

ORGANIC BEAUTY IS ONLY SKIN DEEP

PERSONAL CARE PRODUCTS DO NOT YET COMPLY WITH THE NATIONAL ORGANIC PROGRAM - October 2002

BY LACEY PHILLABAUM

(with article interview/quotes from Joseph...below in blue)

While most organic producers may see beauty care as marginally related to their organic endeavors, the expansion of organic standards to cover the sector will have profound conceptual and regulatory implications for the whole organic industry.

Beauty care products are notoriously under-regulated. Any number of dangerous chemical and synthetic additives are used in their processing. The National Organic Program (NOP) has been vague about when and whether organic personal care products will be held to the same standards as organic foods. In the meantime, body care manufacturers have seized on the label "organic" as a marketing scheme, sometimes heralding a negligible amount of organic ingredients while their bottles are filled with the same synthetic chemicals.

Unwitting consumers pay premium prices for "organic" products under the misconception that they are materially different than the non-organic products on the shelf. New chemical scares and unverified claims about the health benefits of organic personal care products will continue to drive phenomenal sales growth.

Body care manufacturers have set out to develop their own standards for organic processing. Many insist that their products simply cannot be made in a manner compliant with existing organic standards and want to list hundreds of synthetic processing ingredients as allowable for organic personal care. Their draft standards have tended towards leniency in many regards.

Ultimately, the search for organic personal care standards may force the organic industry to define its outer bounds. If organic is a concept indicative of a lifestyle, organic personal care might be an important element. But if organic is a strict agricultural standard, large commercial processing of organic personal care products may not even be possible.

For now, organic personal care products making fraudulent claims, using toxic ingredients and, at the very least, misleadingly labeled will continue to crowd the shelves of natural food stores.

Conventional Beauty in America

The larger cosmetic industry increasingly looks to the organic niche as the newest in a long series of "innovations" that drive the market, constantly repackaging "hope in a bottle." North Americans spend \$154 per year per capita on cosmetics. The personal care industry in the US is about a \$30 billion a year business. Of the \$6.25

billion spent on cosmetics alone in this country in 2000, \$190 million was for natural and organic products.

The industry's hopes for eternal youth are validated by stunning 39 percent growth in the natural and organic cosmetic sector annually. In one survey conducted by Health, 83 percent of responding consumers indicated that they would rather use all natural body products, though more than half could not define "natural" or "organic."

The myth of beauty and veil of glamour shrouding the sophisticated world of international cosmetics is the stuff of teenage pulp romance, underlain by a global empire of Oz-like proportions, in legend. Liliane Bettencourt, the daughter of L'Oreal founder Eugene Schueller, is the richest person in Europe, with a fortune of \$20 billion. But many cosmetic companies have fallen prey to the global recession this past year. Estee Lauder posted a 22 percent drop in net profits in the first fiscal quarter of 2001, with its stock value 34 percent lower for the year. Revlon has suffered nine straight quarters of losses, and its stock is half of what it was a year ago. While these giant cosmetic brands may seem a far cry from natural and organic personal care products, they increasingly look to "organic" as a new marketing concept. Global giant Unilever launched its own organic shampoo in 2000 to much hue and cry. Twenty-year industry leader Aveda was bought by Estee Lauder in 1998.

Cosmetic houses feed on innovations; without them, the market stalls. The industry has no place to go but up. The demand for their products must be constantly remanufactured through "innovation." "One of the dilemmas facing the industry at the moment is that penetration of many product sectors is extremely high, leaving little scope for attracting new users," explains trade journal Soap, Perfumery and Cosmetics. "Brand loyalty is extremely strong for cosmetics and toiletries and new product development is the key to keeping customers sweet." The journal quotes the PR manager for European manufacturer, Mintel, asking, "How can we increase usage among European consumers? Do we change consumer perception or make the product more exciting so that they use more?" One database service for cosmetics logs 300 new products a day. "With penetration levels for many categories reaching an all-time high, companies need to explore different ways of attracting new users," says Soap, Perfumery and Cosmetics.

