

Cosmetic Claims & Clean beauty



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Cosmetic claims & Clean Beauty

- 1 Regulatory framework of claims in Europe
- 2 Free from claims
- 3 Concept of clean beauty



01

Regulatory framework in Europe

Regulatory framework

Reference texts

- Cosmetic regulation CE n°1223/2009
- Regulation CE n°655/2013 regarding cosmetic claims
 - Technical document on cosmetic claims



Regulatory framework

- Claims are **texts, images or symbols** used by brands to promote the properties of a cosmetic product.
- Each claim must meet **6 common criteria** :
 - **Legal compliance**
 - **Truthfulness**
 - **Evidential support**
 - **Honesty**
 - **Fairness**
 - **Informed decision-making**





Legal compliance

Claims which convey the idea that a product has a specific benefit when this benefit is mere compliance with minimum legal requirements should not be allowed.

Example :

- not tested on animals
- approved by authorities



Truthfulness

Neither the general presentation of the cosmetic product nor individual claims made for the product should be based on false or irrelevant information.

Example :

- the presence of an ingredient
- false or misleading claims



Evidential support

Claims for cosmetic products, whether explicit or implicit, shall be supported by adequate and verifiable evidence

The level of evidence or substantiation shall be consistent with the type of claim being made (**weight of evidence**)



Honesty

Presentations of a product's performance should not go beyond the available supporting evidence

Claims shall not attribute to the product concerned specific (i.e. unique) characteristics if similar products possess the same characteristics.



Fairness

Claims for cosmetic products shall be objective and shall not denigrate :

- the competitors
- ingredients legally used



Informed decision-making

Presentations of a product's performance should not go beyond the available supporting evidence

Claims shall not attribute to the product concerned specific (i.e. unique) characteristics if similar products possess the same characteristics.



02

“Free from” claims



COSMED
THE FRENCH COSMETICS ASSOCIATION FOR SMES

“Free from” claims

- Trend on cosmetic products : Claiming the absence of 1 or more ingredients
- Issues :
 - denigration of certain ingredients / competitors
 - misunderstanding by consumers
 - creation of unfounded fears in the consumer
- To avoid the misuse of these claims , a regulatory framework has been established : *Technical document on cosmetic claims*
 - “Free from” claims do not respect common criteria
 - some " free from" claims are still possible but **should not be the main message of the product.**
 - It should simply help the consumer to make an **informed choice**



damasco
Tocopheryl acetate,
Citronellol*, Geraniol*
Hydroxycitronellal*, Citral* (*natural)
occurring in essential oil)

FREE FROM:

~~Synthetic fragrances, parabens,
mineral oil, silicones, sulphates,
propylene glycol, phthalates,
GMOs, PEGs, TEA and DEA~~



WE NEVER TEST ON ANIMALS
LAND



Free from alcohol

- in a mouthwash intended as a family product

Free from animal-derived ingredients

- In products intended for vegans

Free from perfume

- for sensitive people

Free from silicones

- for hair care products



Free from hydroquinone (in skin cream)

- forbidden ingredient
- legal compliance

Free for paraben

- Certain parabens are safe when used in accordance to Regulation (EC) No 1223/2009.
- Fairness



03

**Clean
Beauty**

Clean beauty : concept

- As "negative" claims have been banned, manufacturers changed their communication strategy. They have switched to a more "positive" communication: **clean beauty**
- **no legal definition**
- Several aspects are now taken into consideration:
 - The composition of the products
 - The environmental characteristics of the product and/or the packaging
 - Societal and environmental actions carried out by companies

Clean beauty : composition




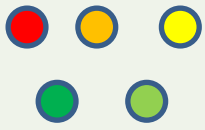
Several tools have emerged to guide consumers during their purchases:

- applications such as Yuka, Clean Beauty, INCI beauty that rate cosmetic products
- Private labels
- internal company blacklist

Is it clearer? how have companies adapted?

Clean beauty : beauty apps

- In 2019, several beauty apps have been launched to “help” consumers to read INCI list
- These applications were, like Yuka, first used for food but quickly turned to cosmetics
- **The way it works depends on the application:** scanning the INCI list or scanning the barcode
- **The score are also very different** from one app to another since the scoring system is specific to each app :
 - The general way it works is to give a score to an ingredient. The more "problematic" ingredients the formula contains, the worse the overall score of the product will be.
 - **Big questionmark** towards the scientific relevance, as “problematic” ingredients are defined by each app and no consideration of threshold

	Notation	Rate		Penalized ingredient	Some explanations on ingredients	How the application works
	<p>Yes From 0 to 100</p>		<ul style="list-style-type: none"> ● No risk ● Low risk ● Moderate risk ● High risk 	<p>EDs, allergens, irritating ingredients, CMR</p>	<p>No except for ingredients in the 4 categories</p>	<p>Scanning the barcode so the product formulas may no longer be up to date</p>
	<p>No</p>	<p>No</p>		<p>EDs, allergens, irritating ingredients, CMR</p>	<p>No except for controversial ingredients</p>	<p>Scanning the formula</p>
	<p>Yes From 0 to 20</p>		<p>from 0 to 10 from 10 to 20</p>	<p>EDs, allergens, irritating ingredients, CMR Regulated substances, Environmentally unfriendly ingredients</p>	<p>Yes with 4 categories (good, satisfactory, not great, controversial)</p>	<p>Scanning the barcode so the product formulas may no longer be up to date</p>



