



Cosmetic Claims Insights

‘Safe Beauty Claims’

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‘Safe Beauty’ Claims

80%
of ingredients in beauty
products have never been
tested for safety.

BEAUTYCOUNTER



Questions:

What do you/we mean by 'safe beauty'?

What are 'safe beauty' claims?

Are they 'logical'/justifiable/legal i.e. is it 'safe' to make them?



*"To remain wise in the midst of folly is in itself madness."
- Rousseau*

'Safe Beauty'

'Safe' beauty refers to a cosmetic product or range of cosmetic products that comply with all international codes and laws governing their creation, manufacture, and marketing to the consumer - These requirements demand first and foremost, 'to do no harm.' and that 'all products and their ingredients and packaging must be safe.'

In brief:

- They must be safe on the skin/eyes/hair/mucous membranes
- Their manufacture must not harm the environment
- They must be procured safely (environment)
- They must do no harm to those making them
- Their disposal must not harm the environment
- Their consumer messages must be complaint: Legal, Truthful, Honest, Evidential, Fair, Informed Decision
- *Misinformation by brands, dermatologists, trichologists, journalists, TV, bloggers, influencers etc. makes cosmetic products 'unsafe'.*



'Safe Beauty' Claims

'Safe' beauty claims refer to messages of a cosmetic product or range of cosmetic products implying that these products are somehow more 'safer', or have a particular characteristic that implies their 'safeness' above mainstream products.

'Clean' is an embarrassingly ignorant marketing term: the experts weigh in on clean beauty

By HOLLY O'NEILL | 10 FEBRUARY 2020

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However, **Not all of these types of claims are actually Legal!**

These consumer messages must be Legal, Truthful, Honest, Evidential, Fair, Understood (Informed Decision).

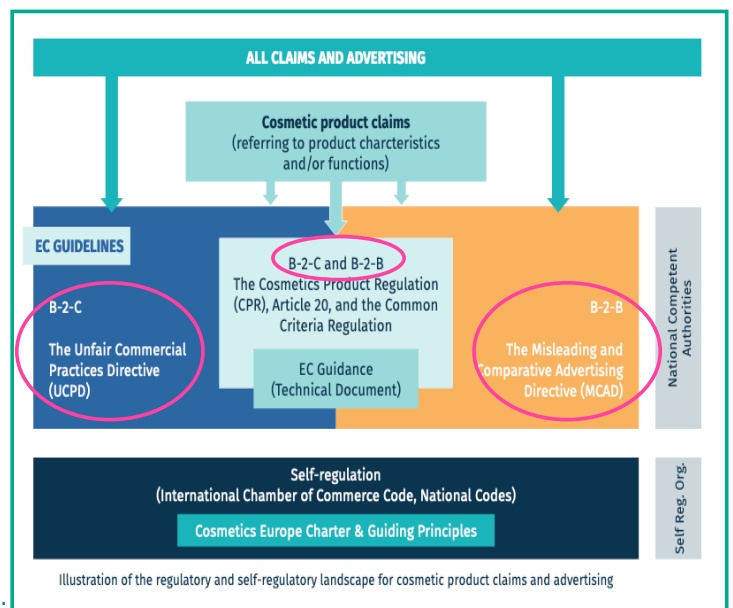
Misinformation by brands, dermatologists, trichologists, journalists, TV, bloggers, influencers etc. makes cosmetic products 'unsafe'.

Cosmetic Regulation Definition (EU):

"... texts, names, trademarks, pictures and figurative or other signs that convey explicitly or implicitly product characteristics or functions in the labelling, the making available on the market and advertising of cosmetic products.

It shall apply to any claim, irrespective of the medium or type of marketing tool used, the product functions claimed, and the target audience".

