

MAKEUP YOUR MIND: A CONSUMER GUIDE TO COSMETIC GREENWASHING  
IN THE UNITED STATES

by

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## **DEDICATION**

For the two most inspirational women in my life, my mom and grandma, for without their continued love and support this work would not exist.

Also for Konnor whose continued love, guidance, and coffee making got me through the writing process.

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## **ABSTRACT**

The term greenwashing was coined by Jay Westerveld in 1986 in an essay describing the hospitality industry and their misleading efforts to promote the reuse of towels. In this guide I define greenwashing as deceiving consumers regarding environmental practices of a company or environmental benefits of a product. This guide explores the deception of environmental marketing and selling of cosmetic products in the United States. By examining regulatory laws and agencies provided by FDA, FTC, and USDA regarding cosmetic labeling and marketing, I create a guide for consumers to detect greenwashing in cosmetic products marketed and sold in the U.S.

# I. INTRODUCTION

Niall Fitzerald, former CEO of Unilever stated, “Corporate Social Responsibility is a hard-edged business decision. Not because it is a nice thing to do or because people are forcing us to do it... but because it’s good for our business”<sup>1</sup>. This quote perfectly encapsulates the concept of greenwashing without intending to. Businesses are motivated to move toward sustainability not because they want or have to, but because it puts more money in their pocket. Whether a company is doing the right thing or is perceived as doing the right thing, they receive the cash they want.

We, as consumers, want to know our dollar is going into the hands of a company with a mission and values we support; the perception of values is no longer enough. I’ve created this work to be a guide to the regulations, rules, and environmental practices of the cosmetic industry to educate the consumer to not unknowingly fall victim to the perception of sustainable values. The concept of greenwashing, regulatory agencies, natural versus organic, being a thoughtful consumer, and becoming a thoughtful consumer are all ideas that will be explored at length. I also include simple graphics the average consumer can incorporate into their cosmetic purchasing practices to support corporations that practice true environmentalism.

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<sup>1</sup> “Interview: Niall FitzGerald, Co-Chairman and Chief Executive, Unilever.” *The Guardian*, Guardian News and Media, 5 July 2003, [www.theguardian.com/business/2003/jul/05/unilever1#:~:text=%22Corporate%20social%20responsibility%20is%20a,constant%20flow%20of%20talented%20people.&text=It%27s%20a%20good%20way%20to%20do%20business.%22](http://www.theguardian.com/business/2003/jul/05/unilever1#:~:text=%22Corporate%20social%20responsibility%20is%20a,constant%20flow%20of%20talented%20people.&text=It%27s%20a%20good%20way%20to%20do%20business.%22). Accessed 15 April 2021.

## II. WHAT IS GREENWASHING?

### Defined

Before learning how to detect greenwashing for yourself, you first need to know the term's origins and how it will be defined in terms of this guide. The concept of greenwashing was first coined by Jay Westerveld in 1986. Westerveld wrote an essay exposing the environmental practices of the hospitality industry and their efforts to get guests to reuse towels<sup>2</sup>. While on a research trip, Westerveld snuck into a hotel to get clean towels, and noticed a card asking guests to reuse their towels to help save the planet's resources<sup>3</sup>. Westerveld knew the hotel chain was expanding at the time and by asking customers to reuse their towels, the company wouldn't waste valuable dollars on washing towels that could be used again. Years later while writing a research paper on multiculturalism, he was quoted as saying he wrote something like, "it all comes out in the greenwash," and was then asked to write a paper further elaborating on the concept.

This would become the birth of the term greenwashing.

As seen through the example above, greenwashing is a facade. Greenwashing is a company hiding behind the mask of environmentalism to gain something in return, and

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<sup>2</sup> de Freitas Netto, Sebastião Vieira, et al. "Concepts and Forms of Greenwashing: A Systematic Review." *Environmental Sciences Europe*, vol. 32, no. 1, 2020. *EBSCOhost*, doi:10.1186/s12302-020-0300-3. Accessed 29 Jan 2021.

<sup>3</sup> Watson, Bruce. "The Troubling Evolution of Corporate Greenwashing." *Chain Reaction*, vol. 129, Apr. 2017, search.informit.org/doi/pdf/10.3316/informit.766428450523476. Accessed 20 Feb 2021.



not to save the environment. The Oxford English Dictionary added the word to its vernacular in 1999 and defines greenwashing as “disinformation disseminated by an organization so as to present an environmentally respectful image”<sup>4</sup>. Many environmentalists believe however, this definition does not capture the true depth of what greenwashing is and its impact on the consumer specifically. TerraChoice, who published the Sins of Greenwashing to be elaborated on later, defines greenwashing focused on the consumer. TerraChoice defines greenwashing as, “the act of misleading consumers regarding the environmental practices of a company or the environmental benefits of a product or service”<sup>5</sup>. The Oxford definition is heavily focused on the business, while the TerraChoice definition is absorbed in the consumer aspect; I will combine both for the purposes of this guide. In this guide I define greenwashing as deceiving consumers regarding the environmental practices of a company or environmental benefits of a product for financial gain.

## Forms

Greenwashing is not one size fits all; it can take many forms. First, greenwashing can begin at the firm-level. Firm-level greenwashing has nothing to do with the products of services a business sells, but the effort of a firm to make consumers believe their corporate brand is indeed green. A popular example of this phenomenon is General Electric’s Ecomagination campaign that was launched in 2005. This campaign, as a New

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<sup>4</sup> Oxford English Dictionary (2021) <https://www.oed.com/>. Accessed 15 March 2021.

<sup>5</sup> “Sins of Greenwashing.” *UL*, 2007, [www.ul.com/insights/sins-greenwashing](http://www.ul.com/insights/sins-greenwashing). Accessed 5 Mar 2021.

York Times opinion piece stated, was “talking green, acting dirty”<sup>6</sup>. Ecomagination was designed to make GE a leader in environmental technology. Unfortunately, Ecomagination is ultimately a front for the consumer to believe GE was more environmentally conscious than they truly are. While the Ecomagination campaign was launching General Electric’s factories were knowingly leaking organic pollutants into the Hudson River while dragging on the clean-up process<sup>7</sup>. The clean-up of the river was also nowhere to be found as an action item on the Ecomagination campaign. GE was also known to do what agencies like the EPA asked them to do, while trying to fight the regulations they were violating. This is a prime instance of firm-level greenwashing.

