

GETTING READY FOR BABY

# Peeling Back the Green Façade

Calling out “Greenwashing” in the Crib Mattress Market as Lessons on Brand Manipulation of Health and Environmental Claims

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## Disclaimer

The content of this report is intended to provide information about claims brands make about the qualities of the crib mattresses they sell, and includes a summary of findings about materials used in crib mattresses as reported by companies via their websites, via email and written communication, or identified through laboratory testing. We provide links to the websites we reviewed for the new information presented in this report on the date the website was reviewed using the “wayback machine,” a website that tracks older versions of information on the internet. We have made appropriate efforts to share our findings with the relevant companies, and have updated the information in this report based on their communications and changes made to their websites.

Any oversights were entirely unintentional and do not represent discrimination by the authors. We make no claim that a specific chemical or material of concern as identified in this report will cause a specific health outcome for a specific child, or that its absence would prevent any specific health effects. The information herein is intended solely as an educational tool, to provide parents with useful information to consider in their decision-making process. We also intend manufacturers, brands, retailers, child care providers, and government bodies to use this as guidance for best practices in crib mattress construction, ingredient transparency, and marketing.

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# Executive Summary

## WHY A REPORT ON GREENWASHING?

Based on our conversations with friends, allies, and strangers, most people – including parents – assume that products on store shelves are safe for use, and rely on the claims on the packaging and websites. However, too many companies misdirect shoppers. We reviewed the websites of crib mattress makers from 2020's *The Mattress Still Matters*<sup>1</sup> and identified misrepresentations and overstatements, which because they are intended to overstate the health and environmental benefits of the product, are considered “greenwashing.” We then translated them into four Tiers of Greenwashing (below).

**“Greenwashing” means the use of marketing claims to over-state or misrepresent a product or company’s efforts to be environmentally sound.**

TIERS OF GREENWASHING	
<b>4</b>	<b>Clear Greenwashing:</b> Marketing language explicitly states something about the product that is verifiably untrue, or highly unlikely to be true based on available information, including claims that do not match testing.
<b>3</b>	<b>Moderate greenwashing:</b> May make false claims privately but not on packaging or on brand website, or may use language that is highly suggestive of safety without being explicitly false. May lean heavily on trade association certifications, and may overstate the certifications’ standards or requirements.
<b>2</b>	<b>Light greenwashing:</b> Does not disclose potentially toxic or concerning chemicals, misleading descriptions, and/or touts trade associations certifications without overstating the certifications’ standards or requirements.
<b>1</b>	<b>Honest and forthcoming:</b> This does not necessarily mean that the products are unqualifiedly healthy, nontoxic, or safe; only that the company makes accurate claims.

Using the information we gathered for *The Mattress Still Matters*, we identified 10 companies that appeared to be engaging in various forms of “greenwashing” and documented those concerns through screenshots. We sent dossiers of our concerns and grounds for objection to each company.

We asked that:

- Eight companies more accurately describe and provide evidence of their **certifications**;
- Two companies remove marketing claims and imagery that strongly suggest or state their products are **natural** when they contained lab-made substances;
- Four companies remove claims that their products are **non-toxic** without providing sufficient evidence to state as such;
- Two companies remove claims that their products are **organic** when the products contained some or mostly non-organic materials; and that
- Three companies clarify or adequately disclose the materials used in their products.

## FINDINGS

Two companies made changes that were sufficient enough that we identify them only as Company A and Company B in the body of this report.

- L.A. Baby made the most greenwashing claims, and failed to respond to our outreach. They make inaccurate or unverified claims of “natural,” “non-toxic,” and “organic,” and their claims did not match prior product testing.
- Babyletto and DaVinci Baby claim to offer “non-toxic” crib mattresses without verification. They also overstated the UL GreenGuard Gold certification. Both made changes to their description of GreenGuard.
- Delta Children also made the claim that their crib mattresses are “non-toxic” and overstated the

UL GreenGuard Gold certification meaning. They adjusted their language regarding GreenGuard but continue to use “non-toxic” on their website.

