

I wanted to take this moment to respond to your inquiries on ingredient safety.

EWG and other less reputable websites use scare tactics. Many scientists, including myself, volunteered to help improve EWG-Skin Deep bogus science. They refused to be unbiased, with an agenda to spread only negatives.

Unfortunately, the web is filled with controversial information about almost everything; not all sources of information are reliable and not all studies are conclusive, especially when using major search engines as a primary source of research. When researching products, one can easily get caught up in the details of ingredients, so it is important for your Client to have confidence not only in the products **but** also in the company that produces them.

When researching product information, it is important to use reputable sources. We recommend the following websites for ingredient information:

- Cosmetic Ingredient Review Board: [www.cir-safety.org](http://www.cir-safety.org)  
The CIRB was established in 1976 with the support of the U.S. Food and Drug Administration and the Consumer Federation of America.
- Personal Care Products Council: [www.personalcarecouncil.org](http://www.personalcarecouncil.org)  
PCPC is the leading national trade association for the cosmetic and personal care products industry.

**Let us assure you that all of Arbonne's product safety and testing is performed independently (not in-house). And we abide by global governmental agency regulations. All Arbonne products must have a 100% pass rate to be introduced to our line.**

All of our cosmetic ingredients are tested periodically for safety and effectiveness by industry experts. CIR (Cosmetic Ingredient Review) Board is the one to determine ingredients' safety. The CIR reports its findings to the CTFA (Cosmetic, Toiletries, and Fragrance Association). The CIR and PCPC (formerly CTFA) are unbiased and extremely reputable. Unlike the FDA (Food and Drug Administration), they are not government bodies. The PCPC (formerly CTFA) is the watchdog for all manufacturing and cosmetic ingredients. We also embrace the European Commissions Scientific Committee on Cosmetic and Non-Food Products (SCCNFP), which conducts safety evaluation on cosmetic ingredients.

Please be assured that Arbonne will take immediate action on any ingredient that is unsafe in any of its formulations when guided by the FDA, the CTFA and the CIR. In our normal course of business, we continue to research and develop the pure, safe, and beneficial products our Independent Consultants and Clients have enjoyed for more than 32 years. We work closely with our suppliers, on a daily basis, to ensure the highest purity without safety concerns. Our ingredient policy may be found on our website.

**We recognize there is a lot of non-reputable, biased, non-scientific information out there in various websites.** Arbonne, along with other companies and federal regulators, does not recognize EWG's Skin Deep website as an unbiased or scientifically accurate resource for information about the safety of skin care or cosmetic ingredients. This source does not perform technical analysis nor does it assess the quality or purity of ingredients. EWG's Skin Deep solely relies on library reference searches or broadcasts and will only publish select documentation. Be careful of all the misinformation on this website as they have their own agenda. Their goal is sensationalism with negative assumptions discrediting the entire industry.

They do not have labs to do analysis, nor to assess quality & purity, so their accusations on ingredients and formulas are incorrect. Their grading system is also bogus and not accurate. This is due to fact that the information they have is out dated, plus their science is incorrect. They do not understand that their concern of impurities had been addressed and pure ingredients are available today. They are not equipped to do any quality checks and just cry wolf.

Recently, Skin Deep- EWG realized without a toxicology lab, they cannot critique products. So they hid behind the European Ingredient Safety Directives proclaiming US ingredients are not safe. But once the European Union tested the ingredients and they were deemed safe, Skin Deep-EWG would not change their negative rating on that ingredient or update their results. For the reasons noted above, among others, Arbonne does not agree with or support this website and its content.

Websites often broadcast sensationalism, “may do this” or “may do that”, “MAY” is not substantiated. We will monitor this concern globally with other Regulatory Agencies EU /Japan etc., beyond the FDA.

The key is not to drastically jump into conclusion and effect changes based

on web news alone. Otherwise we would make multiple changes every day. Please avoid EWG SKIN DEEP web comments. They have their private agenda.

Oxybenzone and Avobenzone are the only true UVA blockers against Melanoma. We have to use both in higher SPF to get this protection.

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# **Statement by Farah Ahmed, Chair Personal Care Products Council Sunscreen Task Force, Response to the 2011 EWG Sunscreen Report**

May 23, 2011

“Despite the extensive body of credible scientific research that demonstrates the safety, efficacy, and public health benefits of sunscreen products, the Washington, DC-based activist group, the Environmental Working Group (EWG), has again questioned the safety and efficacy of sunscreens in another unscientific and unsubstantiated report released just in time for Memorial Day. EWG’s assertions about the safety and efficacy of sunscreen products and ingredients lack the rigor and reliability of formal, expert evaluation, are not peer-reviewed, and confuse and alarm consumers.

“In its 2011 sunscreen report, EWG once again challenges the scientific community’s consensus that sunscreen products are safe and effective. The group’s allegations are in direct conflict with established scientific safety assessments of sunscreen products and their ingredients

and the assessments of regulatory authorities in the U.S., European Union, Canada, and several other countries. Ignoring the established scientific and regulatory safety assessment process for sunscreen products and ingredients, **EWG invents its own sunscreen product rating system not based on credible scientific methodology.** In fact, EWG's methodology for calculating SPF values has been proven to be inaccurate and unreliable by sunscreen experts, both in the U.S. and abroad.

