern, such as eyelash glues and nail glues;
- iv. Recreational sunscreens; and
- v. Aerosols, due to respiratory concerns. For the purpose of this program, aerosol products are those that are pressurized, through the use of a propellant or mechanical force, to dispense product. This definition of aerosol does not include pump spray products.

b) Products must score “Green” in Skin Deep®.

EWG will license only products that score in the “green” range of EWG’s Skin Deep® database. Products in Skin Deep® are rated on a 1 to 10 scale, with 1 representing the best score and 10 representing the worst. Only those products receiving a “green” rating score between 1 and 2, are eligible for licensing.

While a cosmetic company is not required to make products available to consumers in the United States to be EWG VERIFIED™, a company must still comply with all FDA regulations of cosmetics applicable to products sold in the U.S. and included in this criterion, including, but not limited to, the use of U.S.-allowed active ingredients, and appropriate FDA-required labeling language and Drug Facts label for product categories that are regulated as Over-the-counter

(OTC) drugs. For any product not sold in the United States, the company shall be responsible for translation fees through EWG’s translation service of choice for the ingredient label and, if applicable, Drug Facts label.

A product is sold in the United States if the company: (1) has products sold in retail stores located in the U.S.; (2) sells to U.S. consumers directly through the company’s own website; and/or (3) establish a storefront on Amazon.com or Alibaba.com through which you arrange to have your products made and shipped directly to U.S. consumers through the platform’s services.

c) Products cannot contain any ingredients on EWG’s “Unacceptable” list (see Appendix I).

EWG’s “Unacceptable” list of ingredients includes:

- i. Certain ingredients with health, ecotoxicity and/or contamination concerns. These include, but are not limited to, ingredients that score a 7 or higher (i.e., in the “red” range) in the Skin Deep® database; and
- ii. Substances falling within any of the following categories due to scientific safety evaluations (with certain limited exceptions):
 - Cosmetic ingredients banned by Health Canada, appearing on the Cosmetics Ingredient Hotlist;
 - Ingredients designated as banned in the European Commission’s database of cosmetic substances, COSING;
 - Chemicals on the state of California’s Proposition 65 list of known carcinogens and reproductive toxins;
 - Substances classified by the International Agency for Research on Cancer as possible, probable and known carcinogens (categories 2B, 2A and 1);
 - Substances listed in the National Toxicology Program’s Report on Carcinogens (reasonably anticipated and known human carcinogens);
 - Substances classified by the EPA’s IRIS program as possible, probable, and known carcinogens (C, B1, B2 and A);
 - Ingredients not allowed by the U.S. Food and Drug Administration to be used in cosmetics;
 - Fragrance chemicals prohibited for use by the International Fragrance Association;
 - Mineral pigments not allowed for use as colorants by the U.S. Food and Drug Administration, Health Canada and/or the European Union;
 - The European Union’s Category 1 designated endocrine disruptors;
 - Substances the European Union has banned or restricted in hair dye products;
 - Substances that fall under the EU’s Globally Harmonized System hazard codes H340-362 (hazard codes for genotoxicity, cancer, and developmental/reproductive endpoints); and
 - Substances designated as sensitizing asthmagens by the Association of Occupational and Environmental Clinics (applies only to products that are powders or sprays).



- d) Products cannot contain any ingredients on EWG’s “Restricted” list that do not meet the restrictions set by authoritative bodies and industry institutions (see Appendix II). Should the guidance of authoritative bodies conflict, EWG shall use the most health-protective limit.**

EWG’s “Restricted” list includes cosmetics ingredients that have been restricted by national and international governments, authoritative bodies, and certain cosmetics and fragrance industry institutions. The restrictions include, but are not limited to, concentration and contamination restrictions established by the following groups:

- i. U.S. Food and Drug Administration;
- ii. European Union (as listed in the COSING database);
- iii. Health Canada;
- iv. Japan’s Ministry of Health, Labour and Welfare;
- v. Personal Care Products Council’s Cosmetics Ingredient Review; and
- vi. International Fragrance Association.

e) Products must follow standard ingredient naming guidelines:

