

The Dirt on Cleaning Product Companies

How Top Manufacturers Rate in Protecting You from Toxic Chemicals



# CLEANING PRODUCT COMPANIES REPORT CARD

Procter & Gamble  C-/42.5	Reckitt Benckiser	S.C. Johnson & Son, Inc.	Sunshine Makers, Inc./ Simple Green	The Clorox Company
	C-/43.5	D /40 =		
D+		B-/62.5	D+/39	C-/44.5
- 1	D+	D+	D+	F
C+	D+	D+	F	
B-	B-	B-		C+
F	D-	A+		D-
182	65	32	15	B- 39
111	7	0	0	
	<b>F</b> 182	<b>F</b> D- 182 65	F D- A+  182 65 32	F D- A+ C 182 65 32 15

Comments: These five cleaning product manufacturers are failing to provide the public with the information they need to make informed buying decisions. It's time for these companies to act like leaders and set an industry standard for comprehensive product labeling and removal of potentially harmful ingredients from ALL of their product lines. NEEDS IMPROVEMENT

### About this Report Card:

"The Dirt on Cleaning Product Companies" provides an in-depth review of how well five of the leading cleaning product manufacturers stack up on toxic chemical and consumer right-to-know issues. Women's Voices for the Earth (WVE) evaluated Procter & Gamble, Reckitt Benckiser, S.C. Johnson & Son, Inc., Sunshine Makers, Inc./Simple Green and The Clorox Company based on information gathered from company websites and direct correspondence with WVE. (See Appendix B for more detailed information on how we scored each company.)

As their grades indicate, these industry leaders could and should be doing much more to protect the health of their most valued customer - you! There are few existing uniform standards to require companies to disclose ingredients, toxic or otherwise, on product labels. And likewise, no government agency tests the toxicity of products before they go to market. In the face of inadequate government oversight, this report card challenges the industry to prove their commitment to consumer safety by dramatically improving their own policies on consumer right-to-know issues and toxic chemicals screening.

At the same time, this report card is a call to action for consumers like you to tell companies that their grades are unacceptable. WVE encourages you to demand that companies come clean about what's in their products. Visit www.womenandenvironment.org to sign our Safe Cleaning Products Petition.

### WHY GRADE CLEANING PRODUCT COMPANIES?

Cleaning product companies stake their integrity on the ability to sell products that consumers need. With words like "trusted," "quality," "healthy" and "responsible" used throughout their literature, it's clear that companies care about gaining the trust and loyalty of consumers. But what happens when consumers ask tough questions regarding the use and labeling of toxic ingredients in products? How well do they respond?

Find out as WVE puts cleaning product companies to the test.

#### HOW DO COMPANIES MAKE THE GRADE?

#### **Product Ingredient Disclosure**

In this category, WVE graded companies on the extent to which they disclosed ingredients in their products.

Consumers need this information for many reasons. Some consumers have allergies or asthma and are trying to avoid chemicals that may trigger symptoms; some are women who are pregnant or trying to get pregnant and want to take extra precautions to avoid exposures that may impact the development of their child; and some are individuals with unique chemical sensitivities or various other diseases who are concerned about controlling their exposures to certain substances.

BOTTOM LINE: In order to make informed decisions about the health risks associated with using cleaning products, consumers must have easy access to information about every ingredient in the products they use.

#### Responsiveness to Consumer Right-to-Know Concerns

In this category, WVE graded companies on their responsiveness to consumer demands for ingredient information and current ingredient disclosure policies.

WVE asked the five manufacturers 1) if they fully disclose product ingredients on the labels of their products; 2) if not, why not; 3) if there are other ways customers can access information on ingredients in cleaning products; 4) if they have a formal policy on labeling, and if so, what does it look like?

Companies were graded on whether they responded to WVE's multiple requests for information, as well as on the caliber of information provided.

BOTTOM LINE: Consumers not only have the right-to-know what ingredients are in products they use, but they also deserve to have their concerns addressed.

#### **Toxic Chemicals Screening Process**

In this category, WVE graded companies on the toxic chemical screening process applied to the products they manufacture.

Because there is limited government oversight of the chemicals used in cleaning products and no standards for testing, manufacturers are left to their own devices to ensure that their products are safe. As a result, toxic screening processes vary considerably from company to company.

BOTTOM LINE: Companies must be transparent about the screening process they use so that consumers can better understand how companies work to avoid and minimize the use of hazardous ingredients.

#### **Toxic Chemicals in Products**

In this category, WVE graded companies on the presence of four specific groups of chemicals of concern in their products, as outlined in our 2007 *Household Hazards\** report. We were unable to grade companies on their use of phthalates, a fifth chemical included in *Household Hazards*, because none of the five companies lists the ingredient on a Material Safety Data Sheet (MSDS) or label. In cleaning products, phthalates are often found in fragrance and have been associated with adverse effects on the genital development of baby boys.

