

IR/PS CSR Case 07-08

The Coalition for Consumer Information on Cosmetics & The Leaping Bunny Logo



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Prepared for Professor Peter Gourevitch
Edited by Jennifer Cheng, MPIA 2008
Corporate Social Responsibility
Winter 2007

Abstract:

This paper investigates the Coalition for Consumer Information on Cosmetics' (CCIC) *Corporate Standard of Compassion for Animals* and its *Leaping Bunny* logo. Both devices seek to simplify the numerous claims relating to animal testing for consumer products and cosmetics, and establish a standardized definition of these practices as well as a commitment against them. CCIC formed in 1996 and the logo made its debut in 1998; today more than one-hundred companies have adopted the Corporate Standard, with some going beyond and adopting the logo as well.

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I. Animals in Society

The relationship between man and animal is as old as humanity itself. Animals provided clothing for our ancestors, food for their families, and were instrumental in establishing agriculture, thus providing the basis for civilization itself. Centuries of social practice and the human superiority complex have always drawn a line between the value and role of animals and humans. Certain animals, namely dogs and cats, have been fortunate to attain the elevated status of human companions (and in many cases even royalty), but the majority of animals are still seen as lesser creatures and objects to be used rather than individuals with rights. Today they are still used for their traditional inputs of agriculture and clothing, but have taken on the exploitative, industrialized role of commercial goods and test subjects. We must remember that the line between human and animal is nebulous; war, slavery, genocide, cruelty, and abuse demonstrate humanity's capacity for savagery and draw into question the superiority on which we base our treatment of animals.

As civilization has progressed, man's awareness of his world and his impact on it have changed accordingly, as have his moral and ethical standards. Predilection for environmental protection, organic food, corporate regulation, and consumer product labeling are all examples of our increasing awareness and willingness—or at least recognized need—to take responsibility for our actions. It is in this context that the developed world has begun to reevaluate and affect change in its treatment of animals, one of the most integral elements of society. Through this essay I will attempt to illuminate the efforts of the *Coalition for Consumer Information on Cosmetics* (CICC) to create a corporate standard and labeling system that standardizes the

definition of animal testing for consumer and cosmetics products, and attempts to regulate against it.

II. Animal Testing & The Animal Testing Industry

The primary purpose behind using animals as test subjects lies in the desire to evaluate products or procedures that are intended to be used by humans. A portion of animal testing involves products that are intended for animals themselves, or to study animal behavior (unrelated to behavioral studies that are intended for extrapolation to humans) but these are minor parts of the overall practice. Animal testing of all kinds can be broken down into five primary categories under which specific types of tests fall.

Pure Research

- Mutagenesis
- Chemical/Radiation Effects
- Behavioral
- Breeding – Evolution & Genetics

Applied Science

- Genetics & Disease
- Naturally Occurring Disease
- Xenotransplantation

Military Testing

- Weapons Testing

Drug Testing

- Metabolics
- Toxicity
- Drug Efficacy
- Reproductive Function, Embryonic Toxicity, Carcinogenic Potential
- Medical Devices

Cosmetics, Personal & Household Products (CPH)

- Final Product/Ingredients Tests
- Irritancy Tests
- Safety Issues
- Toxicity

Of these categories, drug testing and medical research often garner the greatest amounts of support from the public, as they can be thought of as necessary evils for the advancement of mankind. Within the United States, much of the animal testing within this field is not performed voluntarily by pharmaceutical or biotech companies, but is mandated by the Food and Drug Administration. Development of new drugs is heavily regulated by the FDA. The Food, Drug, and Cosmetics Act permits the FDA's Center for Drug Evaluation to require extensive toxicity

testing on animals before being allowed to enter the clinical trial phase.¹ Common required tests include:

- **Acute (short-term):** 7 to 20 rats + dogs or primates
- **Subchronic (14-180 days) toxicity:** rats + dogs or primates
- **Chronic (lifetime) toxicity:** 120 rats + 32 dogs or primates
- **Cancer causing effects:** 400 rats + 400 mice
- **Toxicity to reproductive systems**
 - **Segment I (reproductive toxicity in 2 generations):** 2500 rats
 - **Segment II (birth defects):** 900 rabbits + 1300 rats
 - **Segment III (peri- and post natal effects):** rats
- **Absorption, distribution, metabolism, excretion, and pharmacological interactions, of active ingredients**
- **Specialty studies**
 - **Genetic toxicity:** 80 hamsters/mice x 2 to 5 separate studies
 - **Immune system toxicity:** 32 rats
 - **Skin/eye/mucosal irritation:** 3 rabbits per test

