The environmental costs of femininity

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Introduction

Consumer goods transmit persuasive but stealthy political messages about the culture that created them (McCRACKEN, 1990, p. 133). Thus, clothing, furnishings, and other fashionable items have a significant role in a period's social ideology and identity. Cosmetics or skin care products help shape and simultaneously reinforce societal perceptions of women, their primary consumers. First, as visibly worn products, cosmetics act as evidence of imperfection and image-consciousness. Second, as an industry, cosmetic companies put forth massive expenditures on advertising to convince women to continue consuming, continue being "image conscious." Thus, cosmetics production and use is a self-reinforcing cycle, generally with corporations as the dominant power – and consumers, unless they consciously resist, as manipulated subjects (BARNUM, 2003).

Cosmetics contain chemicals, both synthetic and organic. Nevertheless, they have evaded the high public perception of personal health and environmental risk that other related industries such as petroleum, paints and coatings, and adherents and sealings bear (POWELL, 2004). This lower chemical risk perception is generally warranted, as it is estimated that only between 2 and 5 percent of adult users will report adverse reactions to cosmetic products (*Canada Gazette, Part I,* 2004, p. 853). Yet these reactions can be extremely serious, and debilitating to affected individuals. A recent *Gazette* highlighted some particularly shocking effects, such as:

- redness, swelling of the arms and legs as well as a general feeling of weakness and difficulty breathing, following a cream application to a person's body;
- within two days of applying hair spray to a child's head, the hair began falling out; a month later, 30 percent was gone, and it continues to fall out;
- after applying a product to her face, a woman's face became

so swollen that she could barely see and her face was unrecognizable.

Hazardous chemicals are present in only small amounts in cosmetic products, a minority among over 10,000 ingredients (*Canada Gazette, Part I, 2004*, p. 853). Still, when the larger picture of manufacturing, packaging, and cumulative personal exposure is addressed, even these traces increase enormously in significance. Further, for those individuals who are impacted, harmful additives can have long-term consequences.

Legally, cosmetics are different than drugs. Cosmetics are intended to improve an individual's appearance with no therapeutic effects, while drugs actually affect the body's functions (Canadian Food and Drugs Act C.R.C., C. 869, POWELL, 2004; LYMAN, 2003). Thus, labelling requirements on cosmetic products in Canada are currently much less stringent than those applied to drugs. These minimal labelling requirements are currently under governmental review, and could become more aggressive.

The intensely intimate and value-charged relationship that consumers, especially women, have with skin care products, necessarily separates them from other chemical industries. Use of petroleum products is not a suggested man-catching strategy! And, although a new coat of paint in an old familiar room may perk up the average housewife, few would recommend, as Nancy Daggett did in her 1952 Homemaker's Encyclopaedia: Personal Beauty and Charm, that daily application, like cosmetics, regardless of one's position, "builds morale."

The mildly threatening, omnipresent nature of cosmetic advertising and pseudo-compulsory application of skin care products for many women make this industry a pressing area for feminist and environmentalist research. This paper explores some of the costs – environmental, social, physical, and cultural – associated with stereotypical feminine behavior, in particular through the lens of cosmetics.

A study of perceptions

The skin care industry constitutes an appropriate case study to demonstrate the link between women's appearance, corporate advertising, the women's movement and environmental degradation. Women dominate household consumption overall, and marketing for household products, from fridges to cleaners, reflects their consumer base both historically and at present (CAIN, 1996). Yet, the skin care industry is perhaps the most dramatic example of a feminized industry. Values Facilitator for The Body Shop, Rifka Khalilieh (2004) observes that 85 to 90 percent of its consumers are women. The skin care industry also spends "proportionately more on advertising than any other major industry group": generally 6 to 20 percent of sales are allocated to advertising expenses (CHAPKIS, 1986). As estimates of total cos-

metics sales in Canada total over \$5.3 billion annually, this amounts to one colossal advertising budget (*Canada Gazette, Part I,* 2004, p. 852).