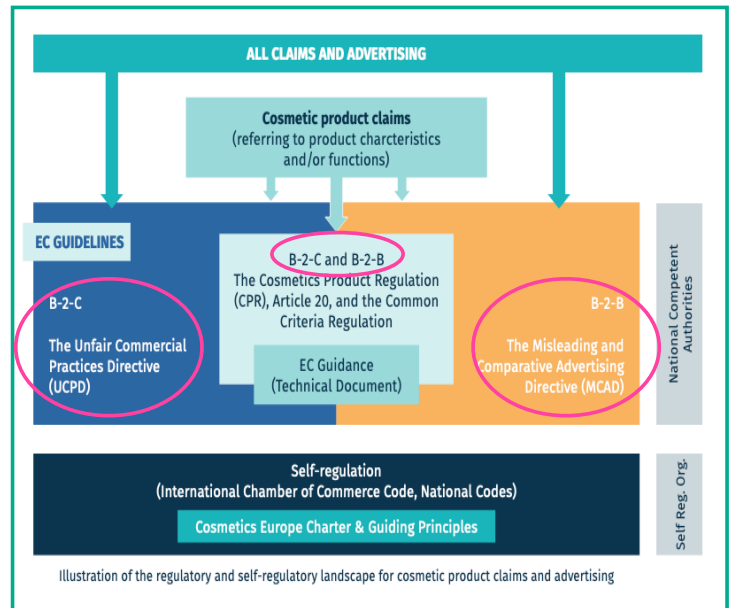
Claims may be (a combination) of different types.



Cosmetic Regulation Definition (EU):

“...In the labelling, making available on the market and advertising of cosmetic products, text, names, trade marks, pictures and figurative or other signs shall NOT be used to IMPLY that these products have characteristics or functions which they do not have*.

*Legal, Fair, Truthful, Honest, Evidence, Informed Decision-Understandable



False Information - Misleading Practices

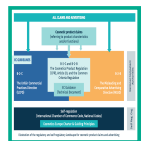
Misleading commercial practices

Article 6

Misleading actions

1. A commercial practice shall be regarded as misleading if it contains false information and is therefore untruthful or in any way, including overall presentation, deceives or is likely to deceive the average consumer, even if the information is factually correct, in relation to one or more of the following elements, and in either case causes or is likely to cause him to take a transactional decision that he would not have taken otherwise:

- the existence or nature of the product;
- the main characteristics of the product, such as its availability, benefits, risks, execution, composition, accessories, after-sale customer assistance and complaint handling, method and date of manufacture or provision, delivery, fitness for purpose, usage, quantity, specification, geographical or commercial origin or the results to be expected from its use, or the results and material features of tests or checks carried out on the product;
- the extent of the trader's commitments, the motives for the commercial practice and the nature of the sales process, any statement or symbol in relation to direct or indirect sponsorship or approval of the trader or the product;



Types of 'Safe Beauty' Claims

Those claims that state the product(s) will do no harm to the person (skin...)

Those claims that state the product(s) will do no harm to the environment

Those claims that state an 'absence' of a particular 'ingredient' or group of ingredients

Those claims that state the product(s) is 'safe'

Not all of these types of claims are actually Legal!



"Alternative facts are complete nonsense. What I'm talking about are factual alternatives."

Misinformation by brands, dermatologists, trichologists, journalists, TV, bloggers, influencers etc. makes cosmetic products 'unsafe'.

Examples of (So-Called) 'Safe Beauty' Claims



'Immunology'

Hypoallergenic

Non-irritant

Non-sensitising

Dermatologist tested

Ophthalmologist tested

'Environmental'

Natural

Organic

Vegan

Does not harm the environment

Total sun protection

'Chemical'

Paraben-free, and other so-called 'free-from' claims

Chemical-free

Non-toxic

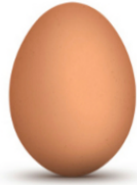
Clean

Not all of these types of claims are actually Legal, or Truthful, or Evidential, or Honest, or Fair, or (even) Understandable!

Misinformation by brands, dermatologists, trichologists, journalists, TV, bloggers, influencers etc. makes cosmetic products 'unsafe'.