Next, greenwashing can occur at the product-level. Product-level greenwashing occurs when a firm advertises a specific product or service they sell as having a certain environmental benefit, when it does not. An example of product-level greenwashing is Kauai coffee’s compostable coffee pods<sup>8</sup>. Kauai advertised their new single-serve coffee pods as “100% compostable.” As stated on their website, “Now you can enjoy the great taste and convenience of single serve coffee without worrying about their environmental

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<sup>6</sup> Sullivan, Ned, and Rich Schiafo. “Talking Green, Acting Dirty.” *The New York Times*, The New York Times, 12 June 2005, [www.nytimes.com/2005/06/12/opinion/nyregionopinions/talking-green-acting-dirty.html](http://www.nytimes.com/2005/06/12/opinion/nyregionopinions/talking-green-acting-dirty.html). Accessed 15 Mar 2021.

<sup>7</sup> Sullivan, Ned, and Rich Schiafo. “Talking Green, Acting Dirty.” *The New York Times*, The New York Times, 12 June 2005, [www.nytimes.com/2005/06/12/opinion/nyregionopinions/talking-green-acting-dirty.html](http://www.nytimes.com/2005/06/12/opinion/nyregionopinions/talking-green-acting-dirty.html). Accessed 15 Mar 2021.

<sup>8</sup> “Earth Day 2020: Companies Accused of Greenwashing.” *Truth In Advertising*, 18 Feb. 2021, [www.truthinadvertising.org/six-companies-accused-greenwashing/](http://www.truthinadvertising.org/six-companies-accused-greenwashing/). Accessed 23 Feb 2021.

impact”. There was a very important caveat to this claim however, which the average consumer likely would not notice unless they were examining the website closely.



Figure I: Kauai-Coffee Homepage. Source: truthinadvertising.org

These “100% compostable pods” were only compostable in industrial composting facilities, not the average compost bin in the consumer’s backyard. Industrial composting facilities are overall scarce, and often only found in large cities like Austin, New York, and San Francisco. In fact, there are only about 100 of these facilities across the entire U.S., and there are multiple states that don’t have a single facility at all, namely in Hawaii where Kauai Coffee obtains a substantial amount of its coffee<sup>9</sup>. Burying environmental claims like this in incredibly fine print a consumer is not likely to examine is a paramount example of product-level greenwashing.

Finally, both firm-level greenwashing and product-level greenwashing can be further broken down into two forms: claim and executional. Claim-level greenwashing is related to claims made about a product. Claim-level greenwashing can be done by making a false claim made about a product, omitting important information that would be important in evaluating the claim, and/or making a vague claim about the environmental

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<sup>9</sup> “Find Composting Cities in Your Area.” *Coffee Composting Compostable SingleServe Coffee PURPOD100*, 2021, [www.coffeecomposting.com/find-a-program/](http://www.coffeecomposting.com/find-a-program/). Accessed 15 Mar 2021.

impact of a product<sup>10</sup>. Executional greenwashing is using nature evoking elements, like trees and animals, and colors, like blue and green, to falsely influence the consumer's perception of the greenness of the brand<sup>11</sup>. These two types of greenwashing are not mutually exclusive. A company can use both claim-level and executional greenwashing to promote the greenness of their product or company. An example of this is the compostable coffee pods from Kauai Coffee. Kauai Coffee combines the nature evoking colors of green and brown (executional greenwashing) with the omission of emphasizing their coffee pods are only compostable at industrial facilities (claim greenwashing). Here is a graphic summarizing the information discussed in this chapter:

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<sup>10</sup> de Freitas Netto, Sebastião Vieira, et al. "Concepts and Forms of Greenwashing: A Systematic Review." *Environmental Sciences Europe*, vol. 32, no. 1, 2020. *EBSCOhost*, doi:10.1186/s12302-020-0300-3. Accessed 29 Jan 2021.

<sup>11</sup> de Freitas Netto, Sebastião Vieira, et al. "Concepts and Forms of Greenwashing: A Systematic Review." *Environmental Sciences Europe*, vol. 32, no. 1, 2020. *EBSCOhost*, doi:10.1186/s12302-020-0300-3. Accessed 29 Jan 2021.

