

Cruelty Free Cosmetics:

Bridging the Gap for Conscious Consumers


*How Online Influencers and Salon Owners Can
Educate, Inform & Encourage the Public When Brands Cannot*

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I. MY WHY

When choosing a topic for my Master's in Advertising and Brand Responsibility program project, I reflected on the pillars of brand responsibility: authenticity; empathy; courage; resilience; and commitment to social good. After one year of studying how brands, companies and organizations should abide to these values and morals, I have continued to evaluate if the ones that I use on a daily basis adhere to these standards.

I soon realized that I had an overall lack of knowledge and understanding of responsible and ethical cosmetic brands. As someone who often places convenience and a low cost over other defining factors when buying cosmetic products, my goal was to empower myself to make smarter decisions on where I put my money and trust.

II. IMPORTANCE OF THIS TOPIC

The purpose of this report is to provide others with the correct information on what animal testing looks like in the cosmetics industry, what safe alternatives should be used by brands and what it truly means if a brand labels itself as "cruelty free." Through my research, I discovered that because there is no consistent legal definition in place regarding "cruelty free cosmetics," brands have the ability to use propaganda and misinformation to influence consumers into buying their "ethical" products. While consumers are looking to become more conscious, they subsequently trust brands that may seem authentic on the surface. This report examines how other gatekeepers for the cosmetics industry could create more authentic platforms to communicate with the public compared to a brand itself. Online influencers and salon owners can educate,

inform and encourage conscious consumers when brands ultimately cannot, as they often place profit above purpose.

The second deliverable to this terminal project is a infographic for online influencers and salon owners. This deliverables communicates how they are in a unique position to help bridge the gap for conscious consumers who are looking for more information about cruelty free cosmetics, but are either weary or confused by the propaganda brands use to appear ethical regarding their treatment and testing on animals.

III. GUIDING RESEARCH QUESTIONS

This paper is centered around the following guiding research questions...

Can the cosmetic industry ever truly be responsible?

Who are the gatekeepers that can communicate accurate information to the public on behalf of the cosmetic industry?

Throughout its past, the cosmetic industry has had a variety of issues around a variety of ethical and environmental issues. More specifically, the cosmetic industry has faced extreme backlash due to factors that include the use of animal testing and unethical supply chains (Yang, 2019). With little to no change, many wonders if this

lucrative industry can ever be responsible, especially for authentic reasons. While the products that comprise this industry vary, as they range from facial makeup, creams and lotions to nail polish and shampoo, they are all either tested on animals or contain animal byproducts. Without a legal guideline on animal testing, countries and even states are forced to create their own rules and regulations. Pair this lack of consistent regulation with no clear legal definition of what “cruelty free cosmetics” are, and consumers may feel overwhelmed and unaware of what they are buying from brands.

This idea of brand resistance is driven by common loopholes that brands can use, rather than investing time, money and energy into changing its habits. These loopholes allow companies to cover up their unethical testing on animals by paying other companies to test its products and ingredients on animals, using unofficial logos or stating that it is required by law (Ethical Elephant). While brands may not be willing to invest time and money in animal testing alternatives or clarity for its consumers, there are other gatekeepers for the industry who may be able to help. In the end, brands must be diligent in research, changing protocols and assuring all consumers that its products are “cruelty free,” meaning that animal testing cannot be used. But gatekeepers such as online influencers and salon owners can be proactive about educating, informing and encouraging conscious consumers who are seeking more visibility for ethical brands to use in their daily routines.



SECTION ONE

BACKGROUND OF INDUSTRY & TESTING

IV. BACKGROUND OF COSMETIC INDUSTRY

a. Worth and Industry Leaders

As defined by the U.S. Food, Drug and Cosmetic Act, cosmetics are "...articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body...for cleansing, beautifying, promoting attractiveness, or altering appearance" (Cohen, P.21). These products may include items for skincare, haircare, or oral cosmetics. Additionally, it encompasses makeup, perfumes, toiletries and deodorants. With a wide array of products all used for various purposes, the cosmetic industry has become one of the most profitable industries. In 2018 specifically, the U.S. was considered to be the most valuable beauty and personal care market globally, generating over \$89 billion dollars that year alone (Ridder, 2021). Of these products, eye cosmetics such as mascara were found to be the most profitable segment. Aside from the eye cosmetics segment, the lip cosmetics category was another highly profitable area, making \$647.31 million dollars in revenue (Ridder, 2021).

