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Helping Consumers Make Better Decisions through Testing, Research and Reporting
&
Analysis of Labels on Household Cleaners in the Marketplace

Used Oil Recycling / Household Hazardous Waste Conference
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ConsumerReports.org™

Our mission since 1936: Test, Inform, Protect. We accept no ads.

Organization Background

- Consumers Union, *Consumer Reports, CROnline, CR Health Letter, CR Finance Letter*
- Mission: Test, Inform, Protect
- Research, testing, investigative reporting, publisher, advocacy
- Help consumers make better informed purchasing decisions
- No advertising, no commercial interest, independent
- Purchase all products tested solely from money made from magazine sales
- Public Service information provided free of charge
- Grant funded projects support eco-labels, hospital infection rates, telecom and other public service projects
- 3 Advocacy Offices (CA, TX, DC) + Consumer Policy Institute (NY)

Some Examples of Public Health Safety Issues Across Departments at Consumers Union

Test – Inform - Protect

- Mad Cow – policy, science, editorial, outreach, advocacy
- Mercury Contamination in Fish - testing, policy, editorial, outreach, advocacy
- Arsenic Contamination in Chicken
- PCB Contamination in Fish
- Pharmacrops and Widespread Contamination
- Teflons and Perfluorinated Compounds
- Pesticide Use Reduction
- Hospital Secondary Infection Rates
- Dietary Supplements and Safety
- Antibiotic Resistance and Farming Practices

Labels that do and don't help consumers avoid mad cow disease

Most Helpful

- Organic
- Biodynamic

Somewhat Helpful

- 100% Grass Fed
- 100% Vegetarian
- No Animal By-products
- 100% Grain Fed

Not Helpful

- Cage Free
- Free Range Claims
- Grass Fed (without specification)
- Grain Fed (without specification)
- Irradiated
- Kosher
- Locally Produced
- Natural
- No Additives
- No Antibiotic Claims
- No Chemicals Added
- No Hormones
- Pasteurized

for more information on these labels, please visit Consumers Union's independent guide to environmental labels at www.eco-labels.org

Analyzing and Communicating Risk at Consumers Union

- **Auto Safety - can be easy to measure**

- **Chemical Safety - not so straightforward**
  - **Lack of good animal models**
  - **Lack of good pharmacokinetic models**
  - **Point of toxicity far removed from source (multiple sources)**
  - **Effects of chemical mixtures in the environment**
  - **Inadvertent consequences**
  - **Multiple Endpoints**

Moving Toward Solutions

Precautionary Principle - Science
Cost-Benefit Analysis – Economics
Sustainable Production – True Cost

Consumer Awareness

Consumer Trust in Information
-honest
-transparent
-meaningful
-verifiable

Better Decision Making
-labels and the point of purchase…

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Eco-labels Background

- Eco-labels.org launched in April 2001

- Initially included labels seen on food and wood products in the U.S. including general claims and later added claims on personal care products and household cleaners

- Developed a set of criteria to measure credibility of labels

- Info on label standards, organization, evaluation and report card by Consumers Union for every record

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Product Categories:

Food
Wood
Personal Care
Household Cleaners
Over 150 labels

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Website Statistics

- ~20,000 visitors to eco-labels.org each month
- ~4 million subscribers to Consumer Reports magazine
- ~1 million of subscribers to ConsumerReports.org

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Background

- eco-labels.org: food, wood, personal care, house
- certified labels to general claims
- criteria to measure credibility
- full label report includes information on standards, organization, and CU evaluation / rating
- short hand label records also available for convenience

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Measuring the Credibility of Eco-labels

1. How meaningful is the label?

2. Does an organization verify that the label standards are met?

3. Is the meaning of the label consistent?

4. Are the label standards publicly available?

5. Is information about the organization publicly available?

6. Is the organization behind the label free from conflict of interest?

7. Was the label developed with broad public and industry input?

LABEL REPORT CARD | PRODUCT AREA SEARCH: Dairy Products

Label	Logo	How meaningful is the label?	Does an organization verify that the label standards are met?	Is the meaning of the label consistent?	Are the label standards publicly available?	Is information about the organization publicly available?	Is the organization behind the label free from conflict of interest?	Was the label developed with broad public and industry input?
antibiotic free		**Not**[1]	**No**	Yes	No	No	No[2]	No
California Certified Organic Farmers - CCOF		**Highly**	**Yes**	Yes	Yes	Yes	No	Yes
Demeter Certified Biodynamic		**Highly**	**Yes**	Yes	Yes	No	No[3]	No
Free Farmed		**Highly**	**Yes**	Yes	Yes	Yes	Yes	Yes
free range		**Not**	**No**	No	No[4]	No[5]	No[6]	No
free roaming		**Not**	**No**	No	No[7]	No[8]	No[9]	No
Georgia Organics		**Highly**	**Yes**	Yes	Yes	Yes	No	Yes
Global Organic Alliance (GOA) - Certified Organic		**Highly**	**Yes**	Yes	Yes	Yes	No	Yes
hormone free		**Not**[10]	**No**	Yes	No	No	No[11]	No
Maine Organic Farmers and Gardeners		**Highly**	**Yes**	Yes	Yes	No	No	Yes

How meaningful is the label?

- Possible Ratings: Highly, Somewhat or Not
- Do the standards make sense?
- Do the indicators used to measure label standards make sense?
- Are there quantitative indicators used when possible?
- Have label standards evolved over time?
- Is the intended meaning of the label carried through in the standards?
- In the context of sustainable production, is the label truly adding value?

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Unmeaningful Labels

Alcohol free
Allergy tested
Fragrance free
Hypoallergenic
Natural
No Chemicals
Nonirritating
Ozone friendly
Sensitivity tested
Unscented

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Is the Label Verified?