Many international manufacturers would very much like to subsume organic within the category of natural. They may not even realize they are different. "The natural trend now encompasses organic, food and aqua ingredients," writes Soap, Perfumery and Cosmetics. A study of the natural trend by business consultants Article 13 "revealed a new context for natural based on consumers' increasing awareness of healthy eating, keeping fit, looking after oneself and the benefits of 'me time.'" "Natural is a very rich theme, but it is changing very quickly," said Jane Fiona Cumming of Article 13.

The development of the "aqua" trend in cosmetics highlights the approach to conceptual marketing that the myth-making cosmetic industry would like to apply to organics. "Aqua is associated with moisture or moisturizing, and is not always restricted to cosmetics and toiletries," said Mintel's David Jago. The "aqua" product need only conjure hydrating images, not fulfill the association with hydration.

Lifestyle or Method?

But organic is neither concept, theme, nor marketing ploy. It is, first and foremost, an agricultural method. Unchecked, the proliferation of the organic beauty market could redefine organic into the language of body care, overwhelming organic agricultural products through sheer number of SKUs and revenue size. With just \$26 billion in global organic sales projected for this year, the entire trade is dwarfed by the \$30 billion US cosmetics market. In fact the entire US organic market is just larger than the wholesale market for cosmetic chemicals in the US, which themselves are just one small part of product formulations.

While organic advocates have lamented the shift from community to industry, a more important dialectic between lifestyle choice and agricultural method has been neglected. The tension on the line between the community and the industry has slipped unawares through the grasp of organic farmers and their advocates. Organic personal care manufacturing will benefit four big cosmetic chemical manufacturers unless rigorous processing standards are developed and enforced. Only by tying organic beauty care closely to the National Organic Program standards can the "lifestyle" marketed by the manufacturers represent the values at the core of organic agriculture.

Down at the Chemical Lab

The growth of the natural body care industry has not slowed the market for chemical additives for such products. In fact, the chemical companies expect to profit from the trend. "The incorporation of active ingredients, such as plant acids and enzymes, into toiletries and cosmetics has become a major force behind growth in an otherwise mature industry," according to a chemical industry analyst from the Freedonia Group. "These chemicals are sold primarily on the basis of performance rather than price, with demand driven by their substantial marketing value."

Dow Chemical is one of four big cosmetic chemical suppliers which cumulatively claim more than 25 percent of US cosmetic and toiletry chemical sales. They expect a five percent growth insales to \$5.6 billion this year. Another of the large chemical suppliers, Cognis, recently introduced plant extracts of three different purity levels for use in cosmetics. "We have observed increased demand for these natural products in the cosmetics market," a company spokeswoman said. The additional price premium to be gained by using certified organic crops for the extracts has not gone unnoticed. Even more profitably, these companies are eager to patent technology to solve the processing dilemmas of organic products.

Numbers quantifying the potential ingredient market for organic growers are harder to come by. Chemical Market Reporter noted the growth of the market for botanical extracts: "Botanical extracts, including herbals that double as food additives or nutritional supplements, are harvesting some of the fastest sales gains among cosmetic chemical products." "We have observed increased demand for these natural products in the cosmetics market," says Ute Griesback, leader of the botanicals

project at Cognis's care chemicals business. "Green tea, aloe vera, chamomile and red clover are the front runners in this area."

Body care manufacturers confirm that their use of organic ingredients has increased dramatically in recent years. Mark Egide says three years ago his company, Avalon, was buying "less than \$10,000 in certified organic. In 2002, we will spend a million dollars on certified organic ingredients." He sees that the demand for ingredients has helped build a market for organic botanicals and ultimately made the organic body care ideal more accessible. "Some of the key ingredients have come down in price significantly as our volumes have gone up dramatically. Our increase in price has taken care of itself somewhat."