The cosmetics industry is comprised of several multinational corporations that dominate the market. These major leaders include Estee Lauder Companies; L'Oréal; Unilever; Proctor & Gamble; Shiseido; Johnson & Johnson; Coty. Although there are hundreds of cosmetics brands, these seven conglomerates own the vast majority of the other brands consumers use daily. In all, these seven leaders own more than 182 other brands (Willett-Wei & Gould, 2017). This breakdown can be seen in the Table One below:

[Table One - The Seven Multinational Corporations in the Cosmetic Industry](#)

Johnson & Johnson	L'Oreal	Shiseido
<ul style="list-style-type: none"> • Clean & Clear • Neutrogena • Aveeno 	<ul style="list-style-type: none"> • Redken • NYX • Essie 	<ul style="list-style-type: none"> • NARS • Benefique • Bare Minerals

Estee Lauder Companies	Unilever	Procter & Gamble	Coty
<ul style="list-style-type: none"> • Lab Series • MAC • DKNY 	<ul style="list-style-type: none"> • Dove • AXE • St. Ives 	<ul style="list-style-type: none"> • Gillette • Head & Shoulders • Olay 	<ul style="list-style-type: none"> • Sally Hansen • OPI • Covergirl

b. Laws Surrounding the Industry

In the United States, the Animal Welfare Act (AWA) of 1966 regulates and enforces animal testing. Typically, in the U.S. animal testing, such as skin and eye irritation tests, force-feeding tests and a lethal dose test, is determined state by state. For example, in 2020, California, Nevada and Illinois banned the sale or import of animal-tested cosmetics after January 1 (Price, 2020). Hawaii, Maryland, New Jersey,

New York and Virginia have also recently introduced regulation around animal testing. While states have led this movement against animal testing, a national ban has yet to be enacted. Since 2014, a bill has been sitting idle in front of Congress on a national ban against animal testing.

Internationally, animal tested cosmetics are already banned in certain countries. In 2013, the European Union banned animal testing on cosmetics and on selling cosmetics that were tested on animals. India, Israel Norway, Iceland and Switzerland soon followed this EU movement. Other areas that have limited animal testing include Australia, Colombia, Guatemala, New Zealand, South Korea, Taiwan, Turkey and states in Brazil. On the contrary, other countries have had long histories in requiring animal testing. For example, China required animal testing until recently. In 2014, China allowed companies creating “ordinary cosmetics” to avoid animal tests for products manufactured and sold internally. These “ordinary” cosmetics may include shampoo or mascara (Humane Society of the United States, 2021). It was not until this year that China stopped mandating testing for imported products. As of May 1 2021, the National Medical Products Administration (NMPA) has allowed international companies to avoid mandatory animal testing if they prove its country-of-origin, that the product is not for children and that the product does not have raw materials that are not on the areas approved raw materials list (Enjoli, 2021).

V. KEY REGULATIONS & ORGANIZATIONS

Below are key organizations and regulations surrounding animal testing. While this is not a comprehensive list, it shows what groups of individuals are responsible for many of the national and international laws that exist around animal testing.

LAWS

- **The Animal Welfare Act (AWA):**
 - Animal Welfare Act of 1966 was signed into law on August 24, 1966. This act regulates the use of animals, specifically mammals, in testing in the United States. It was created to provide a baseline of care and treatment for animals used in testing, while ensuring that research and experimentation can occur. The U.S. Department of Agriculture (USDA) and the Animal and Plant Health Inspection Service (APHIS) enforce this act. Other species and animals such as birds, rats and mice became included in a larger group of protected animals in the 2002 Farm Security Act.

- **Policy on Humane Care and Use of Laboratory Animals from the Public Health Service (PHS):**
 - The 2015 updated reprint was recently updated from its 2002 version. According to the website for OLAW, which provides information on this policy, some principles that should be considered when government agencies revise standards for testing, research or training in regards to vertebrate animals include but are not limited to: the transportation and care of animals must comply with the Animal Welfare Act; procedures with animals should be for the good of society and health; animals selected

should be the appropriate species and the minimum number required; distress and pain are avoided or minimized; appropriate medication is given to animals to relieve pain during procedures.

FEDERAL ORGANIZATIONS

- The Food and Drug Administration (FDA):
 - The Food and Drug Administration is a federal agency that began on June 30, 1906. It ensures public health by monitoring various products in the United States, including veterinary drugs, biological products, medical devices, food supply, and cosmetics. According to its website, in 1997 the FDA formed the Interagency Coordinating Committee on the Validation of Alternative Methods with thirteen other Federal agencies. The website also states that this committee coordinates the “development, validation, acceptance, and harmonization of alternative toxicological test methods throughout the U.S. Federal Government.”
- Institutional Animal Care and Use Committee (IACUC):
 - Institutional Animal Care and Use Committee (IACUC) regulates companies and institutions that are required to meet the animal welfare standards set by AWA. Institutions that conduct these types of tests have an IACUC, which must have at least three members and meet a list of qualifications, which reports to the NIH Office of Laboratory Animal Welfare (OLAW).