Medical testing on animals has few boundaries. Animals are repeatedly infected with deadly viruses and bacteria, injected with chemicals and vaccines, have their organs removed and replaced with the organs of other animals, used to demonstrate medical techniques, and are in a position to suffer abuse and pain throughout. Interestingly, animal tests have proven again and again to poorly imitate human physiology and reaction. The FDA itself recently reported that 92 out of 100 drugs that successfully pass the animal testing stage fail during the human clinical phase.² Why such tests continue is difficult to hypothesize. Perhaps America's overly-litigious society forces the government and companies to cover all avenues of human injury; perhaps adopting alternate testing methods is not an endeavor many are willing to take unless they are forced. What is certain is that an enormous industry exists around animal testing.

Vivisection is a sizeable industry. In the United States more than 1100 regulated testing facilities and a further 4000 distributors, transport companies, dealers, etc. employ tens of

¹ StopAnimalTests.com, "U.S. Food and Drug Administration (FDA)," [www.stopanimaltests.com/us-fda.asp]

² Ibid.

thousands of people. Testing is also carried out in Canada, Europe, and Japan.³ The specific types of animals subject to testing include mice, rats, dogs, cats, fish, primates, horses, pigs, chickens, insects and more. In North America, Europe, and Japan it is estimated that between 50 and 115 million animals are involved in animal experimentation each year. Specific numbers are impossible to obtain as mice, rats, and birds, which make up 80-90% of all animal test victims are not covered by the US Animal Welfare Act and do not need to be counted.⁴ Nearly all animals used die as a result of the experiments, or are euthanized. Obtaining animals for experiments is done through a network of class A and B dealers. Class A, supplying 50% of test subjects, sell animals that have been purpose bred for the animal testing industry.⁵ Class B distributors supply “random source” animals and their sources are more questionable. They purchase from auctions, and source animals from pounds and shelters that would otherwise euthanize un-adoptable animals. There are allegations that these people have stolen animals from owners, or take them from individuals who place “free to a good home” advertisements.⁶ Animal rights groups are quick to point out these incidents, while institutions that use animals in testing downplay such occurrences as much as possible and allude to “strict” regulations that they feel prevent such undesirable activity.⁷ Testing equipment—and animals—are available from distributors, most notably *Animal Lab Magazine*, which provides anything from mice to restraint devices to tools and monitoring equipment.⁸

³ Animal Care Publications, “Facility Lists,” [www.aphis.usda.gov/ac/publications.html]

⁴ StopAnimalTests.com, “Animal Research Industry,” [www.stopanimaltests.com/AnimalResearchInd.asp]

⁵ California Biomedical Research Association, “Frequently Asked Questions The Role of Animals in Biomedical Research,” [www.ca-biomed.org]

⁶ StopAnimalTests.com, “Animal Research Industry,” [www.stopanimaltests.com/AnimalResearchInd.asp]

⁷ California Biomedical Research Association, “Frequently Asked Questions The Role of Animals in Biomedical Research,” [www.ca-biomed.org]

⁸ StopAnimalTests.com

Within the United States measurable regulation of the animal testing industry does exist. The majority is managed by the United States Department of Agriculture and its authority for regulation originated with the US Animal Welfare Act of 1966 (7 USC, 2131-2156) Amended in 1970, 1976, 1985, 1990 and 2002)⁹ Some of its provisions include requirements that test animals are provide anesthesia if they may be subjected to painful procedures, medical care is to be provided by veterinarians, animals that experience chronic pain which cannot be relieved are to be painlessly euthanized, and personnel conducting procedures are to be appropriately qualified. The act applies to the following animals, with notable exceptions to exclude the food and leather industries from regulation under this specific act:

“Animal means any live or dead dog, cat, nonhuman primate, guinea pig, hamster, rabbit, or any other warm-blooded animal, which is being used, or is intended for use for research, teaching, testing, experimentation, or exhibition purposes, or as a pet. **This term excludes birds, rats of the genus *Rattus*, and mice of the genus *Mus*, bred for use in research; horses not used for research purposes; and other farm animals, such as, but not limited to, livestock or poultry used or intended for use as food or fiber, or livestock or poultry used or intended for use for improving animal nutrition, breeding, management, or production efficiency, or for improving the quality of food or fiber.** With respect to a dog, the term means all dogs, including those used for hunting, security, or breeding purposes.”¹⁰

Currently, the act requires that all breeders (kennels), exhibitors, carriers, research institutions (including Universities), dealers, exhibitors, and handlers or animals be registered with the USDA. The names and addresses of all registered entities are available to the public and listed by state. All facilities are inspected at least once per year, and an annual report of violations is published and available to the public. Specific facilities are not names in the report, but information may be requested from the US government through the Freedom of Information Act. Of particular note is the disproportionate violations regarding living condition and care in

⁹ Animal Welfare Act and Regulations (7 U.S.C. 2131-2156) 1966. [www.nal.usda.gov/awic/legislat/usdaleg1.htm]

¹⁰ Animal Welfare Act, “Regulations” Section 1.1 Definitions [www.aphis.usda.gov/ac/publications/AWR/PART1.HTML]

comparison to animal treatment and handling.¹¹ While Animal Welfare Act Regulations fall short in comprehensively addressing the total suffering of animals in the testing industry, they do provide the critical element of revealing exactly who is carrying out animal tests and to which companies they are connected. To enhance or ensure the ability of government regulators to prevent animal suffering, more stringent cruelty requirements are needed, more frequent audits should occur, and the permissibility of specific experiments must be established. At present, as long as a facility follows government regulations, there is no limit to the nature or type of experiments carried out, nor is there a limit on the number or species of animals involved. Restriction on the types of animals used is an ideal method of reducing suffering in animal testing as humans are likely to support the elimination of dogs, cats, primates, and other larger animals from testing before they are willing to support the elimination of rodents.

We now turn our attention to the main issue in this paper: animal testing and the cosmetics and household product industry.

III. Cosmetics, Personal Care Products, Household Products & Testing

Animal testing for cosmetics (make-up, skin care), personal care products (dental care, topical medicines, soap, hair care, etc) and household products (cleansers, laundry detergent, air fresheners, etc) parallel the patterns of animal testing for drugs and medical applications as the primary purpose has been safety and toxicity testing. Every time a product label reads “Harmful if swallowed/inhaled,” “Tear-free,” or “Skin irritant,” we can be sure that these statements are a result from animal testing experiments. Products are routinely forced into animal stomachs to see how much it takes to kill the animal, applied to their skin/eyes to determine if irritation or burns

¹¹ 2005 Violation Summary [www.aphis.usda.gov/ac/violations/2005violations.pdf]

occur, or inhaled by animals and the results recorded. Such experiments defy all semblance of morality and logic as it is common sense that any cleaning product, no matter how eco-friendly, is likely to make a human sick if ingested, or that applying makeup and skin cream directly into the eye is likely to cause significant irritation. In any case, as with drugs, products are tested on humans in clinical trials before market release. Significant information exists on the potential health and allergic reactions of thousands of potential cosmetics, personal care, and household product ingredients, yet some companies continue to test every variation of their new products on animals. Household, personal care, and cosmetics products cannot be linked to potentially revolutionary or life changing applications, as medical testing can, and their immediate and long term usefulness is seriously questioned.

Backlash against animal testing for C.P.H. products first began in 1980. The 1970s had seen the birth of the animal rights movement with Peter Singer's 1973 book *Animal Liberation*. The book had a profound influence on Henry Spira, who founded *Animal Rights International (ARI)* the following year. On 15 April 1980 *ARI* launched the first anti-vivisection campaign against a cosmetics company when it took out an entire page in the *New York Times* displaying a rabbit whose eyes had been damaged, several test tubes, and the headline "How many rabbits does *Revlon* blind for beauty's sake?"¹² Until this campaign very few consumers had ever known that everyday products from the local drugstore were tested on animals. It also marked the beginning of the movement by C.P.N companies to search out alternate methods of testing products and phasing out animal tests.