I Want A Chemical-Free Product - Really?

INGREDIENTS OF AN ALL-NATURAL EGG



INGREDIENTS: AQUA (75.8%), **AMINO ACIDS (12.6%)** (GLUTAMIC ACID (14%), ASPARTIC ACID (11%), VALINE (9%), ARGININE (8%), LEUCINE (8%), LYSINE (7%), SERINE (7%), PHENYLALANINE (6%), ALANINE (5%), ISOLEUCINE (5%), PROLINE (4%), TYROSINE (3%), THREONINE (3%), GLYCINE (3%), HISTIDINE (2%), METHIONINE (3%), CYSTINE (2%), TRYPTOPHAN (1%); **FATTY ACIDS (9.9%)** (OCTADECENOIC ACID (45%), HEXADECANOIC ACID (32%), OCTADECANOIC ACID (12%), EICOSATETRAENOIC ACID (3%), EICOSANOIC ACID (2%), DOCOSANOIC ACID (1%), TETRACOSANOIC ACID (1%), OCTANOIC ACID (<1%), DECANOIC ACID (<1%), DODECANOIC ACID (<1%), TETRADECANOIC ACID (<1%), PENTADECANOIC ACID (<1%), HEPTADECANOIC ACID (<1%), TETRADECENOIC ACID (<1%), HEXADECENOIC ACID (<1%), EICOSENOIC ACID (<1%), DOCOSENOIC ACID (<1%), OMEGA-6 FATTY ACID: OCTADECADIENOIC ACID (12%), OMEGA-3 FATTY ACID: OCTADECATRIENOIC ACID (<1%), EICOSAPENTAENOIC ACID (EPA) (<1%), OMEGA-3 FATTY ACID: DOCOSAHEXAENOIC ACID (DHA) (<1%); **SUGARS (0.8%)** (GLUCOSE (30%), SUCROSE (15%), FRUCTOSE (15%), LACTOSE (15%), MALTOSE (15%), GALACTOSE (15%); **COLOUR** (E100: E160a), E306, E101; **FLAVOURS** (PHENYLACETALDEHYDE, DODECA-2-ENAL, HEPTA-2-ENAL, HEXADECANAL, OCTADECANAL, PENTAN-2-ONE, BUTAN-2-ONE, ACETALDEHYDE, FORMALDEHYDE, ACETONE); SHELL (E170). ALSO CONTAINS BENZENE & BENZENE DERIVATIVES, ESTERS, FURANS, SULFUR CONTAINING COMPOUNDS AND TERPENES.

AN ALL-NATURAL BANANA



4,442 views of your post in the feed

INGREDIENTS: WATER (75%), **SUGARS (12%)** (GLUCOSE (48%), FRUCTOSE (40%), SUCROSE (2%), MALTOSE (<1%), STARCH (5%), **FIBRE (3%)** (E400, E461, E462, E464, E466, E467) **AMINO ACIDS** (GLUTAMIC ACID (19%), ASPARTIC ACID (16%), HISTIDINE (11%), LEUCINE (7%), LYSINE (5%), PHENYLALANINE (4%), ARGININE (4%), VALINE (4%), ALANINE (4%), SERINE (4%), GLYCINE (3%), THREONINE (3%), ISOLEUCINE (3%), PROLINE (3%), TRYPTOPHAN (1%), CYSTINE (1%), TYROSINE (1%), METHIONINE (1%); **FATTY ACIDS (1%)** (PALMITIC ACID (30%), OMEGA-6 FATTY ACID: LINOLEIC ACID (14%), OMEGA-3 FATTY ACID: LINOLENIC ACID (8%), OLEIC ACID (7%), PALMITOLEIC ACID (3%), STEARIC ACID (2%), LAURIC ACID (1%), MYRISTIC ACID (1%), CAPRIC ACID (<1%), OLA (<1%), PHYTOSTEROLS: E515, OXALIC ACID, E306, E306 (TOCOPHEROL), PHYLOQUINONE, THIAMIN, **COLOURS** (YELLOW-ORANGE E101 (RIBOFLAVIN), YELLOW-BROWN E160a), **FLAVOURS** (ETHYL HEXANOATE, ETHYL BUTANOATE, 3-METHYLBUT-1-YL ETHANOATE, PENTYL ACETATE), E1510, NATURAL RIPENING AGENT (ETHENE GAS).

