

# Opening the Black Box: A Guide to Cleaning Product Ingredients



## Introduction

Consumers are becoming more and more concerned about the safety of the chemicals in the products they bring into their homes. Product labeling is needed to provide consumers with the information they need to identify and avoid chemicals linked to harm to human health and the environment, including [breast cancer](#), other forms of cancer, hormone disruption, reproductive harm, and developmental and neurological harm. Consumers and some retailers have been pressuring manufacturers for more ingredient transparency because, until recently, no federal or state laws required ingredient disclosure in cleaning products.



Breast Cancer Prevention Partners' report, [Right to Know: Exposing Toxic Fragrance Chemicals](#), tested seven cleaning products to identify the hidden, unlabeled chemicals in the products. Since no federal law requires disclosure of cleaning product ingredients, we used sophisticated and expensive laboratory tests to identify these chemicals, which is not an option for most consumers. Our results revealed the presence of over 60 hazardous chemicals in the seven cleaning

products tested. We found ingredients linked to cancer (such as 1,4 dioxane and benzene), hormone disruption (such as diethyl phthalate (DEP) and benzyl chloride), respiratory harm (such as 2-butoxyethanol and 3-carene) and developmental harm (such as lilial and toluene).

Without required ingredient disclosure, consumers are left wondering and worrying about what's in the products they use to clean their homes. This lack of transparency is not only a consumer right to know issue, but also an environmental justice issue. The majority of janitors, domestic workers and hotel cleaners in the U.S. are women and people of color. They use cleaning products all day, every day, resulting in a much higher exposure to the chemicals in cleaning products than the average consumer. In addition, communities of

### Why is ingredient disclosure in cleaning products important?

- Consumers are empowered to make more informed purchases, allowing them to choose safer products for themselves and their families.
- Workers can advocate for safer products and take steps to protect themselves from unsafe chemical exposures in their workplace.
- Manufacturers are motivated to take hazardous chemicals out of their products, rather than publicly disclosing them.
- Federal and state regulators have the information they need to effectively regulate cleaning products.
- Our environment benefits from the reduction of toxic chemicals polluting the air and water.

color and low-income communities are often disproportionately exposed to harmful chemicals in the places they live and the products they use; exposure to chemicals in cleaning products adds to their cumulative exposure to unsafe chemicals, many of which are linked to chronic diseases and conditions.

## Breakthrough: The California Cleaning Product Right to Know Act of 2017

A confluence of factors, including consumer demand, market forces, and legislative and regulatory actions in California and New York, set the stage for the California Cleaning Product Right to Know Act of 2017. The bill, also referred to as Senate Bill 258 (SB 258), required disclosure on labels and product websites of intentionally added ingredients in household and institutional cleaning products, including air care products, automotive products, general cleaning products, and polish or floor maintenance products. SB 258 was authored by Sen. Ricardo Lara (D- Long Beach) and sponsored by Breast Cancer Prevention Partners (BCPP), Environmental Working Group, Natural Resources Defense Council, and Women's Voices for the Earth.



A unique aspect of this legislative process was the extensive negotiation process held between advocates for the legislation, including the author, sponsors, and key supporters (Seventh Generation, The Honest Company and the Center for Environmental Health (representing the perspective of domestic workers)), as well as representatives from the cleaning products industry, including major trade associations – Household and Commercial Products Association (HCPA) and American Cleaning Institute – and

multinational corporations such as Proctor & Gamble, Reckitt Benckiser (RB), and SC Johnson. All parties approached the negotiations with the goal of finding a compromise that provided consumers with the information about cleaning product ingredients that they want and deserve in a manner that was workable for industry. In the end, the first ever law requiring cleaning product ingredient disclosure on both labels and websites passed with very broad and active support from advocates and industry alike. The legislation was supported by over 65 public health, environmental justice, environmental health, worker health, and environmental NGOs;



as well as many of businesses and trade associations that participated in the negotiations, including Seventh Generation, The Honest Company, HCPA, Proctor & Gamble, RB, SC Johnson, and WD-40.

Since websites can be accessed from anywhere and companies do not make product labels for just one state market, this state law will serve as a de-facto law of the land and provide cleaning product ingredient disclosure in not just California, but across the entire country and the globe.

## Ingredient Disclosure Required by CA SB 258

### On the Label (as of January 2021), you'll find:

- List of ingredients in the product (not as complete as online information).
- Website address and phone number to get more information.
- Indication of the presence of any European Union fragrance allergens if present at or above the concentration of 100 parts per million (ppm).