[\(link to OCA's complaint against the industry's and Avalon's Fraudulent Claims\)](#)

Cosmetic Regulatory Failings

Teenage folklore holds that nail polish is sold in diminutive bottles because the stuff is so toxic it wouldn't be legal in a bigger one, not because nails are small. The folklore is right. The composition of many personal care products includes toxic, carcinogenic and endocrine-disrupting materials. The Food and Drug Administration (FDA) classifies cosmetics into 13 categories, but it does not regulate them. According to the FDA, "A cosmetic manufacturer may use any ingredient or raw material and market the final product without government approval." Seven toxins are banned, but many more known toxins and carcinogens are allowed in cosmetic formulations. Less than one percent of the FDA's budget is for skin care.

Some body care products, like antiperspirants and deodorants, are actually classified as over-the-counter drugs, not cosmetics, because they affect the function of the body. The health implications of body care products are numerous but, "The cosmetics industry is self regulated," says Gay Timmons, an organic inspector and broker. "As long as you don't kill anybody, you can formulate and produce a product."

A 1994 article in Science cites "reports on the discovery of toxic face powder in a 3,000-year-old tomb in a Mycenaean cemetery in Greece as proof that lead has been eroding European women's skin for at least the same period of time." Toxic makeup is nothing new, and at this rate, organic makeup doesn't look likely to be the end of it, as the same dangerous chemicals are allowed in organic personal care products. But recent cosmetic safety scares could be used to market organic personal care as a safer alternative.

The approximately six pounds of skin each human carries around is a porous membrane one-twentieth of an inch thick, through which numerous environmental toxins enter the body. Skin is a "more significant gateway for toxins into your body than what you eat," says organic personal care product manufacturer Diana Kaye of TerrEssentials. Traces of 700 different chemicals can be found in the body. Positive Health cites a study showing 500 chemicals present in a single fat cell of a healthy 30-year-old British female.

The National Institute of Occupational Safety and Health (NIOSH) found that 884 chemicals used in personal care products and cosmetics are known to be toxic. A Canadian study in Pediatric Drugs cites cosmetic and personal care products as the most common cause of unintentional poisonings of kids under six.

In July, three consumer protection groups released independent test results showing 52 of 72 consumer products like hair spray, perfume, nail polish, food wrap and medical supplies contained a dangerous class of endocrine-disrupting industrial solvents, called phthalates.

Phthalates are a softener mostly found in products like fragrances and nail polish and not in organic personal care products. But the media attention to phthalates prompted worried consumers to look for something safer. Other toxic chemicals are being used in organic personal care. One of the most common and notorious cosmetic toxins is sodium laurel sulfate. It has not been reviewed for organic processing yet may be in organically labeled body care products.

Another toxin used in organic personal care is methyl paraben. The majority of skin lotions and creams use methyl paraben as a preservative. In the past, worries over methyl paraben have centered on its low systemic toxicity, which can cause allergic reactions. Now methyl-, ethyl-, propyl- and butylparaben have been found to be weakly estrogenic. The European Union has asked the European industry trade group about the implications for breast cancer. While parabens are not potent estrogens, continuous topical exposure may pose a danger. In fact, because the liver metabolizes most ingested paraben, an article by Dr. Elizabeth Smith suggests you'd be better off drinking the stuff than regularly slathering it on your skin.

Health Claims

None of this stops consumers from looking to organic personal care products as a sop for worries about cosmetic materials. Numerous health claims are already being made on behalf of these products.

"Why poison your skin when you can use natural remedies free from toxic chemicals" asks Hilary Magazine, a web-based publication with some discrete and some not-so-discrete product endorsements peppered throughout. "Would you jeopardize your safety and the safety of your loved ones to save a mere couple of dollars by purchasing generic personal care products at a local drugstore? I hope not. I support and believe in all natural, organic personal care products (90-day money back guarantee). Discover for yourself!"

It is widely accepted in the industry that consumers buy organic beauty products under the illusion that the products are held to organic food standards. Despite this awareness, the word organic is used on the labels of products that do include toxic processing materials and which do not comply with the NOP.