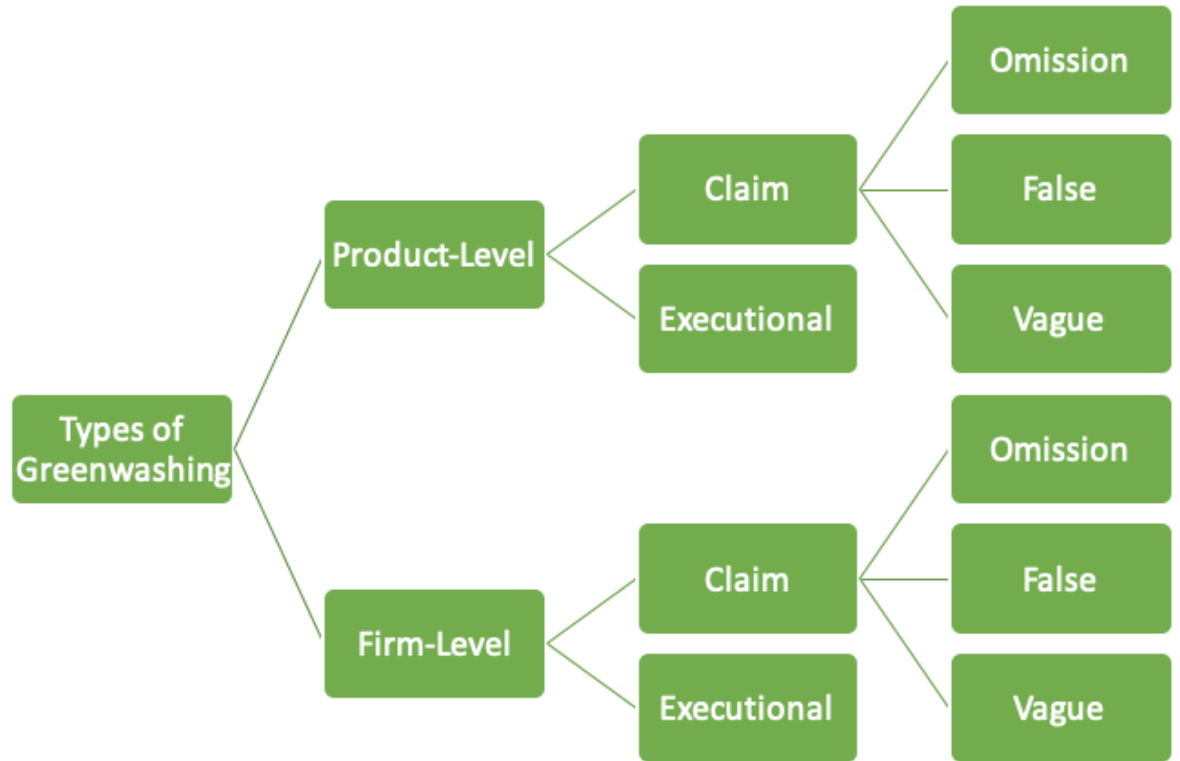


Figure II: Summarizing Types of Greenwashing

### III. GOVERNMENTAL REGULATION

#### The FDA

In order to fully understand the depth of cosmetic laws and regulations in the United States, we first need to know what is and is not a cosmetic. Cosmetic regulation in the U.S., particularly cosmetic labelling, is done by the Food and Drug Administration. The FDA specifically regulates and enforces the Food, Drug, and Cosmetic Act. As a whole, the FD&C Act regulates cosmetic products marketed in the United States. Any cosmetic marketed in the U.S. (whether it was manufactured there or not) must comply with labeling requirements laid out in the FD&C Act.

As defined by the FD&C Act, a cosmetic is an "article intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body...for cleansing, beautifying, promoting attractiveness, or altering the appearance," with the exception of soap<sup>12</sup>. It's important to note that if a product claims to accomplish this through physiological activity or by changing the structure of a person's skin, the product is also considered a drug, and has further associated regulations. In this guide only cosmetics that are not also considered a drug will be considered for simplicity.

Generally, the FD&C Act prohibits the marketing of cosmetics that are adulterated or misbranded. The Act defines adulterated as a product that contains any

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<sup>12</sup> Center for Food Safety and Applied Nutrition. "Is It a Cosmetic, a Drug, or Both? (Or Is It Soap?)." *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/cosmetics-laws-regulations/it-cosmetic-drug-or-both-or-it-soap](http://www.fda.gov/cosmetics/cosmetics-laws-regulations/it-cosmetic-drug-or-both-or-it-soap). Accessed 16 Mar 2021.

“poisonous or deleterious substance which may render it injurious to the users”<sup>13</sup>. This requirement applies to both the product itself and the packaging. A product is considered to be misbranded by the Act if its labeling is “false or misleading”<sup>14</sup>. This means the label does not contain all of the legally required label information as dictated by the FDA and/or the Food, Drug, & Cosmetic Act.

The FDA lays out much more specific, detailed requirements for general cosmetic labeling, but only the ones relevant to detecting greenwashing will be discussed. The FDA considers a product mislabeled if its label is false or misleading (by their own defined standard) and/or if its container or fill is misleading. The FDA considers two factors when determining whether a product label is deemed misleading: representations made or suggested and failure to reveal material facts in light of such representation and/or material with respect to consequences resulting from intended use<sup>15</sup>. The extent to which these representations or lack thereof are made are also examined. In simpler terms, the FDA examines if the label failed to include important facts and/or if the label failed to include consequences to use of the product and to what extent.

Cosmetic ingredient labeling is covered by the Fair Packaging & Labeling Act as well as the FD&C Act. The primary requirement for all cosmetic products for ingredient labeling is the “declaration of ingredients except flavor, fragrance, and trade secret

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<sup>13</sup> 21 USC 361: Adulterated cosmetics. Accessed 22 Mar 2021.

<sup>14</sup> 21 USC 361: Adulterated cosmetics. Accessed 22 Mar 2021.

<sup>15</sup> Center for Food Safety and Applied Nutrition. “Cosmetics Labeling Guide.” *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/cosmetics-labeling-regulations/cosmetics-labeling-guide](http://www.fda.gov/cosmetics/cosmetics-labeling-regulations/cosmetics-labeling-guide). Accessed 07 Feb 2021.

ingredients [presented] in descending order of predominance”<sup>16</sup>. Ingredient labels must also be presented in a way that is clear and inconspicuous, and ingredients must be listed as their name as established by the commissioner, the adopted ingredients list, or by its chemical or technical name. The FDA defines a trade secret as any “commercially valuable plan, formula or process...that can be said to be the end product of either innovation or substantive effort”<sup>17</sup>. A proposed trade secret must be submitted for approval to the FDA before it can be deemed as such. If the FDA does approve, a trade secret ingredient may be labeled at the end of the ingredients list as the phrase “and other ingredients.” Fragrances and flavors can just be labeled as such, and any aids used in processing do not need to be declared.

Despite all of these labeling rules from the FDA, individuals and companies are the ones ultimately responsible for the safety of their cosmetics. Ingredients put into cosmetic products (that are not also considered a drug), with the exception of color additives, do not require FDA approval before being put on the market. Generally speaking, a manufacturer can use any ingredient they want given it’s safe for customary use, properly labeled, and the ingredient does not cause the product to be misbranded. The cosmetic products themselves also do not require FDA approval before being put on the market. All of these factors combined means the FDA can only enforce companies to be in compliance with the law. More specifically, the FDA can only take actions against

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<sup>16</sup> Center for Food Safety and Applied Nutrition. “Cosmetics Labeling Guide.” *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/cosmetics-labeling-regulations/cosmetics-labeling-guide](http://www.fda.gov/cosmetics/cosmetics-labeling-regulations/cosmetics-labeling-guide). Accessed 07 Feb 2021.