- i. Each ingredient name should be listed using International Nomenclature for Cosmetics Ingredients labeling guidelines as found in the most recent edition of the International Cosmetics Ingredient Dictionary and Handbook.
- ii. Mixtures must be listed by their component INCI names. For example, the mixture “Geogard Ultra” must be listed as “Gluconolactone, Sodium Benzoate.” Any reference to trademark ingredient mixtures must not appear in the ingredient list;
- iii. If INCI names are not available, ingredients must be listed using a unique chemical name. (Note: Registered Trademark names will not be allowed)
- iv. The name of sunscreen ingredients should conform to FDA regulations even when sunscreen ingredients are included in a product that does not make an SPF claim.
- v. All botanicals should include the scientific name followed by the chemical modification, such as extract or oil. A company may decide if it will list the common name as well. The general naming structure should be as follows:
 - [Botanical name] [(Common name), optional] [Name of relevant plant part, such as leaf or stem, if applicable] [Chemical modification]
 - For example, Aloe Barbadensis (Aloe Vera) Leaf Extract

- f) Products fully disclose all ingredients, including ingredients used in fragrance and flavor mixtures and chemicals used to coat mineral ingredients.**

EWG will license only those products that fully disclose their ingredients. This provision includes, but is not limited to, complete disclosure of fragrance and flavor mixtures, as well as chemicals used to coat mineral ingredients. According to the certifying body NSF, and for the purposes of this agreement, an ingredient is “any substance used in the preparation of the product that is still present in the final commercial product.”

In cases where a product’s fragrance or flavor mixture is five ingredients or less, the company must list fragrance ingredients on the product package. If the fragrance mixture is comprised of more than 5 ingredients, the company must include, on the product’s package, either 1) a disclosed ingredient list, or 2) the term “fragrance” or “flavor” followed by an asterisk, as well as the first five ingredients in the mixture (based on concentration) and instructions on where to find the disclosed list of ingredients following a corresponding asterisk directly beneath the ingredient list (see example below for details on placement and wording).

The company must include their disclosed ingredient list, including all of their fragrance or flavor ingredients at or above 0.01%, in Skin Deep and on the company’s website.

Example product ingredient list

Ingredients: Water, Butyrospermum Parkii (Shea) Butter, Fragrance.*

** Fragrance ingredients include: Citrus Paradisi (Grapefruit) Extract, Citrus Limon (Lemon) Extract, Lavandula Angustifolia (Lavender) Extract, Camellia Sinensis (Green Tea) Extract, Mentha Piperita (Peppermint) Leaf Extract, and others (See full fragrance ingredient list in company website)*

Chemicals used to coat mineral ingredients must be listed on the product package.

Note, EWG reserves the right to perform random product testing, including through qualified third-party testing services, to ensure that products fully disclose all ingredients on the label.

g) Product manufacturers must develop, document and follow current Good Manufacturing Practices.

EWG requires that licensed companies develop, document and follow a Good Manufacturing Practice program in line with that recommended by the FDA’s Guidance for Industry: Cosmetic Good Manufacturing Practices.

These practices include, but are not limited to:

- i. Maintaining documentation and records;
- ii. Assessing the suitability of buildings, facilities and equipment;
- iii. Maintaining adequate filth and pest controls;



- iv. Assessing raw materials;
- v. Establishing standard operating procedures (SOPs);
- vi. Evaluation laboratory controls; and
- vii. Reviewing and documenting product complaints, adverse event reports and voluntary recalls.

**Moisturizers and lip balms that offer UV protection must additionally follow FDA good manufacturing practices applicable to SPF products.*

h) Products must pass basic microbial challenge tests and repeat these tests as appropriate.

EWG will only license products that have:

- i. Specified to EWG which ingredients, if any, are intended as preservatives; and
- ii. Passed microbial challenge tests for the finished product (current formulation). (Refer to U.S. Pharmacopoeia Anti-Microbial Effectiveness Testing (USP 51) for relevant challenge test). Companies must also have protocols in place to repeat microbial challenge tests if/when the product formulation, manufacturing process, or packaging change.

