

November 30, 2010

Mr. Donald Clark, Secretary
United States Federal Trade Commission
Washington DC, USA

Dear Mr. Clark:

Thank you for the opportunity to comment on the issue of "organic" personal care and beauty products labeling. As you know, some companies currently label their products as "organic," when they, in fact, only contain a small percentage of organic ingredients. Or worse, these organic ally labeled products actually contain synthetically derived ingredients, along with just a few organic ingredients. This kind of false labeling is very much confusing to the consumer, who, from reading the front of the label, thinks they are purchasing a fully organic product. Very often they also pay a premium for products they think are organic, expecting them to cost more.

As an organic advocacy group in the state of Nevada, our position on this matter is very simple. The USDA National Organic Program already has a very adequate and workable set of standards for organic food. The National Organic Standards Board recently recommended that this same set of standards be applied to organic personal care and beauty products. Whole Foods Market has already adopted a similar set of principals for such products purchased by their stores, to be fully implemented in 2011.

Our recommendation would be as follows: first, the FTC should take immediate measures to stop companies from falsely labeling their personal and beauty care products and cause them to remove all such products from the marketplace, within a short period of time, and 2nd, the FTC should recommend to the USDA National Organic Program that they adopt the recommendations of the National Organic Standards Board, and begin regulating this kind of product in the same way they regulate organic food. Currently they have the means to certify organic personal care and beauty products, but have stopped short of adopting a set of standards and regulating the products themselves, more generally, as they do with food. The same rules that apply to agricultural food products would pertain to personal care and beauty products. The list of prohibited ingredients, already extensively developed for food processors, may need to expand. We would hope that the FTC will advise the USDA NOP to begin regulating organic personal care and beauty products.

The consumer deserves consistency and clarity in labeling of all kinds, including organic labeling. The USDA should be the agency over seeing this industry, as the consumer has already grown accustomed to meanings inherent in the USDA icon and language, "100" Organic," "Organic," and "Made With Organic Ingredients." We would hope that the FTC would advise the USDA NOP to assume this regulatory function.

Sincerely,

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