

FULL DISCLOSURE:

The case for stronger household product labelling



Every day, cleaning and personal care products that lack ingredient lists and warning labels expose Canadians to toxic chemicals that are linked to allergies, endocrine or hormone disruption – and even cancer. Many are also persistent pollutants in our environment.

In 2012, the World Health Organization and United Nations Environment Programme released a major review of the science of endocrine-disrupting chemicals, indicating that chemicals in consumer products may be linked to increasing rates of cancers of the breast, thyroid and prostate.¹

To enable consumers to reduce their exposure, Canada needs better labelling rules to inform consumers about harmful ingredients in cleaning and personal care products.

Health warning labels on products such as tobacco and alcohol have been used in many jurisdictions to offer consumers information about the potential harms associated with exposure to product ingredients.² This study summarizes the results of four focus groups commissioned by Environmental Defence and conducted by Environics Research in Toronto that explored Canadian consumers' opinions and attitudes on the use of health warning labels on personal care and cleaning products. The results of the focus groups are also supported by findings from a policy literature review on health warning labels and disclosure policies for various consumer products.

Consumers Want More Information

Canadian consumers are increasingly aware of the health and environmental impacts of chemicals in household goods, and have subsequently become more interested in safer alternatives. However, due to regulatory gaps it is very difficult for consumers to know for certain whether a cleaning or personal care product contains harmful ingredients.

Consumer product labelling rules in Canada often do not require complete disclosure of ingredients on product labels. For example, disclosure of ingredients in household cleaners and in fragrance mixtures used in personal care products is not required, leaving consumers unaware of the potential presence of toxic chemicals in these goods. While several major companies have recently committed to better disclosure policies, reports have shown that voluntary programs are insufficient.⁴

In 2014, a David Suzuki Foundation survey found the following results among 10,500 Canadian households:

15,000 products



Ingredient list on less than 50%


















Unsubstantiated "green" claims on 25% of products

While cleaning products have to display warnings related to acute hazards such as poisoning, warnings about chronic health risks are not required. Along with the lack of such warning statements, health and environmental claims made by companies can be very misleading. According to a 2012 Canada-wide survey of over 10,500 participants, the survey found that of over 15,000 products that participants had in their homes, nearly 25 per cent made unsubstantiated “green” claims and less than half of the products displayed an ingredient list on the packaging.⁵ That’s why health warning labels in conjunction with full ingredient disclosure are necessary for informed consumer choices.

Labelling Policy: Canada Behind California, EU

As the table below shows, Canada is behind in its labelling policy. Other jurisdictions around the world such as the European Union and the state of California have modernized their labelling rules to better inform consumers and improve industry practices.

	Cleaning Product Ingredients	Personal Care Product Ingredients	Fragrance Ingredients	Health Warning Labels on Consumer Products
CANADA	<div>  <p>Disclosure not required</p> </div>	<div>  <p>Disclosure required with exemptions (e.g. fragrance)</p> </div>	<div>  <p>Disclosure not required</p> </div>	<div>  <p>Not required on cleaning or personal care products for harmful chemicals like carcinogens</p> </div>
EUROPEAN UNION	<div>  <p>Disclosure required for detergents.</p> </div>	<div>  <p>Disclosure required with exemptions (e.g. fragrance)</p> </div>	<div>  <p>Some allergens used in fragrance have to be listed</p> </div>	<div>  <p>Required on household cleaning products for harmful chemicals like carcinogens</p> </div>
CALIFORNIA	<div>  <p>Disclosure not required</p> </div>	<div>  <p>Disclosure required with exemptions (e.g. fragrance)</p> </div>	<div>  <p>Disclosure of specific chemicals of concern only</p> </div>	<div>  <p>Required on consumer products for chemicals causing cancer and other chronic conditions and on furniture for flame retardants</p> </div>
<div> <div>WEAKER</div> <div>    </div> <div>STRONGER</div> </div>				

Better Labels Influence Consumer and Manufacturer Behaviour

A look at other product categories and jurisdictions shows that labels inform and influence consumers' purchasing behaviour. Health warning labels offer an effective solution to inform consumers of potential health risks associated with using a certain product. For example, tobacco product warning labels have helped reduce smoking rates around the world by warning smokers about the dangers of smoking.⁶

Similarly, labels on personal care products and household cleaners can also help inform consumers of the dangers of toxic chemicals in personal care and cleaning products (such as

cancer-causing formaldehyde, a key carcinogen in cigarette smoke).