Since 1980 a significant number of claims and labels have appeared on C.P.N products, making claims regarding animal testing. Part of this push to end animal testing and inform

¹² Henry Spira, *Wikipedia* [en.wikipedia.org/wiki/Henry_Spira]

consumers of new policies is due to increasing ethical standards of companies and those within them. Another potentially greater impetus for change comes from changing consumer preferences. Polling demonstrates that there is a belief among consumers of C.P.N products that animal testing for these items is neither desirable nor seen as necessary. In 1995 only 31% of Americans thought cosmetics testing on animals was right. A different poll showed that 58% of Americans felt using animals for cosmetics research should be prohibited, with another 23% disapproving but not seeing the need for legislation.¹³ As companies introduced products that were not tested on animals, and companies formed whose corporate policies were always against animal testing, the only simple means of information conveyance to the consumer—discounting individual research done by the consumer before purchase—has been through labeling. Numerous statements have appeared on C.P.N products over the past twenty years making a variety of claims, including:

- Cruelty Free
- No Animal Testing
- Not Tested on Animals
- Never Tested on Animals
- We Do not Test on Animals
- This Product has not been Tested on Animals
- Against Animal Testing
- Product and Ingredients Not Tested on Animals

The true meaning and message of these statements are nebulous. As there is no regulation of animal testing claims, these labels could mean that indeed the product and its ingredients were not tested on animals, just the final product was not tested on animals but the ingredients were, or the company does not test on animals but contracts out to another one that does. Standardizing this message was never attempted until the advent of the Coalition for Consumer Information on

¹³ Noah Lewis, "Testing Cosmetics on Animals: An Idea Whose Time Has Gone," Harvard Law School, Spring 2004, 9-10.

Cosmetics in the mid-1990s and its *Corporate Standard of Compassion for Animals* and *Leaping Bunny Logo*.

IV. CCIC & The Bunny

The Coalition for Consumer Information on Cosmetics formed in 1996 as a coming together of eight national animal rights non-profit groups. In the United States they are, the American Anti-Vivisection Society, the American Humane Association, the Animal Protection Institute, Beauty Without Cruelty USA, the Doris Day Animal League, The Humane Society of the United States, the New England Anti-Vivisection Society, and in Canada, the Animal Alliance of Canada.¹⁴ Since inception, a further 11 European national animal rights groups, including the British Union Against Vivisection, and 3 international groups have added their support to the CCIC. The coalition is not incorporated and is supported by funding from its coalition members. There is no CEO but a steering committee does exist, comprising representative from various CCIC and non-CCIC groups. The most updated list available reads as follows:¹⁵

- Tina Nelson – American Anti-Vivisection Society
- Amy Ridings – American Humane Society
- Ethel Thurston – Beauty Without Cruelty
- Sara Amundson – Doris Day Animal League
- Gina Alvino – Humane Society of the United States
- Theo Capaldo – New England Anti-Vivisection Society
- Ann Marie Giunti – People for the Ethical Treatment on Animals (PETA)

An agreed upon definition of no animal testing and an adoptable standard was created by the CICC. A company that wishes to adhere to the *Corporate Standard of Compassion for*

¹⁴ “About Us,” The Coalition for Consumer Information on Cosmetics [www.leapingbunny.org/about_us.htm]

¹⁵ “Leaping Bunny (Corporate Standard for Compassion for Animals),” eco-labels.org, [www.eco-labels.org/label.cfm?LabelID=239&searchType=Label%20Index&searchValue=&refpage=labelIndex&refqstr=]

Animals agrees to 1) Not test its products or the ingredients of its products on animals in any way 2) Not commission the testing of its products of the ingredients of its products to a research facility 3) Not purchase from suppliers ingredients or products that were tested on animals 4) Agree to obtain from their suppliers, and submit their own assurance that their products and ingredients are not tested on animals, on an annual basis.¹⁶ A cut-off period of several years is allowed, permitting companies to claim no animal testing several years after discontinuing the practice. Companies are free to adopt the standard and continue to use their own variation of no-animal testing label, but they are not required to license the *Leaping Bunny* logo, the internationally recognized symbol or adherence to the compact. They must, however, be approved before by CCIC, submit agreement documents, and cannot simply add their name to a list. Licensing of the logo costs between \$500 and \$4000 and is graduated on the basis of a company's annual revenue. If a company licenses the logo, then they additionally agree to submit to an independent audit of their animal testing practices, policies, and record keeping at least once every three years.¹⁷ Licensed groups benefit from being able to display the Bunny logo, as well as receiving promotion in CCIC's *Compassionate Shopping Guide*.