INGREDIENTS OF ALL-NATURAL BLUEBERRIES



INGREDIENTS: AQUA (84%), **SUGARS (10%)** (FRUCTOSE (48%), GLUCOSE (40%), SUCROSE (2%)), **FIBRE (2.4%)** (E460, E461, E462, E464, E466, E467) **AMINO ACIDS** (GLUTAMIC ACID (23%), ASPARTIC ACID (19%), LEUCINE (17%), ARGININE (8%), ALANINE (4%), VALINE (4%), GLYCINE (4%), PROLINE (4%), ISOLEUCINE (3%), SERINE (3%), THREONINE (3%), PHENYLALANINE (2%), LYSINE (2%), METHIONINE (2%), TYROSINE (1%), HISTIDINE (1%), CYSTINE (1%), TRYPTOPHAN (<1%); **FATTY ACIDS (<1%)** (OMEGA-6 FATTY ACID: LINOLEIC ACID (30%), OMEGA-3 FATTY ACID: LINOLENIC ACID (19%), OLEIC ACID (18%), PALMITIC ACID (6%), STEARIC ACID (2%), PALMITOLEIC ACID (<1%), OLA (<1%), PHYTOSTEROLS: OXALIC ACID, E300, E306 (TOCOPHEROL), THIAMIN, **COLOURS** (E163a, E163b, E163c, E163d, E160a) **FLAVOURS** (ETHYL ETHANOATE, 3-METHYL BUTYRALDEHYDE, 2-METHYL BUTYRALDEHYDE, PENTANAL, METHYLBUTYRATE, OCTENE, HEXANAL, STYRENE, NONANE, NON-1-ENE, LINALOOL, CITRAL, BENZALDEHYDE, BUTYLATED HYDROXYTOLUENE (E321)), METHYLPARABEN, E1510, E300, E440, E421 and **FRESH AIR** (E941, E948, E290).

What is a Chemical Exposure? | Chemical Safety Facts

James Kennedy

<https://www.chemicalsafetyfacts.org/chemistry->

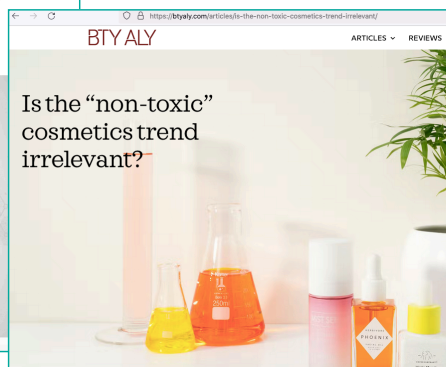
Backlash: 'Safe Beauty' Claims

Shaky science led to a rush of 'paraben-free' beauty products. But they might not be safer.

Perspective by Jenna Mandel
February 15, 2022 at 8:00 a.m. EST



(The Washington Post/Stock Images)



In the European Union (EU), a cosmetic marketing claim is regulated under EU Regulation (EC No. 655/2013). The Annex III – 'free from' claims were added on the July 3, 2017 to the list of regulations to be effective/mandated from July 1, 2019. At the same time the Annex IV 'hypoallergenic' claim was introduced.

THE VOICE OF REASON AMONGST
THE CHAOS OF THE CLEAN
BEAUTY BACKLASH

BEAUTYMATTER

AUGUST 30, 2021

Has Clean Beauty Become a Misinformation Movement?