Product labelling rules can also positively influence manufacturer behaviour. In 2013, California updated its furniture flammability standards to require the disclosure on the product label of the use of flame retardants – a group of chemicals linked to endocrine disruption and adverse impacts on neurological development in children. Since then, the use of some of the most common and harmful flame retardants has significantly declined across the United States.⁷



ALCOHOL

Warning labels aimed at pregnant women help avert alcohol-related damages to fetuses.



TOBACCO

Health warnings featuring images and text are partially credited with declining cigarette consumption in many countries.



FURNITURE

Labels on flame retardant-free upholstered furniture is causing a shift in U.S. purchasing – and manufacturing – behaviour.

In 2013, California updated its **furniture flammability standards** to require the disclosure on the product label of the use of **flame retardants – a group of chemicals linked to endocrine disruption** and adverse impacts on neurological development in children.

FOCUS GROUPS: KEY FINDINGS

Findings from the Environics Research-conducted focus groups support the notion that Canadian consumers do not have the necessary or accessible information to make safe and healthy choices when shopping for cleaning and personal care products.

In line with the findings in literature from other jurisdictions and other product categories, participants were supportive of health warning labels that warn consumers of the chronic health dangers of certain ingredients in products, and indicated that they would seek better alternatives if warned about the presence of a cancer-causing or harmful chemical in a product.

Current Labels do not Protect the Health of Consumers

Focus group participants indicated that long-term health impacts were not among the key considerations that many consumers think about when choosing a cleaning or personal care product. On the other hand, price and brand recognition, and for some, environmental concerns were among the common factors that participants considered. Despite the lack of regulations to ensure the accuracy of safety messages and health claims,

participants generally acknowledged that consumers have a responsibility to use products in a safe manner by following instructions provided on or with products. In fact, many mentioned that product features such as scent or marketing statements influenced their

“Cigarettes have the label that you can die and millions of people are still smoking. If companies are still being shady about it... it's the most fair to let people know and make their own decision.”

“I assume that when I'm buying a product that it's been tested.”

perceptions of the healthiness of the product. This is troubling since participants generally under-scored the lack of clarity and consistency in how ingredients or effects are listed. Only a few participants mentioned that they read full ingredient lists and often look for ingredients that stand out.

“The only thing which has ever stopped us is if it's been in the media that this particular product has been cancerous or something serious.”

False Belief that Product Ingredients are Tested and Safe

Focus group discussions revealed that despite concerns about the clarity and/or consistency of ingredient listing, participants generally trusted that current Canadian laws mandated the rigorous testing of personal care and cleaning products,

“I have faith in the process of becoming a product – that it's not bad for me.”

especially if bought from well-known stores.

In fact, Canadian regulations do not require chemicals to be proven safe before they enter the market for use in consumer products. Furthermore, a 2016 audit by Canada's Environmental Commissioner, Office of the Auditor General, criticized inadequate and lax regulatory enforcement by Health Canada with regards to safety testing of cosmetics and personal care products. The report also underscored the problem of incomplete disclosure of ingredients, by emphasizing that the "fragrance" component of a product's ingredient list may consist of a myriad of chemical ingredients that have been shown to pose health risks to humans.⁸

The findings of the report underline the fact that widely available products contain substances that are harmful. Yet, among focus group participants

there was a general misunderstanding that the government ensures the safety of products before they enter the market and that big-name retailers can be trusted for supplying safe goods.

"It's on you to look it up to see what you're ingesting or putting on your skin...but we're not scientists. Within reason, they should be putting warnings on stuff."

"It would cause me to pause. Maybe there's something out there that's better for you. I can find another product that will do the same job. There's such a wide variety of options out there."

"The writing on the back is so small... It is almost like they don't want you to know."

Consumers Need Full Ingredient Disclosure, Warning Labels

Focus group participants acknowledged the usefulness of on-package warning labels indicating health risks associated with a product. Many emphasized the importance of ensuring readily identifiable information on the product about the presence of harmful chemicals that may cause serious health problems such as cancer.

Several participants stated that seeing a health warning label about cancer or other serious health risks would make them reconsider buying the product and seek a safer alternative. Participants acknowledged the responsibility and ability of manufacturers to reformulate products to avoid chemicals of concern and a drop of revenue as a result of consumer change in preferences.

Evidence from the state of California, where Proposition 65, a law that mandates warning statements on products that include specific chemicals of concern such as BPA, has been in force for three decades, shows that manufacturers reformulate products to remove toxic ingredients in order to avoid requiring warning labels on their products. For example, major manufacturers eliminated lead from plumbing supplies.⁹

"They're going to find their sales going down. They're going to stop putting in the things that people don't like."