In July of 2007, WVE conducted a survey of company MSDSs, to identify whether products contained the following chemicals: monoethanolamine (MEA) and ammonium quaternary compounds, which are linked to asthma; and glycol ethers and alkyl phenol ethoxylates, which are linked to birth defects and fertility problems. After making several requests to the five companies to remove these ingredients from product lines, WVE conducted a follow-up survey of household cleaning product MSDSs in May and June of 2008 to determine which products had been discontinued or reformulated.

BOTTOM LINE: Since the release of WVE's report Household Hazards, four of the five companies surveyed showed a reduction in the number of products containing chemicals of concern.



\*Download Household Hazards at:
www.womenandenvironment.org/
campaignsandprograms/SafeCleaning/
ResourcesCleaning

"Simple Green
Naturals products
offer 100%
sustainable ingredient
sources, non-toxic
formulations,
biodegradable
formulations, full
ingredient disclosure
and international
scientifically-accepted
ingredient names."

-From the Simple Green website

http://www.simplegre en.com/products\_ naturals\_family.php

**Sunshine Makers** Inc./Simple Green is the only one of the five industry leaders to provide full ingredient disclosure, including scientificallyaccepted ingredient names and fragrance components, on a product line's label. Yet, this same policy has not been extended to the company's larger, traditional line

of cleaners.

### PRODUCT INGREDIENT DISCLOSURE

Criterion	Points Possible	Procter & Gamble	Reckitt Benckiser	S.C. Johnson & Son, Inc.	Sunshine Makers, Inc./ Simple Green	The Clorox Company
Company provides a list of all ingredients on all their product labels	10	0	0	0	0	0
Company provides a list of all ingredients for individual products on their website	5	0	0	0	0	0
Company provides Material Safety Data Sheets (MSDS) for their household products on their website <sup>1</sup>	5	5	5	5	5	5
Company follows labeling laws required under the European Union $^{\rm 2}$	5	5	5	5	5	0
Total Points:	25	10	10	10	10	5
G	RADE:	D+	D+	D+	D+	F

<sup>&</sup>lt;sup>1</sup> See Appendix B for a listing of company websites.

Procter & Gamble is committed to a 'precautionary approach' in assuring the safety of our products before we put them on the market."

-ROBERT LINDENSCHMIDT,

Director, **Product Safety &** Regulatory Affairs

Out of the five companies rated, **P&G** has the longest list of products containing chemicals of concern identified by WVE.



# Should Ingredients Be Posted on a Website or on the Label?

Ideally, ingredient information should appear on both a website and a label - as consumers prefer different methods for finding information. Posting ingredients on a website alone, however, will not reach all users of cleaning products. According to a 2007 Pew Center survey, age, ethnicity and education level all affect internet access. For example, only 56% of Latinos, 32% of persons without high school diplomas and 27% of those over the age of 71 go online. All of these groups however, are regular users of cleaning products. Having ingredient information on the label also provides consumers an easier way to comparison shop while in the store. Providing ingredient information on the product label at the point of purchase and the point of use, in addition to a website, is necessary for consumer safety.

<sup>&</sup>lt;sup>2</sup> The European Union (EU) Detergent Directive requires companies to disclose all ingredients, except fragrance, on a website, as well as list 26 identified allergens on labels of products sold in the EU.



# Consumers Want Ingredient Information

Consumers want to know what is in the products they use on a daily basis. A 2007 survey of Washington State residents conducted for the Washington Department of Ecology found that up to 85% of respondents said it was very or extremely important for the government to require manufacturers to label all of their products with complete ingredient lists. In addition, WVE has collected thousands of signatures on a petition that requests that cleaning product manufacturers fully disclose ingredients on their product labels. To sign the petition, visit www.womenandenvironment.org and click Take Action.

Amazingly Clean= 21-25 Basically Clean = 16-20 Could Be Cleaner = 11-15 Dingy = 6-10 Filthy = 0-5

### RESPONSIVENESS TO CONSUMER CONCERNS

Criterion	Points Possible	Procter & Gamble	Reckitt Benckiser	S.C. Johnson & Son, Inc.	Sunshine Makers, Inc./ Simple Green	The Clorox Company
Company responded to WVE's correspondence	5	5	0	0	5	5
Company has acknowledged that consumers want to know what is in their products through a statement on their website or via WVE correspondence	5	5	5	5	0	5
Company has taken steps to address ingredient labeling concerns by developing a formal policy	5	5	5	5	0	0
The formal policy includes revealing ingredient information beyond compliance with the law	5	0	0	0	0	0
If they do not disclose already, the company has expressed a willingness to provide full ingredient disclosure as indicated in their response to						
WVE correspondence	5	0	0	0	0	5
Total Points:	25	15	10	10	5	15
GF	RADE:	C+	D+	D+	F	C+