**“Compounding this lack of scientific objectivity is the fact that sunscreen products ranked highly by EWG are promoted for sale on the group’s Web site via their partnership with [Amazon.com](https://www.amazon.com), generating revenue for EWG and demonstrating a clear and inappropriate commercial interest.**

“Consumers can be confident that the sunscreen products they rely on for protection against the harmful effects of the sun are both safe and effective. Sunscreen products have been thoroughly studied and tested by qualified scientists and regulatory authorities throughout the world. In the U.S., sunscreens are regulated as over-the-counter (OTC) drugs by the U.S. Food & Drug Administration (FDA) and are subject to rigorous scientific assessment, including safety and efficacy substantiation according to FDA standards that are among the most rigorous in the world.

“In addition to FDA, the Centers for Disease Control (CDC), the American Academy of Dermatology (AAD), the Skin Cancer Foundation, physicians and other health care professionals also emphasize the safety of sunscreens and the importance of their use as part of a safe sun regimen.

The dangers of the sun are clear and widely recognized by sunscreen experts and dermatologists. A National Institutes of Health “Report on Carcinogens” identifies solar UV radiation as a “known human carcinogen.” Further, a single bad burn as a child is known to increase the skin’s susceptibility to damage and skin cancer throughout life. In light of this scientifically sound and somber evidence of the dangers of the sun, it is alarming that EWG’s “annual report” could cause some consumers to avoid using sunscreens on themselves and their children.

“EWG’s report is fraught with unsubstantiated assertions, contradictions, and distorted facts. Some examples include:

### **Skin Cancer**

“EWG’s report cites increasing skin cancer rates and questions sunscreen efficacy in fighting this dangerous disease. EWG fails to consider that the

higher skin cancer rates of today are the result of excessive unprotected sun exposure from several previous decades as well as the ability to better track, monitor, and report occurrence of the disease.

“It is important to understand that approximately 90 percent of nonmelanoma skin cancers are associated with exposure to ultraviolet (UV) rays from the sun.<sup>1</sup> Each year there are more new cases of skin cancer than the combined incidence of cancers of the breast, prostate, lung and colon.<sup>2</sup> Further, up to 90 percent of the visible changes commonly attributed to aging are caused by the sun.<sup>3</sup>

“EWG’s assertions are contrary to the body of scientific and medical data that recognizes the use of sunscreens as part of an overall program of sun safety to help protect against skin cancer and other forms of damage caused by the sun.

### **Vitamin A in Sunscreen**

“Retinyl palmitate, commonly known as Vitamin A, has been used safely in various cosmetic and cosmetic/OTC drug preparations, including sunscreen products, for many years. In its latest sunscreen report, EWG once again questions the safety of Vitamin A in sunscreens. Vitamin A, an important vitamin in humans, is made up of a family of compounds called retinoids. Retinoid esters, including retinyl palmitate, account for more than 70 percent of Vitamin A. Retinyl palmitate is approved by FDA as a food additive. Retinyl palmitate has been reviewed by the Cosmetic Ingredient Review (CIR) twice and found to be safe for use in cosmetics. CIR is an independent panel of renowned scientific and medical experts that assesses the safety of cosmetic ingredients used in the U.S.

“There is no compelling evidence that retinyl palmitate in sunscreen products presents any human health risk to consumers. In 2000, the National Toxicology Program (NTP) published a notice stating that it would study the potential of retinyl palmitate to enhance UV radiation-induced photocarcinogenicity. The NTP issued a report for this study in 2011, conducting a peer review in January 2011. The Personal Care Products Council filed extensive and detailed comments highlighting the serious methodological flaws associated with this study. In spite of these flaws, the NTP Peer Review Panel nevertheless concluded there was an effect above the control cream (cream without retinyl palmitate) used in the test. Unfortunately, the control cream, which in all toxicological tests should not cause any effect on the test animals, was improperly formulated for this test and caused a significant response that all but obscured the ability to detect any effect arising from retinyl palmitate. In fact, the flaws

are so significant that the results of the study cannot be used for a science-based assessment of risk. It should be noted that there is a large body of evidence that in humans, retinoids have anti-cancer effects, in contrast to the effects sometimes seen in mouse models.

“Unfortunately, EWG has inappropriately used these findings to alarm consumers by telling them that products containing retinyl palmitate, including sunscreens, may not be safe. Their position is simply not supported by the available scientific data.

### **Safety of Oxybenzone**

“In its latest sunscreen report, EWG again questions the safety of an FDA-approved active ingredient in some sunscreens called oxybenzone. When used as a sunscreen ingredient, oxybenzone, also known as Benzophenone-3, protects the skin from harmful UV rays.

“FDA and regulatory authorities in Canada and the European Union have approved the use of oxybenzone as a safe and effective OTC sunscreen ingredient. The safety of oxybenzone has also been reviewed and confirmed by the [CIR expert panel](#). CIR has confirmed that oxybenzone is safe for use as a photo stabilizer (to protect the formulation) in cosmetic products.