E.U. AND CALIFORNIA PRODUCT LABELS

For illustration, here are two hypothetical label examples for household products sold in California and the EU featuring the updated health warning symbol.



CALIFORNIA



WARNING: This product can expose you to chemicals such as phthalates and Chlorinated Tris which are known to the State of California to cause cancer, birth defects or other reproductive harm, or both. For more information go to: P65Warnings.ca.gov

E.U.



[TRADE NAME] CLEANING PRODUCT
WARNING: MAY CAUSE VERY SERIOUS
LONG-TERM HEALTH EFFECTS.



EUROPEAN UNION PRODUCT WARNING LABELS

Through regulations and industry agreements, the EU has put in place a uniform system of warning labels on cleaning products. Warning labels have to include the word 'warning' or 'danger' followed by hazard and precautionary statements, flanked by a pictogram. Key symbols include:



This new symbol indicates health hazards like skin irritation or sensitization, serious eye irritation, or that a product could be harmful if swallowed.



This new symbol indicates more severe and chronic health hazards, including cancer and reproductive health risks.



The symbol indicates that the product is toxic to aquatic organisms and/or causes long-term damage to the ecosystem.

Conclusion

The focus groups and supporting literature review found that Canadian consumers are interested in safer and environmentally-friendly cleaning and personal care products. However, **consumers purchasing personal care and cleaning products currently do not have access to the information needed to make informed choices.**

Current Canadian rules for product ingredient disclosure fall short to fully inform consumers of the presence of potentially harmful chemicals. There is a lack of public trust in the accuracy of product ingredient lists. Consumers want better disclosure policies and health warning labels to help them avoid toxic chemicals in cleaning and personal care products.

Labelling regulations in places like California enjoy public support and positively impact consumer and producer behaviour.

With full ingredient disclosure and health warning labels, there is a clear incentive for manufacturers to eliminate toxic chemicals from their products in order to avoid including warning labels.


Recommendations

Based on our findings, we recommend that the federal government updates and strengthens Canada's labelling rules for consumer products to require:



1

FULL DISCLOSURE
of product ingredients on
the product label, including
fragrance ingredients.



2

**MANDATORY TEXT-
AND PICTURE-BASED
WARNING LABELS**
for chronic health risks
such as cancer, endocrine
disruption or infertility.

REFERENCES

1. WHO & UNEP. (2012). State of the science of endocrine disrupting chemicals. An assessment of the state of the science of endocrine disruptors prepared by a group of experts for the United Nations Environment Programme (UNEP) and WHO. <http://www.who.int/ceh/publications/endocrine/en/>
2. In 2002, Canada led the way by being the first country to implement graphic health warning labels on cigarette packages. Today, over 100 countries around the world have warning labels on tobacco products, contributing to increased public awareness of smoking-related health problems and to millions of lives saved.
3. A 2012 survey in British Columbia demonstrated that 99 per cent of over 10,500 Canadians who participated wanted companies to disclose all ingredients in household cleaners (David Suzuki Foundation, 2012).
4. A recent report concluded that major brands of household cleaners like Proctor & Gamble and SC Johnson & Son that have voluntarily released ingredient lists on their websites continue to withhold important product information like the presence of harmful ingredients in small concentrations or specific product fragrance ingredients. Some products also continue to contain harmful chemicals like synthetic musks, and which remain undisclosed on product labels (Women's Voices for the Earth, 2015).
5. David Suzuki Foundation. (2012). http://www.davidsuzuki.org/publications/downloads/2012/CS_executive_summary.pdf
6. Swayampakala, K., Thrasher, J. F., Hammond, D., Yong, H. H., Bansal-Travers, M., Krugman, D., ... & Hardin, J. (2014). Pictorial health warning label content and smokers' understanding of smoking-related risks—a cross-country comparison. *Health education research*, cyu022.
7. Stapleton & Cooper (2016). Flame Retardant Applications in Residential Furniture: Results from the Duke Superfund Foam Screening Project. (Webinar Slides)
8. Office of the Auditor General of Canada (2016). Chemicals in Consumer Products and Cosmetics. http://www.oag-bvg.gc.ca/internet/English/parl_cesd_201605_03_e_41382.html
9. Mary Graham. (2000). Regulation by Shaming. In *The Atlantic*. <http://www.theatlantic.com/magazine/archive/2000/04/regulation-by-shaming/378126/>

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A REPORT BY:



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