### TOXIC CHEMICALS SCREENING PROCESS

Criterion	Points	Procter & Gamble	Reckitt Benckiser	S.C. Johnson & Son, Inc.	Sunshine Makers, Inc./ Simple Green	The Clorox Company
The company follows the precautionary principle (defined as a preventative approach despite scientific uncertainty)	5	0	0	0	0	0
The company uses an internal screening process for all of its products (companies receive half the points if they screen some of their products)	5	5	5	5	5	5
The company uses an external screening process for all of its products (companies receive half the points if they screen some of their products)	5	2.5	2.5	2.5	0	2.5
The company's chemical screening process excludes use of certain chemicals that may be harmful	5	5	5	5	5	0
The company publishes information about their chemical screening process on their website	ir 5	5	5	5	0	0
Total Points:	25	17.5	17.5	17.5	10	7.5
	GRADE:	B-	B-	B-	D+	D-



### SHOULD COMPANIES FOLLOW THE PRECAUTIONARY PRINCIPLES

The precautionary principle is essentially a "better safe than sorry" approach. The Wingspread Statement on the Precautionary Principle states "Where an activity raises threats of harm to the environment or human health, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically." With respect to a toxic chemical screening process, the precautionary principle would guide a company to avoid the use of potentially harmful chemicals despite ongoing scientific uncertainty about the extent of the harm.

The precautionary principle forms the basis for European environmental law1, was formalized by the United Nations at the 1992 Rio Conference on Sustainable Development<sup>2</sup>, and is followed by leading companies like Hewlett Packard, Seventh Generation and The Body Shop.

The 'precautionary principle' label is specifically misleading, misinterpreted, and is not followed by any responsible company in the world today."

report card score.

-Reckitt Benckiser's response to their

<sup>&</sup>lt;sup>1</sup> The Wingspread Statement on the Precautionary Principle was developed in 1998 at a conference of leading scientists, philosophers, lawyers and environmental activists, to discuss and reach agreement on the necessity of the precautionary action in public health and environmental decision-making. For more information see: http://www.sehn.org/wing.html

<sup>&</sup>lt;sup>2</sup> D. Gee, Financial Times (London), U.S. ed. 2, 16 December 1999, p. 14.

<sup>&</sup>lt;sup>3</sup> United Nations, "Rio Declaration on Environment and Development," Rio deJaneiro, June 1992

<sup>6</sup> The Dirt on Cleaning Product Companies

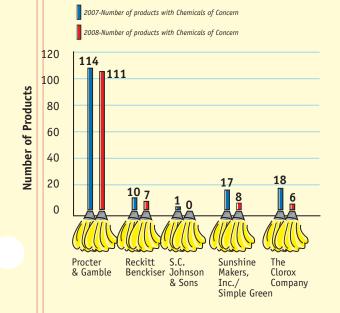
### TOXIC CHEMICALS IN PRODUCTS

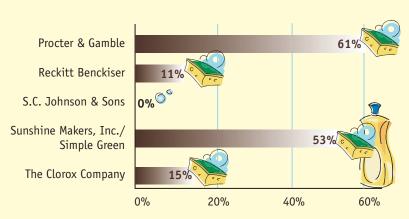
Criterion	Points Possible	Procter & Gamble	Reckitt Benckiser	S.C. Johnson & Son, Inc.	Sunshine Makers, Inc./ Simple Green	The Clorox Company
Company's products DO NOT CONTAIN chemicals of concern cited in WVE's report <i>Household Hazards</i> (monoethanolamine, glycol ethers, ammonium quaternary compounds, alkyl phenol ethoxylates)	5	0	0	5	0	0
Since the release of <i>Household Hazards</i> , company has reduced the number of products it sells that contain the above chemicals of concern:						
% reduction of products that contain the above chemicals of concern*	100%	0%	30%	100%	53%	67%
Points given for reduction of products	15	0	6	15	9	12
Company has developed a "green" line of products, which expresses a willingness to use less toxic chemicals in their products	5	0	0	5	5	5
Total Points:	25	0	6	25	14	17
GR	ADE:	F	D-	A+	С	B-

<sup>\*</sup> See Appendix B for more information on how points were awarded

#### NUMBER OF CLEANING PRODUCTS WITH CHEMICALS OF CONCERN IN 2007 VS. 2008

#### PERCENTAGE OF CLEANING PRODUCTS THAT CONTAIN CHEMICALS OF CONCERN





# CHEMICALS OF CONCERN IN COMMON HOUSEHOLD CLEANING PRODUCTS - 2008

In July of 2007, Women's Voices for the Earth (WVE) published a groundbreaking report called *Household Hazards* that synthesized research from over 75 studies and reports on the potential health impacts of chemicals commonly found in cleaning products specifically related to asthma and reproductive harm. In the report, we identified products made by Procter & Gamble, Reckitt Benckiser, S.C. Johnson & Son, Inc., Sunshine Makers, Inc./Simple Green and The Clorox Company that contained chemicals of concern. Since the report's release, four of the five companies have removed chemicals of concern from their product formulas. The following list reveals which products still contain these chemicals.