"Customers may not realize that the organic label claims on nonfood products doesn't necessarily represent the same standards as they do on foods," acknowledged the organic trade publication Natural Food Merchandiser in March.

"Nowhere do the terms 'natural' and 'organic' take more of a bruising than in the cosmetic industry," according to New Vegetarian and Natural Health. "Most cosmetics companies utilizing the term 'organic' on their label are using the chemistry definition of organic-meaning a compound that contains carbon... By using this definition they could say that a toxic petrochemical preservative called methyl paraben is 'organic' because it was formed by leaves that rotted over thousands of years to become oil."

"Right now, it's really a free for all," says Kerin Franklin of Frontier Natural Brand, the manufacturer of the Aura Cacia line of personal care products.

But most organic advocates are hesitant to call a spade a spade. The network of certifiers, ingredient reviewers and consultants who monitor the marketplace on behalf of organic farmers and producers, after all, have a monetary interest in courting, not castigating, potential organic manufacturers. English organic certifier, the Soil Association, refers delicately to "a marketplace currently saturated with unverified claims" and many products with "unsubstantiated or questionable organic claims."

"There is a great deal of abuse in the supplement and personal care industry right now," says Gay Timmons, "well, not a great deal, but some. I think it is a problem for growers if the word organic doesn't maintain its meaning."

"No one wants to stand up to these folks," agrees Brian Baker, a materials reviewer for the Organic Materials Review Institute (OMRI). (OMRI does not have a policy on personal care products.) "Their products are full of synthetic ingredients that are prohibited. Cosmetics are not subject to the same scrutiny as food products."

Doesn't the NOP Already Take Care of This?

No one seems more confused about whether the National Organic Program regulates these products, or at least their organic claims, than the NOP.

Language in the preamble to the 1990 Organic Food Production Act, the NOP's authorizing legislation, says it is superceded by the Food, Drugs and Cosmetics Act, the authorizing legislation of the FDA. Until May of this year, both the organic and personal care industries assumed the NOP would not affect the products. But on May 5, the NOP released a statement that appears to claim these products fall under its scope. Since then, an industry driven lobbying campaign has pressured the NOP to back off. While no new public statement has been released by the NOP, the industry itself feels confident that it will not fall under the purview of the National Organic Program or be held accountable to the labeling laws come this October. Fortunately, a few manufacturers are working to bring their labels into compliance and a handful are releasing formulations meeting the materials requirements of the NOP.

"We here in the Department of Agriculture deal with food and other products. Personal care products, I would suggest that you check with the FDA," remarks NOP public affairs specialist George Chartier confidently. "I was talking to people higher up in the USDA just the other day and they were confirming that those products would not be covered."

Questioned about the NOP's May 5 statement, Chartier seems less sure, "I am almost certain that we are not involved with personal care. Let me just triple check... I'll call you back." The NOP statement reads, in part, "The regulations under the NOP apply to the following products, classes of products and production systems:... cosmetics, body care products..."

"I have researched the question of personal care products and the NOP and this is how it was explained to me," Chartier continues. "[The NOP] is not seeking at this time to focus the organic program on cosmetics. The Department of Agriculture focuses its energy on agricultural products. If a company wants to have the word 'organic' on its packaging it needs to find a certifying agent that is willing to work with the company."

Chartier seemed unaware that many such uncertified products making organic claims already exist.

Despite the NOP's confusion, the personal care sector believes it has exempted itself from the NOP final rule via the fiat power of its trade group-the personal care task force of the Organic Trade Association (OTA). Some manufacturers even seem unaware that there is a difference between the regulatory body overseeing organics and the OTA.

"I don't think anyone is going to change the labels until there is an actual rule," says Avalon's CEO Mark Egide. "The October 21 statement only applies to food. I don't believe the initial statement that they wanted compliance will apply. The OTA has asked for an 18-month extension of that timeline... There is no enforceable rule or regulation at this time for non-food products."