In accordance with ISO 29621, products with the following characteristics are considered to be at low-risk for microbial contamination and are therefore exempt from this criterion:

| Physico-Chemical Characteristics | Limits |
|---|---------------------|
| pH | < 3.0 |
| pH | > 10.0 |
| Ethanol or other alcohol | > 20% |
| Filling temperature | > 65.0 °C |
| Water activity (a _w) | < 0.75 ^a |
| Solvent based products | |
| Oxidizing products | |
| Aluminium chlorohydrate | > 25% |

i) Products must disclose all fragrance allergens that are required on personal care product labels in the European Union.

The EU requires companies to indicate the presence of 26 fragrance allergens in the list of ingredients when concentrations exceed 0.01% in rinse off products and 0.001% in leave-on products, without regard as to whether these allergens were added directly as an ingredient or are present as a component of a fragrance ingredient. The allergens and their CAS numbers are attached in Appendix IV.

EWG requires that companies list fragrance allergens meeting the above EU criteria at the end of their ingredient lists on the product package. If fragrance allergens are dispersed throughout the ingredient list rather than listed at the end, they must be clearly identified with an asterisk or similar symbol indicating that the allergen is a component of the parent ingredient. Companies may choose to indicate these allergens on the product package and/or on the product webpage. If companies choose to list the allergens solely on their website, they must also indicate on the product package the specific ingredients that have the relevant allergenic components with an asterisk and include a phrase at the end of the ingredient list which points to the website for the full list of allergens.

Please note that if the EU’s requirements for labeling fragrance allergens change (for instance, more allergens are added to their list), EWG’s licensing criteria will change accordingly.

***Effective 2021, we will be updating our requirements for allergens labeling. As of our 2021 Science and Criteria Update, we will require companies to have all relevant allergens labeled on product packaging at the time of licensing and companies will no longer receive a 1-year grace period for this requirement.*

j) Products must follow the European Union’s labeling guidelines for nanomaterials used in cosmetics.

EWG requires that all licensed cosmetics products follow the European Union 2009 labeling guidelines for nanomaterials in cosmetics, provided that any claims about nanomaterials are properly substantiated and comply with any applicable FDA regulations for cosmetics. For the purposes of this agreement, we refer to the EU’s 2011 recommended definition: “‘Nanomaterial’ means a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm.”

This criterion requires:

- i. Manufacturers using ingredients that meet the aforementioned definition of nanomaterials in their product/s to list these ingredients on the product’s ingredient list; and
- ii. The names of such ingredients to be followed by the word “nano” in parentheses. For more information on the EU’s guideline for nanomaterials in cosmetics products, see: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:342:0059:0209:en:PDF>.



k) Product labels must indicate an expiration date or a “period of time after opening.”

Within one year, EWG requires licensed products to address the product's shelf stability by including one of the following pieces of information on the label:

- i. An expiration date for products; or
- ii. The period of time a product may be used after opening without any harm to the consumer. This “period of time after opening” must be indicated on products with a shelf life of 30 months or more.

For more information on “period of time after opening,” please see: https://ec.europa.eu/growth/sectors/cosmetics/legislation_en

Additional Criteria for EWG-Licensed Companies

Companies with products licensed by EWG must agree to all of the following:

a) Companies must commit to submitting all reports of product problems or serious adverse events to the U.S. Food and Drug Administration and to EWG, with all personally identifiable information (e.g., names, addresses) redacted from such reports.

EWG requires companies with licensed products to submit all reports of product problems or serious adverse events resulting from the use of any of the company's products to the FDA through the MedWatch site (<http://www.fda.gov/Safety/MedWatch/>). Companies should also submit those reports, with all personally identifiable information redacted from such reports, to EWG.

Product problems include, but are not limited to:

- i. product contamination;
- ii. questionable stability; and
- iii. labeling concerns.

For FDA's definition of product problems and relevant examples, see: <https://www.fda.gov/safety/reporting-serious-problems-fda/product-problems>

Serious adverse events include:

- i. death;
- ii. a life-threatening event;

- iii. hospitalization;
- iv. a disability or permanent damage;
- v. a congenital anomaly or birth defect; and
- vi. disfigurement, including serious and persistent rashes and infections.