PRIVATE ORGANIZATIONS

- Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC)
 - This private, nonprofit organization is known as the highest standard for organizations that use animals in research and testing. This accreditation program evaluates institutions every three years and encompasses internal review processes.

VI. BACKGROUND OF ANIMAL TESTING

a. Types of Animal Tests and Definitions

Five common animal tests are used regularly in this industry. Often, these tests which may include skin and eye irritation tests, force-feeding and lethal dose tests are performed without animal consent and without pain relief for these animals (Humane Society of the United States, 2021). Serious side effects and illnesses may come about, such as seizures and paralysis. It is not rare that animals are left dead at the end of these experiments either. Animals that are often used in these studies include bunnies, rats or mice. For example, "In carcinogenicity tests, rats and mice are exposed to substances daily for up to two years to see if they develop tumors; reproductive toxicity test involves daily exposure of pregnant rats and up to two generation of pups, often by force-feeding" (Cohen, P.19). A description of the five common animal tests can be seen outlined below.

- Test One: Toxicokinetic
 - Toxicokinetic testing is used to determine the endpoint for a substance or chemical that penetrates the body, such as cosmetic ingredients.

Exposure may be from dermal, oral or inhalation. For animals used, death may be the endpoint.

- Test Two: Skin Sensitization

- Skin sensitization tests evaluate the endpoint of a chemical at which it creates an allergic response or skin allergy, such as guinea pig tests. Skin damage or irritation are likely results for the animals used.

- Test Three: Repeated Dose Toxicity

- Repeated dose toxicity examines the effects of frequent exposure. This chronic exposure may have effects on the lifespan or overall health of the experimented animal. Animals suffer from force-feeding and side effects from the toxic chemicals they are exposed to.

- Test Four: Carcinogenicity

- Carcinogenesis is a complex process that is characterized by a sequence of stages and biological interactions. It may test devices or materials on or by exposure to a test animal. These carcinogens may cause cancer and damage to cell DNA in animals.

- Test Five: Reproductive Toxicity

- Reproductive toxicity tests gain information on how various aspects play into the male and female fertility processes and reproductive cycles. Animals are typically killed when these studies are over to allow their bodies and organs to be further studied.

SECTION TWO

CRUELTY FREE COSMETICS &
TESTING ALTERNATIVES

VII. DEFINING CRUELTY FREE COSMETICS

As previously mentioned, the FDA defines cosmetics as "...articles intended to be applied to the human body for cleansing, beautifying, promoting attractiveness or altering the appearance without affecting the body's structure or functions" (Humane Society of the United States, 2021). While there is a clear definition of what cosmetics include, there is no single or legal definition of what "cruelty free" cosmetics are.

According to Mintel Global New Products Database (GNPD), the term "cruelty free" is the most often used claim in new cosmetics. The GNPD shows that increasing numbers of companies are launching ethical cosmetic and skincare lines" (Sheehan & Lee, P.11). This is extremely problem some as a lack of consistency and clarity is provided to the public. Ultimately, various countries can define cruelty free cosmetics products by various standards, allowing brands to market themselves as "cruelty free" regardless of what animal testing or animal byproducts are used.