- Nook Sleep misrepresented claims of both “natural” and “organic.” Previously, products produced under the same marketing claims had undisclosed PFAS in the cover. They did not respond.
- Graco® misused “organic” claims, made public claims at odds with previous product testing, and misrepresented the UL GreenGuard Gold certification. They provided no response.
- Colgate Mattress® and Dream on Me misrepresented UL GreenGuard Gold certification. Dream on Me disputed our findings and made no changes. Colgate Mattress® did not respond.

## TIPS FOR PARENTS

- 1 Get curious about words like “nontoxic,” “organic,” and “natural.” Look for verifiable certifications – not just logos – to confirm these claims.
- 2 Be wary of claims about what isn’t present: “BPA-free” or “PFOA and PFOS-free” items may have very similar chemicals, with similar impacts.
- 3 Watch out for misrepresentations about materials. Foam labeled as “plant-based” or “soy foam” are still polyurethane, with a little plant oil.
- 4 Remember: not all certifications are the same. Look for strong certifications like MADE SAFE®, GOTS, and GOLDS, and for proof of the certification

## MUST-DOS FOR MAKERS AND BRANDS

- 1 Make products to meet consumers’ expectations for human and environmental health. Then document that by securing robust certifications.
- 2 When you have secured a third-party certification, include explanations and documentation wherever you share the certification.
- 3 Don’t use meaningless terms like “natural” or “eco-friendly.” Use third-party certifications to

prove the benefits of your products.

- 4 Don’t use “non-toxic” unless every single component and process used to make your product from raw material to final products is free of all known or suspected harmful chemicals.
- 5 Stop confusing consumers by telling them what isn’t in your product. Be up front and provide full transparency about what *is* in your product.
- 6 Don’t mislead by focusing on a minor improvement in one component of your product, such as claiming polyurethane foam is “soy foam.”

That greenwashing has become such a prevalent trend is itself evidence that consumers demand products that are right for their health and for their environment. Manufacturers need to make safer products, not just to change marketing claims.

As consumers become more judicious and knowledgeable about their health, brands that authentically practice sustainability and safety will be rewarded and those that mislead and deceive their clients will be punished.

## RETAILER ADVICE

65% of consumers state they want to buy from purpose-driven brands that advocate sustainability. Think like a parent when stocking your (physical or virtual) shelves. When retailers earn a reputation for selling misrepresented or greenwashing products, customers learn to look elsewhere.

## URGENT REQUESTS OF REGULATORS, PARTICULARLY THE FEDERAL TRADE COMMISSION

Take a more proactive stance in pursuing manufacturers that engage in greenwashing. Manufacturers only misrepresent the sustainability and health of their products because they believe they can do so with impunity, or that any financial consequences from their behavior will be compensated for by increased sales. The Federal Trade Commission has all the legal authority it needs to punish bad actors, and it should do so more vigorously.

## Introduction

Parents take many steps to protect their babies as they grow. Most expect that a children's product offered for sale is safe and matches the advertising and marketing claims made about it. Despite this expectation, in many cases this isn't true: there are broad loopholes that allow companies to use chemicals that they don't disclose to the public. Some of these may even harm human health, even in products for newborns.

Many companies take advantage of this widespread belief by advertising that their products are unqualifiedly safe and environmentally friendly. When a company makes a claim to a product's sustainability or safety that is overstated, false, or misleading, we call that greenwashing.

**Greenwashing:** The use of marketing claims to over-state or misrepresent a product or company's efforts to be environmentally sound.

It's a play on the term "whitewashing" – a deliberate attempt to cover up unpleasant or unlawful facts, itself from the old-fashioned practice of using "whitewash" product to paint over fences, bricks, stonework, etc. to hide flaws.

As consumer appetite for safer, healthier, and more sustainable products has grown, so has greenwashing. When faced with this demand, companies have two choices: make safer products at higher costs, or seek to gain higher profits by presenting products as safer while using conventional, less expensive, and sometimes even less-safe materials.

Greenwashing has become a very big problem in

the marketplace at large and in children's product sectors in particular. It comes in all shapes and sizes, from slight misstatements or natural imagery to presentation of icons as implied certifications, and outright lies about the product.

Examples of greenwashing we have seen include:

- Making unverified claims that their entire product is natural or organic when only one element or a small proportion of it is.
- Overstating the meaning of a certification.
- Creating and using their own logo graphic to appear on par with independent certifications.

