



Association Professionnelle
de Cosmétique Écologique et Biologique

COSMEBIO POSITION PAPER

Is Clean Beauty opening the door to Greenwashing ?

Introduction

Cosmébio was founded as an association in 2002, at a time when consumers were becoming increasingly aware of the dirty underside of the chemical industry. At this time, there were no regulations governing natural and organic cosmetics. In order to protect the consumer from the new marketing tactics of Greenwashing, Cosmébio imposed mandatory certification for its members. By respecting a strict standard with detailed and challenging criteria, the cosmetic brands using the Cosmébio label could provide actual proof for their claims. However, even with a high demand for certification and an overall positive evolution for the cosmetics sector, some greenwashing allegations persevere and continue to confuse the consumer.

In this position paper, we will attempt to dissect the reality of the Clean Beauty trend through the optic of the 5th commitment listed in our Manifesto: *“Communicating with transparency about our strengths as well as our dilemmas”*.

The origins of the “Clean Beauty” claim

It’s been a few years now since the term “clean beauty” first appeared in the French beauty market. Yet, its true origin comes from the United States as a new marketing method promoting cosmetics that claim to be “clean” from undesirable ingredients.

“Clean beauty” as a claim, was being used by brands wanting to offer consumers products having a more natural composition and using less unnecessary, or even “dangerous” ingredients.

This ideology, which is noble in principle, owes a lot of its creation to the lack of American regulations for cosmetics. In the United States, only about 10 ingredients are prohibited

through cosmetic regulations, whereas in Europe we can count more than 1300 prohibited ingredients¹. One could say that the Clean Beauty trend is a result of this absence in regulation for the American market.

Despite the existence of stricter European regulations and an exigent organic label, Clean Beauty has nevertheless found its place in the French market. A market which, we might remind you, already benefits from our organic label, whose obligations are much stricter and more precise than the commitments of most non-certified brands claiming to offer Clean Beauty.

The noble promises of Clean Beauty are lost soon as this claim seeks to deceive the consumer through storytelling, providing no proof of true commitments.

As the use of the term "clean beauty" is not regulated, any brand can employ it: those offering cosmetics with petrochemical ingredients, those offering cosmetics with natural ingredients...but not certified (therefore with a lack of traceability) and those offering certified organic cosmetics.

A marketing claim with no regulation, nor certification

The absence of a definition or an official certification standard for Clean Beauty enables non-certified brands to be vague in their commitments and their claims. For them, Clean Beauty is an easy response to consumer demand for reassurance. The term "clean beauty" thus offers an illegitimate power to certain brands who try to seduce the committed consumer with many false claims.

Indeed, we can find many cases of abuse with the use of this claim:

First example: A brand that uses "Clean Skincare" in its slogan, commercializes a product containing a large number of synthetic ingredients but also harmful ingredients prohibited by our COSMOS standard: Carbomer (suspected of being carcinogenic), Phenoxyethanol (irritant, suspected of being toxic to the liver and blood, highly polluting manufacturing process), Sodium Hydroxymethylglycinate (formaldehyde releaser).

The second case we are putting under the spotlight: A brand that displays a Clean Beauty label and claims to be "Certified Clean" uses Sodium Cocoyl Isethionate (SCI) in its products. An ingredient which is notably prohibited by the COSMOS standard because of its highly polluting manufacturing process and use of an extremely dangerous chemical, putting the health of the manufacturers at risk. It seems contradictory to us to say that a product is "clean" when it contributes to environmental pollution and harms the health of workers.

¹ <https://www.fda.gov/cosmetics/cosmetics-laws-regulations/prohibited-restricted-ingredients-cosmetics>

Clean Beauty is not to be confused with “certification” and even less with “organic”

All certified organic COSMOS cosmetics (and labelled Cosmécio) are "clean" but not all cosmetics that claim to be "clean" are certified organic and are not necessarily "clean". The absence of regulation and certification mentioned above has created a market with many "free from" claims and ingredient “blacklists”. How can consumers really know where to put their trust?

Furthermore, if a brand claims that its ingredients are of natural origin with no certification backing their allegations, how can the consumer be sure that, for example, the "ASCORBYL PALMITATE" mentioned in its INCI list is not of synthetic origin or animal based? Certification=traceability.

What is troublesome about this topic is that the terminology "Clean Beauty" is often used to replace stricter claims such as "Natural cosmetics" and "Organic cosmetics" which are claims subject to Regulation No. 655/2013 and controlled by the DGCCRF in France².

Conclusion

Since its arrival in France, “Clean Beauty” has captured the attention of consumers with its simple message, yet it has been to the detriment of certification and real organic cosmetics.

With this statement, we wish to remind the consumer that only natural and organic certification provides a real guarantee regarding the composition of cosmetics products. Additionally, Cosmécio is one of the only 3 labels recognized by ADEME as “excellent”³ in terms of being a true guarantee for consumers. We therefore ask consumers to look further into the real motivations behind brands using the claim “Clean Beauty”. In the absence of certification, we often discover a paradoxical reality.

In conclusion, we can affirm with confidence that "story telling" and “Clean marketing” is an efficient marketing tactic. However, through our experience and expertise in natural and organic cosmetics, only the Cosmécio label and the COSMOS standard provide a real guarantee to consumers in terms of product composition, their naturalness, the benefits for the environment and the potential harmlessness of cosmetic formulas.

Greenwashing, it's not clean.

² https://www.economie.gouv.fr/files/files/directions_services/cge/filiere-parfums-cosmetiques.pdf?v=1648227721

³ <https://agirpoulatransition.ademe.fr/particuliers/labels-environnementaux#labelsrow-3>