

CHAGRIN VALLEY
SOAP & SALVE
COMPANY

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ATTN: Green Guides - Organic Roundtable, Project No. P954501

I am the founder of Chagrin Valley Soap & Salve Company, a woman-owned, small business that manufactures and sells certified organic personal care products. My Company started in my kitchen and now employs 12 full-time people.

We spend thousands of dollars each year to obtain and maintain USDA organic certification for our products. Why? Because we believe in organic. It is a promise to our customers that our products are made with agricultural ingredients produced without genetically modified organisms, hormones, pesticides, artificial fertilizers or other toxic synthetic additives.

But "organic" means more than that to our Company. Growing organically improves the quality of our environment by protecting our land and groundwater from contamination and by promoting the use of sustainable resources and the conservation of soil and water.

The USDA website claims, *"We've created a level playing field by developing clear standards, investigating consumer complaints, and taking action against farmers and businesses that violate the law."*

Unfortunately, the "level playing field" does not exist for the organic personal care industry. Organic food producers and handlers can be assured that their

competitors are not gaining an unfair advantage in the marketplace by using the word "organic" or a misleading brand name on products that do not meet the USDA organic regulations. Sadly, the lack of enforcement of the USDA labeling laws for companies that manufacture personal care products provides an unfair advantage to those companies that choose NOT to become certified organic.

We recently received an email from a customer with a link to another company's website that claims to sell "organic soap." The customer wrote,

"Their soap says the words "organic soap" right on their label and your soap only says made with organic oils and herbs. So I have to assume that your organic soap is not really organic."

This email highlights a major problem in the soapmaking and personal care industry -- false and misleading labeling. Although the company referred to in the customer email was not a certified organic company, their soap was labeled "organic" and the word "organic" was used throughout their website and in their company name. These companies are not selling "organic" products, they are simply selling the word "organic." The word "organic" should stand for something more than a marketing hype to entice consumers looking for better products for their family.

Although Chagrin Valley Soap & Salve has been a USDA Certified Organic Company for over six years, we are not permitted to use the word "organic" in our name because we manufacture and sell some products that are less than 95% organic. Since our soap is about 87% to 90% organic, "made with organic ingredients" is the only "organic" label that we are allowed use for our soap. As USDA Certified Organic company, we are bound by the labeling rules of the National Organic Program (NOP).

There are many companies that use the use the word "organic" in their company name and on their products notwithstanding that they are neither a certified organic company nor are their products organic. When a customer searches the Internet for organic personal care products, these non-complying companies come up on the first pages of the search (to the detriment of our Company) and mislead the consumer by representing their products as organic, either by direct labeling of the product or by the use of the word "organic" in their company name. Since they are not held accountable by any certifying agency, they simply do not need to follow labeling regulations.

Even though we go through the exact same rigorous, time consuming and expensive process, certified organic manufacturers of personal care products are not treated with same respect, care and concern as organic food and agriculture producers by the USDA. We are not even allowed to petition for the addition of new raw materials to the National List of Allowable and Prohibited Substances.

In the food and agriculture industries the rules apply to everyone and are enforced with prosecutions and fines. In the personal care products industry, the rules are ignored to the detriment of those of us who follow them. We do not need more rules and regulations. We need enforcement of existing rules to prevent misrepresentation through misleading advertising and labeling and to protect the consumer. Enforcement of the existing rules will "level the playing field."

Very Truly Yours,

Ida Friedman Kasdan

Chagrin Valley Soap & Salve Company