Once we knew what to look for, we noticed greenwashing seemingly everywhere. It can be a real challenge, even for experts, to try to cut through the marketing noise to understand what is or is not in a product. And if experts are struggling to make heads or tails of things, we can only imagine how overwhelmed parents are.

This does not serve the public desperately trying to find products that align with their values and protect their family's health and safeguard the environment.

### WHY FOCUS ON CRIB MATTRESSES?

If there's one thing a baby needs, it's a bed. As newborns spend up to two thirds of their days sleeping,<sup>2</sup> the substances in their mattress are integral to their most impactful "environment" of their day. The Getting Ready for Baby campaign is committed to changing the marketplace such that every family has access to a mattress that is safe and healthy, regardless of budget, or time to comb through and evaluate claims from different companies.

In 2020, we released *The Mattress Still Matters*, an investigative report detailing what companies disclose about the materials they use in their crib mattresses. In addition to compiling information from websites and direct communications from the companies we identified, we worked with independent laboratories to test thirteen of the mattresses

included in our review for potentially hazardous chemicals like flame retardants, PFAS coatings, heavy metals, and more.

In the process of gathering data and evidence, we noticed an alarming trend: some companies were saying one thing about their products, and tests were showing another. Others vastly overstated the value of certain characteristics of their products. The issue was wide-spread enough that we created a separate effort to identify instances of egregious greenwashing by crib mattress brands, seek changes, and share our findings with the public.

One of the core tenets of a competitive marketplace is that the consumer can make rational, informed choices. One assumption is that they have access

to all the information they need to make these decisions. When a company obscures the fact that potentially hazardous chemicals are present in their products, consumers cannot make informed choices. Since babies sleep on crib mattresses up to 18 hours a day, parents have a right to know what is in that product. Ultimately, all crib mattresses should be free of harmful chemicals. To get there, brands and product makers must meet the basic economic tenet and be honest and transparent.

We all want to do the right thing for our children and the environment. We hope this report helps parents understand greenwashing as it applies to crib mattresses and other products. Companies are more likely to do the right thing and honestly represent their product if they know people are watching.



## FROM THE MATTRESS STILL MATTERS

In *The Mattress Still Matters*<sup>3</sup>, released in 2020, we reviewed 227 online product descriptions from 37 crib mattress brands to determine what we could learn about the materials they use. We had 13 mattresses from different brands tested in laboratories and compared company disclosures with the chemicals detected. Mattresses were purchased in late 2018 and early 2019. Models can change frequently; that report was a snapshot in time.

### Good news:

**Two mattresses by Sealy™ without disclosed chemicals of concern were available for less than \$100:**

EverLite™ 2-Stage crib mattress for \$99, and Premier Posture™ 2-Stage crib mattress for \$99.

**Ten mattresses from six brands didn't rely on petroleum and avoid all chemicals of concern.** They were made by Lifekind®, Naturepedic®, Obasan, OMI®, Soaring Heart, and White Lotus Home.

Additionally, company information indicates that **19 products from five companies were free of vinyl, polyurethane foam, added flame retardants, PFAS, antimicrobials, or added minerals:** Lullaby Earth™, My Green Mattress, Naturepedic®, Oeuf, and Sealy™.

## CHEMICALS OF CONCERN FINDINGS

- Brands reported **vinyl in 27% of their crib mattress covers**. Of the 13 tested, six were made of vinyl, and all six contained plasticizers.
- Two-thirds of brands now report using flame barriers, and 12% of mattresses are designed without barriers or additives. Two FR barriers and two vinyl covers we tested contained antimony. One company uses modacrylic barriers.
- PFAS chemicals were disclosed for nine products from three companies, and testing found PFAS in mattresses from three other companies.
- One company reported adding a phosphorus-based flame retardant (FRs) to their core and we confirmed that through testing. Another reported an ammonium polyphosphate FR layer.
- Our testing identified seven mattresses that contained indications of FRs: four had combinations of bromine, chlorine and phosphorus. Five contained antimony at relatively high levels.
- Seven companies make claims about antimicrobial properties. One uses silver, one quaternium compounds, one a zinc-based solution, and four don't say what imparts that property.