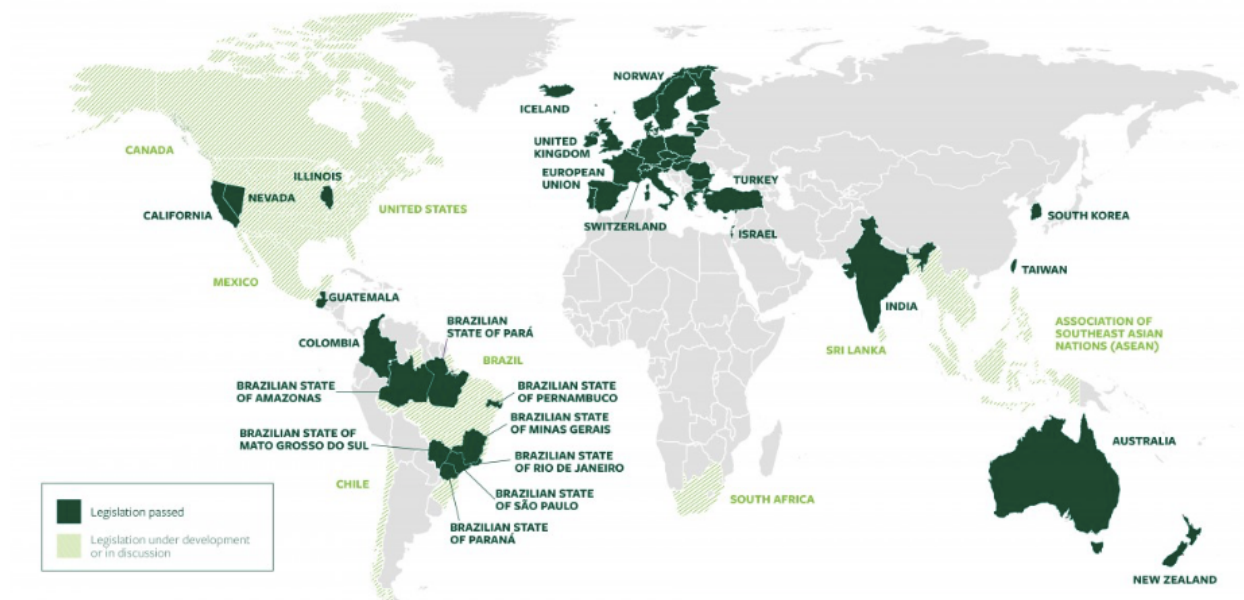
a. Cruelty Free Campaigns

Certification systems, campaigns and training programs have been influential in the progression of cruelty free cosmetics. All three draw focus to the movement and provide clarity to many consumers. By example, certification systems have been created to give brands, companies and organizations a baseline of ethical guidelines to follow. One such certification system is the Fair-Trade Labeling Organization (FLO), which was founded in 1997. This nonprofit provides brands standards of what ethical working and living conditions should be met for farmers and workers.

To continue, the "Be Cruel-Free Australia" campaign was a relatively recent push in the world of cruelty free cosmetics. In this campaign, the Humane Society

International and its Animal-Free Safety Assessment Collaboration partners created a training program to aid companies and government entities in understanding and eliminating animal testing. "...The Be Cruelty-Free Campaign is leading the charge to ban cosmetics animal testing worldwide by engaging consumers and companies, rewriting laws, and advancing the science of safety testing....the campaign also partners with bloggers who search out cruelty-free cosmetics and personal care products, doing intensive detective work on manufacturers before making recommendations" (Cohen, P.23). The campaign also identified which countries have passed legislation and which ones still are waiting on pending bills, as seen in the map below. This map is especially useful in applying pressure to countries that have had legislation in front of government entities with little or no official action. By creating these standards, companies and brands can be given a fair trademark, indicating to conscious consumers its transparent practices (Wang, Zhao & Song, 2020). The campaign became popular as it works with bloggers to post about cruelty-free cosmetics and care products, giving consumers a personal feel into how they may be able to adopt this in their own lives. Areas with current and pending legislation can be seen below in Figure One:

Figure One - Current and Pending Legislation



**Courtesy of the Humane Society*

b. Cruelty Free Versus Vegan Cosmetics

Since the FDA has been slow to define cruelty free cosmetics, many consumers have turned to “vegan-friendly” or “vegan” alternatives when looking at brands. Vegan cosmetic products are ethical as they do not contain animal byproducts or use animals in manufacturing. More specifically, the vegan market has grown exponentially in recent years. “In 2017, Grand View Research says the global vegan cosmetics market size was worth an estimated \$12.9 billion...” (InVitro International, 2019). One of the largest markets in the world for these particular kinds of products is the United Kingdom. In 2018, Marketing Week reported that vegan beauty products in the UK grew 38 percent, with more than half of all Brits now opting for vegan-centric purchasing behaviors (InVitro International, 2019).

Gen-Z individuals and millennials have placed more of an emphasis on factors such as sustainability and social responsibility when purchasing from brands. In a recent study, 87% of millennials believe brands have a responsibility in addressing social and environmental issues (Best & Mitchell, 2018). They too focus on ethical lifestyle choices and cruelty free products. Recently, it was estimated that about 12% of millennials describe themselves as vegetarians or vegans (InVitro International, 2019).

c. Why Consumers are Demanding Cruelty Free Cosmetics

Consumers, whether it be millennials, Gen-Z individuals or members of other generations, are becoming increasingly more conscious about where they invest their money and trust. They are not only looking at purchasing factors such as price or availability. They are also taking into considering if the brand is taking courageous actions around authentic causes, like animal testing. Current day consumers have adopted “ethical consumption” tendencies to bridge the gap between morals and practices (Sheehan & Lee, P.6). More specifically, ethical consumption is defined as, “The intentional purchase of products and services that the customer considers to be ethically produced” (Sheehan & Lee, P.6). For example, this may include a conscious consumer utilizing positive buying methods, which is done through opting for products that meet higher standards and certifications of sustainability and ethical practices. Additionally, consumers may boycott an unethical brand that does not align with one’s own values or ideas by no longer financially investing in that brand. Other forms of ethical consumption include: fully screened purchasing; relationship purchasing; and anti-consumerism.

d. Conscious Consumer Cloudiness

As previously mentioned, brands can market their products as cruelty free without meeting a legal definition or standard. While consumers may believe that a brand is being conscious by researching products that are supposedly good for the environment and for animals, they may be left confused by tricks and lies. While this is not to say that all brands that market itself as cruelty free are doing so only for material gain, many may be using performative action and marketing ploys to appear more ethical than they truly are.