V. Targets & Effectiveness

The CCIC and its *Leaping Bunny* program have a dual goal: to reduce suffering and cruelty toward animals and to provide consumers with the ability to identify a product that truly was not tested on animals. The cut-off date provision means that products and companies which have tested on animals in the past, but that have changed their practices, can adopt the compact and logo. Faith in the validity of the logo is supported by company policies within the

¹⁶ "Compassionate Shopping Guided," Coalition for Consumer information on Cosmetics, [www.leapingbunny.org/pdf/ccicguide_full.pdf]

¹⁷ "Leaping Bunny (Corporate Standard for Compassion for Animals)," eco-labels.org

C.P.H products industry and US laws, the influence of whistle-blowing animal rights groups and independent monitoring of companies that have licensed the logo.

Actions on the part of companies that do test on animals, in conjunction with US laws regarding animal testing is one of the stronger influences supporting the validity of the CCIC's compact and logo. The majority of C.P.H products that consumers in North America and Europe consume come from a small group of companies. Of these, the best known are *Procter & Gamble*, *Unilever*, *Johnson & Johnson*, *Colgate-Palmolive*, and *L'Oréal*. These five companies manufacture hundreds of the most common brands of makeup, toothpaste, shampoo, conditioners, skin cream, household cleaners, and soaps that are purchased everyday. All of these companies freely admit that they do indeed test their products on animals. *Johnson & Johnson*, *P & G*, and *Unilever* all provide easily accessible documents regarding their company's policy toward animal testing. They all acknowledge their desire and goal to eliminate animal testing for their products, though some websites require deeper investigation to locate such information; *L'Oréal's* website states that it has had a policy of no product testing on animals since 1989, but in its Corporate Social Responsibility report says—in addition to the massive investment in alternate testing methods—that this only refers to final products.¹⁸ *Procter & Gamble* maintains the most comprehensive information available describing its animal testing policies, its scientific advances in developing alternative testing methods, and a partnership with the Humane Society of the United States regarding its efforts to eliminate animal testing for product safety.¹⁹ Over the

¹⁸ L'Oréal 2005 Sustainable Development Report
[www.loreal.com/_en/_ww/group_new/pdf/LOREAL_RDD_GB.pdf]

¹⁹ "P&G and HSUS Create Partnership," Research Involving Animals,
[www.pg.com/science/ria_hs_partnership.jhtml]

past two decades *P & G* has spent more than \$200 million eliminating animals from testing procedures.²⁰

What may be of concern to some is the possibility of a company signing the CCIC compact or adopting the Bunny logo while it still tests on animals. The possibilities of this scenario are low. While many of *P & G*, or *Unilever's* products are not tested on animals, some still are. Because the companies themselves are not animal-free, they have not attempted to label singular products as not tested on animals. Here, the power of US law and the influence of animal rights groups come into play. Thanks to the registration requirements of the Animal Welfare Act and the inspection visits by USDA auditors, it is known which companies own testing facilities, and if they do not own or operate them themselves, it is possible to obtain this information. The fact that that mice, rats, and birds are exempt from these monitoring schemes does not significantly weaken this argument. In testing drugs, it is quite possible for minute amounts of a substance to damage or kill a rat; however, the same is not often true with C.P.H products. The substances in these items are more benign and greater quantities are need to affect an animal. Mice and rates are small. Their physical size prevents them from acting as viable test subjects as the amounts of a substance needed for testing normally exceeds the size of the animal itself.²¹ Therefore, we are left with larger animals such as rabbits, guinea pigs, dogs, cats, and monkeys which are regulated by the US government. Not tested on animal labeling by a known animal-testing company would immediately be seized up and publicized by animal rights groups.