“EWG also alleges a connection between UV filters found in sunscreens and hormone or endocrine disruption, but to date, available scientific data does not support a link between UV filter exposure and endocrine-disruptive effects in humans.

### **Sunscreen and Free Radicals**

“It is well known that UV light can produce free radicals in the surface of the skin and that this leads to the damage associated with excessive exposure to sunlight, most often observed as redness or sunburn.<sup>4</sup> The skin produces natural barriers that absorb the UV light to protect against damage. The interaction of solar UV with these natural barriers can produce free radicals.

“The application of a sunscreen supplements the natural UV absorbers and protects against free radical formation and the associated damage that can occur. Even if sunscreens were to form free radicals, this would occur on the surface of the skin and would not affect the underlying structures.

“Every sunscreen is tested in an SPF test to establish the level of

protection provided by the product. These tests confirm that the level of damage in sunscreen-protected skin is well below what occurs in the absence of sunscreen application since there is no 'redness' produced. Moreover, even with doses of UV light, which do produce free radicals and redness, the presence of sunscreens blocks such reactions.

“By virtue of their ability to absorb UV radiation before it can interact with skin, sunscreens provide significant protection against UV-induced free radical formation within skin compared with unprotected skin. Studies have documented the protective effects of individual sunscreen actives as well as commercial sunscreen products for their ability to protect against UV-induced free radical formation within skin compared with untreated or bare skin.<sup>5</sup>

### **Stability**

“The 2011 EWG report also claims that many sunscreen ingredients break down significantly when exposed to sunlight and quickly stop working. This is simply not true. Sunscreen formulators take into account the physical and chemical properties of the active ingredients to ensure they perform effectively and meet all established FDA requirements, including chemical stability. FDA also requires that sunscreens meet strict stability testing requirements to ensure they are effective when purchased by consumers.

## **The Council Responds to EWG Sunscreen Report Posted: May 25, 2010**

John Bailey, chief scientist of the [Personal Care Products Council](#), has released a statement in response to the [2010 Environmental Working Group \(EWG\) Sunscreen Report](#).

Bailey finds the report unscientific and unsubstantiated, noting that the American Academy of Dermatology, the Skin Cancer Foundation, the Center for Disease Control, the US Food and Drug Administration (FDA), physicians and other health care professionals have all emphasized the safety of sunscreen use. Bailey is concerned that the group's report will needlessly cause consumers to avoid

using **sunscreens**, when that use is critical to prevent skin damage and skin cancer.

Sunscreens in the United States are regulated as OTC drugs by the FDA and must undergo pre-market approval that involves rigorous scientific assessment including safety and efficacy substantiation according to FDA standards," noted Bailey. He further stated, "The FDA testing and regulatory process for sunscreen products is the most rigorous in the world."

According to Bailey, EWG did not use the established scientific and **regulatory** safety assessment process for sunscreen products and ingredients. The following topics are those proposed and questioned in the report.

***Vitamin A:*** In their report, EWG questioned the safety of vitamin A in sunscreens. He notes that retinyl palmitate has been reviewed by the Cosmetic Ingredient Review (CIR) expert panel and found to be safe in cosmetics.

***Skin cancer:*** EWG questions the ability of sunscreen to fight skin cancer based on increased skin cancer rates. Bailey maintains that skin cancer rates are the result of excessive unprotected sun exposure from several decades prior and on our ability to better track, monitor and report occurrence of the disease.

***Oxybenzone:*** In response to the safety of oxybenzone, Bailey notes, "When used as a sunscreen **ingredient**, oxybenzone, also known as benzophenone-3, protects the skin from harmful UV rays. Oxybenzone is also used to protect cosmetics and personal care products from degradation by absorbing UV rays." Benzophenone-3 is approved in the United States, Canada and the EU as a



safe and effective OTC sunscreen ingredient. In addition, it has been found safe for use as a photostabilizer by the CIR. Finally, Bailey added that there have been no available scientific data supporting a link between UV filter exposure to endocrine-disruptive effects in humans.

## **Skin Deep (Environmental Working Group )**

Skin Deep database is intended as a resource for consumers, who can search by ingredient or product when choosing personal care products. However their scientific interpretation is wrong and their references are out dated. Their Product grading scale is also bogus and they often use it to rate companies with obsolete products.

As an Example:

In June 2009, EWG updated Skin Deep with a report on chemicals in sunscreen, lip balm and SFP lotions. The report states that 3 out of 5 sunscreen products offer inadequate protection from the sun, or contain ingredients with significant safety concerns. The report identifies only 17% of the products on the market as both safe and effective, blocking both UVA and UVB radiation, remaining stable in sunlight, and containing few if any ingredients with significant known or suspected health hazards.

Industry representatives call these claims "highly inaccurate." Personal Care Products Council (PCPC) general council Farah Ahmed stated "It is very clear to me that they have a very low level of understanding of

the way sunscreens work and the way they are regulated by the FDA and tested by the industry." He expressed further concern saying "I would hate to think that there are parents out there not using sunscreen on their kids because of a report like this that is not based on real science."