Yet this investment does not negatively impact the profitability of cosmetics. The industry frequently packages inexpensive products and sells them dearly, thus making its profit margins quite remarkable (CHAPKIS, 1986, p. 93). Indeed, Chapkis estimates that only seven cents of a consumer's dollar goes to actual cosmetic ingredients. Finally, as the skin care industry inherently sells beauty, youth and glamor, consumers are willing to splurge – indeed, will often choose a similar but more expensive product, in hopes of better results (CHAPKIS, 1986, p. 93).

The link between cosmetics and human and environmental health is counter-intuitive to most consumers, which is what makes this case a particularly interesting example. Since skin care products are comprised of chemicals, they should be included in a listing of "chemical industries" - an inclusion they vigorously resist, with the notable exception of the "Aveda" line which is ISO 14001 certified according to its 2001/2002 Ceres Report. Even so-called "natural" products can include such harmful ingredients, in manufacture and packaging, as polyvinyl chloride (PVC) plastics, or use base ingredients such as sodium laurel sulphate and phthalates. This discrepancy between what consumers often understand "natural" to mean and what the products actually contain leads Mary McGrath (2004) and others to recommend a rigorous cosmetic labelling system with standardized, mandatory listed degrees of environmental and human toxicity.

As Rona Abramovitch (2004) noted, many individuals not directly involved in environmental work are unlikely to consider the chemical composition of their skin care products, instead trusting that authorities such as policy makers, cosmeticians, hair stylists, and pharmacists will ensure their safety. On a purely chemical level, if they are not pregnant and use skin care products in moderate amounts, this low level of risk perception seems justified. Yet, considering the skin care industry on a larger scale, with manufacturing, testing, production, distribution, eventual disposal, and corporate advertising power, a more troubling picture regarding environmental and human health appears.

Consequently, in 2003-2004, I conducted a study to further explore perceptions of the cosmetics industry. Comparative quantitative analysis of the chemical composition of cosmetics has already been undertaken by qualified groups. For instance, a 2002 report, *Not Too Pretty: Phthalates, Beauty Products & the FDA*, could be used by other researchers as a template for feminist research into beauty product composition and health impacts (HOULIHAN et al., 2002). Other industry literature proved inaccessible to the general public (i.e. advertising standards of the Cosmetic, Toiletry and Fragrance Association). A Freedom of Information inquiry into these standards, although time-consuming and expensive, could prove extremely valuable.

Nevertheless, much has been written about the relationship between advertised products and consumer desire (e.g. BARNUM, 2003; MYVESTA, 2002; BUDGEON and CURRIE, 1995; SESSIONS, 1990). The goal of my study was to explore, in more depth, the linkages between these advertised "needs," personal empowerment and satisfaction, and health. Supplementary information was provided through personal, face-to-face interviews.

Of the six adults contacted, four agreed to be personally interviewed for this project. Subjects were chosen for their differing perspectives on environmental and human health as they relate to the skin care industry: a female Masters student; the Executive Director of a small environmental non-governmental organization; a Facilitator for The Body Shop, a commercial enterprise specializing in environmentally friendly cosmetics; a female senior academic and Program Director, and a male MBA

and program administrator of an environmentally-oriented College. Every half-hour interview was recorded on tape and supplemented by notes taken throughout the conversation. A summary of these recordings was e-mailed to each subject within a week for review, and their corrections to the text integrated into a final copy.

Questions were open-ended and used a funneling technique, going from general to successively more directed inquiries. The thread of questioning enquired into participants' ideas about femininity, consumerism, beauty and the skin care industry. Interviews were more conversational than strictly inquisitive, using feminist ideals of egalitarian exchange as outlined by Ted Palys in the 2003 publication of *Research Decisions: Quantitative and Qualitative Perspectives*, 3rd ed.

In attempting to link historical attitudes towards femininity and contemporary cosmetic composition and advertising, interview subjects provided valuable insights. Interviews in particular highlighted that there are no simple answers to the pervasive cosmetic use in society, nor are women exclusively impacted by image-consciousness.