You may also find certification logos providing more information or indicating the product meets certain criteria for safer chemicals. For example:

- [Smart Label](#) – By scanning the QR code with a smart phone, you can easily find and access much of the online information required by SB 258 while shopping in a store.
- [Safer Choice](#) – An EPA program that reviews ingredients to help consumers and commercial buyers identify products with safer chemical ingredients, without sacrificing quality or performance. Products with this seal meet the [Safer Choice Standard](#).
- [Green Seal](#) – Products with this seal have been reviewed by the nonprofit Green Seal, one of the nation's oldest and largest ecolabel programs, and certified as having met rigorous standards for health, sustainability, and product performance.



### On the Product Website (as of January 2020), you'll find:

- Disclosure of intentionally added ingredients.
- Precedent-setting fragrance ingredient disclosure, including:
  - All non-hazardous fragrance ingredients present at or above 100 ppm.



- All fragrance ingredients on one of the 22 “designated lists” or “DL” of hazardous chemicals, regardless of concentration.
- Presence of any EU fragrance allergens at or above 100 ppm.
- No trade secret protections for any ingredients on the “designated lists.”
- Any of 33 identified hazardous non-functional constituents (a.k.a. contaminants) if present at or above 100 ppm and 1,4 dioxane at or above 10 ppm.
- Ingredient function: what the ingredient does in the product.
- CAS #: a unique number assigned by the Chemical Abstracts Service to every chemical substance.
- Safety Data Sheet for the product.

The sheer volume as well as some of the new and unfamiliar information can be a bit overwhelming, so we created a short video to help you find, navigate, and understand online cleaning product ingredient information: [https://youtu.be/kjIZeJ\\_dxNc](https://youtu.be/kjIZeJ_dxNc)

## Still to Come

Disclosure of Prop 65 chemicals, which are known to the State of California to cause cancer or reproductive harm, as of January 2023. Full disclosure of these “worst of the worst” chemicals is very important to consumers; however, the delay for Prop 65 disclosure was requested by industry to allow sufficient time to remove these chemicals from their products – which is, after all, the ultimate goal of ingredient disclosure: safer products.

## Glossary of Terms

- **Active Ingredients:** Ingredients in disinfectants that kill bacteria and viruses. Regulated by the EPA as pesticides.
- **CAS #:** Chemical Abstracts Service Registry Number is a unique designation allowing clear identification of a specific chemical, which may have multiple common or chemical names.
- **Designated Lists or “DL”:** A set of 22 authoritative lists indicating that a chemical is linked to negative impacts (or effects) on health and the environment such as cancer, reproductive or developmental harm, neurotoxicity, hormone disruption, respiratory harm, and air and water contamination.
- **Fragrance Ingredients:** Ingredients used to impart or mask smells or odors.
- **Function:** What the chemical is used for in the product, e.g., fragrance, cleaning agent, preservative, foaming agent, etc.
- **Intentionally Added Ingredients:** Non-fragrance ingredients added for a specific function in the product.
- **Non-Functional Constituents:** Contaminants or byproducts of the manufacturing process that do not serve any function in the finished product.
- **Private label products:** Products manufactured for a retailer, such as a grocery store chain, Target, or Walmart, to sell only in their stores under their own brand name.
- **Safety Data Sheets:** Provides detailed information to workers about potential hazards of chemicals in products.

New York State is also working on regulations to require additional online disclosure. While it is unclear when those regulations will be released, finalized, and implemented, the expectation is that they will add to the ingredient information currently required by SB 258. Together, these two state requirements will provide complementary and critical elements of ingredient disclosure in cleaning products.

## A Word about Disinfectants

Cleaning products that claim to kill bacteria and viruses are regulated by the federal EPA as pesticides and as result are subject to a strict set of rules for what can appear on the product label. The specific ingredient(s) in the product that kill bacteria and viruses are called “Active Ingredients” and must be listed on the label along with their percent concentration. “Inactive Ingredients” are not pesticides; however, these chemicals may still pose hazards to users. Due to the federal requirements on package labels, SB 258 only requires online disclosure for disinfectants, including their inactive ingredients and fragrance.

## What does it mean if you can’t find a product’s ingredient list?

As mentioned above, if you’re looking for a list of ingredients in a disinfectant, you won’t find it on the label; head to the product’s website.