- Possible Rating: Yes or No
- Is there an organization that verifies the meaning of the label?
- Little to no verification qualifies label as a General Claim
- If regulation, is it well enforced?

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Unverified Labels

Alcohol free
Allergy tested
Antibacterial / Antimicrobial*
Fragrance free
Hypoallergenic
Natural
No additives
Non-hazardous
Some non-toxic claims
Non-irritating
Ozone friendly
Sensitivity tested
Unscented

*quasi verified

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Ways Labels Can Be Truthful but Misleading

- Claims with poor definition
- Lack of Verification
- Loopholes in label standards
- Products certified based on sub-standards or loopholes
- Lack of enforcement

Market Promotion of Truthful but Misleading Label

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No CFC Voluntary Claim

- 1978 ban on CFCs in aerosol products
- May contain other ozone depleting substances
- Industry sponsored Consumer Aerosol Products Council provides "No CFC" logo without qualifying information

Truthful and Meaningful Claim

EPA's label statement: "Contains No CFCs or Other Ozone Depleting Substances. Federal regulations prohibit CFC propellants in aerosols" EPA must grant approval to manufacturers wishing to use this claim.

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Is the Label Consistent?

- Possible Ratings: Yes or No
- Does the label have similar meaning from product to product?

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Is the Label Transparent?

- Possible Ratings: Yes or No
- Are the standards accessible to the public?
- If verified, is information about the organization available?
    - Funding
    - Board of Directors and Affiliations
- Are the goals of a label stated clearly and accurately?
- Do the goals of the standards accurately reflect the label?
- Without proper transparency, it is difficult or impossible to assess meaningfulness and conflict of interest

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Is the Label Free From Conflict of Interest?

- Possible Ratings: Yes or No
- For uncertified, general claims, there is inherent conflict of interest
- Are there any board members who are certified?
- Do any board members or staff have a vested interest in the certified product?
- Does any of the funding (other than certification fees) come from those who are certified?

Factors contributing to transparency rating

- Does the label claim to be independent?
- If so, but still has conflict of interest, will affect transparency
- Industry should take credit for setting a higher bar

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Were the standards developed with broad public input?

- Possible Ratings: Yes or No
- Was there a wide range of stakeholder groups involved?
- Was there a public comment period?
- Did stakeholder input come from industry, environmental, consumer / public interest, and other relevant groups?
- Is there an expert group that advises the standards making organization?

Type of Labels Commonly Found on Household Cleaners that Suggest Greater Environmental Value

- Natural
- Vegan
- Non-toxic
- Nons
- Hypoallergenic
- Degradability
- Animal Welfare

Overarching Issues Preventing Consumers From Making Environmentally Sound Purchases of Household Cleaning Products

- Ingredients not required to be listed
- Safety and efficacy of many chemicals not well established or required to be tested
- Lots of unverified labels
- Misleading labeling and market promotion activity
- Guidance not well enforced

Examples of Certified Labels on Household Cleaning Products

- Green Seal (environment) – highly meaningful
- Scientific Certification Systems (environment) - tbd
- CCIC (no animal testing) – somewhat meaningful
- Organic (on ag based ingredients) – not meaningful on whole product
- ACMI - Non-toxic – somewhat meaningful
- Certified Vegan – somewhat meaningful

Rating and Reporting Labels: Case Study
ANTIBACTERIAL CLAIMS

- What does the label suggest?
- How does the label meet CU criteria?
  - Do the standards support the claim being made?
  - Does the labeled product have additional value over the conventional counterpart?
- Is the label credible? Is it appropriate? Does it address sustainable practices?

Digesting information:

Science Analysis

Policy Analysis

Reporting

Rating

FDA on Antimicrobials and Precaution
Lester Crawford, *Deputy Commissioner, FDA, October 2002*

"In 1974, our agency published the recommendations of its advisory panel on over-the-counter antimicrobial drug products. Among other findings, the panel…identified triclosan as one of the ingredients of antimicrobial products that lacked sufficient evidence of safety and effectiveness. …The FDA still is looking for data on the long term health effects of triclosan, and at present, there is no joint effort to trace the effect, if any, of antiseptic products on antimicrobial resistance…consumers and health care professionals are not as fully protected as they deserve, expect, and have the right to be."

Antibacterial Claims on Cleaning Products

split personality

FDA

- Regulates personal care products
- 1994 proposed monograph on antimicrobial testing requirements – never final
- Only regulates lotions currently – none approved

EPA

- Regulates cleaners making antibacterial claims
- Pesticidal agent and product registration required (except odor claims)

SOAP

Hand

Household Cleaners

Problem: Manufacturers classifying dish soap as hand soap when making antibacterial claim, thus avoiding testing for safety or efficacy

Example of Market Promotion of Antibacterial Labeling

Industry sponsored www.germsmart.com lists lotions as one type of antibacterial personal care product "designed to enhance personal hygiene" -- *the FDA has not approved the claim on any lotions to date*

The Nons and the Narrow Divide

FHSA / CPSC
Define and regulate:

- Hazardous
- Flammable
- Corrosive
- Combustible
- Poison
- Caustic

Claims are verified

Voluntary Labels:
Ratings: somewhat to not meaningful

A product labeled as non hazardous (-flammable, -corrosive etc) suggests that there is no hazard or harm that can come from exposure to the product.

However, these types of claims only mean that the product was not found to be hazardous according to the FHSA

None of these claims are verified

Non-Toxic Confusion

FHSA

LHAMA

Prop 65

ACMI non toxic label

WIMA non toxic label

Non-toxic general claim

Non-biotoxic

ACMI-industry sponsored group verifying label on arts and crafts materials (standards not completely transparent)

WIMA-industry sponsored group verifying label on pencils and erasers