For more details on serious adverse events, see: <http://www.fda.gov/Safety/MedWatch/HowToReport/ucm053087.htm>.

b) Companies must acknowledge that EWG's “Unacceptable” and “Restricted” lists will be reviewed annually and updated as needed. A phase-in period will be provided to allow companies to comply with any updates.

EWG will review and update EWG's “Unacceptable” and “Restricted” lists once annually to reflect the latest in science, regulations and other relevant considerations. If changes are made, EWG will alert companies that a new list is pending two (2) months before making the changes. Companies will be granted eighteen (18) months from the time the new lists are publicly announced to make the necessary changes to their formulation and packaging. At the end of the 18-month period, companies will no longer be able to manufacture or distribute products with EWG's licensed mark that do not comply with the new “Unacceptable” or “Restricted” lists. If companies continue to distribute non-compliant products with EWG's licensed mark, this will be treated as a breach of EWG's licensing agreement. In the rare event that scientific evidence emerges demonstrating that a personal care product ingredient will pose significant harm to human health, EWG reserves the right to request that companies either remove the ingredient or cease distribution of the relevant products with EWG's licensed mark in a shorter timeframe than specified above.

c) Companies must acknowledge that as a condition of participating in the licensing program, EWG will add all of their licensed products to EWG's Skin Deep® database if such products are not already rated therein.

d) Companies must acknowledge that EWG's Skin Deep® database is dynamic and the scoring algorithm may change over time.

EWG strives to make all of its consumer databases as robust as possible. For this reason, Skin Deep® is a dynamic database and product and/or ingredient scores are subject to change over time due to both emerging science and scoring algorithm improvements. In most cases, EWG will give companies prior notice of such changes to the scoring system; unforeseen circumstances may deem such notice impossible in rare situations. If changes to the Skin Deep® scoring system render a company's product out of compliance with EWG's licensing criteria, the company will have 18 months either to regain compliance or to remove the EWG licensed mark from their product packaging and associated materials.



- e) **Companies must acknowledge and agree that EWG has the right to perform random product testing, including through qualified third-party testing services, to ensure that products meet the provisions outlined in EWG's Licensing Criteria.**

EWG requires companies with licensed products to acknowledge that EWG has the right to perform random product testing, which may include the use of qualified third-party services, to ensure that products bearing the EWG licensed mark meet the provisions highlighted in this criteria document.

Documenting Compliance with EWG's Licensing Criteria for Personal Care Products

To verify compliance with the following four criteria:

- **Must be in one of the approved licensing product categories;**
- **Score "Green" in Skin Deep®;**
- **Not contain any ingredients on the EWG "Unacceptable" list; and**
- **Follow standards ingredient naming guidelines.**

Companies must submit a completed Product Submission Form with product name, ingredients and all package text. Companies must also submit legible images or pictures of their package (as it appears on actual products for sale) for verification purposes. [Product Submission Forms can be downloaded from the application page.]

EWG will upload product information to an internal platform that will highlight if the product to be licensed meets the EWG criteria specified above.

To verify compliance with this criterion:

- **Not contain any ingredients on the EWG "Restricted" list above the allowed concentrations.**

EWG will require companies to acknowledge our Safety Substantiation Notice and confirm that any "restricted" ingredients present in the product meet the relevant restrictions set by authoritative bodies and industry institutions.

To substantiate **concentration restrictions** companies must provide certification that the restricted ingredient present in the product(s) meets the relevant concentration restrictions set by authoritative bodies and industry institutions. Company may meet this requirement by providing a signed and dated statement from a formulator that the concentration used is below relevant standards.

To substantiate **contaminant or impurity restrictions** companies must provide laboratory test results that show that the product(s) or ingredient(s) meets relevant contamination restrictions as outlined in EWG's Licensing Criteria. The laboratory test results must be dated no more than 2 years prior to the submission date.

To demonstrate compliance with this criterion:

- **Fully disclose all ingredients on the label, including ingredients used in fragrance and flavor mixtures and chemicals used to coat mineral ingredients.**

Companies must submit a signed affidavit that they have fully disclosed all the intentionally added ingredients (including ingredients in fragrance and flavor and chemicals used to coat mineral ingredients) on the company's public facing website including, fragrance or flavor ingredients at or above 0.01%. EWG will supply companies with the necessary form (the Master Personal Care Products Affidavit can be downloaded from the application page).

