



Review of the Voluntary Industry Code to Support the Australian Ban on Testing Cosmetics on Animals

Summary of Industry Survey Results

Survey Process:

- A direct survey via SurveyMonkey of cosmetic industry businesses, open to Accord members, non-members and relevant retailers, was issued on 10 November 2023 and closed on 12 January 2024.
- This survey complemented the open-ended public call for feedback on the Code, that also ran over the same period.

Demographics:

- The survey received 22 responses. While survey inputs were anonymous to encourage responses, information about the type and size of the responding business was sought.
- Three (3) responses stated their company “do not have cosmetic products” putting them outside the scope of this survey. This reduced the number of in-scope responses to 19.
- Fourteen (14) responded that they import cosmetic products into Australia. Four (4) stated that they manufactured cosmetic products locally and that they imported product as well. There were 3 responses from retailers. Twelve (12) respondents were Accord members.
- Six (6) were large businesses (with 200+ employees), 6 were medium (20-200 employees) and 2 were small (<20 employees). The rest (5) did not answer this question.

Results:

- Eight (8) companies said they routinely promote advertising/marketing claims related to animal testing (AT) compared to 6 who said they did not.
- *Should AT claims be made...* Two (2) companies stated that AT marketing claims have a place in Australia compared to 3 who said they do not know that animal testing is banned. The rest (14) did not answer this question
- *Types of AT claims made...* Of the 8 companies making animal testing claims, 7 stated they used “Not Tested on Animals”, 7 stated they used “Vegan”, 4 stated they used a third-party certification logo (such as Choose Cruelty Free), 3 stated they used “Cruelty Free”, and 1 made the claim “Animal Friendly”.

- *AT Ban awareness...* Twelve (12) companies stated they were aware of the animal test ban that came into force on 1 July 2020, none stated they were unaware, with the rest (7) not responding.
- *Code awareness...* Ten (10) companies responded they were aware of the Code, with 2 stating they were unaware and the rest (7) not responding.
- *Code usage...* Three (3) companies stated they used the Code as an adopted reference in their advertising compliance system. Two (2) companies used the Code as an outside reference for their marketing and/or corporate legal function. Two (2) companies stated they rarely consulted the Code and 1 said they did not use it despite making AT claims. One (1) stated they relied instead on third-party certification. And 1 stated that while they do not make AT claims they reference the Code for its information on the AT ban operation.
- *Barriers to Code usage...* Nine (9) companies stated that there were **no** factors inhibiting their ability to use the Code compared to 1 stating otherwise. This respondent cited their view that the Code did not provide practical enough guidance. Another suggested the Code include more examples.

Discussion:

- Accord's *BeadRecede* database was used to issue the survey to members and non-members in mid-November 2023. This targeted ca. 130 companies, though not all were selling cosmetics.
- Overall, the response rate for this voluntary survey was considered reasonable in the circumstances, given the Australian ban on animal testing has been in place for several years and this is no longer the 'hot issue' it was prior to the ban.
- Consistent with the ban being in place, 32 per cent of respondents stated they are **not** making AT claims. As one respondent noted on AT claims – "Not needed anymore... except in countries where they are required by their government".
- For the 68 per cent making AT claims, the main claim used was "Not Tested on Animals". This relatively unambiguous claim is recommended in the Code. Many also indicated they used the claim "Vegan" – a concept that covers additional potential animal related aspects, not explicitly 'no animal testing'. The more ambiguous claim "Cruelty Free" was reported in use by 3 respondents. A clear minority of 1 used the similarly ambiguous claim "Animal Friendly".
- There was strong awareness from respondents regarding both the ban and the Code. Of the 2 companies stating they were unaware of the Code, both were non-members of Accord; one a retailer and the other, an importer.
- The finding that most respondents had no difficulties using the Code shows that it remains mostly fit-for-purpose with no pressing need for major revision. The suggestion from 2 respondents that better examples are needed was investigated during this revision.

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