Subjects noted that the cosmetics industry is, indeed, a chemical industry, yet one with relatively low risk perception associated to it (POWELL, 2004). This was contrasted with attitudes about food: although consumers will increasingly go out of their way to buy foods produced organically, this consciousness has not spread to cosmetics at the same rate (McGRATH, 2004). Considering the ingestible nature of many cosmetic products (for example, lip balm is often ingested, and nail polish by covering fingernails also comes into frequent contact with food), McGrath and Khalilieh considered this discrepancy surprising.

Ignorance of cosmetic options was a major theme in all interviews. Many consumers use the products that various experts (stylists, pharmacists, for example) recommend. Thus, these "experts" are an interesting target area for promotion of ethical and environmentally sound cosmetic options (ABRAMOVITCH, 2004). Also, the degrees of difference in "natural" cosmetics likely escapes many consumers. Clairol's "Herbal Essences," The Body Shop Ginger Shampoo and Aveda Rosemary Mint Shampoo may be viewed as equal in all areas but price, despite their respective increasing environmental and human health friend-liness (McGRATH 2004; KHALILIEH, 2004). The important distinctions in manufacturing practices, animal testing methodology, distribution and ingredient composition are not effectively understood by many consumers. Public education and effective labeling were proposed as positive solutions by all subjects.

Cosmetic companies' consumer accountability was also emphasized. Interview subjects felt empowered, that as consumers they could vote with their dollar (McGRATH, 2004; KHALILIEH, 2004). Although consumerist strategies are not the primary recommendation of this work, they have a place in an overall conscious-raising effort to make cosmetics manufacturers more accountable. Powell noted, for example, that if an industry giant could be convinced to go organic, its action would have a positive ripple effect throughout the industry.

Finally, all subjects agreed that appearance, and, by extension, cosmetic appearance-improvement strategies, disproportionately impact women. Abramovitch wisely qualified this generalization by noting that these impacts differ depending on a woman's social and working status, and that appearance matters for everyone, although probably even more for women than for men. McGrath suggested that this could be observed through ads, as "the barometer of consumer consciousness." Khalilieh felt that ads, as well as being an indication of societal attitudes, were implicated in creating a "climate of fear" for women: fear of aging, gaining weight, getting wrinkles, or not being attractive enough.

Social costs of cosmetics

As reported in the September 2002 Marketing to Women report of Myvesta's 2002 Money Abuse Survey, shopping can be emotional for all consumers, but especially women. In his 1990 essay "Ecofeminism and Work," Robert Alan Sessions notes that women's historical "exclusion from male sources of meaning and power have left them especially vulnerable to compensatory consumption," namely purchases made to ease some emotional distress, loss, or conflict. According to Myvesta, 21 percent of women shop to feel better when they are lonely, and 18 percent do so for stress relief. Corporations and advertising agencies confirm that such behavior for women is natural, irrational, forgivable ... and exploitable (BARNUM, 2003).

Women's personal advocacy declined following the victory of Allied Forces, due to a strong North American resurgence of 18th-century ideals about domestic femininity. These ideals were emphasized through material and popular culture media. Considering consumer goods as "the visible parts of culture" (McCRACKEN, 1990, p. 131), the replacement of women's wartime utilitarian fashions with Christian Dior's "The New Look" in 1947 (ROYAL ONTARIO MUSEUM, 2002-2003) proved a significant change in women's role in society. Unlike earlier clothing designed with rationing and Home Front work-force requirements in mind, the New Look featured tiny corseted waistlines, full skirts, sloping shoulders and newly developed stiletto heels (WRIGHT, 1989). Thus, a delicate and sumptuous overall picture of womanhood was presented, reminiscent of feminine ladies of leisure from the Victorian era. Popular culture media outlets supported this shift enthusiastically, as an excerpt from the May 1955 Housekeeping Monthly, entitled "The Good Wife's Guide," demonstrates. Featuring many helpful suggestions for the average homemaker - on cleanliness, appearance, cooking, treatment of men, what to fill the days with and their subordinate place in the overall domestic arrangement – perhaps most important is the closing remark that "a good wife always knows