To show compliance with this criterion:

- **Develop, document and follow current Good Manufacturing Practices (GMPs).**

EWG will require companies to sign an affidavit that they have developed or will develop, document and follow GMP program. EWG will supply companies with the necessary form (the Master Personal Care Products Affidavit can be downloaded from the application page). EWG may request a copy of a company's GMP documentation at any time.

To show compliance with this criterion:

- **Pass basic microbial challenge tests and repeat these tests as necessary.**

EWG will require companies to sign an affidavit that their product either satisfies the requirements for exemption from this criterion OR passed basic microbial challenge tests. EWG also reserves the right to request documentation that proves that the product meets the requirements for exemption or documentation of the challenge tests results (the Master Personal Care Products Affidavit can be downloaded from the application page).

To demonstrate compliance with this criterion:

- **Disclose all fragrance allergens that are required on personal care product labels in the European Union.**

EWG will require companies to sign an affidavit that they will disclose all fragrance allergens that are required on labels in the EU. EWG will review their product's ingredients and assess if fragrance allergens are likely present, whether as a directly added ingredient or as a component of a fragrance ingredient. If EWG identifies that fragrance allergens may be present, companies must either label them appropriately or submit a signed affidavit from their ingredient supplier that no allergen is present or, if present, all fragrance allergens meet the concentration restrictions specified by the EU (i.e., 0.01% in rinse off products and 0.001% in leave-on products). EWG will supply companies with the necessary form (the Master Personal Care Products Affidavit can be downloaded from the application page).



To demonstrate compliance with this criterion:

- Follow the EU's labeling guidelines for nanomaterials used in cosmetics.

EWG requires companies to sign an affidavit that they will follow the EU's labeling guidelines for nanomaterials in cosmetics within 1 year of signing the contract. At the end of the 1-year timeframe, EWG will require companies to either label nanoscaled ingredients or submit affidavits from ingredient suppliers that none of the ingredients in the licensed product are considered nanomaterials according to the EU's 2011 recommended definition (i.e., "a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm"). EWG will supply companies with the necessary form (the Master Personal Care Products Affidavit can be downloaded from the application page).

To demonstrate compliance with this criterion:

- Indicate expiration date or the period of time after opening.

EWG requires companies to sign an affidavit that they will indicate an expiration date or the period of time after opening on package labels within 1 year of signing the contract. At the end of the 1-year timeframe, EWG will review submitted product images to assess if the product is in compliance with this criterion (the Master Personal Care Products Affidavit can be downloaded from the application page).

To demonstrate compliance with this criterion:

- Commit to submitting all reports of product problems or serious adverse events to FDA (for all products).

EWG requires companies to sign an affidavit that they will commit to submitting all reports of product problems or serious adverse events to FDA (the Master Personal Care Products Affidavit can be downloaded from the application page).

To verify compliance with the following four criteria:

- Acknowledge that EWG's "Unacceptable" and "Restricted" lists will be updated once per year with a phase-in period for companies to comply with updates;
- Acknowledge that as a condition of participating in the licensing program EWG will add all of its licensed products to EWG's Skin Deep® database if such products are not already rated therein;
- Acknowledge that Skin Deep® is dynamic and the scoring algorithm may change over time;
- Acknowledge and agree that EWG has the right to perform or commission random product testing, including through qualified third-party testing services, to ensure that products meet the provisions outlined in EWG's Licensing Criteria.

EWG requires companies to sign an affidavit that they acknowledge and agree to the criteria specified above. EWG will supply companies with the necessary form (the Master Personal Care Products Affidavit can be downloaded from the application page).

APPENDICES

Appendix I: EWG's Unacceptable List – Personal Care Products

Note: This is a summary list. Full list available on the program's application page.