Brands may be able to market its products as cruelty free without truly caring for animals in a number of different ways, which include:

- Misconception One: Hiring Other Companies to Test
 - Outside firms may be paid to test cosmetic brand products and ingredients on animals.
- Misconception Two: Using an Unofficial Logo
 - Brands may place an image or logo that a consumer would associate with a cruelty free brand or ethical brand on its product or shipping material. This can be better explained by the concept of “heuristic processing.” “...heuristic processing can result in a halo effect where a simple cue leads consumers to generalize that the product is more favorable in areas not addressed by the cue. For example, Roe, Levy and Derby and Andrews, Burton and Kess found that products with a simple nutritional symbol on the package... led consumers to develop positive attitudes regarding other nutritional values that were not addressed on the symbol” (Sheehan & Lee, P.7).

- Misconception Three: Using Ingredients Tested on Animals
 - Brands may fail to disclose that they test ingredients on animals or that these ingredients are animal byproducts.
- Misconception Three: Creating Its Own Definition
 - Without legal framework, there are no particulars on loopholes such as if brands can market itself as cruelty free, even if it has a history of testing on animals.
- Misconception Four: Claiming the Law Requires Animal Testing
 - With recent changes around animal testing in China, brands may still claim that animal testing is required globally.

These tricks and ploys can have an immense impact on the perception consumers have of a specific brand. Consumers may be more invested in a brand that cruelty free, and willing to pay more for its product. Ultimately this benefits the brand by increasing their sales. Additionally, consumers may even be willing to recommend the brand to others via word of mouth or post about it on their online platforms or social media channels, giving the brand new customers. Once consumers have this positive association with a product, then they are extremely likely to have a positive association with that brand as a whole. In a study by the Coalition of Consumer Information on Cosmetics (CCIC), a group that investigates animal testing by personal care product manufacturers, it was discovered that that over two-thirds of a 1,000 person sample either agreed or strongly agreed that companies should not test consumer products like cosmetics and dish detergent on animals (Sheehan & Lee, P.11). Table Two below

further demonstrates the five bulleted loopholes that brands may use to market itself as cruelty free, when it is not:

Table Two - Myths and Loopholes Around Cruelty Free Cosmetics

<i>Misconception</i>	<i>Truth</i>
“We don’t test on animals.”	<i>Aka...we hire others to do it.</i>
“Our logo is a certified bunny logo.”	<i>Aka...a cute bunny sells more.</i>
“Our end product was never tested on animals.”	<i>Aka...an ingredient may have been.</i>
“Yes, we are truly cruelty free.”	<i>Aka...there is actually no legal definition.</i>
“We do not test on animals except when it is required by the law.”	<i>Aka...we care more about money.</i>

**Courtesy of Ethical Elephant*

VIII. ALTERNATIVES TO ANIMAL TESTING

a. Alternative Methods

The cosmetic industry has a wide range of alternatives to animal tests that it could use. One option is using human cell cultures or lab grown human tissue. Additionally, completely synthetic skin, such as MatTek’s EpiDerm, could be used to test cosmetic product reactions. Some brands that have used this technique include Avon, Unilever and Procter & Gamble (Price, 2020). To continue, in-vitro techniques

can be performed on donated samples or outside of living organisms, such as on a microscope. As well, computer models have the power to create various situations and simulations. Additionally, human volunteers, an alternative already used in the medical field, maybe utilized. While all of these options range in technology and price, they are all similar in that they do not inflict unnecessary pain, injury or death upon innocent animals. Aside from the options mentioned, there are nearly 50 non-animal tests alternatives currently being developed (Humane Society of the United States, 2021).

One brand that has been utilizing alternative testing methods is Biao Cosmetics, founded in 2012. Biao is a socially responsible company that uses natural and organic products and 100% post-consumer recycled packaging. It also uses animal testing alternatives such as in-vitro cell testing, which means that the test being performed in or on laboratory equipment such as a test tube rather than a living organism or animal. Another brand that uses cruelty free practices is Prai Beauty, founded in 1999 by animal philanthropist, Cathy Kangas. As a board member for the Humane Society of the United States, Kangas earned the Leaping Bunny seal for her company. Kangas says a survey following an early product launch found that the concept of being cruelty free mattered to 72% of all of its customers (Cohen, P.23).