Yet, for working- and middle-class North American women, a "lady of leisure" lifestyle was generally far removed from their reality. Dr Sharon Hartman Strom and Linda Wood (1995) emphasize that women's out-of-home employment was not a revolutionary post-war phenomenon. Women have worked since pre-modern times, and, despite the Victorian era of idealized middle-class domestic femininity (BRIDENTHAL et al., 1998), increased their participation in the capitalist economy steadily throughout the 20th century. During the Second World War, necessary Home Front industrial production led North American states to encourage more women than ever before to work as breadwinners and nation-builders, personified by such wholesome media characters as Norman Rockwell's 1943 illustration of Rosie the Riveter.

For former domestic servants, wartime factory work provided better wages, more opportunities for socialization, more regular hours and often better treatment than their positions in middle-class households. Thus, upon the Allied victory, many servants showed little interest in returning to their former stations (HUMBLE, 2002). Unfortunately, especially for middle class wives, the end of hostilities also signaled the end of women's perceived usefulness outside the home. Despite a continued rise of women's paid employment through the 1940s, 1950s and 1960s, hegemonic forces paradoxically glorified the traditional family. Thus, the nuclear suburban household anchored by a homemaking mother was presented favorably, and contrasted to those liberated women who were getting "out of hand" (HARTMAN STROM and WOOD, 1995). With fewer domestic servants, fewer societally condoned out-of-home work opportunities, and increasing distance between the home and economic centers due to increased suburban settlement, many middle-class women who were formerly household managers and part-time workers became housewives.

Societal trends further encouraged the nuclear family model. Marriage and childbirth, with their accompanying home-based responsibilities, were occurring at unusually young ages throughout the baby boom of the late 1940s and into the 1950s (STRONG-BOAG, 1997). These larger families needed safe, spacious accommodation, most easily obtained in suburban communities (STRONG-BOAG, 1997). They also required full-time caretakers, and women were overwhelmingly - even threateningly, through pseudo-scientific psychology manuals warning about maternal deprivation and its negative impacts on future citizens (SPOCK, 1946; BOWLBY, 1953) - encouraged to take on this role. The increased distance between women, children and family-based activities and the masculine economic means of production firmly re-enforced a traditional gendered division of labor, famously questioned by Betty Friedan's landmark feminist text The Feminine Mystique in 1963.

Finally, anxiety over the "Red Menace" created a stressful societal context. Baby boomers (BOWMAN, 2004) remember adults clustered around the radio listening to reports on the Cold War and Korean War, neighbors building bomb shelters in their backyards, and air raid drills. Suburban developments, emphasizing stable, middle-class families grounded by full-time homemaking moms, were perceived as an indicator of capitalism's success (STRONG-BOAG, 1997, p. 377).

These socially-imposed restraints on acceptable feminine activities following World War II were not the first incidence of a societal backlash against feminine progress towards equitable full active citizenry. For example, women's suffrage and, more recently, women's large-scale entry into professional arenas have been differentially protested by conservative elements. The overt heckling and booing that confronted suffragettes, described by June Purvis (2002) in "Deeds, not words': daily life in the Women's Social and Political Union in Edwardian Britain, has evolved into a more covert contemporary strategy of "experts" such as Chemist Gordon Freeman (1990) presenting cautionary tales of links between increased numbers of professional career women and rising divorce and juvenile delinquency rates. Interestingly, these attacks often present the "deviant" women as unattractive or unfeminine (WRIGHT, 1993). Thus, the women are implied to be failures at the most attainable, universal feminine task: sexual attractiveness to men (BUDGEON and CURRIE, 1995, p. 184)

The post-war cultural barrage on sex role shifts, through printed or spoken materials and consumer goods, was of an unprecedented scale. Hegemonic messages on women's appropriate behavior was disseminated in a much more efficient, persuasive and dominating fashion through the spread of television ownership. According to Mary Bellis' 2004 *History of Television Timeline*, 1948 saw a 4,000 percent increase in television audience and over one million homes in the US owning televisions. Indeed, *A Timeline of Television History* (2004) reports that, by 1954, homemaking magazines routinely offered homemakers "tips on arranging living-room furniture for optimal television-viewing pleasure."

