

north florida face painting guild

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COSMETICS AND CHEMISTRY; OR WHAT DO THOSE WARNING LABELS MEAN?

Tallahassee FL. March, 2011— Recently there has been an increased awareness in cosmetic labeling especially as it is applied to products face painters use. To get right to the source the North Florida Face Painting Guild talked, at length, with a doctor of chemistry from a Florida university. We are providing his comments in full since we'd like everyone, professional face painters to concerned parents to have a better understanding of the FDA labeling as applied to cosmetics....

"I think there's a substantial misunderstanding amongst many of us about the role the FDA plays in the cosmetic marketplace. The FDA only has authority over manufacturers of cosmetics, and even then they are primarily concerned with the proper labeling of the cosmetics.

The FDA doesn't have any authority over the use of the cosmetics, no matter whether the cosmetic is used by a consumer or by a professional face painter. Therefore, the approval or lack of approval by the FDA of a color additive has no bearing on whether face painters can use cosmetics containing that additive near the eyes or anywhere else.

Case in point: there are NO color additives approved by the FDA for injection into the skin and as a result, **the entire tattoo industry operates without FDA approval** (see the first three paragraphs here: <http://www.fda.gov/cosmetics/productandingredientsafety/productinformation/ucm108530.htm>). That lack of approval is despite the fact that tattooing is an ancient human practice that most people would regard as being safe when performed with proper sanitation.

The FDA does not approve cosmetic formulations (i.e. the finished products you buy) but rather has the authority to declare that those products are mislabeled or adulterated if they don't follow the FDA's

rules. In most cases, it is up to the manufacturer to determine if the ingredients are appropriate. However, color additives are a special case where the FDA has created a list of approved additives and specifies that a cosmetic is mislabeled or adulterated if it contains color additives that are not approved for that use. That does not mean that the cosmetic is unsafe for your application if it contains additives the FDA has not approved. It only means that they haven't approved it (see tattooing, above).

In the case of use around the eyes, the FDA requires a relatively stringent set of tests to determine if the additive will cause eye irritation. The tests are conservative (i.e. they are designed to err on the side of caution) and have in the past involved things like the notorious Draize test in which the additive to be tested is in continuous contact with the eye of an animal (typically a rabbit) for up to two weeks. An additive that fails such testing is not approved for use in cosmetics intended for use around the eye.

However, just because an additive causes a problem when placed IN the eye for 14 days straight does not mean that it will cause a problem when applied NEAR the eye for a few hours at a time, especially if the use is intermittent or rare, as in a child being face painted. In reality, with a professional painter doing the application and thus ensuring that the paint does not enter the eye, the more appropriate standard for color additive choice might well be whether it is approved for use on the skin -- since eyelids and brows are just skin, after all. The FDA's approval process is designed to help prevent eye irritation in (primarily) women who use eye shadow every day and whose eyes might be regularly or continuously exposed to the additive; it isn't necessarily an appropriate standard to judge other uses.

Merely using a cosmetic that was not labeled for use near the eye does not automatically make one liable for subsequent problems. Conversely, approval of the color additives would not shield a painter from liability, so I hope no one is making that assumption. That's because the FDA only approves certain ingredients (like color additives) and not the entire formulation. You are relying on the manufacturer of the product to ensure that the other ingredients are safe for your intended use, so saying you use "FDA approved paints" or "FDA approved ingredients" is basically meaningless. Don't believe me? Read the section "Does FDA approve cosmetics before they go on the market?" and the one below it, here: <http://www.fda.gov/Cosmetics/GuidanceComplianceRegulatoryInformation/ucm074162.htm>

The experience of the face painting community (i.e. the lack of eye damage related reports, claims and lawsuits) is quite likely a better, more realistic assessment of the safety of these products than is the FDA's approval process, just as centuries of tattooing are a more reliable indicator of its safety than the FDA's lack of approval of tattoo inks.

If after all that I were still concerned, I would seek out the testing data for the color additives in question and see if the effects that caused the FDA to not approve them for eye use were problems that showed up immediately or if they were effects that took days of exposure to manifest themselves. Prompt effects might be a problem, but chronic effects are unlikely to be problems in a face painting situation."

Karen Mercer, founding artist of **FairyDust Faces** and co-director of the **North Florida Face Painting Guild** is extensively committed to the success of art instruction in public schools and in local youth organizations. The

North Florida Face Painting Guild is committed to the safety, quality and professionalism of face and body art in northern Florida.

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