b. CAMSEC Database

Created in Korea in 2013, the Consortium of Alternative Methods for Safety Evaluation of Cosmetics (CAMSEC) Database has been providing accessible and important about safe alternatives for animal testing. Registered users have an abundance of free and open data at their fingertips. Important safety information on animal testing alternatives involving in-vitro and in silico methods are published

frequently. Scientists explain its importance in the following quote, stating “...It is necessary to include various compounds as positive and negative controls to validate an in vitro test with the purpose of replacing an in vivo test and the results from in vivo animal tests are required for use as references. In addition, information on the physical and chemical properties of compounds is essential to effectively use in silico tools” (Seung Won Kim and Bae-Hwan Kim, 2016). Alternative methods listed on this site can replace animal tests typically used in the cosmetics industry, such as eye irritation tests, skin corrosion and irritation tests, skin sensitization tests and oral mucosal irritation tests. Since 2013, the site expanded to include information on over 396 substances, 18 alternative methods, 7 animal test methods and 38 functional categories, all available in various languages such as English and Korean (Kim & Kim, 2016). For easy navigation and a positive user experience, this information is divided into four separate categories: chemical information, alternative methods information, animal toxicology information and chemical efficacy information.

c. Arguments against Cruelty Free Cosmetics

The main theory that discounts the use of animal testing in the cosmetics industry is utilitarianism. In this theory, happiness of the majority is the single most important idea. In context of animal testing, the happiness of not only consumers should be considered, but also the animals who are having tests performed on them. By example, “Animals experimented in the cosmetics industry suffered great pain and did not get happiness, which means that the cosmetics industry goes against the morality of utilitarianism. Therefore, animal experiments conducted by the cosmetics industry are unethical” (Wang, Zhao & Song, P.112). The humans involved in this process have the

power to stop animal testing as it inflicts pain, harm and even death on these animals. Animals are ultimately not able to consent to these tests and they are able to feel, think, behave and experience pain similar to that of ourselves. Although animals are not the same as humans biologically, the wellbeing and the happiness of animals must be prioritized.

d. Arguments for Cruelty Free Cosmetics

On the other end of the spectrum, some justify the use of animals in testing because of the Kantian maxim theory. In essence, the cosmetic industry itself was founded completely on this theory in an effort to “protect the human race” (Wang, Zhao & Song, 2020). Even if the animals involved experience serious illness, injury or death, consumers are better off because of this process. This theory defends using animals to ultimately ensure safety for consumers who will use these cosmetic products on their lips, faces and eyes. Even the death of an animal in this process is seen as moral if it protects humans from potentially unseen, dangerous consequences.

IX. IMPORTANCE OF DEVELOPING AND ENFORCING CRUELTY FREE CERTIFICATES AND PRODUCT LABELS

With a variety of misleading tactics used by brands and a lack of a legal definition by the government, one emerging area that could help conscious consumers looking for truly ethical products is certificates and product labels. As mentioned earlier, many brands will place an animal, often a bunny, on its packaging or product to appear as though it is not tested on animals. In reality, the brand may test either ingredients or end products this way. Phrases that often accompany these product labels include

“...animal friendly, not tested on animals, and we never test on animals” (Cohen, P.20). This commonly altered product label stems from the Leaping Bunny seal. Beginning in 1996, the Coalition for Consumer Information on Cosmetics (CCIC) has given over 2175 brands Leaping Bunny Certificates. According to its website, companies earn this recognition by pledging to not use any new animal testing throughout its sourcing and production processes. Additionally, these companies must recommit to the program every year and submit audits to third party groups for proof of its ethical practices. Similarly, People for the Ethical Treatment of Animals (PETA) has its “Global Beauty Without Bunnies’ Program” which allows brands to pay a \$350 one-time licensing fee can use its certified logos. This indicates that the company or brand has banned animal testing and animal ingredients in all products. Common unofficial and official animal cruelty free logos can be seen below in Figure Two and Figure Three, with the Leaping Bunny Logo in the top left corner on the second photo.

Figure Two - Unofficial Cruelty Free Logos



Figure Three - Official Cruelty Free Logos



**Courtesy of Ethical Elephant*



SECTION THREE

ROLE OF INFLUENCERS & SALON OWNERS

X. WHY BRANDS ALONE CANNOT SOLVE THIS ETHICAL ISSUE

While some brands have taken the cruelty free cosmetics movement to heart, either by incorporating animal testing alternatives or earning certifications and product labels, others have taken advantage of using this term for inauthentic reasons. For example, some brands may do this to increase sales for itself and become a leader in the industry. Or, a brand may realize that conscious consumers are demanding brands to be better and feel as though it has to make surface level changes or market itself as cruelty free to compete with other brands. After all, these brands are for-profit companies. Marketing advertising and communications has helped brands do this, for example “The creation of public relations advisors has helped companies develop creative campaigns, including the use of propaganda. Consequently, companies have engulfed public relations campaigns with conscious capitalism, whether the company is a proponent of sustainability or not.” (Vachon, P.180). This practice of applying propaganda tactics to cruelty free cosmetics is very similar to brands that greenwash to appear as if they are concerned about sustainability. The idea that brands use propaganda to sell or market their products is centered around public perception of that brand. With propaganda, the source of the fact or statement said can be identified. But, if brands use disinformation, then this “secretly introduced” information can deceive the public, without identifying the source (Vachon, P.181). For example, if a brand has another source state that it is cruelty free, even though it hires a third party to conduct animal tests on its behalf, then consumers may not be able to trace this information to other sources.