<sup>17</sup> 21 CFR 20.61(April 1 2021). Accessed 23 March 2021.



companies with misbranded, adulterated, or hazardous cosmetics after they are already for sale<sup>18</sup>.

## The FTC

The Federal Trade Commission primarily regulates marketing claims made by companies, and in this case, claims made on cosmetic labels. The FTC enforces the Fair Packaging and Labeling Act as mentioned above. According to the FTC, the FP&L Act directs the FTC and FDA to issue regulations ensuring “consumer commodities” be labeled to “disclose net contents, identity of commodity, and name and place of business of the product's manufacturer, packer, or distributor...and authorizes additional regulations where necessary to prevent consumer deception”<sup>19</sup>. In other words, the Federal Trade Commission regulates the language of marketing a product, which brings us to the Green Guides.

The Green Guides are guides designed as a “best practices” for environmental, or green, marketing for the purpose of not misleading consumers. The Green Guides were first published in 1992, and have been revised in 1996, 1998, and 2012<sup>20</sup>. The Green

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<sup>18</sup> Center for Food Safety and Applied Nutrition. “FDA Authority Over Cosmetics: How Cosmetics Are Not FDA-Approved.” *U.S. Food and Drug Administration*, FDA, 2021, [www.fda.gov/cosmetics/cosmetics-laws-regulations/fda-authority-over-cosmetics-how-cosmetics-are-not-fda-approved-are-fda-regulated](http://www.fda.gov/cosmetics/cosmetics-laws-regulations/fda-authority-over-cosmetics-how-cosmetics-are-not-fda-approved-are-fda-regulated). Accessed 07 Feb 2021.

<sup>19</sup> FTC. “Fair Packaging and Labeling Act: Regulations Under Section 4 of the Fair Packaging and Labeling Act.” *Federal Trade Commission*, 4 Mar. 2020, [www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act-regulations-0](http://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act-regulations-0). Accessed 24 Mar 2021.

<sup>20</sup> FTC. “Fair Packaging and Labeling Act: Regulations Under Section 4 of the Fair Packaging and Labeling Act.” *Federal Trade Commission*, 4 Mar. 2020,

Guides apply to claims of environmental attributes of a product in connection with marketing or selling that product, which includes labeling, promotion, advertising, or any other marketing medium.

This does not mean the guides are legally binding, legislative rules, however. The FTC not only has to prove a product's marketing is in violation of the Green Guides, but also prove it is in violation of Section 5 of the FTC Act, which regulates "unfair or deceptive acts or practices in or affecting consumers"<sup>21</sup>. The wider implications of this means unless there is a case deciding certain outlines in the Green Guides are violated, and the consumer was deceived by these claims, most environmental claims go unchecked.

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[www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act-regulations-0](https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act-regulations-0). Accessed 24 Mar 2021.

<sup>21</sup> FTC. "A Brief Overview of the Federal Trade Commission's Investigative, Law Enforcement, and Rulemaking Authority." *Federal Trade Commission*, 16 Oct. 2019, [www.ftc.gov/about-ftc/what-we-do/enforcement-authority](https://www.ftc.gov/about-ftc/what-we-do/enforcement-authority). Accessed 25 Feb 2021.

## IV. NATURAL VS. ORGANIC

### Organic

Because the FDA only has authority to enforce the Food, Drug, & Cosmetic Act and the Fair Packaging & Labeling Act, and “organic” is not defined in either of those acts, the FDA has no ability to regulate the word organic. The word organic is regulated by the United States Department of Agriculture, which oversees the National Organic Program, or NOP<sup>22</sup>. The NOP defines organic, and therefore the USDA is the regulatory agency for the word organic. If a cosmetic product is composed of any agricultural ingredients, and can meet the standards set out by the USDA, a cosmetic product is eligible for USDA organic certification.

Organic cosmetic products can become very complicated, as they have to comply with USDA organic standards, as well as all other packaging and labeling standards from the FDA and FTC. These products become even more complicated, especially for the consumer to examine, as there are various types of organic a product can be. There are four different categories organic products can be split into, each with their own rules and regulations: 100% organic, organic, made with organic ingredients, and not organic.

If a product is deemed by the USDA to be “100% organic”, 100% of the product’s ingredients and processing aids are organic, there are no GMOs, all ingredients comply with the National List of Allowed and Prohibited Substances, the product has been

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<sup>22</sup> USDA Agriculture Marketing Service. *National Organic Program*, USDA, 2008. Accessed 07 Feb 2021.

certified by an accredited certifying agent, and the product is allowed to display the USDA organic seal, as pictured below.



Figure III: USDA Organic Seal. Source: USDA Agricultural Marketing Service

If a product is labeled “organic,” 95% of its ingredients are organically certified, there are no GMOs, the non-organic ingredients comply with the National List of Allowed and Prohibited Substances, the product has been certified by an accredited certifying agent, and it is also allowed to display the seal previously pictured.

If a product is said to be “made with organic ingredients,” the product contains at least 70% organic ingredients, there are no GMOs, the non-organic ingredients comply with the National List, is certified by an accredited certifying agent, but is not allowed to bear the USDA seal.

A product cannot claim to be organic on its principal display panel if the product contains less than 70% organic ingredients. A product is allowed, however, to list up to three USDA-certified organic ingredients on the main panel<sup>23</sup>. These products may still contain GMOs, and are not allowed to display the USDA seal. For example, if a lipstick

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<sup>23</sup> USDA Agriculture Marketing Service. *National Organic Program*, USDA, 2008. Accessed 07 Feb 2021.

was made with only 65% organic ingredients, it could not advertise itself as an “organic lipstick” on its main display panel. This lipstick can however, state on its main display panel that it is made with “organic beeswax, honey, and agave.”



Figure IV: Comparison of Organic Categories

## Natural

Though the two are often used interchangeably, natural has a completely different meaning than the word organic, especially regulatorily. The FDA also does not have a definition for the word natural, and only simply recommends on their website not to use the word natural as part of an ingredient statement, simply because ingredients are legally

required to be referred to by their common or accepted names<sup>24</sup>. The USDA also has no definition of natural, especially so as it applies to cosmetics. The FTC, however, has a complicated relationship with defining and enforcing regulations on the word natural.