#### PROCTER & GAMBLE\*:

PRODUCT NAME	INGREDIENT	HEALTH CONCERN <sup>1</sup>
Liquid Cheer ColorGuard	Monoethanolamine	Asthma
Liquid Cheer Colorguard Regular 2X	Monoethanolamine	Asthma
Liquid Cheer Complete	Monoethanolamine	Asthma
Liquid Cheer Complete 2X	Monoethanolamine	Asthma
Liquid Cheer Dark	Monoethanolamine	Asthma
Liquid Cheer Dark 2X	Monoethanolamine	Asthma
Liquid Cheer Free & Gentle	Monoethanolamine	Asthma
Liquid Cheer Free & Gentle 2X	Monoethanolamine	Asthma
Liquid Cheer Fresh Linen	Monoethanolamine	Asthma
Liquid Cheer Fresh Linen 2X	Monoethanolamine	Asthma
Liquid Cheer High Efficiency	Monoethanolamine	Asthma
Liquid Cheer High Efficiency 2X	Monoethanolamine	Asthma
Liquid Cheer True Fit	Monoethanolamine	Asthma
Liquid Cheer True Fit Detergent 2X	Monoethanolamine	Asthma
Liquid Dreft	Monoethanolamine	Asthma
Liquid Dreft 2X	Monoethanolamine	Asthma
Liquid Era	Monoethanolamine	Asthma
Liquid Era 2X	Monoethanolamine	Asthma
Liquid Era Crystal Springs	Monoethanolamine	Asthma
Liquid Era Crystal Springs 2X	Monoethanolamine	Asthma
Liquid Era Free	Monoethanolamine	Asthma
Liquid Era Free 2X	Monoethanolamine	Asthma
Liquid Era Max	Monoethanolamine	Asthma
Liquid Era Max 2X	Monoethanolamine	Asthma
Liquid Gain Fresh Awakenings	Monoethanolamine	Asthma
Liquid Gain Fresh Awakenings 2X	Monoethanolamine	Asthma
Liquid Gain Gentle Breeze	Monoethanolamine	Asthma
Liquid Gain High Efficiency Island Fresh	Monoethanolamine	Asthma
Liquid Gain High Efficiency Original Scent	Monoethanolamine	Asthma
Liquid Gain Island Fresh	Monoethanolamine	Asthma

<sup>&</sup>lt;sup>1</sup> The chemicals of concern listed throughout this report are included for precautionary reasons as they have been linked to potential health effects in scientific studies. Research on specific health impacts due to household use of cleaners containing these chemicals is extremely limited. For greater detail on the science behind these chemicals of concern, see our Household Hazards report, available at: www.womenandenvironment.org/campaignsandprograms/SafeCleaning/ResourcesCleaning

Liquid Gain Island Fresh 2X	Monoethanolamine	Asthma
Liquid Gain Island Fresh High Efficiency 2X	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Apple Mango Tango	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Apple Mango Tango 2X	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Gardenia Delight	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Gardenia Delight 2X	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Honeysuckle Guava Groove	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Honeysuckle Guava Groove 2X	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Mandarin Lime Fusion	Monoethanolamine	Asthma
Liquid Gain Joyful Expressions Mandarin Lime Fusion 2X	Monoethanolamine	Asthma
Liquid Gain Original Fresh 2X	Monoethanolamine	Asthma
Liquid Gain Original Scent	Monoethanolamine	Asthma
Liquid Gain Plus A Touch of Softness Cotton Fresh	Monoethanolamine	Asthma
Liquid Gain Plus A Touch of Softness Simply Fresh	Monoethanolamine	Asthma
Liquid Gain Regular High Efficiency 2X	Monoethanolamine	Asthma
Liquid Gain Soothing Sensations Lavender Lilac Moment 2X	Monoethanolamine	Asthma
Liquid Gain Soothing Sensations Vanilla Orchid Mellow 2X	Monoethanolamine	Asthma
Liquid Gain Whitewater Fresh	Monoethanolamine	Asthma
Liquid Gain Whitewater Fresh 2X	Monoethanolamine	Asthma
Liquid Gain with A Touch of Softness Cotton Fresh Detergent 2X	Monoethanolamine	Asthma
Liquid Gain with A Touch of Softness Simply Fresh 2X	Monoethanolamine	Asthma
Liquid Gain with Bleach Alternative	Monoethanolamine	Asthma
Liquid Gain with Bleach Alternative Outdoor Sunshine 2X	Monoethanolamine	Asthma
Liquid Ivory Snow	Monoethanolamine	Asthma



# Chemicals of Concern Commonly Found in Household Cleaners

**Monoethanolamine (MEA)** is a surfactant found in some laundry detergents, all-purpose cleaners and floor cleaners and is a known inducer of occupational asthma.

**Ammonium quaternary compounds** are disinfectants found in some disinfectant sprays and toilet cleaners that have been identified as inducers of occupational asthma.

**Glycol ethers, such as 2-butoxyethanol,** are solvents commonly found in glass cleaners and all-purpose spray cleaners that have been linked to reduced fertility and low birth weight in exposed mice.

**Alkyl phenol ethoxylates (APEs)** are surfactants found in laundry detergents, stain removers and all-purpose cleaners, which have been found to reduce embryo survival in fish and alter tadpole development. APEs are commonly detected as contaminants in rivers and streams, and have also been found in household dust.