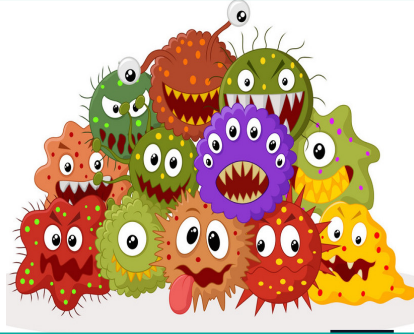
The proliferation of products marketed as "non-toxic" is starting to receive a backlash for relying heavily on fear tactics.

BY: WING SZE TANG - JAN 8TH, 2020

Non-Compliant ‘Safe’ Beauty Claims

Has the Consumer become so terrifying, that **WE** have to make these claims? **OR**

Did **WE** make the consumer terrifying because **WE** created the opportunity for these types of claims?



Once one ingredient/brand starts ‘something’ everyone else follows because they do not want to be seen as ‘foolish’ when the ‘something’ they are ‘following’ actually IS foolish !

The biggest communication problem is that we do not listen (or even read) to understand....



We listen/read to reply!



Information Disorder

The social media boom has created an architecture of misinformation that, if left unchallenged, will have damaging long-term effects on the beauty industry...it has already started...

Sir Tim Berners-Lee: *"We need a web that spreads truth more than rubbish"*

(Guardian, 15.03.2021)

<https://www.theguardian.com/lifeandstyle/2021/mar/15/tim-berners-lee-we-need-social-networks-where-bad-things-happen-less>

What is the Solution?



"Since I no longer trust the media. I get all my news from hysterical people on the street."

Context: Expectations & Viewpoint

Facts Matter!

Legal, Fair, Truthful, Honest, Evidence, Informed Decision-Understandable

- Images, words, etc.
- Expectation from the WHOLE CLAIM
- EXPECTATION from the product
- Understand your 'safe beauty' claim(s) - what is factual? what are you implying?
- See it from the consumer viewpoint as well - will they actually understand you?
- Provide a body of evidence that supports the whole claim and then challenge it

Misinformation by brands, dermatologists, trichologists, journalists, TV, bloggers, influencers etc. makes cosmetic products 'unsafe'.

Context: Expectations & Viewpoint

As always our industry learns the hard way:

- Clarity of data (information) - benefits outweighing risks
- Amount of data (information) - is it enough, too little or too much?
- Perception growth (social media hysteria)
- Decisions based on dis/mis-information (exacerbated by misinformation in press, social media...)
- Press 'stirring it up' (facts not checked)
- **Once one ingredient/brand starts 'something' everyone else follows because they do not want to be seen as 'foolish' when the 'something' they are 'following' actually IS foolish !**
- Our regulatory systems and industry politics are struggling to cope - doubt and suspicion in consumers are too easily created and very hard to erase
- 'Safe Beauty' is a goldfish bowl environment - every single thing is scrutinised, politicised, turned around, misrepresented...
- The 4P's - Key Factors we need to get to grips with:
PR (collective anxiety), Process (bureaucracy logic is too 'rigid'), Politics (industry, competition, government), 'Punters' (uneducated, make or break us)
- Hazard versus Risk (social media, press, focus on hazards, and rarely/more often than not, fail to take into account the benefits and risks)

Safe Beauty Claims:
Alternative Truths &
Dangers of Indifference



Thank you

Web: www.ccintl.eu
LinkedIn: www.linkedin.com/in/tmcallaghan
Twitter: [@Cosmet_Claims](https://twitter.com/Cosmet_Claims)

COSMETIC CLAIMS INSIGHTS

This column focuses on being aware of your claims compliance responsibilities given the growing consumer demand for evidenced based cosmetics.

This month:

That's Our Data Not Yours ...!



by Theresa Callaghan PhD
Skin Care Scientist and
Cosmetic Product Claim Specialist

Monthly column with EuroCosmetics2go newsletter
<https://www.eurocosmetics-magazine.com/>

EURO COSMETICS