Parabens

Concern: Endocrine disruption

Propyl paraben
Isopropyl paraben
Butyl paraben
Isobutyl paraben

Formaldehyde and formaldehyde-like chemicals

Concern: cancer, sensitization

Formaldehyde
Methylene glycol

Formaldehyde releasers

Concern: Contact dermatitis

DMDM hydantoin
Imidazolidinyl urea
Diazolidinyl urea
Quaternium-15
Bronopol (2-bromo-2-nitropropane-1,3-diol)
5-Bromo-5-nitro-1,3-dioxane
(sodium) Hydroxymethylglycinate
Polyoxymethylene urea
Methenamine
Glyoxal

Isothiazolinones

Concern: Contact dermatitis

Methylchloroisothiazolinone
Methylisothiazolinone
Benzoisothiazolinone

Retinyl Palmitate/Retinoids

Concern: phototoxicity



Lead acetate

Concern: cancer, reproductive/developmental toxicity

Triclosan

Triclocarban

Concern: endocrine disruption, ecotoxicity

Toluene

Concern: reproductive and developmental toxicity, respiratory irritation

Phenacetin

Concern: cancer

Thimerosal

Concern: developmental neurotoxicity

Ethanolamines

Concern: asthma, for DEA cancer, reproductive and developmental toxicity.

Monoethanolamine

Diethanolamine

Triethanolamine

2-butoxyethanol

Concern: respiratory and hematopoietic toxicity

Octyl methoxycinnamate (OMC)

Oxybenzone (benzophenone-3)

Concern: endocrine disruption

Hydroquinone

Concern: suspected carcinogen, kidney damage in animals

Styrene

Concern: cancer

Triphenyl phosphate

Concern: endocrine disruption

Cocamide DEA

Concern: cancer (prop 65 listed, concern likely due to DEA contamination)

BHA

Concern: cancer and developmental effects in animals

Propyl gallate

Concern: incomplete data on reproductive toxicity, some evidence of endocrine disruption

Carbon black

Concern: cancer, contamination with petrochemicals such as PAHs

Nitro- and polycyclic musks

Concern: endocrine disruption

Musk xylene

Musk ketone

Musk ambrette (synthetic)

Galaxolide

Tonalide

Phantolide

Celestolide

Traseolide

Versalide

Cashmeran

Animal-derived ingredients

Concern: animal welfare

Emu oil

Equine oil

Mink oil

Bithionol

Concern: photosensitization

Chloroform

Concern: cancer

Halogenated salicylanilides

di-, tri-, metabromsalan and tetrachlorosalicylanilide

Concern: dermal toxicity



Hexachlorophene

Concern: neurotoxicity

Mercury compounds

Concern: neurotoxicity

Methylene chloride

Concern: cancer

Vinyl chloride

Concern: cancer

Zirconium-containing complexes

Concern: respiratory and dermal toxicity

Phthalates

 (Complete list available on the application page)

Concern: Endocrine disruption/developmental/repro toxicity

Dibutyl phthalate

Dimethyl phthalate

Butylbenzyl phthalate

Diethyl phthalate (Companies must request that fragrance houses not use these in their formulations.)

Siloxanes/cyclomethicone

(Complete list available on the application page)

Concern: Bioaccumulation. D4: weak endocrine disruptor, uterine tumors. D5: endocrine disruption, reproduction. D6: endocrine disruption, reproduction Ecotoxicity.

D3

D4

D5

D6

D7

Cyclomethicone

Perfluorinated and Polyfluorinated compounds

(Complete list available on the application page)

Concern: persistence and bioaccumulation, various health endpoints

Quaternary ammonium compounds

(Complete list available on the application page)

Concern: asthma, sensitization

Methacrylates

(Complete list available on the application page)

Concern: sensitization, respiratory irritation

Microbeads/Microplastic

(Microplastic is defined as plastic microspheres \leq 5mm in diameter)

Concern: ecotoxicity

Silver and its salts

(Complete list available on the application page)

Concern: ecotoxicity

Alkylphenol ethoxylates

(Complete list available on the application page)

Concern: ecotoxicity

Chlorofluorocarbon propellants

Concern: ecotoxicity

Talc

Concern: potential asbestos contamination (and related cancer concerns)

Ethoxylated compounds

(Complete list available on the application page)

Concern: potential 1,4-dioxane and ethylene oxide contamination (and related cancer concerns)

Nitrosating agents

(Complete list available on the application page)

Concern: potential nitrosamine contamination (and related cancer concerns)



Ingredients on one or more of the following lists of chemicals of concern (with certain limited exceptions):

