



# **Cosmetics Testing**

**Cosmetics are used daily by millions of people, and include a vast range of products such as shampoo, makeup, moisturiser, perfume, etc. Approximately 38,000 animals are used every year across the EU to test new ingredients and products.**

## **British law**

In 1998, in a historic triumph for the animal protection community, the government announced it would no longer issue licences to test cosmetic products or ingredients on animals. This took the form of a voluntary agreement with the cosmetics industry, although it is not entrenched in law.

## **The loophole**

This is certainly a step in the right direction. **HOWEVER**, there is no ban on selling cosmetics in this country which have been tested abroad. This, therefore, does little to help the animals, as companies just carry out their testing outside of Britain. As a result, most of the products we see on our shelves are **NOT** cruelty-free, contrary to the beliefs of most people. Countries such as the U.S. and Japan require that all new ingredients must be

animal tested to ensure safety. This means that every 'new improved super formula' we see advertised has invariably involved much cruelty in its development. Generally, finished products do not have to be tested if they comprise a combination of previously tested substances, unless it is suspected that that particular combination will cause a toxic reaction.

## **The European Union (EU)**

A proposed ban on the sale and marketing of cosmetics tested on animals within the EU is currently under negotiation. The European Parliament, recognising its constituents' concerns, supports the combined ban but the European Commission and the Council of Ministers do not. They support a ban on carrying out animal tests but do not want the marketing ban. Initially this may not seem to be a problem, but without a sales ban, companies could simply conduct their animal testing outside the EU and still sell the products within it. A sales ban would force companies to use non-animal methods. It now remains to be seen whether the Commission and the Council of Ministers will uphold the will of the EU Parliament and its people. (In the last vote the UK minister, representing the Dept of Trade & Industry, vigorously opposed the combined ban.)

## The World Trade Organisation

The excuse Ministers give for opposing the sales ban is that it may not comply with World Trade Organisation (WTO)\* rules. Such a ban would mean that products from non-European countries, e.g. the U.S, that had involved animal testing could not be sold within the EU. This could be seen as discrimination, as WTO rules state that a product from abroad cannot be rejected in favour of a national product purely on the basis of protection of a country's own interests. However, there is a situation where this rule can be overridden, namely if the trade restriction is either to protect public morals, or to protect human, animal, plant life or

health. Animal testing falls into both of these categories and there is no reason to believe a cosmetics sale ban would be deemed WTO-incompatible.

\* The World Trade Organisation deals with global trade rules between member nations, ensuring 'free trade' between countries. There are 144 members.

A campaign is currently underway by the BUAV to ban the sale of all animal tested products within the EU. Visit their website [www.buav.org](http://www.buav.org) for the latest news. More detailed information on EU law and WTO rules with regards to cosmetic testing can be found in the RSPCA's report; 'Safe and Sound', downloadable from their website [www.rspca.org.uk](http://www.rspca.org.uk).

In the meantime, the best way to encourage manufacturers to change their policy on animal testing is through consumer power. This can involve writing letters to the 'bad' companies and purchasing only cruelty-free products.

## Frequently asked questions

### ***How can we be sure that products are safe if they haven't been tested on animals?***

Most ingredients have been on the market for years, anyway. In fact, there are 8,000 established ingredients! Surely this is enough for companies to work with. There are many companies producing cosmetics that have not been tested on animals,



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which proves that it can be done. Animal experimentation for cosmetics could end tomorrow - there is simply no excuse for its continuation. Unfortunately, it is the drive for money that fuels the animal testing industry. Companies are able to trick people out of their money by producing 'a revolutionary new formula to banish split ends' or 'new longer lasting lipstick'. However, if the product contains new ingredients, animal suffering will have taken place in its formulation.

Also, a lot of safety testing comes down to common sense. Everyone knows that we shouldn't drip shampoo into our eyes and then not wash it out, so can doing this to animals possibly help us? Any accidental exposure that we encounter will be at a far smaller level than is administered in animal tests, therefore results simply cannot be transferred. As mentioned above, the corrosiveness of most substances is already known, therefore a simple way would be only to use known safe substances in cosmetics.

Additionally, this question assumes that animal testing is a valid model for human safety. In fact, risks to human health CANNOT be established by using animals. Even short-term dangers like skin or eye irritation manifest very differently in different species, so that no animal can predict what will happen in another. For example, bleach causes severe irritation to human skin, but only mild irritation to rabbit skin. Human eyes are 18 times more sensitive to CS gas and 90 times more sensitive to CR gas than rabbit eyes.

There are numerous biological differences between humans and animals in the way we react to chemicals, so that the health and safety of consumers is actually being compromised by scientifically worthless animal tests.

**What are the alternatives to animal testing?**

Very little money is put into funding alternatives, simply because there is no motivation for companies to do so. Animal testing is a convenient way of getting a product on the market. This is why it is so vital that the combined sales and marketing ban is implemented.