More specifically, the use of propaganda and disinformation is heavily utilized by brands in language and messaging. Due to a lack of a legal definition for cruelty free cosmetics, brands may state on their website, social media platforms or products that there is no animal suffering, or no animal testing used in its process, but leave out aspects such as if its ingredients were tested on animals. This is extremely problematic as the public has varying ideas and levels of what pain and suffering means. For some, animal welfare may only concern if an animal were to be hurt or injured in the process of animal testing. For other cruelty free cosmetic advocates, they may look to see if a brand meets all of the “Five Freedoms” identified by the UK Farm Animal Welfare Council, which include a more holistic approach to the treatment of animals, taking into consideration aspects such as if the test animal is free from hunger, thirst and fear (Negowetti, P.135). For example, “There are several reasons defining animal welfare for purposes of a labeling scheme is difficult. Animal welfare is a multi-dimensional concept that comprises physical and mental health, and aspects such as physical comfort, absence of hunger, diseases, and injuries. This multidimensional aspect makes it difficult to succinctly summarize what the phrase means, particularly on a package...” (Negowetti, P.136).

XI. ROLE OF INFLUENCERS AND SALON OWNERS

a. Bridging the Gap for Conscious Consumers

Although brands may not be the best ambassadors for cruelty free cosmetics for conscious consumers who are seeking ethical and safe products, other gatekeepers have the ability to educate and inform the public about this industry. The first group that

has the ability to provide information to conscious consumers are social influencers, specifically YouTube makeup artists. This group is in a particularly powerful position to do this due to the amount of visibility these individuals have. For example, in 2018, people watched on average more than a million beauty videos every day on YouTube (Jones & Gelbart, 2018). Some of the most famous beauty vloggers include Yuga at 21.4 million subscribers, Zoella at 12.1 million subscribers and Bethany Mota at 10.5 million subscribers (Jones & Gelbart, 2018). The second group that has an opportunity to help bridge this gap for conscious consumers who are disappointment or confused by brands use of misinformation while trying to find cruelty free cosmetic products are salon owners and staff. Every day, countless consumers trust salon stylists and artists for a number of services. Often, many salon customers will buy their personal cosmetic products directly from these individuals given their trust in them.

XII. RECOMMENDATIONS FOR ONLINE INFLUENCERS

a. Create Authentic Platforms

While posting to the public about cruelty free cosmetics, the main goal of online influencers should be to create authentic platforms that build trust and ensure transparency. These online influencers act as gatekeepers and third-part endorsements for brands who are in a unique position to shape public awareness and perception. Their content on social media platforms such as Instagram, Facebook, Twitter or YouTube allows them to monetize their following and promote ethical brands. Viewers place a sense of trust in them to act as trustworthy sources that are there to educate them.

In a case study centered around how influencers for Maybelline post and engage with content on social platforms, a number of characteristics were revealed which show traits of authenticity. These characteristics were most useful in creating and sustaining faith amongst the public. Mentioned below in Table Three are some of the most important traits viewers and social media users looked for:

Table Three - Traits of Authentic Online Influencers

<i>Characteristic</i>	<i>Explanation</i>
Reliability	<ul style="list-style-type: none"> -Friendly body language -Relaxed choice of words -Two-way dialogue
Knowledge	<ul style="list-style-type: none"> -Clear facts about products -Personal experiences with application of products -Insightful information about the industry as a whole
Helpfulness	<ul style="list-style-type: none"> -Various tutorial videos -Frequent how-to instructions
Articulation	<ul style="list-style-type: none"> -Creates a bridge between technicalities and conversation -Use of strong verbal skills
Confidence	<ul style="list-style-type: none"> -Portrays messages of confidence in and affinity for a brand (Ex: "love, best, or favorite")