So indeed, what were women to do in their suburban isolation? In her 1993 doctoral thesis entitled "The most prominent rendezvous of the Feminine Toronto": Eaton's College Street and the organization of shopping in Toronto, Cynthia Jane Wright posited that "women's job is to be an attractive sexual object. Clothes and make-up are necessary tools of the trade. Man, as consumer of woman-as-sexual-object, is the commodifier" (WRIGHT, 1993, p. 26). Advertisers, quick to recognize women-as-sexual-object's ability to sell almost anything, participated in linking commodification of women's sexuality with overall consumerism (BOUCHIER, 1983). This commodification of women persists stubbornly, as noted by Kate Rossiter, in her

2001 article "Growing up Girl." Women's bodies are presented, through material culture goods and advertising pressure, as a commodity which requires fixing.

Although Lyman (2003) notes that cosmetic testing is not as rigorous as drug testing prior to entering the market, the level of research and analysis is still quite significant. In North America, once a product is approved in clinical trials, it moves to manufacturing, packaging and distribution. Importantly, testing of product additives for consideration of safe consumer exposure is conducted on a single-additive basis, i.e. daily burden of phthalates, in isolation from additional additives (COSMETIC, TOILETRY AND FRAGRANCE ASSOCIATION, 2004). This does not appropriately reflect users' common strategy of employing a myriad of products in tandem.

Entire theses, books and magazines have been written weighing the merits against moral costs of animal testing (FREITAG, 1995; FANO, 1997; Scientific American, 1997). As Freitag's 1995 Ph.D thesis notes, viable alternatives to investigate whether a product metabolizes safely can include tests on fungi, computer models, and - controversially - human tissue. Particularly when researching devastating diseases such as AIDS and cancer, animal testing of drugs is tolerated as worthwhile in many moral cost-benefit analyses. That animals should be, as Lynda Dickenson (1990) phrased it, "victims of vanity" is far less acceptable. Indeed, animal testing was a "hot button issue" (POWELL, 2004) that helped facilitate the increasing success of alternative, natural cosmetic companies such as the Body Shop, which does not test their manufactured products on animals and continues to work towards guaranteeing the same through their sources, and Aveda, entirely free of animal testing in sources and products. Products have historically been tested on animals primarily to establish levels of irritation caused by a harmful but useful additive. Chemicals that match this profile and have received particular attention of late include phthalates and sodium laurel sulphate.

Phthalates, in the forms of Dibutyl Phthalate (DBP), Diethyl Phthalate (DEP), and Dimethyl Phthalate (DMP) were reviewed and categorized as safe in a 1984 Food and Drug Association (FDA) assessment, a classification that has since been questioned by researchers of both industry and non-profit groups (HOULIHAN et al., 2002). Information available on the American Cosmetic, Toiletry and Fragrance Association (CTFA) site, supported also by the Canadian CTFA (CCTFA), states that phthalates "are used in cosmetics as plasticizers, solvents and fragrance ingredients in a wide variety of cosmetic product types" (CTFA, 2003). DEP is also used in nail care products at concentrations of up to 15 percent, hair goods at up to 0.1 percent, and fragrances at up to 11 percent. Finally, they are added to PVC plastic to increase the packaging agent's life-span. Phthalates are said not to accumulate in human tissues but pass quickly through urine, yet there is significant concern over their effect on developing male sex organs and other reproductive anomalies (CTFA, 2003; HOULIHAN et al., 2002)

Sodium Lauryl Sulphate (SLS) and the related Ammonium Lauryl Sulphate are detergents most often found in shampoos. They assist in emulsifying dirt and grease, but are skin irritants. There is concern that they are also carcinogens, refuted by a Journal of the American College of Toxicology 2(7) article highlighted on the CTFA site. Although perhaps not cancercausing, in animal tests, they have been shown to significantly alter skin composition and accumulate in hair follicles with prolonged exposure. Thus, it is recommended that frequently-used products not have concentrations greater than 1 percent.