Monoethanolamine	Asthma
Monoethanolamine	Asthma
	Monoethanolamine Monoethanolamine Monoethanolamine Monoethanolamine Monoethanolamine Monoethanolamine Monoethanolamine Monoethanolamine



# The Stink on Fragrance in Products

Many consumers like the way their cleaning products smell, but they may not know that fragrance can contain highly toxic substances. Several chemicals common in fragrance are volatile organic compounds (VOCs) like benzaldehyde and toluene, both of which are skin and lung irritants and may also have more serious systemic health effects, particularly on the nervous system. Chemicals like phthalates, which have been linked to reproductive problems, have also been used in fragrance. And other chemicals, such as coumarin and linalool are well known allergens that can lead to a variety of health issues ranging from respiratory problems to skin conditions like eczema. Many companies regard fragrance as a corporate trade secret, which further hinders efforts to require disclosure of the ingredients. Consumers must demand that companies disclose the ingredients in fragrance so that they can effectively protect themselves from unnecessary exposure.

Liquid Tide Free	Monoethanolamine	Asthma
Liquid Tide Free 2X	Monoethanolamine	Asthma
Liquid Tide Free High Efficiency 2x	Monoethanolamine	Asthma
Liquid Tide Fresh Scent	Monoethanolamine	Asthma
Liquid Tide High Efficiency	Monoethanolamine	Asthma
Liquid Tide High Efficiency Clean Breeze	Monoethanolamine	Asthma
Liquid Tide High Efficiency Free	Monoethanolamine	Asthma
Liquid Tide Mountain Spring	Monoethanolamine	Asthma
Liquid Tide Mountain Spring 2X	Monoethanolamine	Asthma
Liquid Tide Original 2X	Monoethanolamine	Asthma
Liquid Tide Pure Essentials with Baking Soda 2X	Monoethanolamine	Asthma
Liquid Tide Pure Essentials with Baking Soda White Lilac Scent	Monoethanolamine	Asthma
Liquid Tide Pure Essentials with Citrus Extracts 2X	Monoethanolamine	Asthma
Liquid Tide Pure Essentials with Citrus Extracts Lemon Verbena Scent	Monoethanolamine	Asthma
Liquid Tide Regular High Efficiency 2X	Monoethanolamine	Asthma
Liquid Tide Regular/Original Scent	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Magnolia & Orange Blossom	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Magnolia & Orange Blossom 2X	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Rose & Violet	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Rose & Violet 2X	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Vanilla & Lavender	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Vanilla & Lavender 2X	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Water Lily & Jasmine	Monoethanolamine	Asthma
Liquid Tide Simple Pleasures Water Lily & Jasmine 2X	Monoethanolamine	Asthma
Liquid Tide Tropical Clean	Monoethanolamine	Asthma
Liquid Tide with a Touch of Downy April Fresh	Monoethanolamine	Asthma
Liquid Tide with A Touch of Downy April Fresh 2X	Monoethanolamine	Asthma
Liquid Tide with A Touch of Downy Clean Breeze	Monoethanolamine	Asthma
Liquid Tide with A Touch of Downy Clean Breeze 2X	Monoethanolamine	Asthma
Liquid Tide with A Touch of Downy Soft Ocean Mist	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Clean Breeze	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Clean Breeze 2X	Monoethanolamine	Asthma

Liquid Tide with Bleach Alternative High Efficiency	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative High Efficiency 2X	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Mountain Spring	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Mountain Spring 2X	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Original Scent 2X	Monoethanolamine	Asthma
Liquid Tide with Bleach Alternative Regular	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Citrus & Light	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Citrus & Light 2X	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Meadows & Rain	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Meadows & Rain 2X	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Spring & Renewal	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Spring & Renewal 2X	Monoethanolamine	Asthma
Liquid Tide with Febreze Freshness Spring & Renewal High Efficiency ${\bf 2X}$	Monoethanolamine	Asthma
Mr. Clean Multi-Surfaces Antibacterial Spray (Lemon Scent)	Monoethanolamine	Asthma
Mr. Clean Multi-Surfaces Antibacterial Spray (Orange)	Monoethanolamine	Asthma

<sup>\*</sup>Note: In 2007 we did not list Procter & Gamble's products by individual scents, but grouped all scents together.

#### RECKITT BENCKISER:

Procter & Gamble Continued

PRODUCT NAME	INGREDIENT	HEALTH CONCERN'
Easy Off Fume Free Max Oven Cleaner (Aerosol)	Monoethanolamine	Asthma
Easy Off Heavy Duty Oven Cleaner (Aerosol)	Monoethanolamine	Asthma
Glass Plus Glass & Multi-Surface Cleaner (Refills)	Monoethanolamine	Asthma
Glass Plus Glass & Multi-Surface Cleaner (Dissolvable Refills)	Monoethanolamine	Asthma
Glass Plus Smart-Fill	Monoethanolamine	Asthma
Lysol Brand II Disinfectant All-Purpose Cleaner (Dilutable) – Fresh Scent	Benzalkonium Chloride	Asthma
Lysol Brand II Disinfectant All-Purpose Cleaner (Dilutable) – Country Scent	Benzalkonium Chloride	Asthma
Lysol Brand II Disinfectant All-Purpose Cleaner (Dilutable) –Lemon Scent	Benzalkonium Chloride	Asthma
Lysol Brand Disinfectant Deodorizing		
All-Purpose Cleaner (Dilutable) – Fresh Scent	Benzalkonium Chloride	Asthma
Lysol Brand Disinfectant Deodorizing Cleaner – Mountain Air Scent	Benzalkonium Chloride	Asthma