"Our expectation is that you will continue to see labels of all different kinds on the shelf for awhile," says OTA task force head Phil Margolis.

Some small companies like Australian manufacturer Organic Formulations have already changed their labels. But Production Manager, Joe Borkovic acknowledges, "I don't know any manufacturers who are seriously addressing the problems with complying and labeling. We really haven't seen a movement in that direction. Either we have underestimated the actuality of it being implemented or no one is worried."

Draft Standards

Behind the scenes the personal care task force has attempted to heavily influence NOP policy regarding personal care products. The task force has already drafted its own personal care standards that it would very much like to see used as the basis of the NOP's. While the task force is composed of a wide variety of experts from all sizes of industry and private certifiers, its track record is mixed and the draft standards have tended to err on the side of industrial ease over organic integrity. If not monitored carefully by farmers and consumers, the task force may become a force forestalling stronger regulation.

Existing NOP regulations for organic foods establish four categories of organic claims. The least significant category, products that use less than 70 percent organic ingredients, cannot make organic claims on the primary display panel. The personal care task force first tried to dilute these categories for organic personal care products by lowering the threshold for "made with organic" to 50 percent. It has since given up the effort, but a number of member manufacturers continue to label products with less than 70 percent organic ingredients as "made with organic."

Organic Water

The task force also considered the proposition that water should be included in the calculation of organic ingredient percentages for personal care products. Some manufacturers argued that a water infusion of certified organic ingredients was a single ingredient and must be weighed and calculated as one. This position is cheerfully acknowledged as ridiculous now, and English organic certifier, the Soil Association, has since required that certified components of all water-based ingredients be measured separately. The draft task force standards, however, still recommend that hydrosols with a small percentage of certified extracts be factored at their weight with water.

"The task force had recommended for the purpose of calculating the percentage of organic ingredients, a hydrosol is considered a single ingredient. Also the task force determined that water infusions cannot be counted as a single ingredient," says task force head Phil Margolis.

Coincidentally, Donna Bayliss, founder of the task force, manufactures all of the lavender hydrosols that are at the foundation of many Avalon Organic Botanicals "made with organic" products. Avalon Organic Botanicals web page claims the task force "standards specifically address the issue of 'blends' and 'infusions,' which are simply organic ingredients (typically herbs) blended in added water." Though hydrosols are also water-based dilutions, Avalon's organic products include "certified lavender hydrosol" in their calculation of ingredient percentages.

"We guarantee that the certified organic percentage on all our product labels is measured strictly with undiluted ingredients, and does not include water, water-herbal blends, or aqua herbal infusions. We use only 100 percent certified organic ingredients, including our certified organic lavender hydrosol, aloe vera, plant oils, herbal extracts." While the task force and Avalon may be holding to a fine distinction between a hydrosol and a water-based ingredient, the exclusion of water is carefully laid out in the NOP's labeling guidelines. Any personal care product companies that do include water in their calculations of organic ingredients in products entering the stream of US commerce after October 21 will be flouting the labeling guidelines of the National Organic Program.

[\(link to OCA's complaint against the industry's and Avalon's Fraudulent Claims\)](#)

Non Food Materials

Some organic personal care manufacturers argue that their products cannot be held to the NOP standards because it is not possible to make the products with only the ingredients allowed for food processing.

Organic consultant Peter Murray suggested that non food ingredients would need to be allowed for personal care products, saying a materials list of "all the ingredients that make things like shampoo and soap functional, preservatives, carriers, solvents and things of that nature" should be created. "Shampoo is not much good if it doesn't wash the hair, you can't just do that with water and detergent and herbs." In particular, Murray cited ingredients "that provide functionality" like "soil removal with surfactants" as necessary. The most common surfactant in shampoo is sodium lauryl sulfate.

Murray says FDA regulations require certain functional ingredients like preservatives. To his way of thinking, the law requires the use of chemicals. "Just like in food, you can't violate an additional regulation just to be organic."