PVC plastic as packaging is a related concern. Manufacturing PVC produces such toxic by-products as dioxin, hydrochloric acid and vinyl chloride, priority pollutants that contribute to cancer, diabetes, neurological damage, and reproductive and birth defects. Dioxin alone is classified by the EPA as a carcinogen

300,000 times more potent than DDT; thus it is not surprising that areas supporting a PVC manufacturing facility have reported higher cancer rates than the general population, with plant workers at the greatest risk (WOMEN'S VOICES FOR THE EARTH, 2004). PVC's complex composition also makes it difficult to recycle. Greenpeace notes that less than 1 percent of PVC plastic is currently recycled, with the rest landfilled or incinerated.

The manufacture of these chemicals has been shown to have negative environmental and worker's health effects (BOENIGER and AHLERS, 2003). Although personal use in small concentrations is approved, testing organizations consider toxin exposure on a single-item basis, rather than recognizing the wider impact of the total accumulated burden of toxins that an assortment of cosmetic products place on the body. The Canadian government has launched the Environmental Impact Initiative (EII) to investigate the longer-term life of these and other personal care chemicals that accumulate once expelled or disposed into the natural environment. It is unclear whether they will study each compound in isolation, or take the wiser – though admittedly more challenging – route of considering the effects that cosmetic chemicals have jointly on the biosphere.

There are alternatives to both toxic cosmetic additives and unfavorable packaging, just as there are alternatives to animal testing. Houlihan et al. noted in their 2002 study of drug-store cosmetic items that many companies have similar products of differing composition, one containing phthalates and the other not, with seemingly no difference in performance or purpose. Aveda and others have developed viable emulsifying ingredients besides Sodium Lauryl Sulphate to use in shampoos and cleansers. Finally, even major corporations, such as Intimate Brands (parent company of Victoria's Secret and Bath and Body Works), have been persuaded to stop using PVC plastics in packaging in favor of other, more easily recyclable and more environmentally sustainable alternatives (WOMEN'S VOICES FOR THE EARTH, 2004).

Current cosmetic legislation

Despite the shortcomings in cosmetic chemical testing, approval and disposal, skin care products *are* a regulated industry. Federal legislation in both Canada and the United States outlines labeling requirements, banned ingredients, and a host of specific considerations for particular additives, and responds to concerns mainly on a complaints basis (DAVIS, 2004). Powerful trade associations represent industry interests in both North American countries.

Government and industry are not necessarily lacking in voluntary and regulatory responses to chemical and technological concerns. Indeed, the overall response is quite progressive. Yet, the focus is exclusively isolationist and technical. Actual chemical concerns surrounding human use of one individual skin care product is less of a dilemma than the joint effect that several will have on human and environmental health, including that of workers in manufacturing facilities. Also more problematic than simple chemical composition of cosmetics is the way people, especially women, are encouraged to use them. Thus, the promising technical regulatory outlook outlined below must be qualified by the fact that it fails to reflect the wider, generally negative influence of cosmetic products on human and environmental health.

In the United States, "cosmetics are legally defined as products not intended to affect the body's functions as drugs are." Thus "the FDA does not require any pre-market safety testing of cosmetics or fragrances to the extent that the agency would a drug" (LYMAN, 2003). Health Canada's Food and Drugs Act C.R.C., C. 869 defines cosmetics as "any substance or mixture of substances, manufactured, sold or represented for use in cleansing, improving or altering the complexion, skin, hair or

teeth and includes deodorants and perfumes. This definition includes soap." Cosmetics are legally approached differently from drugs, and thus products must be slotted into one or the other category in the *Act*, despite much overlap between the two types.

Cosmetics are further distinguished from over-the-counter products that make therapeutic claims or contain ingredients not permitted in cosmetics, from products that contain natural therapeutic ingredients, from goods intended to be ingested but not have a therapeutic effect and from pesticides such as insect repellent.