## KEY CHEMICALS OF CONCERN

**PFAS** (per- and polyfluoroalkyl substances): a class of over 9,000 waterproofing and nonstick chemicals can contribute to immune and thyroid problems, and cancer.<sup>4</sup>

**Antimicrobials** may appear to help keep babies healthy, but there is no evidence that they reduce disease. They are not needed.<sup>5</sup>

**Flame retardants**<sup>6</sup> are used in barriers or added to foam to meet federal flammability standards, made with bromine or chlorine (called organohalogens), phosphorus or nitrogen in harmful forms, or the heavy metal antimony trioxide.<sup>7</sup>

**Polyvinyl chloride**<sup>8</sup> (PVC or vinyl) is a waterproof material or coating that requires many additives like bisphenol A and plasticizers, some of which can disrupt hormones, and some are not well studied.<sup>9</sup>

**Polyurethane**, especially when used as foam, contains blowing agents, fillers, additives and inputs that are not disclosed and may be harmful.<sup>10,11</sup>

## Methodology

To prepare this report, our researchers first reviewed the crib mattress data collected for our 2020 report, *The Mattress Still Matters*. From 37 companies that were part of *The Mattress Still Matters*, we identified ten companies whose communications appeared to meet our baseline definition of “greenwashing.”

We then used the following rubric to sort company claims into four tiers. Our team then gathered, documented, and timestamped evidence from the companies’ own marketing materials and consulted with experts and certification programs to verify that our concerns were legitimate. We then sent the evidence to companies electronically and by mail along with a list of requested changes.

We asked that:

- **Eight companies** more accurately describe and provide evidence of their **certifications**;
- **Two companies remove** marketing claims and imagery that strongly suggest or state their products are **natural** when they contained lab-made substances;
- **Four companies remove** claims that their products are **non-toxic** providing sufficient evidence to state as such;
- **Two companies remove** claims that their products are organic when the products contained some or mostly non-organic materials; and that
- **Three companies clarify** or adequately disclose the materials used in their products.

We corresponded with companies that responded, and have adjusted our evaluations of companies that made changes we requested.

We then categorized the companies into the four tiers of greenwashing, and have described the forms of greenwashing and then provided screenshots

from eight of the companies, so that readers of this report can better understand how to identify greenwashing claims on any marketing website or product packaging they are reading.

Websites change rapidly, and in some cases we share screenshots from updates to websites published after we prepared our outreach to companies, when doing so helps illuminate examples of greenwashing for people to use when reviewing any product.

TIERS OF GREENWASHING	
<b>4</b>	<b>Clear Greenwashing:</b> Marketing language explicitly states something about the product that is verifiably untrue, or highly unlikely to be true based on available information, including claims that do not match testing.
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<b>1</b>	<b>Honest and forthcoming:</b> This does not necessarily mean that the products are unqualifiedly healthy, nontoxic, or safe; only that the company makes accurate claims.



## Findings and Results

The most common form of greenwashing we identified has to do with certifications – how companies market them and whether a website visitor can access up to date documentation confirming the nature and scope of the certification. We identified eight companies engaging in “greenwashing” in this way.

Next most common was the misuse of terms like “natural,” “non-toxic,” and “organic.” We identified six companies for which we identified that concern.

### COMPANY RESPONSES

In response, four companies updated their marketing materials to more accurately reflect the sustain-

ability and health of their products. When notified they were inappropriately presenting a nonprofit organization’s logo as a certification, Company A removed it from their website. When alerted to an overstatement of UL GreenGuard Gold’s certification standards, Company B removed the claim from their website. Because they corrected inaccuracies in their marketing material, these companies have not been named in this report.

Babyletto and DaVinci Baby, when pressed about non-toxic claims and an overstatement of UL GreenGuard Gold’s certification standards, corrected the latter and reported that they are seeking of the robust third-party certifications we discuss in the