There are in vitro\* methods of testing for the whole spectrum of possible adverse effects but so far only three in vitro tests have been scientifically validated within the EU: one for photo-toxicity (reaction on exposure to sunlight) and two for skin corrosion. They use fragments of human skin and are thus directly applicable to people. Other tests are currently awaiting validation. For example, there are a variety of alternatives to the Draize test\*\* but validating them is problematic because the original Draize\*\* test is so inaccurate that comparisons are poor. Another problem is that regulatory authorities are reluctant to accept superior scientifically-validated non-animal tests - even though animal tests themselves have never been validated!

\*in vitro (in a test tube) as opposed to in vivo (in a body)

\*\* A horrific test whereby chemicals are dripped

into the eyes of fully conscious rabbits to gauge irritant potential.

**Don't cosmetic tests only make up a small proportion of animal tests anyway?**

Yes, it is true that across Europe, cosmetic tests make up 0.3% of all animal experiments. However, this still translates into thousands of animals. Additionally, non-animal safety tests which would be developed as a result of a cosmetics testing ban, could also be applicable when testing chemicals and pharmaceuticals, meaning that millions of animals could be saved in these areas too.

**How do I know if a product is cruelty-free?**

There are two main cruelty-free policies:

**Five year rolling rule**

This indicates that the product does not contain any ingredients that have been tested in the previous five years. So, for example, a product developed in 1998 couldn't be used in 2003 but could be used in 2004. However, since a product can take several years to come to market, this policy is only a mild inconvenience to companies intent on continuing their use of animals.

Listed below are some companies which have a fixed cut-off date. Vg indicates that the products are suitable for vegans. Vt indicates that the products are suitable for vegetarians, and NV means that some products may contain non-vegetarian ingredients – check the labels or write to head office for a list. Most of these companies supply mail order, or their products can be found in health shops. Also, supermarkets are increasingly beginning to stock some of these ranges.

Animal Aid	Vg	01732 364546
Beauty Without Cruelty	Vt	01229 775185
Body Shop	NV	
Care for Life	Vg	01458 251559
Caurnie Soap Co	Vg	0141 776 1218
Cosmetics to Go	Vt	01424 201202
Co-op (own brand)	NV	
Creighton's Naturally	Vt	
Daniel Field	Vg	0207 437 1490
Honesty	Vg	01629 814888
Montagne Jeunesse	Vt	01792 310306
Pure Plant	Vg	
Superdrug	NV	
Weleda	Vt	0115 944 8222

### **Fixed cut-off date (FCOD):**

Most substances have been tested on animals at some point, including even water. It is therefore virtually impossible to buy a cosmetic that has never ever involved animal testing. Ethical companies adopt a fixed cut-off date. This means that a company's products or ingredients haven't been tested on animals after a specific date. It is important that both the company itself and its suppliers conform to this date. Obviously, the longer ago the cut-off date, the more ethical the product. Animal Aid believe that this is the only cruelty-free policy.

### ***I wrote to a company, and they said that none of their products are tested on animals? Is this a satisfactory response?***

No! It is quite possible that their finished products have not been tested, but the ingredients that go into the products may well have been. When writing or phoning a company, always ask for a fixed cut-off date that applies to both the company itself and its suppliers, as this is the only way you can guarantee that its products are cruelty-free.

Other ambiguous labelling to watch out for:

*We do not carry out animal tests (another company may have done it on its behalf!)*

*Contains only natural ingredients (still may have been tested on animals!)*

*Environmentally Friendly (doesn't necessarily mean animal friendly!)*

Our policy has been not to test products or ingredients since year xxx (a dangerous statement as this implies a FCOD, but again they may have contracted the animal testing, or it may be done by their suppliers.)

If a company states a fixed cut-off date, then this date should apply to every single cosmetic product in its own brand range. However, it may have a different policy for its household product range (polish, cleaners, washing powder etc.). It is always advisable to check with the company concerned.

Additionally, some people may be reluctant to purchase from large stores, such as Sainsbury's or Superdrug, because, despite the fact that their own brand products are cruelty-free, they sell other brands which aren't.

Do not be fooled by a company which states it is required to conduct animal tests by law. This simply means that it is using new ingredients (which by law do have to be tested -

but not necessarily on animals), and not making use of the vast range already in existence, i.e. it is fuelling the animal testing industry through its drive for profit, and could easily stop if it wanted to.

Remember, manufacturers use cleverly worded statements to try and trick well-meaning people into buying animal tested products. Always read between the lines!

If a company has assured me of its fixed cut-off date, is it then safe to assume that no animals have suffered in its development?

Many people will want to avoid products which contains slaughterhouse by-products. Cosmetics can often include gelatine, animal glycerine, collagen, tallow, lard etc. etc. Some companies make cosmetics that are exclusively vegetarian/vegan, whereas with other companies, only certain products may be suitable.

## **Final word**

It may be tempting to buy from the latest fashionable range, but before you do, spare a thought for the animals who have suffered just to make the consumer look beautiful. To put an end to cosmetics testing, only buy from cruelty-free companies Also, get involved in any way you can in helping the BUAV with their cosmetics campaign ([www.buav.org](http://www.buav.org)). Remember, every little bit of effort helps!

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