The word natural is not legally defined under the FD&C Act or the FP&L Act. The FTC has stated that if a company states a product is “all natural” or “100% natural” then “consumers have a right to take them at their word”<sup>25</sup>. This was declared in 2016 after four separate FTC settlements were declared against companies claiming to have all natural products that still contained synthetic ingredients. In other words, if a company claims a product is all natural yet contains synthetic ingredients, they should likely reexamine these claims because as of 2016, the FTC does not deem this claim unacceptable.

## Application to Other Words and Phrases

Outside of specific words like organic with definitions dictated by a governmental body, or words like natural with precedent cases defending or discrediting their usage, most language, as long as it is not outright deceiving, is allowed in advertising cosmetic products. This includes many environmental marketing buzzwords such as: clean,

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<sup>24</sup> Center for Food Safety and Applied Nutrition. “Small Businesses & Homemade Cosmetics: Fact Sheet.” *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/resources-industry-cosmetics/small-businesses-homemade-cosmetics-fact-sheet#7](http://www.fda.gov/cosmetics/resources-industry-cosmetics/small-businesses-homemade-cosmetics-fact-sheet#7). Accessed 04 Mar 2021.

<sup>25</sup> Fair, Lesley. “Are Your ‘All Natural’ Claims All Accurate?” *Federal Trade Commission*, 25 Mar. 2021, [www.ftc.gov/news-events/blogs/business-blog/2016/04/are-your-all-natural-claims-all-accurate](http://www.ftc.gov/news-events/blogs/business-blog/2016/04/are-your-all-natural-claims-all-accurate). Accessed 01 Mar 2021.

environmentally friendly, sustainable, eco-friendly, green, and non-toxic. If a word does not have a legal definition as defined by a governmental body, it is considered unregulated and should be thoughtfully considered when examining a cosmetic product.

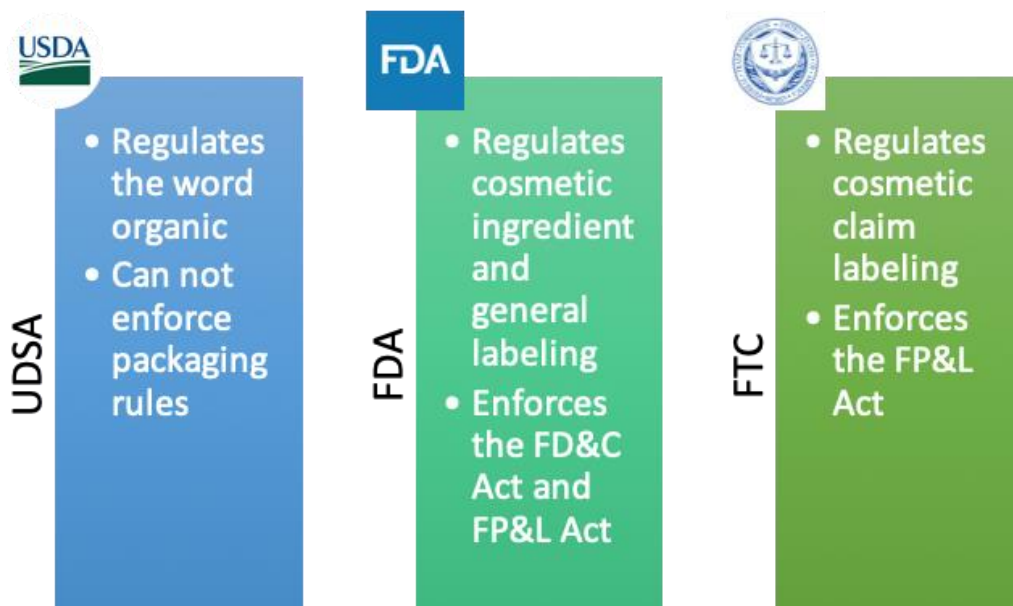


Figure V: Summary of Regulatory Agencies

Another issue to keep in mind is a company’s choice of ingredient label. While companies are required to disclose ingredients by either their common or legally accepted names, a company might choose one over another to influence the perception of the consumer, as is often done with parabens. Some companies might label parabens to be easily spotted as “methylparaben” or “isobutylparaben.” This is not always the case, however. Often, companies will abbreviate the names of parabens, making them harder to spot. Methylparaben becomes simply “methyl” and isobutylparaben becomes simply “butyl”<sup>26</sup>. Companies not only use this technique with parabens, but a multitude of other

<sup>26</sup> Witts, Charlotte. “List of Parabens to Avoid.” *Naturaler*, 6 Sept. 2019, [naturaler.co.uk/list-of-parabens-to-avoid/](http://naturaler.co.uk/list-of-parabens-to-avoid/). Accessed 12 April 2021.

ingredients viewed as harmful to most consumers. It is crucial to become informed of practices like this on the journey to becoming a more thoughtful consumer who is not lured in by greenwashing.



# V. BECOMING A THOUGHTFUL CONSUMER

## The Seven Sins of Greenwashing

TerraChoice, which has since been acquired by UL, conducted a study of environmental claims made on products and based on the results developed a list known as the “Seven Sins of Greenwashing” to help consumers identify products being greenwashed<sup>27</sup>. These Sins include:

### 1. Sin of the Hidden Trade Off

- a. This means a product has a small set of characteristics that does make it environmentally friendly, but a large part of the product is still not sustainable.

### 2. Sin of No Proof

- a. This sin often refers to a claim made by a company with no certification or third-party to substantiate the claim.

### 3. Sin of Vagueness

- a. If a product makes a broad claim that it is “green” or “natural”, they are utilizing the sin of vagueness.

### 4. Sin of Worshipping False Labels

- a. This sin simply means the label is fake. This could include false certifications.

### 5. Sin of Irrelevance

- a. This sin refers to making a claim that is irrelevant. For example, if a product said it did not contain an ingredient that is banned in a product as a selling point, the sin of irrelevance has been implemented.

### 6. Sin of Lesser of Two Evils

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<sup>27</sup> “Sins of Greenwashing.” *UL*, 2007, [www.ul.com/insights/sins-greenwashing](http://www.ul.com/insights/sins-greenwashing). Accessed 01 Feb 2021.