### SUNSHINE MAKERS, INC./SIMPLE GREEN:

PRODUCT NAME	INGREDIENT	HEALTH CONCERN'
Simple Green All-Purpose Cleaner	2-butoxyethanol	Fertility problems, Low Birth Weight
Simple Green All-Purpose Towelettes	2-butoxyethanol	Fertility problems, Low Birth Weight
Simple Green BBQ Grill Microwave Cleaner	2-butoxyethanol	Fertility problems, Low Birth Weight
Simple Green Carpet Cleaner	2-butoxyethanol	Fertility problems, Low Birth Weight

Simple Green All-Purpose Cleaner - Lemon Scented	2-butoxyethanol	Fertility problems,
		Low Birth Weight
Simple Green Lemon Scented All-Purpose Wipes	2-butoxyethanol	Fertility problems,
		Low Birth Weight
Simple Green Scrubbing Pad	2-butoxyethanol	Fertility problems,
		Low Birth Weight
Simple Green All-Purpose Wipes	2-butoxyethanol	Fertility problems,
		Low Birth Weight
Simple Green Wipes	2-butoxyethanol	Fertility problems,
		Low Birth Weight

#### THE CLOROX COMPANY:

PRODUCT NAME	INGREDIENT	HEALTH CONCERN 1
Clorox Disinfectant Floor & Surface Cleaner Crisp Citrus	Benzalkonium Chloride	Asthma
Clorox Disinfectant Floor & Surface Cleaner Refreshing Clean	Benzalkonium Chloride	Asthma
Clorox Disinfecting Kitchen Cleaner	Monoethanolamine	Asthma
Formula 409 All-Purpose Cleaner Antibacterial Kitchen Lemon Fresh	Monoethanolamine	Asthma
Formula 409 Antibacterial All-Purpose Cleaner	Monoethanolamine	Asthma
Pro Formula 409 Degreaser and Multi-Purpose Cleaner*	2-butoxyethanol	Fertility
		Problems,
		Low Birth Weight

"For Clorox,
regulatory
compliance is a
starting point –
not an end in
itself. Our goal is
to go beyond
compliance."

Sunshine Makers, Inc./Simple Green Continued

-Mary O'Connell, Director, Public Relations

As of September 2008, Clorox is the only one of the five rated companies that is out of compliance with the EU Detergent Directive. They do not have a website that discloses ingredients as required.

\*This product is currently advertised on the Clorox website, but there is no MSDS sheet available. The MSDS we obtained in 2007 for this product indicated it contained 2-butoxyethanol.



# The EU and Canada Ingredient Labeling and Disclosure Policies

**European Union** – The European Union (EU) Detergent Directive requires cleaning product manufacturers to disclose all ingredients included in products, except those used in fragrance, on a public website. In addition, companies must list known allergens, as identified by the EU, on the product label. This listing *does* include ingredients that are used in fragrance. Currently, 26 allergens are required to be disclosed.

Canada – While no regulation of cleaning products exists yet in Canada, a federal bill calling for manufacturers of all products sold in Canada to list all toxic ingredients has been introduced and seconded in parliament. In addition, member companies of the Canadian Consumer Specialty Products Association (CCSPA) have voluntarily agreed to begin disclosing ingredients they use in their cleaning products by January 1, 2010. However, companies have not agreed to reveal the ingredients in fragrance, dyes or preservatives. Of the five companies reviewed in this report card, only Sunshine Makers, Inc./Simple Green is not a member of the CCSPA.

#### METHODOLOGY FOR THE RATINGS FOUND IN THIS REPORT CARD

#### **GRADING SCALES:**

For each section of criteria described below (i.e. Product Ingredient Disclosure, Consumer Right-to-Know, etc.), a cumulative score was calculated. Each section had a maximum total of 25 points. A scale was created to compare companies on each criteria section.

Amazingly Clean = 21-25 points

Basically Clean = 16-20 points

Could Be Cleaner = 11-15 points

Dingy = 6-10 points

Filthy = 0-5 points

An overall score, which added the scores for each criteria section for each company, was also calculated. The maximum possible score was 100 points (4 x 25 points each). A scale was created to compare the companies on their overall grade.

Amazingly Clean = 81-100 points

Basically Clean = 61-80 points

Could Be Cleaner = 41-60 points

Dingy = 21-40 points

Filthy = 0-20 points

#### ADDITIONAL CORRESPONDENCE WITH COMPANIES LEADING TO SCORE ALTERATIONS

In August 2008, each company received a certified letter with a preview copy of its grades and an explanation of the methodology used to calculate those grades. Companies were given the opportunity to reply and provide new information about their products and policies, and to correct any information which they believed WVE held in error. WVE received responses from all five of the companies and made alterations to each company's grades where they were justified.