**Courtesy of Kristen Forbes*

b. Aligning Values

In 2014, Kylie Jenner created Kylie Cosmetics, a line that does not test its ingredients, formulas or products on animals anywhere in the world. Kylie is not only a business leader in the cruelty free cosmetic industry, but she is also an online influencer herself. This places her in a unique position to be both be a figurehead of a recognizable cruelty free brand but also an online ambassador. After examining how she both markets her line and communicates with her followers, a number of useful tactics were identified to create authentic platforms, some of which align with the values mentioned in Table Three above. To establish “reliability” Kylie created an understanding about her audiences’ demographics and psychographics. She realized what content her following enjoyed seeing and what tone they related to. Regarding “knowledge” and “helpfulness” Kylie’s content is used to educate, inform and empower her followers on what is in each product, how to apply the products and what the product looks like. She is known to show swatches on her arm of products on social channels and during YouTube makeup videos. As an additional point, Kylie also partnering with the correct influencers that share aligning values, are courageous enough to take a stand on what they believe in and are students of what they are posting about. For example, Kylie has used beauty influencers and gurus like MakeupShayla and Nicol Concilio, who have a large following on both Instagram and YouTube (Talbot, 2018).

XIII. RECOMMENDATIONS FOR SALON OWNERS

a. Create Authentic Experiences

Similar to online influencers, salon owners should rely on clear and reliable marketing and messaging to educate and inform the public of this important topic. Salon owners can achieve this through a variety of platforms, including digital channels but also through their in-person experience. Customers of these salons often buy shampoo, conditioners, hair masks and makeup at in-store locations and through websites. They trust salon owners and staff to pick products that are worth the cost and customized for their personal needs. Rather than placing faith in someone who they may not know online, these owners and staff often have an existing customer relationship where they can be honest about what products they use both on their consumers and on themselves. Due to the momentum from these movement, cruelty free salons are even opening up in larger cities throughout the United States, giving customers a wholistic salon experience they can feel good about. Table Four and Table Five expresses various methods salon owners and staff can use to build an authentic digital platforms and in-person experiences for customers:

Table Four - Methods to Create Authentic Digital Platforms

<i>Method</i>	<i>Rationale</i>
Become visible on search result page	-Use key words to increase website traffic (Ex: "Leaping Bunny Certified" or "salon products with vegan ingredients")
Establish a website	-Websites with authentic and transparent information about products and practices can increase loyalty and trust

Run a newsletter or blog	-Blogs may offer additional information through hyperlinks on industry jargon or uncommon words (Ex: “Our products are tested through animal alternatives like in-vitro techniques”)
Use consistent social branding	-Social platforms can include key additional information about the salon’s background/work around cruelty free cosmetics in its bios (Ex: “NYC’s First Cruelty Free Salon” or “Cruelty Free Since 2002”)

*Courtesy of J. Hallberg

Table Five - Methods to Create Authentic In-Person Experiences

Method	Rationale
Tell your customers what products you use	-Cruelty free brands such as Biao Cosmetics should be used on customers and sold online
Give out product samples	-Product samples allow customers to try ethical products without having to pay for a new product
Start local partnerships	-Partnerships with local companies/brands that align with cruelty free values is an efficient way to reach new customers -These brands should hold similar or prestigious certifications for sustainable and ethical practices (Ex: B Corps)
Create a salon tour	-Virtual or in-person tours can explain the cruelty free products that are used and sold at the salon

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**Courtesy of J. Hallberg*

XIV. CONCLUSION

While it may seem as though animal testing is here to stay in the cosmetics industry based on its rich past, the cruelty free cosmetics movement offers a sense of optimism to consumers demanding change. The idea of avoiding animal testing may become a reality if brands are willing to invest time, money and energy into researching, developing and incorporating safe non-animal alternatives into its business models. They also have to be completely honest about animal byproducts and ingredients that are in its products. Additionally, brands must be transparent about its practices, such as if it pays other companies to test animals for it. Likewise, if key organizations and groups were to create global legislation and a concise definition around cruelty free cosmetics, then clarity can be provided to conscious consumers. Although there are arguments in favor of keeping animal testing, there are overwhelming arguments that point to eliminating animal testing by activists, consumers, scientists, researchers and other professionals. These reasons include facts such as that animals do not have the ability to consent, safe alternatives are available and injury or death to animals is avoidable.

Ultimately, if brands continue to use misinformation, disinformation or propaganda to hide or cover up what ingredients or animal tests it utilizes, then other gatekeepers to the cosmetic industry have the ability to educate, inform and encourage the public. More specifically, online influencers such as YouTube makeup artists are in a unique spot to provide accurate information to both new views and existing fans.

Authentic platforms can be created for these influencers through reliability, knowledge, helpfulness, articulation and confidence. Another group that has the opportunity to help consumers who are seeking to use ethical consumption is salon owners and staff.

Methods to creating authentic digital platforms may include blogs or newsletters informing customers of the cruelty free products used in-house. In addition, in-person experiences can empower consumers to change their habits, which include giving products out at appointments or salon events of cruelty free products. Together, these two gatekeepers and consumers who are committed to change can continue to better the landscape of the cosmetic industry, helping it become more ethical and responsible.

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