- a. This sin is similar to the first. If a product uses a claim to distract from the greater environmental impacts of that item, this sin has been employed.

**7. Sin of Fibbing**

- a. This sin is exactly as it sounds; a claim is outright false. This could include stating a product is certified USDA Organic, when it indeed is not.

The Seven Sins of Greenwashing allow for a simple way for the consumer to decipher the true sustainability of the products they are purchasing. Let's use these in application to cosmetic products.

## Application



Figure VI: Goodness Glow Miracle Bomb. Source: burtsbees.com

Pictured above is a product from the Burt's Bees website. There are two examples of greenwashing on this product. First, "natural plant-derived" is utilizing the sin of vagueness. What plant is it derived from? How does Burt's Bees define natural? Second, Burt's Bees is utilizing the sin of vagueness a second time when it states the Miracle

Bomb is “100% Natural Origin.” They do however, further define their percentage natural standard of that presented by ISO 16128, which will be explored further later on. Upon first glance to a consumer glancing at this product for the first time in a storefront, “100% Natural Origin” could mean anything. Doing your due diligence on brands and their specified standards, however, is part of becoming a thoughtful consumer.



Figure VII: Tarte Shape Tape Concealer Advertisement. Source: [tartecosmetics.com](http://tartecosmetics.com)

Pictured above is an advertisement for Tarte Cosmetics Shape Tape Concealer. In this advertisement, there are two sins of greenwashing used multiple times. Firstly, Tarte uses the sin of vagueness when it states the concealer is cruelty-free, since this term has no governmental definition and cannot be enforced. Second, Tarte implements the sin of irrelevance when it states the product is not formulated with sodium lauryl sulfate and

triclosan. These are two products that are foaming and antimicrobial agents used in soaps. As discussed earlier, soap is not considered a cosmetic, so these ingredients not being included is irrelevant.

For an example of firm-level executional greenwashing, let's turn to Sephora. Sephora has a section on their website known as "Clean at Sephora." Products with the "Clean at Sephora" seal are formulated without "parabens, sulfates, SLS and SLES, mineral oils, formaldehyde, and more"<sup>28</sup>. Other ingredients included in this list are animal oils, coal tar, styrene, and undisclosed synthetic fragrance. Again, though hair care is included in this section, SLS and SLES are compounds found in soaps for foaming agents, and wouldn't be found in cosmetics to begin with. Coal tar is not allowed in any cosmetic product. Coal tar is used in dandruff shampoo, but if it is included, is then subjected to be a cosmetic drug, and is no longer subjected to the guidelines from the FDA on cosmetic products<sup>29</sup>. Also, according to the FDA and Fair Packaging and Labeling act, "under U.S. regulations, fragrance and flavor ingredients can be listed simply as 'Fragrance' or 'Flavor,'" so Sephora has no way of truly knowing whether or not these products contain naturally-derived fragrances, or synthetic fragrances, as these items would just be labeled as "fragrance" unless the company chooses to disclose

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<sup>28</sup> "Best Clean Beauty Products 2021." *Sephora*, Sephora, 2021, [www.sephora.com/beauty/clean-beauty-products](http://www.sephora.com/beauty/clean-beauty-products). Accessed 27 Mar 2021.

<sup>29</sup> *Coal Tar Information*, Cosmetics Info, 2021, [cosmeticsinfo.org/coal-tar-information#:~:text=Coal%20Tar%20is%20not%20used%20in%20any%20cosmetics.&text=The%20FDA%20concluded%20that%20Coal,finished%20dandruff%20shampoo%20drug%20product](http://cosmeticsinfo.org/coal-tar-information#:~:text=Coal%20Tar%20is%20not%20used%20in%20any%20cosmetics.&text=The%20FDA%20concluded%20that%20Coal,finished%20dandruff%20shampoo%20drug%20product). Accessed 27 Mar 2021.

otherwise<sup>30</sup>. Sephora is a prime example of a firm using the sin of irrelevance and vagueness to make consumers believe they are environmentally conscious. Not only is Sephora using claim greenwashing, they are using executional greenwashing.



Figure VIII: Clean at Sephora Website. Source: sephora.com

Pictured above is the landing site for the “Clean at Sephora” section of sephora.com.

Sephora utilizes the color green and images of botanicals to draw the consumer into the facade that these products are truly green and clean by the highest of standards, especially since they have the green “Clean at Sephora” seal of approval.

## Reliable Non-Governmental Certifications

Though not regulated and verified by the government, there are reliable third-party certifications that do ensure the environmental sustainability of products. The International Standard Organization, or ISO, established the ISO 16128, which is a guideline for the technical definitions and criteria for organic and natural cosmetic

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<sup>30</sup> Center for Food Safety and Applied Nutrition. “Fragrances in Cosmetics.” *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/cosmetic-ingredients/fragrances-cosmetics#labeling](http://www.fda.gov/cosmetics/cosmetic-ingredients/fragrances-cosmetics#labeling). Accessed 28 Mar 2021.

ingredients<sup>31</sup>. This document does not address requirements for packaging, but rather defines a way to “calculate natural, natural origin, organic, and organic origin indexes that apply to ingredient categories”<sup>32</sup>. Companies that follow the standards of ISO 16128 have a concrete way of defining previously vague terms, so the consumer knows exactly what they are buying. This standard is an excellently defined way for consumers to know the true greenness of the product they are buying.

Biorus has created a “Clean” cosmetic certification with strict criteria. This includes: being vegan according to the standards of the Vegan Society, reef friendly, produced by a brand that dedicates at least 0.2% of revenue to compensating for or reducing their carbon footprint, efficient and environmentally friendly, produced by a brand that invests in human welfare, minimalistic, recyclable, and has been analyzed for safety<sup>33</sup>. Each of these criteria are scored and certified as follows:

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<sup>31</sup> Center for Food Safety and Applied Nutrition. “Fragrances in Cosmetics.” *U.S. Food and Drug Administration*, FDA, 24 Aug. 2020, [www.fda.gov/cosmetics/cosmetic-ingredients/fragrances-cosmetics#labeling](http://www.fda.gov/cosmetics/cosmetic-ingredients/fragrances-cosmetics#labeling). Accessed 28 Mar 2021.