Increasing awareness about environmental issues throughout the Canadian population has accompanied a greater concern about ingredients in various consumer products, particularly household cleaners, foods and cosmetics (CAIN, 1996; AD-VERTISING STANDARDS CANADA et al., 1998/2003). In response, Health Canada's Environmental Impact Initiatives (EII) will focus on studying "the potential effect of personal care products and pharmaceuticals ... in the Canadian environment and on human health" (HEALTH CANADA, 2004). To assist with issue identification, in 2002 EII commissioned a survey to establish environmental assessment regulations and project benchmarks. The 1,512 completed phone surveys presented some interesting findings on Canadians' ideas about health-related issues

Although much of the survey is of interest to recycling and waste disposal specialists, particularly relevant to this work is that 52 to 55 percent of Canadians read labels on cosmetic products and similar consumer goods. Surveyed individuals were primarily interested in ingredient lists. This finding is supported by a smaller survey of women by Maria Cain for her 1996 Masters thesis, where 17 of 26 total participants regularly read product labels of household products (CAIN, 1996, p. 130). The vast majority of these individuals stated they read labels "to find out about ingredients." This attention to ingredients was justified in the EII survey by the observation that 52 percent of surveyed individuals feel that cosmetic products likely pose a threat to the environment, and 45 percent thought the same of soaps and shampoos.

Unfortunately for those conscientious citizens who wish to read cosmetics labels, ingredient information is not currently required by Canadian law to be expressly outlined (*Canada Gazette, Part I,* 2004, p. 853). These minimal requirements are currently under review, with the March 27, 2004 *Canada Gazette, Part I* outlining "proposed amendments to the *Cosmetic Regulations* [that] would require ... cosmetic manufacturers [to] declare ingredients on a label or exterior wrapping for all cosmetics" (*Canada Gazette, Part I,* p. 852). This amendment, which also includes an enforcement strategy, seems likely to be supported by Canadians, as their survey results demonstrate a general interest in stronger labeling requirements. Citizens will thus be able to make more informed choices about what they wish to use on their bodies.

Increased labeling requirements, accompanied by the Ell's initiatives to better regulate products not well managed by current *Food and Drugs Act* legislation, are promising avenues of regulatory action. The additional Ell and labeling amendment goal of raising public awareness about cosmetic additives is also positive. Yet, these initiatives seem to be the equivalent of "end of pipe" pollution prevention measures, focused on better management and disposal rather than on more environmentally sound manufacture or, more ambitiously, on the questioning of the overall product necessity.

Advertising guidelines

"The pressure of advertising and publicity is unceasing. If you use a certain lotion, the advertisements state, or imply, the next

man you meet will fall in love with you. You know that isn't so. No man has ever fallen in love with a woman because she used a certain beauty product – in fact, millions of people managed to fall in love and marry before the cosmetic industry was born. Nevertheless, an otherwise sensible woman reading an advertisement like this, or seeing it on a billboard, or hearing it on the radio, will rush out to buy the lotion as though it were a magic formula that would transform her appearance, character, and future prospects."²

Khalilieh (2004) emphasized that, without cosmetic surgery, no product can reverse the aging process on skin and the best consumers can hope for is, through cleansing, polishing and moisturizing, a well-maintained visage. Yet Sheila Rogers noted on her November 5, 2003 edition of Sounds Like Canada "everybody wants something to make them look younger." Where 20 years ago there were face creams for normal and oily skin, now there are over 1,000 kinds of anti-wrinkle cream. Rogers' guest, Wanita Bates, emphasized that the claims of anti-aging creams are often outrageous. Yet, guidelines for cosmetic advertising are reasonably well established, with the Guidelines for Cosmetic Advertising and Labeling Claims (ADVERTISING STANDARDS CANADA et al., June 2003) revisited on a regular basis in response to the rapid evolution of the skin care industry. The Canadian Cosmetics, Toiletry and Fragrance Association also has a Code of Marketing Practices, access to which is limited to members only.

