TO: **ORGANIC TRADE ASSOCIATION (OTA), USDA NATIONAL ORGANIC PROGRAM (NOP)** · *FROM:* **CONCERNED CITIZENS FOR STRONG ORGANIC STANDARDS**

DON'T WATER DOWN ORGANIC STANDARDS FOR BODY CARE!

WHAT'S THE PROBLEM:

Currently, various body care companies and interests are looking to gut the organic standards for body care so as to make them meaningless, pressuring the Organic Trade Association (OTA) and the USDA's National Organic Program (NOP) to codify extremely weak watered-down standards.

These companies falsely claim that "organic" floral waters are somehow key functional components of their products. Not only is the presence of these waters largely insignificant and inconsequential, their actual organic content is extremely minimal since they are almost completely water.

Nonetheless, various so-called "natural" body care manufacturers are using these waters to green-wash their products and make organic label claims, even though their formulations are in fact largely composed of the same conventional synthetic cleansers, conditioners and preservatives found in mainstream products.

On the front panels of their products, these companies assert "70% organic ingredients" to mislead consumers into thinking that they are buying mostly organic products when they assuredly are not.

Body care ingredients & products should only be considered organic if:

1 · **Certified organic agricultural raw materials are utilized exclusively, versus petroleum or conventional vegetable raw materials, in the manufacture of the key basic cleansing and conditioning ingredients.**

2 · **Manufacture of such ingredients is reasonably simple and ecological.**

3 · **The toxicity of each ingredient is minimal.**

4 · **Non-agricultural water is not counted in any shape or form as contributing to organic content. (Agricultural water is the naturally occurring water in a plant and is fine.)**

WHAT SHOULD BE THE STANDARD:

Organic body care standards should mirror organic food standards, which stipulate a mandatory 70% minimum weight of non-water/ non-salt agricultural organic content in a product for a "Made with Organic" label claim to be made on the front panel.

Each and every proposed cleansing or conditioning ingredient should be reviewed independently and rigorously under the above criteria. Non-agricultural water should not be allowed to contribute to the organic weight calculation for an "organic" label claim on the front panel in any shape or form. Most body care products on the market today that make organic claims on the front label contain organic ingredients amounting to less than 5% of non-water/non-salt weight.

Organic body care products, like organic food products, should be about sustainable agriculture, consumer and farm-worker health, and ecological processing methods, and should not be defined by a wishy-washy, watered-down set of standards that affords another marketing shtick for conventional body care products.

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