<sup>32</sup> “ISO 16128-2:2017.” *ISO*, International Standards Organization, 15 Sept. 2017, [www.iso.org/standard/65197.html](http://www.iso.org/standard/65197.html). Accessed 28 Mar 2021.

<sup>33</sup> “Cosmetic Certification: Clean Beauty.” *Biorius*, Biorus, [biorius.com/cosmetics-certifications/clean-beauty-certification/](http://biorius.com/cosmetics-certifications/clean-beauty-certification/). Accessed 28 Mar 2021.

Standard item	Score
1. Enhanced safety assessment	5
2. Vegan	5 (vegetarian, meaning Honey and Dairy-based ingredients accepted: 3)
3. Reef-safe	3
4. Environment friendly cosmetic brand	3
5. Performant and environment friendly cosmetic product	3
6. Human friendly cosmetic brand	2
7. Minimalistic	2
8. Recyclable packaging	2
<b>Total</b>	<b>25</b>

2. Reach at least 13 out of 15 on standard items 1, 2, 5 and 7.

3. Reach at least 16 out of standard items 1, 2, 3, 5 and 7 for sunscreen products.

Figure IX: Biorus Cosmetic Certification Criteria. Source: [biorius.com/cosmetics-certifications/clean-beauty-certification/](http://biorius.com/cosmetics-certifications/clean-beauty-certification/)

If the company fulfills the Clean certification criteria the company receives a certificate, as well as the ability to display the Biorus “Clean Beauty” logo on their packaging as pictured below.



Figure X: Biorus Clean Beauty Logo. Source: [biorius.com/cosmetics-certifications/clean-beauty-certification/](http://biorius.com/cosmetics-certifications/clean-beauty-certification/)

## **VI. BEING A THOUGHTFUL CONSUMER**

Learning the nuances of cosmetic regulations and greenwashing and how they intertwine can be incredibly confusing. Luckily, I have it broken down into three simple infographics that you can use anywhere, anytime if you feel unsure of the environmental legitimacy of your product.

### **Reading the Label**

The simplest, and arguably most important way, to become a thoughtful consumer is reading the label of your cosmetic products. Most people already do this with their grocery products, but it's crucial to do the same with your cosmetics . The first item on label to examine are the claims being made. Use this flow chart to evaluate if the claims on a label are being greenwashed or not:



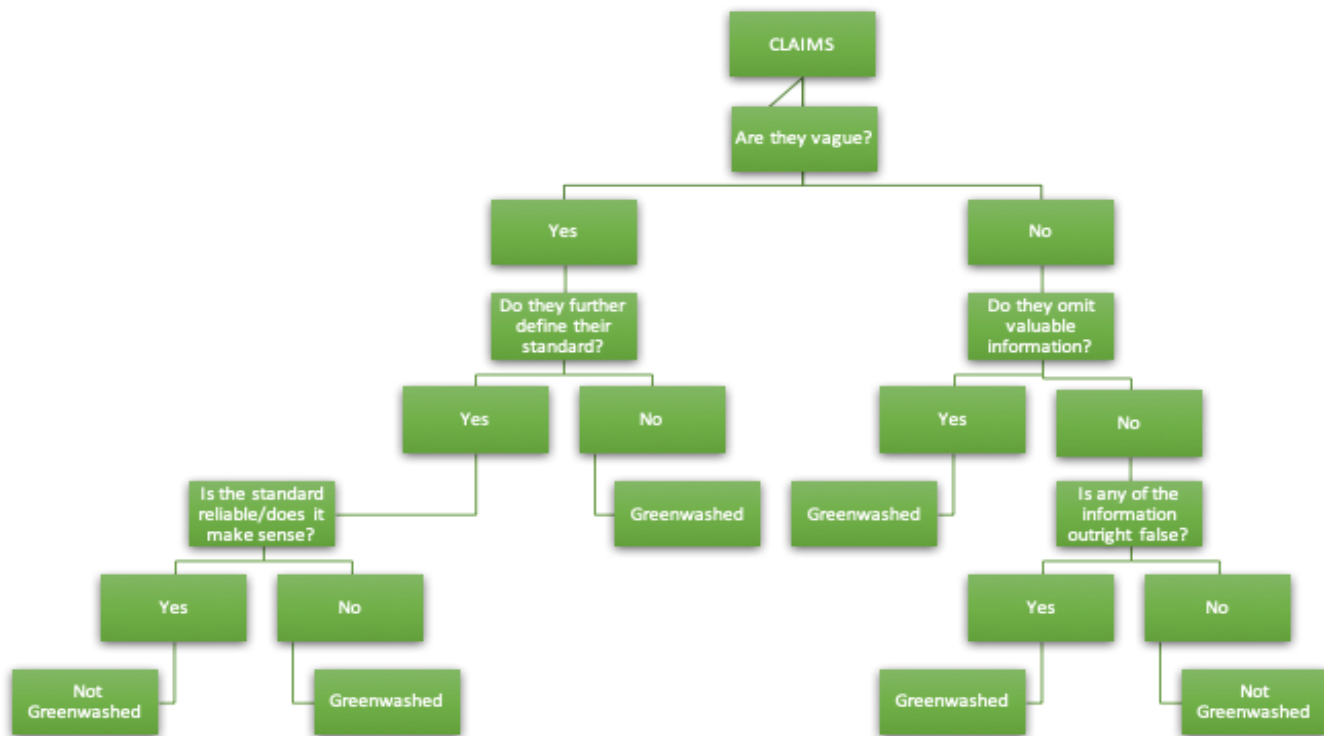


Figure XI: Claim Greenwashing Flowchart

This flowchart combines every element of claim greenwashing discussed previously. You’ll notice that a product is not deemed “Not Greenwashed” unless it passes the test for all types of claim greenwashing: vague, omission, and falseness. If a product is greenwashed in one aspect it is deemed greenwashed as a whole. It’s important to keep in mind it’s not enough to stop at claim greenwashing, as products can be greenwashed in other aspects as well.