The *Guidelines* list acceptable versus unacceptable phrasing strategies for marketing campaigns, clearly indicating that these suggestions are "not exhaustive," and thus leaving some leeway for discretionary action by enforcement bodies. Yet who *does* enforce them? The efficacy of these guidelines is extremely questionable. A few forbidden product claims, according to the *Guidelines* (ADVERTISING STANDARDS CANADA et al., June 2003, pp. 8-20), include: product is deeply penetrating; product makes skin look younger; product can reduce, reverse, slow, or prevent aging; product will lift or tighten skin; product can repair damage; product will be "anti-wrinkle" or "anti-aging"; product is like a surgical lift.

If these "guidelines" could be upgraded to "standards," they would then be legally enforceable under Part I, item 17, of the Food and Drugs Act, which states that "where a standard has been prescribed for a cosmetic, no person shall label, package, sell or advertise any article in such a manner that is likely to be mistaken for that cosmetic, unless the article complies with the prescribed standard" (p. 12). This is an admittedly large legal jump, but the importance of corporate responsibility for advertising messages has been recently underlined through legal challenges against fast food companies such as McDonalds (McLIBEL SUPPORT CAMPAIGN, 2003), and federally-imposed stern restrictions on tobacco advertising (KERR, 1997). Legal challenges to social harms of fast food are quite relevant to possible cosmetics challenges: both wield enormous advertising power, both are omnipresent in North American society, and both demonstrably harm human health, especially if an individual is highly susceptible or a frequent "user."

Yet, advertising is an extremely persuasive and underlying societal force in North America. As Shelley Budgeon and Dawn Currie noted in their 1995 piece on the post-feminist subtext of *Seventeen Magazine* ads, "the failure to acknowledge the complexity of these types of processes which make meaning possible undermines efforts to regulate the types of images available to the consuming public" (BUDGEON and CURRIE, 1995, p. 185). Simple regulation of ad content will not effectively limit its hegemonic messages: careful arrangement of image and text can subtly present messages without overtly stating aging or appearance-oriented threats (BUDGEON and CURRIE, 1995, p. 181). Educational initiatives that foster the ability to recognize advertising tactics, must accompany regulatory reform to suc-

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cessfully mediate the effect of cosmetic advertising on consumers' desires (BUDGEON and CURRIE, 1995, p. 185).

Conclusion: A plan for action

The Canadian regulatory formula for cosmetics currently follows an overly simplistic, technocratic understanding of the industry by externalizing all socio-political effects and ignoring the myriad of toxic substances citizens face daily *in combination*, continuing to consider thresholds on a per-item basis.

Certainly to compensate for negative societal and environmental impacts, large corporations often exhibit impressive corporate citizenship. McDonald's charities include Ronald McDonald house, and an endless assortment of neighborhood, professional sporting and cultural events. Tobacco industries were major supporters of the arts, culture, and sport. Cosmetic industries are no less active, although their charities of choice reflect their market demographics, and thus concentrate on areas such as violence against women and breast cancer.

Many would ask where the harm is in allowing large companies to give back to their consumers through charities. Perhaps the answer lies in a distinction made by Mark Sagoff in his 2001 article, where he notes that "not all of us think of ourselves simply as consumers. Many of us regard ourselves as citizens as well. We act as consumers to get what we want for ourselves. We act as citizens to achieve what we think is right or best for the community" (p. 468). Citizens will support a proposal that seems to serve a greater moral cause, or that lessens a significant societal risk. To combat the negative societal effects of cosmetic advertising, I insist that women should use their hardgained rights as citizens, rather than their carefully cultivated consumer impulses, to lobby government for a more inclusive regulatory regime. Effective education campaigns about the social and health effects of cosmetics, as well as media literacy campaigns to combat both sly and overt advertising pressure, would support these regulatory changes (BUDGEON and CURRIE, 1995, p. 185). With the Federal EII still in fledgling phases and cosmetics regulations under review, now is an ideal time to proactively insist on better protection of human and environmental health in the cosmetics industry.

Notes

- This survey, along with other Issue Identification documents for the EII, is available online at Health Canada's website: http://www.hcsc.gc.ca/ear-ree/fda_report_e.html.
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