Beauté : ces produits sont notés 100/100 sur Yuka
 Par Salomé Touboul Mis à jour le 02 décembre 2022 à 11:57



**Note Yuka
100/100**



100% d'ingrédients d'origine naturelle

POUR DE VRAI

Adapté aux petites mains

Gel vert qui change de couleur

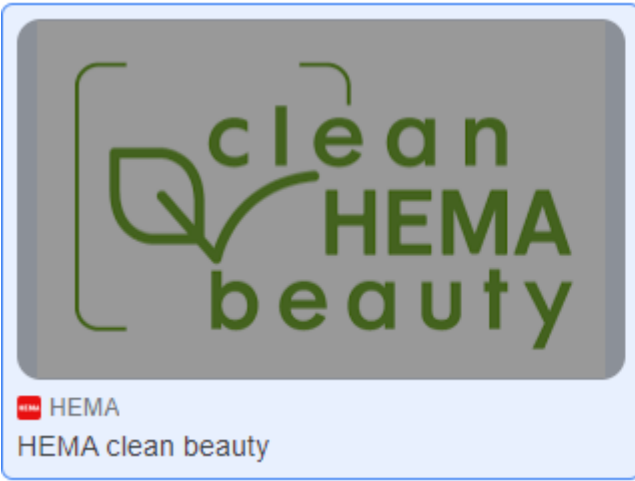
100/100
Yuka

Stickers à l'intérieur

Sans conservateur ni allergène *

Clean beauty : logos and black lists of ingredients

- Logos multiplication
- “Clean beauty” can also be accompanied by blacklists of ingredients: lists that can contain 100s of ingredients, often of petrochemical origin, controversial etc...
- these lists are not necessarily easily accessible to the consumer
- **Misuse of "free from" claims**



HEMA
HEMA clean beauty



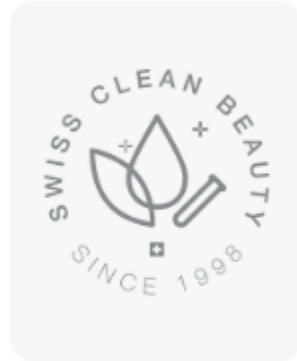
MeyerSPA
Clean Beauty | MeyerSPA | Ma...



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Look Beautiful
Natural Glow from 100% pure, ...



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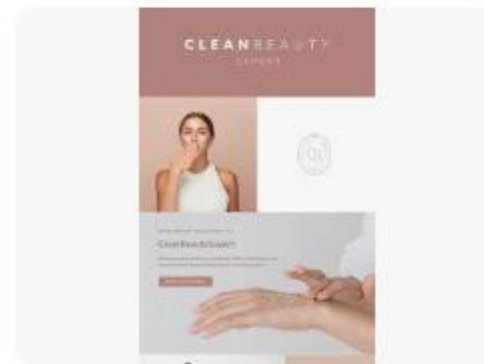
Biorius
Certifications des produits cos...



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USPTO .report
CLEAN BEAUTY COMMIT...



Pinterest
Clean beauty logo and branding de...



cleanbeautymarket.com.au
Clean Skincare + Natural, Organic Beauty ...



Catrice
Clean Beauty | CATRICE COSMETICS



Le rouge français

The CLEAN BEAUTY label confirms that our formulations do not include any controversial or allergenic ingredients, and also recommends our makeup products for pregnant women.



THE BEST OF CLEAN BEAUTY

Clean at Sephora is a curation of the very best in clean. Since we launched, we've continued to improve our assortment with science-backed innovations and by eliminating even more unwanted ingredients. That means our Clean seal has the highest standards across the industry.

No phthalates

No formaldehydes or formaldehyde-releasers

No oxybenzone and octinoxate

No hydroquinone

No triclosan

No coal tar

No methylisothiazolinone

No insoluble plastic microbeads

And more: For the full list of excluded ingredients, click [here](#).

Curious about clean fragrance? Our clean perfumes have higher standards. See more on our formulated without list, or head to our clean fragrance page.

Click [here](#).

To see our standards for wellness and ingestibles, click [here](#).

For our guidelines on CBD click [here](#).

Clean beauty : environmental claims

EC study on Greenwashing in 2020

- Out of 344 claims that appeared doubtful:
 - > 50%: claims too ambiguous for the consumer ;
 - 37%: vague and general claims
 - 59%: no readily available evidence

→ In 42% of cases, the claims were exaggerated, false or misleading.