OTA's Tom Hutcheson made it clear that the trade group would lean towards lenience in its proposed personal care product standards, suggesting to Natural Foods Merchandiser that, "The biggest hurdle for the organic personal care niche will be to convince the overall organic industry that the synthetics it uses in processing products are as necessary as the allowable synthetics in food."

Preservatives are one of the key ingredients that manufacturers claim are necessary to produce shelf-stable organic products.

An article in *Alive: Canadian Journal of Health and Nutrition* explains, "Every chemical cosmetic product on the market is formulated for shelf life of over three years. Therefore, each contains a large amount of preservatives (usually four synthetic parabens) to prevent spoilage. These are cellular toxins; otherwise, they wouldn't kill microbes. They penetrate the skin to a certain extent and many have been shown to cause allergic reactions and dermatitis."

"When you buy a lotion it may sit on your shelf for years," says broker Gay Timmons. "You would not buy any kind of food, open it and then leave it on your shelf for two or three years. That is what people do with cosmetics. That requires a rather important and profound use of preservatives because of the pathogen concerns and fungal concerns. How do you balance that preservative system need with an organic claim? Can we even do it?"

The notion that the FDA regulations require non-organic food ingredients is more specious than the claim that the FDA regulates the cosmetics industry. Materials expert Baker, who was briefly part of the OTA task force, points out that the use of preservatives for shelf stability may not be compatible with consumer expectations of the meaning of organic. "Consumers who buy organic expect their food to be fresh without preservatives. Perhaps one solution is to not claim that something is shelf stable and just put instructions to refrigerate. You'd have to talk to the FDA. This is an assertion that I've heard repeated, but no one has been able to give me a referenceto the legislation or the agency. Even if people are required by law to use

prohibited substances to make a product that does not entitle them to label it organic," says Baker, reversing Murray's assertion that "You can't violate an additional regulation just to be organic."

While some companies claim organic personal care products can't be made without synthetic preservatives or with all-organic ingredients, others say they are already doing it. [Joe Borkovic of Australia's Organic Formualtions says his family makes certified organic blends and personal care products without synthetics.](#) American producer TerrEssentials also claims to make some personal care products with organic ingredients.

Jayne Ollin of Lakon Herbals wrote in June for the Organic Consumers Association: "Many large health and beauty aide manufacturers have begun lobbying USDA in an effort to convince officials that personal care products cannot be made without the use of synthetic additives or that botanical preparations or herbal essential oil cannot be extracted without the use of toxic solvents such as hexane or petrol. This attempt to lower the standards is not compelled by the science of botanical formulations."

British certifier the Soil Association released its own "developmental" personal care standards in April, saying, "Our guiding principles have been to ensure a maximum proportion of organic ingredients, minimum processing and clear labeling." In explaining that their standards included non-food materials, the Soil Association commented, "We have kept as far as possible to the same principles that relate to organic food, where a very limited list of additives and preservatives are permitted. Many beauty products are complex and require complicated processes. For safety and hygiene reasons, it is sensible to allow some preservatives."

"Preserving" the Environment

[Organic Formualtion's Joe Borkovic puts the question of synthetic and natural in perspective, "I think it is possible to create products with completely natural ingredients, not just naturally derived. The real question is are we using principles of sustainability. If we continue to use ingredients that are harmful to ourselves and the natural environment, we will continue to denigrate this earth. We can find options and need to find options to move in a direction where we can mitigate some of the harm for what we are doing to the earth."](#)

The effect of cosmetic chemicals on the environment is just beginning to be understood. In March, a team of US Geological Survey scientists showed that a variety of chemicals from personal care products were among 95 wastewater contaminants found in US waterways. While clean water efforts historically focused on obvious, point-sources of pollution like heavy industry, personal care products and pharmaceuticals have posed a much more insidious and serous threat to aquatic life. Every night when the daily share of that \$30 billion in cosmetics is washed off, it is washed into the sewage system and ultimately the waterways. An EPA report notes that these chemicals have a devastating effect even when they are not "persistent" because they are continuously replenished. "Their continual infusion into the aquatic environment serves to sustain perpetual life-cycle exposure for aquatic organisms." Similarly the anti-fungal and anti-microbial ingredients that make

personal care products shelf-stable retain their anti-microbial and anti-fungal properties in microbe- and fungus-rich aquatic environments. Ultimately, the result is a double exposure for humans, who drink the chemicals they wash down the drain in their tap water.