#### PRODUCT INGREDIENT DISCLOSURE CRITERIA

#### Company provides a list of all ingredients on all product labels

To confirm if a company's cleaning products included full ingredient listing\* on the labels, WVE conducted informal shelf surveys in grocery stores throughout the spring of 2008. Full credit (10 points) was awarded if the company fully listed ingredients on the labels for all of its products.

#### Company provides a list of all ingredients for individual products on their website

To verify if a company's cleaning products included full ingredient listing on a website, WVE staff conducted website searches in May and June 2008. Full credit (5 points) was awarded if the company fully listed ingredients on the website for all of its products.

### Company provides Material Safety Data Sheets (MSDS) for household products on their website

WVE conducted website searches in May 2007 and again in May 2008 for MSDSs on each company's website. Points were awarded if MSDSs for all products were readily available to download from the website.

<sup>\*</sup> Full ingredient listing is defined as disclosure of all ingredients, regardless of concentration, used in the product. This includes preservatives, dyes and fragrances, and the constituents therein. The ingredients also must be listed by a uniquely identifiable chemical name, not by ambiguous functional descriptors such as "plant-based cleaning agent," "preservative" or "fragrance."

#### Company follows labeling laws required by the European Union

For products sold in the European Union (EU), the EU Detergent Directive requires manufacturers to disclose all ingredients (except fragrances) on a website. The labels of these products must also list certain allergens identified by the EU. To confirm this, WVE staff conducted website searches for the products sold by each company in Europe, and looked for ingredient listings. We were unable to confirm if product labels contained allergen listings. Points were awarded if we located a webpage where ingredient listings for products sold in Europe could be accessed.

#### RESPONSIVENESS TO CONSUMER RIGHT-TO-KNOW CRITERIA

#### Company responded to WVE's correspondence

In June 2007, WVE sent letters by certified mail to all five companies. The letter contained a survey asking about willingness to provide full disclosure, and included a request for full ingredient labeling and removal of toxic ingredients. A follow-up letter was also sent to non-responding companies in September 2007. Points were awarded in this category if the company responded to either letter.

### <u>Company has acknowledged that consumers want to know what is in their products through a statement on their website or via WVE correspondence</u>

WVE reviewed all correspondence we received from the company in 2007 or 2008 which acknowledged consumer interest in ingredient disclosure. WVE staff also reviewed company websites in May 2008 for additional documents such as annual reports, sustainability reports or other materials looking for similar acknowledgment language. Points were awarded if acknowledgment was indicated in any of these materials, demonstrating an awareness of this consumer issue.

### Company has taken steps to address these concerns by developing a formal policy

WVE reviewed all correspondence we received from the company in 2007 or 2008 indicating a formal policy on ingredient disclosure. WVE staff also reviewed company websites in May 2008 for additional documents such as annual reports, sustainability reports or other materials looking for documentation of a formal policy on disclosure. Points were awarded if a formal policy was discussed or disclosed in correspondence, or on the company's website.



### Chemicals in the Marketplace

Of the estimated 85,000 chemicals in the U.S. marketplace, only a small fraction have ever been tested for their chronic impacts to human health.

While Europe has banned 1,100 chemicals from use in products, the U.S. has banned fewer than 10.

### The formal policy reveals ingredient information beyond compliance with the law

WVE reviewed all correspondence we received from the company in 2007 or 2008 indicating a formal policy on ingredient disclosure. WVE staff also reviewed company websites in May 2008 for additional documents such as annual reports, sustainability reports or other materials looking for documentation of a formal policy on disclosure. WVE reviewed formal policies on ingredient disclosure to determine if the policy included disclosing ingredient information beyond mere compliance with the law. For example, ingredients that are registered pesticides (such as certain disinfectant chemicals) are the only class of chemicals required by federal law to be disclosed on a product label. Points were awarded only if the company's policy included greater disclosure than that required by law.

### If they do not already disclose, the company has expressed a willingness to provide full ingredient disclosure as indicated in their response to WVE correspondence

In June 2007, WVE sent letters by certified mail to all five companies. The letters contained a survey asking about willingness to provide full ingredient disclosure. A follow-up letter with the survey was also sent to non-responding companies in September 2007. Points were awarded in this category if the company responded affirmatively that they were willing to disclose ingredients in the future.

#### TOXIC CHEMICALS SCREENING PROCESS CRITERA

### The company follows the precautionary principle (defined as a preventative approach despite scientific uncertainty)

WVE reviewed all correspondence received from the company in 2007 or 2008 indicating an adherence to the precautionary principle. WVE staff also reviewed the company's website in May 2008 for additional documents such as annual reports, sustainability reports or other materials looking for documentation of the use of the precautionary principle in the company's policies. Points were awarded if the precautionary principle was mentioned in any of these materials as a guiding value held by the company.

