

April 24, 2023

Federal Trade Commission
Office of the Secretary
Bureau of Consumer Protection
600 Pennsylvania Avenue
Washington, DC 20580

RE: Green Guides Review, Matter No. P954501

The Independent Beauty Association (IBA), a non-profit trade association representing roughly 600 entrepreneurial companies across North America, respectfully submits the following comments in response to the Commission's review and request of the Federal Trade Commission's (FTC's) Green Guides for public comment as published in the Federal Register December 20, 2022.

IBA was founded in 1974 with the mission to foster the success of entrepreneurial companies in the independent cosmetic and personal care industries. Our membership represents a broad cross-section of the indie beauty industry including raw material and packaging suppliers, finished product manufacturers, brands, and retailers, as well as providers of essential services such as legal, regulatory, technical, export and business advice.

IBA supports updating the Green Guides, as a common understanding of environmental marketing terminology is fundamental for consumers, brands, investors, and regulators. Truthful and substantiated claims help to avoid "greenwashing," and IBA applauds the FTC for ensuring that the Green Guides are updated to reflect evolving scientific understanding, innovation, and consumer perception in this area. IBA provides the following commentary for consideration as the Green Guides are being reviewed and updated:

IBA encourages the Commission to consider opportunities to harmonize the Green Guides with other international laws, regulations, and standards. Many IBA member companies participate in a global marketplace through their brands, supply chains, and services and must comply with laws and requirements in multiple jurisdictions in the U.S. and abroad.

IBA urges the Commission to consider approaches that help ensure a level playing field where emerging brands and businesses may innovate—and thrive—alongside their largest competitors. For entrepreneurial companies and emerging brands, the lack of consistent standards, definitions, and/or substantiation comes with a variety of risks and liabilities. Additional costs associated with more rigorous substantiation requirements are often very challenging for small businesses; however, agreed-upon norms, practices, and guidelines are very important in establishing consistency, transparency, and credibility across the industry.

IBA highly recommends the Commission consider a more frequent and regular update schedule to keep pace with industry innovation, the speed of technology, and the reach of social media, as the last update to the Guides was over a decade ago.

Providing more clarity on specific industry-relevant definitions and substantiation would help companies understand the requirements for claims language and drive more consistency and transparency for consumers.

Many IBA members are highly involved in driving sustainable practices throughout their companies and communities. They use green claims in their business and customer dealings, and sustainability is part of many brands' foundational business proposition. However, while many beauty companies are familiar with the Green Guides, the degree of understanding and complexity varies widely across the industry, and may or may not be consistent with other industry sectors. Below are examples of claim language relevant to the beauty industry that could use clearer guidance, based on member company input.

General Marketing Language	Specific Language	Waste Management Language
Sustainable	Life Cycle Assessment (LCA)	Compostable
Green	Carbon Footprint	Degradable
Natural/Nature-derived	Carbon Offset/ Carbon Neutral/Negative/Positive	Recyclable/Recycled
Renewable	Reef Safe/Reef-Friendly	Upcycled/Downcycled
Clean [Beauty/Ingredients]	Bioplastic	Plastic Free/Plastic Negative
Blue [Beauty]	Plant-based/Plant-derived	Circular
Eco-friendly/Environmentally-friendly		Net Zero/Zero Waste

IBA is grateful for the forum to submit these comments on the Green Guides and welcomes the opportunity to engage FTC further to provide additional context and perspective on ensuring consistent, truthful, and fact-based information regarding environmental claims in the beauty industry.

Respectfully submitted,



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Independent Beauty Association