If you have read all claims on a label and it has passed the claim greenwashing test, you’ll next read the label for executional greenwashing, and ingredient examination. This is a much simpler process. Pictured below is a graphic of questions to ask yourself about the product you’re examining.

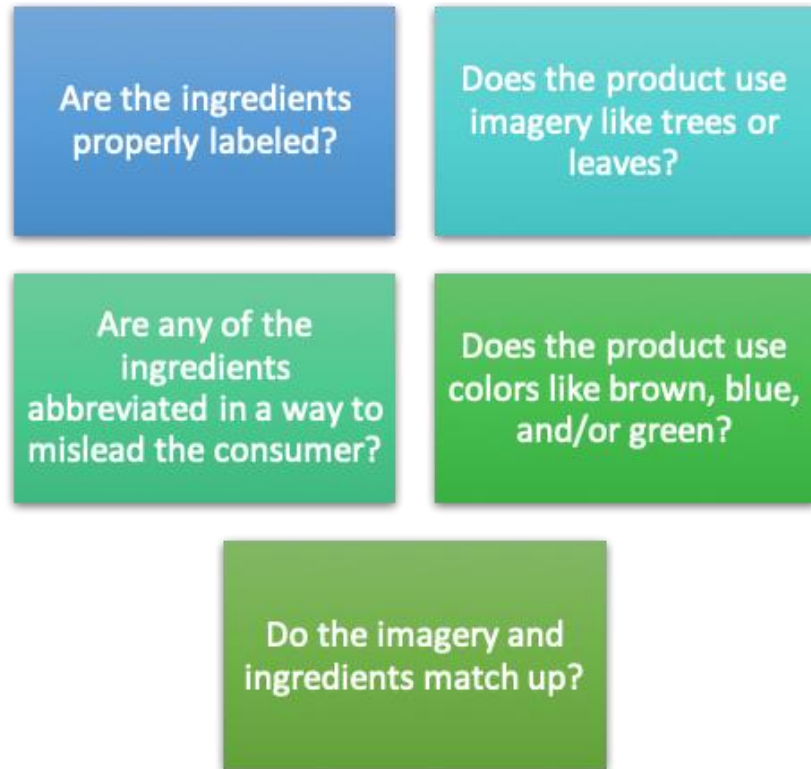


Figure XII: Questions to Ask of Ingredients and Imagery

The most important question to consider is the last one, “do the imagery and ingredients match up?” Often, if a company is trying to make the consumer believe a product is a more natural alternative to others on the shelf, they’ll use environmental imagery like trees combined with colors like blue and green to convey the products supposed naturalness (executional greenwashing). It’s paramount to consider the ingredients of the product in combination with the label. It can be especially useful to compare the ingredients of a “green” product with one not marketed as such. For example, let’s compare Kosas Cloud Set Baked Setting & Smoothing Talc-Free Vegan Powder and Charlotte Tilbury Airbrush Flawless Finish Setting Powder. The Kosas setting powder is deemed “Clean at Sephora,” and advertises itself as clean, whereas the Charlotte Tilbury is not “Clean at Sephora” and does not advertise it as such.

Here is the ingredient list for the Kosas powder:

Mica, Silica, Capryloyl Glycerin/Sebacic Acid Copolymer, Lauroyl Lysine, Glyceryl Stearate, Octyldodecanol, Simmondsia Chinensis Seed Oil / Simmondsia Chinensis (Jojoba) Seed Oil, Pentylene Glycol, Glycerin, Glyceryl Caprylate, Potassium Sorbate, Bambusa Arundinacea Stem Powder, Passiflora Edulis Seed Oil, Glyceryl Undecylenate, Aqua / Water, Stearic Acid, Candelilla Cera / Euphorbia Cerifera (Candelilla) Wax, Xanthan Gum, Sodium Phytate, Cetearyl Oliviate, Tocopherol, Sorbitan Oliviate, Honokiol, Paeonia Officinalis Flower Extract, Helianthus Annuus Seed Oil / Helianthus Annuus (Sunflower) Seed Oil, Vitis Vinifera Seed Extract / Vitis Vinifera (Grape) Seed Extract (+/-): CI 77891 / Titanium Dioxide, CI 77491 / Iron Oxides, CI 77492 / Iron Oxides, CI 77499 / Iron Oxides.

Here is the ingredient list for the Charlotte Tilbury powder:

Talc, Mica, Polymethyl Methacrylate, Dimethicone, Silica, Pentaerythrityl Tetraisostearate, Cetearyl Ethylhexanoate, Zinc Stearate, Zea Mays (Corn) Starch, Chlorphenesin, Potassium Sorbate, Tocopheryl Acetate, Pei-10, Propylene Glycol, Prunus Amygdalus Dulcis (Sweet Almond) Oil, Rosa Multiflora Flower Wax, Tetrasodium Edta, Aqua/Water/Eau, Dimethiconol, Tilia Cordata Flower Extract, Methylparaben, Ethylparaben, Propylparaben, Butylparaben, [+/- Titanium Dioxide (Ci 77891), Iron Oxides (Ci 77491, Ci 77492, Ci 77499)].

All identical ingredients between the powders have been underlined. Both powders have the same base of talc and mica, stearates to stabilize the product, water, potassium sorbate to preserve the product, and iron oxides as the pigment in the powder. The other ingredients in the Kosas powder are oils, waxes, and extracts. The other ingredients in the Charlotte Tilbury powder are oils, waxes, silicones, other chemicals, and parabens. In this

case, the perception of the product matches the ingredients of the product. While both have the same general base, the Charlotte Tilbury product contains four different types of parabens and various synthetic silicones. The Kosas Cloud Set Bakes Setting & Smoothing Talc-Free Vegan powder passes the imagery and ingredients greenwashing test. Examining seemingly natural products against those not deemed as such is an excellent indicator of executional greenwashing.

## Final Notes

This guide is not all inclusive, nor is it absolute. Greenwashing is a vast concept with many intricacies for the consumer to evaluate. The processes and concepts mentioned above are merely a push in the right direction to not being a consumer victimized by greenwashing. Consumers vote with their dollar, and the best way to show a company you do not support their green facade, is to give that dollar to a competitor with environmental legitimacy.

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