#### The company uses an internal screening process for all of its products

WVE conducted research on the company's website in May 2008 looking for mention of an internal toxic chemical screening process. An internal process is one developed by the company and used only by that company on its own products, without any third-party oversight. Full credit (5 points) was awarded if an internal toxic chemical screening process was identified and applied to all of the company's products. Partial credit (2.5 points) was awarded if an internal toxic chemical screening process was applied to only some of the company's products.

#### The company uses an external screening process for all of its products

WVE searched the company's website in May 2008 looking for mention of an external toxic chemical screening process or other third party eco-label certification. WVE also searched the websites of three well-known eco-labels: GreenSeal, EcoLogo and Environmental Protection Agency's Design for the Environment program. An external process or eco-label is a process or label developed by a neutral third party not associated with the company that provides criteria for screening chemicals used in products. Full credit (5 points) was awarded if an external toxic chemical screening process or eco-label was identified as applicable to all of the company's products. Partial credit (2.5 points) was awarded if an external toxic chemical screening process was applied to only some of the company's products.

### The company's chemical screening process excludes use of certain chemicals that may be harmful

WVE reviewed each company's chemical screening process (internal or external) and determined if the process contained provisions that excluded a list of harmful chemicals. Points were awarded if WVE identified specific chemicals of concern or classes of chemicals (i.e. known carcinogens) that would be screened out by the process.

#### The company publishes information about its chemical screening process on their website

Transparency of a company's screening process is important in assuring the credibility of the program. WVE reviewed company websites in May and June 2008 looking for language which clearly spelled out the chemical screening process used for their products. Points were awarded if the chemical screening process was explained clearly on the website. Points were also awarded if the company utilized an external eco-label or screening process that clearly explained its criteria on the website.

#### TOXIC CHEMICALS IN PRODUCTS CRITERA

# Company's products DO NOT CONTAIN chemicals of concern cited in WVE's report Household Hazards (monoethanolamine, glycol ethers, ammonium quaternary compounds, alkyl phenol ethoxylates)

Points were awarded if the company had no products listed in the appendix of the *Household Hazards* report published in July 2007. The report listed products that contained chemicals of concern as reported on MSDSs available on the company's website in May 2007. (See www.womenandenvironment.org to download a copy of *Household Hazards* for more details and Chemical Abstract Service (CAS) numbers for the chemicals of concern.)

#### Company has reduced the number of products it sells that contain chemicals of concern

WVE reviewed the MSDSs available on the company's website in May and June 2008, many of which had been revised since *Household Hazards* was published in 2007. In addition, we reviewed the company's marketing webpages for products listed in *Household Hazards* that had been discontinued since the previous year, as well as the MSDSs of all new products introduced in the last year. We compared the number of products previously listed in *Household Hazards* with the number of products sold in 2008 that still contained chemicals of concern listed above. From this comparison we calculated the percent reduction in products over the last year that contain these chemicals. Points were awarded on the following scale depending on the extent of the reduction in products containing these chemicals.

0%	reduction of products that contain the above chemicals	0 points
1-19%	reduction of products that contain the above chemicals	3 points
20-39%	reduction of products that contain the above chemicals	6 points
40-59%	reduction of products that contain the above chemicals	9 points
60-79%	reduction of products that contain the above chemicals	12 points
80-100%	reduction of products that contain the above chemicals	15 points

### Company has developed a "green" line of products, which demonstrates a willingness to use less toxic chemicals in their products.

WVE reviewed the marketing materials on the company's website in May through July 2008 to determine if a "green" line of products was being manufactured. WVE also reviewed the MSDSs of the "green" line products to ascertain that none of these products contained the chemicals of concern listed in *Household Hazards*. Aside from this review, WVE did not undertake any further analysis of the "green" line products to determine their safety or efficacy. Points were awarded if a company was manufacturing a "green" line of products that did not contain chemicals of concern listed.

#### Company Websites with available MSDSs:

http://www.thecloroxcompany.com/products/msds/index.html

http://www.scjohnson.com/msds us ca/default en.asp

http://www.simplegreen.com/products\_msds.php)

http://msds.reckittprofessional.com/customer\_services/msds/product/index.xml

http://www.pq.com/company/our\_commitment/msds/fabric\_home.jhtml

#### Company Websites Disclosing Ingredients in EU-Sold Products

http://www.sciproducts.info/ngcontent.cfm?a id=2699&country id=2

http://www.rbeuroinfo.com/

http://www.scienceinthebox.com/info-pq/index.html

http://www.simplegreen.ch/page.php?product=1

# WOMEN'S VOICES FOR THE EARTH (WVE)

Women's Voices for the Earth (WVE) is a national organization that engages women to advocate for the right to live in a healthy environment.



Women across the country are learning how to make their own cleaners with safe ingredients using WVE's Green Cleaning Party Kit. Visit www.womenandenvironment.org to learn more or to donate.

SUPPORT WE AND JOIN A GROWING COMMUNITY OF WOMEN WHO ARE CALLING FOR CHANGE.

VISIT WWW.WOMENANDENVIRONMENT.ORG TO TAKE ACTION!