There may also be pre-existing inventory on store shelves, particularly outside of California, with labels that pre-date the California cleaning product disclosure law and therefore lack the ingredient list. Again, the information should be available on the product website.

You might also be unable to find ingredients for some private label products. Virtually all national brands, as well as private label products for national retail chains, are sold in California, and are therefore subject to the requirements of the CA law. However, some companies sell in discrete sections of the country, such as the South (Publix), mid-West (Meijer), or New England/mid-Atlantic (Stop and Shop), and as a result, are not required to comply with SB 258.

Finally, it’s possible that the information is in a hard-to-find location on the company’s website, or the company is not fully complying with the law. In either case, you might consider contacting the company to 1) ask where the information is located, or 2) point out that they are breaking the law and urge them to post the required information.



## Conclusion

While many green cleaning product companies, such as Seventh Generation, have fully disclosed their ingredients for decades, passage of the California law represents the first time ever that companies are being legislatively *required* to disclose the chemicals in their cleaning products. The pending New York regulations are expected to provide additional ingredient information.

Consumers can now make more informed choices about the products they bring into their homes. And as more consumers choose products free from hazardous chemicals, the market will move toward making safer cleaning products, protecting both our health and the environment.

# Appendix

## Review of On-line Ingredient Disclosure Compliance

BCPP sought to understand the level of compliance with the California Cleaning Products Right to Know Act by reviewing the website of cleaning product manufacturers. We looked at a cross section of products based on both the type of company (general manufacturers (mix of small to multinational companies), “green” companies, private label brands, and institutional product companies) and the type of product (disinfectants, general purpose cleaners, laundry detergents, dishwashing detergents, air fresheners, and degreasers), with some overlap between the two categories. The number of products per company ranged from one to five, depending on the size of the company and how many product categories they offer for sale.

We found a high level of compliance overall, particularly for the primary elements of the law: ingredients (including fragrance ingredients), CAS #, and function. We designated some companies as being “partially compliant” if we found a substantial amount of ingredient information but not everything required; typically, the missing information consisted of the links to the CA law’s Designated Lists and/or the Safety Data Sheets. However, we did not confirm that the information was missing by contacting the companies to check if it was available in some hard-to-find section of their website. Products designated as “Not Compliant” lacked all or the majority of required information. Additionally, we reviewed products from three private label companies that sell in markets outside of California to see if they were providing ingredient information, even though (since they sell outside of California) it is not required. We found that they were not disclosing.

While 65% of companies are fully complying with the law, and close to 90% have most of the ingredient information required, more education and pressure is needed to ensure full compliance.



Table 1: Results by Cleaning Product Type

Cleaning Product Types	Compliance by Product sold in CA (63 total reviewed)*
Disinfectants	46 (73%) – Fully compliant
General Purpose Cleaners	12 (19%) – Partially compliant
Laundry Detergents	5 (8%) – Not compliant
Dishwashing Detergents	
Air Fresheners	*An additional 9 products from private label companies
Degreasers	outside of CA did not comply.

Table 2: Results by Cleaning Company Type

Cleaning Company Types	Compliance level of 26 companies selling in CA
12 – General Manufacturers (from small to multinational companies)	20 (65%) – Fully compliant
7 – “Green” companies	6 (23%) – Partially compliant
7 – Private label companies (3 outside of CA)	3 (12%) – Not compliant
3 – Industrial products companies	

### List of Companies

3M Co.	Mrs. Meyer’s Clean Day
Beaumont Products, Inc.	Procter & Gamble Co.
Church & Dwight Co.	Publix Super Markets, Inc.
Colgate-Palmolive Co.	Reckitt Benckiser Group
Costco Wholesale Corp.	S.C. Johnson & Son, Inc.
Ecolab, Inc.	Seventh Generation, Inc.
ECOS	Spartan Chemical Company, Inc.
Fuller Brush Co.	Stop & Shop Supermarket Co.
Henkel Chemicals Co.	Target Corp.
The Honest Company	The Clorox Company
J.R. Watkins Co.	Tru-Earth
Kroger Co.	Walmart Inc.
LA's Totally Awesome	Weimen
Meijer Inc.	Zep, Inc.
Method Products Corp.	

Breast Cancer Prevention Partners (BCPP) is the leading science-based policy and advocacy organization working to prevent breast cancer by eliminating our exposure to toxic chemicals and radiation.

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Visit [bcpp.org](http://bcpp.org) to learn more.

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