Unlike government agencies, animal rights groups are not hindered by extensive bureaucracy, nor do they have an incentive to maintain a status quo. Many of these groups such as the Humane Society of the United States and the People for the Ethical Treatment of Animals

²⁰ Lewis, 8-9

²¹ Lewis, 4-5

(PETA) have extensive networks of members and volunteers who are able to mount their own investigations, protests, get issues noticed by the media, and mount legal challenges to practices by corporations, individuals, and the government. PETA has been notoriously successful in infiltrating laboratories, slaughter houses, factory farms, fur farms, and even shareholder meetings to expose the cruel practices in all animal related industries. On their numerous websites such as www.bloodyburberry.com, www.furisdead.com, and www.iamscruelty.com they offer photographs, videos, resources, and merchandise relating to barbaric treatment of animals and dishonest statements and policies of companies. Groups like PETA constantly monitor institutions making use of animals. A corporation claiming it does not test on animals, or labeling its products as not tested on animals, when in fact it does, is exactly the type of behavior that animal rights groups will attack. They attempt to expose company practices, publicize them, and hope to affect consumer and individual behavioral changes through shock or heightened awareness.

Several animal rights groups publish shopping guides that give information on company's that do and do not test C.P.H products in some way on animals. PETA maintains a fairly strict list of do test and does not test companies. They list companies as "do test" if any portion of a product is tested on an animal, or if it refuses to sign PETA's statement of assurance that no tests are carried out. Companies appearing on the "do not test" list have signed PETA's statement of assurance that they do not commission any non-required animal tests. Should a company commission animal tests for pharmaceuticals, as required by US law, they are still eligible for inclusion on the list.

A final element of support for the validity of the Bunny logo and standard is independent monitoring of companies that have licensed the logo. Licensed companies agree to undergo an

independent audit at least once every three years. Funding for the audits is provided by CCIC's supporting members. Audits carried out more frequently than once every three years could may overstretch the resources of CCIC. In 2001 six companies, Clear Conscience, Dr. Bronner's, Eco-Dent, Naturade, New Vision, and Seventh Generation were the first to be investigated. Audits were performed by SGS International Certification Services, the world's leading inspection, verification, testing and Certification Company.²² All six companies passed their audits, continuing to follow all of CCIC's directives and prohibit all forms of animals testing. Since this time CCIC's website has not presented updated information on the monitoring program nor does it provide information as to the specific costs associated with SGS' services. Constant monitoring by a hired firm may not ultimately be necessary to ensuring the compliance of Corporate Standard/Bunny logo followers.

VI. Final Remarks

The Coalition for Consumer Information on Cosmetics has attempted to devise a standard that guarantees a product and the company that produced it did not involve animal testing anyway. Alone, this standard and the monitoring of the CCIC do not provide overwhelming support for the ability of the compact and the logo to prevent cruelty to animals. However, it is with the combined efforts of the US government, animal rights groups, and consumers that the compact and label gains significant strength. Preventing cruelty to animals is only part of CCIC's mission. Creating a standard that unites the numerous claims related to animal testing benefits consumers by giving them an independent standard, rather than and in house label, on which to base their purchase decision. The greatest challenge to CCIC and the Bunny logo is one of

²² "News," The Coalition for Consumer Information on Cosmetics," [www.leapingbunny.org/news.htm]

visibility and recognition. Since none of the major C.P.H companies are animal test free and cannot adopt the logo, the average shopper is unlikely to come across it. If the logo were required in signing the Corporate Standard of Compassion for Animals, it is likely its visibility would increase. Presently, only 40% of compact signatories have licensed the Bunny logo as well. Adoption by the USDA or the Bunny logo as the official standard and label for no animal testing would give it its strongest basis of support. Whatever the developments regarding the logo, the greatest likelihood is that companies will eventually eliminate animal testing for C.P.E products on their own.

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VII. Discussion Questions

1. Discuss the arguments for and against animal testing in cosmetics. Why is it different for the food or drug industry? Why would some large companies like L'Oreal, Proctor and Gamble and Unilever be unwilling or find it difficult to abolish animal testing altogether?
2. What does the CICC organization do that the US Animal Welfare Act of 1966 fails to address?
3. Go the Coalition for Consumer Information website. How many companies have ascribed to its mission? How many licensees does the organization have? Are there any well brands on the list? How successful has the (CICC) been in abolishing animal testing in cosmetics and personal care products?
4. The author states that only 40% of the CICC's Compact signatory licensee the bunny logo. What motivates some companies to use the logo and why would others choose not to?
5. What measures should the CICC take to increase its visibility? Should it require all of its signatories to license its bunny logo? Embark on an aggressive consumer awareness campaign? Or does it need to strengthen and consolidate its organization structure?

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