Clean beauty : environmental claims

Reference texts

- **ISO 14021** : Environmental labels and declarations
 - Self-declared environmental claims
 - Vague or imprecise environmental claims or claims that generally imply that a product is beneficial or harmless to the environment **are prohibited**
- EU future Proposal for a Directive on Green Claims
- **Guidelines /regulations** issued by authorities in each countries

→ **TO AVOID GREENWASHING !**



Clean beauty : ISO 14021



Vague, imprecise,
ambiguous claims
Exaggerated claims

- Environmentally friendly
- Planet friendly
- Non-polluting
- Green - Eco-friendly
- Protects the ozone layer



Details required: whole
product? component?
Explanatory notes

- Sustainable (with explanatory note)
- Sustainable development (with explanatory note)



Claims proven by
standardised, reliable and
reproducible methods
Certifications

- Degradable - Biodegradable
- Compostable
- Recyclable / Recycled
- Energy efficient (water etc...)

Clean beauty : environmental claims

In France

- AGEC Act (law on the fight against waste and the circular economy of 10 February 2020)
- Article 13 of the AGEC bans the use of certain claims, such as
 - "environmentally friendly",
 - "biodegradable" and ;
 - all equivalent terms ("eco-responsible", "bio-responsible"; "nature-friendly"; "planet-friendly"; "eco-friendly"; "; "bio-compatible"; "eco-friendly"; "good for the environment"; "green" ; " better for the environment "

→ because they are clearly confusing and/or overly global for the consumer.

→ **TO AVOID GREENWASHING !**

Clean beauty : environmental claims

In France (other examples)

Ocean protect

- Not allowed
- Possible if the claim refer to a **reduction in ecotoxicity** (e.g. "reduced ecotoxicity", "less ecotoxic", ...)
- **not to an absence of ecotoxicity**, as the addition of a substance to the environment is never harmless.
- Limited impact (as long as proven)

Environmental claims qualifying a company

- must specify whether it concerns all the company's activities, the production process or one of the product development stages
- explanations of the company's approach must be readily available to the consumer.
- the consumer must understand the exact approach of the company.

Conclusion

The concept of clean beauty does not exist from a regulatory point of view

- cosmetic regulations and/or claims regulations apply and a key driving principle is not to mislead consumers

For environmental claims :

- Be careful not to do greenwashing!
- Authorities in France and internationally are carrying out more and more controls on this subject



Upcoming Cosmetic Product Series



Cosmetic Product Webinar Series #1 *Join Us!*

Certification for Cosmetic Products

6 February
11:30 – 12:30 CET
16:00 – 17:00 IST



Cosmetic Product Webinar Series #2 *Join Us!*

Packaging of cosmetic product requirements in China

8 February
11:30 – 12:30 CET
16:00 – 17:00 IST



Cosmetic Product Webinar Series #3 *Join Us!*

Shelf life and Stability Study of cosmetic products

13 February
11:30 – 12:30 CET
16:00 – 17:00 IST



Cosmetic Product Webinar Series #4 *Join Us!*

Formulating and manufacturing of new generation cosmetics

15 February
11:30 – 12:30 CET
16:00 – 17:00 IST



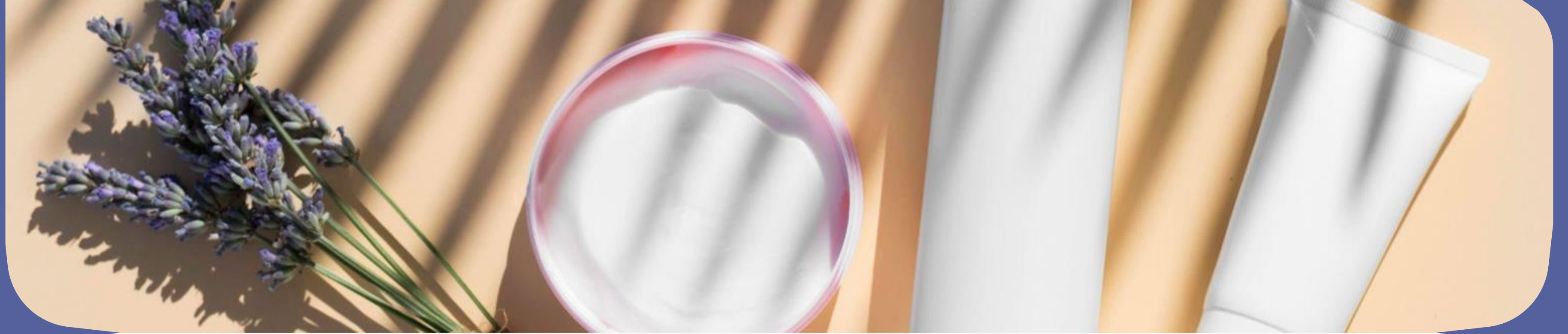
Cosmetic Product Webinar Series #5 *Join Us!*

Formulating Organic and Natural cosmetic products

22 February
11:30 – 12:30 CET
16:00 – 17:00 IST

Register at:

<https://www.gpcgateway.com/event>



Thank you!

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