Tap Reviews

The final determination about allowable ingredients in organic products lies with the NOP. The National Organic Program already has a system in place to assess the suitability of different materials: the technical advisory panel (TAP) review. This process has shown itself to be highly deliberative and fairly transparent in the past, with long and public debates at the NOSB level about controversial materials like synthetic amino acids in livestock feed and boiler chemicals containing volatile amines. The OTA task force is arguing that the speed of the past TAP reviews is not sufficient to list personal care processing materials quickly enough. The task force claims only 150 TAP reviews have been done in the last three years and estimates that, at the current rate, it would take many years to evaluate the unapproved materials currently used in personal care processing. OTA proposes that classes of materials be reviewed under single TAPs to speed the process.

"The food industry had 12 years to develop the materials list, and there are still some materials that need to be reviewed. If you assume that every single ingredient would have to have a TAP review, instead of categories of ingredients for personal care products, fiber and supplements, then there are probably easily 1,000 ingredients that need TAP review. TAP reviews have been occurring at the rate of 50 to 75 a year," says Phil Margolis. "Categories would be an efficacious way to provide for appropriate implementation."

Conversely, the industry's desire to approve 1,000 new ingredients for organic processing might be viewed as the problem, not the speed of the review process. At present, there are less than 100 synthetic materials allowed in organic production. While it might be acceptable to approve a class of benign materials or prohibit harmful ones in one fell swoop, many ingredients will require individual TAPs. The recommendation for categories of TAPs could be used by the industry to list ingredients that might not otherwise qualify for approval.

California recently amended its state organic food production act to give state regulatory agencies purview over personal care products. If signed by the governor, the legislation will allow the California Department of Agriculture and Health Services to enforce the NOP as a state organic program. The law will ensure that, for Californian consumers at least, personal care products will have to live up to the 70 percent standard of processed organic foods.

Gay Timmons worked on the amendments and says, "All the state of California has done is protected consumers and farmers so far. It is sort of the first volley."

California Department of Agriculture organic program manager Ray Green explains that the law would go into effect on January 1, 2003, "and we would probably begin immediate enforcement, at least in terms of educating the industry and notifying people and starting to get them to change their formulas and change their labels."

California's approach makes clear that organic personal care regulations are coming. Sooner or later, there will be a standard for processing organic lipstick, lotion, shampoo and the like. But the strength of those standards is still malleable.

Organics offers body care what amounts to gold in the language of the industry of illusion: something new. If makeup is hope in a bottle, organic ingredients in organic makeup should be the substance of that hope. The acceptance of natural forces implicit in the work of an organic farm is in tension with the mission of all things "cosmetic." "Natural products" themselves are in tension with the nature we know of a farm. The organic landscape is a diverse patchwork of sweeping pastures, double-stitched vegetable rows, palettes for composting, greenhouses, barns, orchards and home. It does not seek to force grand uniformity across the landscape through tractor or pesticide. It does not seek to disguise disease of the body or tame the unkempt earth with synthetic inputs and makeup. The illusions and misconceptions at the base of cosmetics may be irreconcilable with the transparent, uniform standards of the National Organic Program. The NOP should begin challenging fraudulent organic labeling claims while evaluating these questions. In one way, organic beauty can affirm the acceptance of nature that organic farms seek-by accepting the meaning of the word organic as legislated by the National Organic Program and mimicking the spirit of organic farming, which does not endlessly seek to replicate the world in its own image.

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