(Complete list available on the application page)

1. Cosmetic ingredients banned by Health Canada, appearing on its Cosmetic Ingredient Hot List.
2. Ingredients designated as banned in COSING, the European Commission's database of cosmetic substances.
3. Chemicals on the state of California's Proposition 65 list of known carcinogens and reproductive toxins.
4. Substances classified by the International Agency for Research on Cancer as possible, probable and known carcinogens (categories 2B, 2A and 1).
 - a. Exceptions: Coffee (2B) since the designation is specific to coffee drinking
5. Substances listed in the National Toxicology Program's Report on Carcinogens (reasonably anticipated and known human carcinogens).
6. Substances classified by the EPA's IRIS program as C, B1, B2 and A (possible, probable, and known carcinogens).
7. Ingredients not allowed by the U.S. Food and Drug Administration (FDA) to be used in cosmetics.
8. The European Union's Category 1 designated endocrine disruptors.
9. Substances the European Union has banned or restricted in hair dye products.
10. Mineral pigments not allowed for use as a colorant by the U.S. Food and Drug Administration, Health Canada and/or the European Union.
11. Ingredients that score a 7 or higher (red) in the Skin Deep® database.
12. Substances that fall under the EU's Globally Harmonized System hazard codes H340-362 (hazard codes for genotoxicity, cancer, and developmental/reproductive endpoints).
13. Substances designated as sensitizing asthmagens by the Association of Occupational and Environmental Clinics (AOEC) (applies only to products that powders or sprays).
14. The International Fragrance Association's (IFRA) list of prohibited substances.
15. Association of Southeast Asian Nations

Appendix II: EWG's Restricted List – Personal Care Products

EWG's "Restricted" list includes ingredients that have been restricted in personal care products by one or more of the following government agencies, authoritative bodies, or industry institutions:

(Complete list available on the application page)

1. U.S. Food and Drug Administration
2. European Union (as listed in the COSING database)
3. Health Canada
4. Japan's Ministry of Health, Labour and Welfare
5. Personal Care Products Council's Cosmetics Ingredient Review
6. International Fragrance Association (For details on the International Fragrance Association's (IFRA) ingredient restrictions, see: <http://www.ifraorg.org/en-us/standards#.VUjrnRfHcxl>)

Appendix III: EWG Product Categories for Licensing

Product categories allowed in the licensing program:

- Baby products: baby shampoo, lotion, oil, soap, wipes, toothpaste, diaper cream, bubble bath
- Hair products: shampoo, conditioner, gel, mousse, detangler, hair color and bleaching, hair spray, dandruff treatment, hair removal waxes
- Make up: BB/CC cream, blush, bronzer/highlighter, concealer, facial powder, foundation, makeup remover, brow liner, eye liner, eye shadow, mascara, lip balm, lip gloss, lip liner, lip plumper, lipstick, body art, glitter
- Nail products: nail polish, polish remover, nail treatment, cuticle treatment
- Skin products: liquid and bar soaps, bath oils/salts/soaks, body wash, bubble bath, exfoliant scrub, masks, oil controller, facial cleanser, foot cleanser, hand sanitizer, lotion, toner/astringent, moisturizer, hand cream, antiperspirant deodorants, anti-aging treatments, around-eye creams, body oil, facial moisturizer/treatment, after shave, shaving cream, body firming lotion, body powder, moisturizer with SPF, lip balm with SPF, after sun products, redness treatment, scar treatment, corn/callus treatment
- Oral products: toothpaste, breath freshener, mouthwash
- Other: vapor rub, muscle/joint soreness, body spray, fragrance, foot odor control



Product categories not allowed in the licensing program:

- Semi-medical products: acne treatment, wound treatment, hormonal cream, pain relief, anti-fungal treatment, anti-itch/rash cream, athlete's foot treatment, eczema/damaged skin treatment, hemorrhoids, denture care, contact lens all-in-1 clean & rinse, contact lens cleaners, contact lens saline solution, eye drops/artificial tears, eye drops/artificial tears for contacts, eye wash, hair-loss treatment, lice treatment shampoo, ear wax removal, oral pain relief, wart removal, cradle cap treatment, nipple cream, "personal cleansing," feminine moisturizer, feminine powder/deodorant, lubricant/spermicide, hair growth inhibitor, hair growth treatment/stimulant, varicose/spider vein treatment, bandages, dental floss, pore strips
- Product categories of public health concern: eyelash glue, nail glue
- Caustic or harsh products: skin fading/lightener, chemical depilatory, hair relaxer, hair perm, baby powder, facial hair bleach, chemical peel
- Recreational sunscreens (including baby sunscreens, sunscreens with SPF 15-30, greater than 30), makeup with SPF, sunless tanning products, sunscreens with SPF less than 15 or SPF greater than 50+, tanning oils
- Aerosols of any kind

Appendix IV: List of Allergens Required to be Listed on Product Labels

See full list of allergens and CAS numbers here: https://ec.europa.eu/growth/sectors/cosmetics/legislation_en

| Common Name | CAS Number |
|--|-------------------|
| Amyl cinnamal | 122-40-7 |
| Amylcinnamyl alcohol | 101-85-9 |
| Benzyl alcohol | 100-51-6 |
| Benzyl salicylate | 118-58-1 |
| Cinnamyl alcohol | 104-54-1 |
| Cinnamal | 104-55-2 |
| Citral | 5392-40-5 |
| Coumarin | 91-64-5 |
| Eugenol | 97-53-0 |
| Geraniol | 106-24-1 |
| Hydroxycitronella | 107-75-5 |
| Hydroxymethylpentyl-cyclohexenecarboxaldehyde | 31906-04-4 |
| Isoeugenol | 97-54-1 |
| Anisyl alcohol | 105-13-5 |
| Benzyl benzoate | 120-51-4 |
| Benzyl cinnamate | 103-41-3 |
| Citronellol | 106-22-9 |
| Farnesol | 4602-84-0 |
| Hexyl cinnamaldehyde | 101-86-0 |
| Lilial | 80-54-6 |
| d-Limonene | 5989-27-5 |
| Linalool | 78-70-6 |
| Methyl heptine carbonate | 111-12-6 |
| 3-Methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one | 127-51-5 |
| Oak moss | 90028-68-5 |
| Tree moss | 90028-67-4 |



Appendix V: The International Fragrance Association's Product Categories Table

These categories are summarized in Table 9 of the Guidance for the use of IFRA Standards, as follows:

| Category | Product type |
|----------|---|
| 1 | Products applied to the lips |
| 2 | Products applied to the axillae |
| 3 | Products applied to the face/body using fingertips |
| 4 | Products related to fine fragrance |
| 5 | Products applied to the face and body using the hands (palms), primarily leave-on: |
| 5A | Body lotion products applied to the body using the hands (palms), primarily leave-on |
| 5B | Face moisturizer products applied to the face using the hands (palms), primarily leave-on |
| 5C | Hand cream products applied to the hands using the hands (palms), primarily leave-on |
| 5D | Baby Creams, baby Oils and baby talc |
| 6 | Products with oral and lip exposure |
| 7 | Products applied to the hair with some hand contact |
| 7A | Rinse-off products applied to the hair with some hand contact |
| 7B | Leave-on products applied to the hair with some hand contact |
| 8 | Products with significant anogenital exposure |
| 9 | Products with body and hand exposure, primarily rinse off |

| Category | Product type |
|----------|---|
| 10 | Household care products with mostly hand contact |
| 10A | Household care excluding aerosol products (excluding aerosol/spray products) |
| 10B | Household aerosol/spray products |
| 11 | Products with intended skin contact but minimal transfer of fragrance to skin from inert substrate |
| 11A | Products with intended skin contact but minimal transfer of fragrance to skin from inert substrate without UV exposure |
| 11B | Products with intended skin contact but minimal transfer of fragrance to skin from inert substrate with potential UV exposure |
| 12 | Products not intended for direct skin contact, minimal or insignificant transfer to skin |

For more details please see the IFRA Standards/Code of Practice 49th Amendment: https://ifrafragrance.org/docs/default-source/ifra-code-of-practice-and-standards/49th-amendment/notification-letter---49th-amendment.pdf?sfvrsn=61fd4b0c_3