Company Name	Green-washing Tier	Misuse of terms			Misrepresentations of		Responded?	Requested changes made?
		Nature/natural	Non-toxic	Organic	Certifications	Materials used		
DaVinci Baby	4		X		X		Yes- changes made	Corrected UL GreenGuard claims, reported seeking 3rd party certification, not yet achieved
Delta Children	4		X		X		Yes- disputed findings	Made minor adjustments
L.A. Baby	4	X	X	X		X	No	No
Nook Sleep	4	X		X			No	No
Babyletto	3		X		X		Yes- made changes	Corrected UL GreenGuard claims, reported seeking 3rd party certification, not yet achieved
Colgate Mattress®	3				X		No	No
Dream on Me	3				X		Yes - disputed findings	No
Graco®	3			X	X	X	No	No
Company A	2				X		Yes - made changes	Removed nonprofit organization logo presented as certification
Company B	2				X		Yes - made changes	Corrected UL GreenGuard claims

next section for the former. If they do receive the certification, we would consider this verification of “non-toxic” claims. As of April 15, 2021, the companies have not added claims of these certifications to their websites.

Two companies – Delta Children and Dream on Me – for the most part rejected the findings of our study. Delta Children did make minor adjustments, including changing their characterization of UL GreenGuard Gold from “healthiest” to “healthier.” Dream on Me made no changes.

Four companies – Graco, Nook, LA Baby, and Colgate – did not respond at all.

What follows are descriptions of our assessment of each company’s website and claims, use of and portrayal of certifications and other icons, and other greenwashing concerns we identified. Companies were asked to remedy each of these.

## DAVINCI BABY

### Boldest claims (as of November 11, 2020)<sup>12</sup>

DaVinci Baby claims that all crib mattresses listed on their website are “100% non-toxic.” At the time we reviewed their website, products contained polyurethane, which we do not consider 100% non-toxic. The crib mattress products on the company’s website as of April 15, 2021, however, state that they are not made with polyurethane. Without a robust, third-party certification for materials, and disclosure of the “vinyl-free” waterproof cover, we have no evidence of the claim that the mattresses are “100% non-toxic.”

The company has communicated to Clean and Healthy New York via email that they were pursuing a robust third-party certification, but of April 15, 2021, the company had provided no verification of this, nor did the DaVinci website include such a claim with verification.

### Certifications

DaVinci Baby’s products are UL GreenGuard Gold certified, which they now accurately describe.

## Summary

DaVinci Baby’s claim that their mattresses are “100% non-toxic” is not supported by any verified broad certification of materials.

## DELTA CHILDREN

### Boldest claims (as of November 30, 2020)<sup>13</sup>

On their landing page, Delta Children claims all their products are “non-toxic.”

### Certifications

Alongside UL GreenGuard Gold and ASTM certifications, Delta Children states that their products are unqualifiedly non-toxic, with no certification that proves such a bold claim. In response, they noted that their products meet or exceed the requirements of the Federal Hazardous Substances Act<sup>14</sup> and Consumer Product Safety Act<sup>15</sup>, which they state regulates acute and chronic toxicity.

### Test Results

Third-party testing of Delta Children’s Serta Nightstar Standard Support Crib purchased in 2018 found an undisclosed vinyl cover. Their flame retardant and core claims matched test results. Delta Children responded that their vinyl is “phthalate restricted” as required by law.

## Summary

Delta Children appears to use some safer materials, but their claim that their products are non-toxic is an overstatement, at minimum given their use of vinyl, even if it complies with federal restrictions of certain phthalates (polyvinyl chloride is made from known carcinogen vinyl chloride, and has requires numerous additives, many known harmful chemicals like BPA).

Also, some products are made with polyurethane, which cannot be considered “non-toxic” due to concerns with blowing agents and additives, and further uses “gel foam” which has no information about the “gel.”

Presenting the UL GreenGuard Gold icon within the

'Healthy Materials' section strongly suggests it is a comprehensive certification of material content, beyond the air emissions standard it is. Delta Children replied that the GreenGuard Gold standard provides a reasonable basis for consumers concerned about the potential health effects of products to distinguish between products. And that Delta states that its description regarding UL GreenGuard is permissible.

## L.A. BABY

### Boldest claims (as of November 6, 2020)<sup>16</sup>

In the Frequently Asked Questions portion of L.A. Baby's website, the company claims "no toxic materials are used in the making of any L.A. Baby product." On products like the Triple Zero 2 in 1 Crib Mattress, the packaging and branding also heavily emphasize that the crib mattress is "naturally organic." However, 2019 testing of the Triple Zero 2 in 1 mattress cover identified PFAS, and tests also revealed polyurethane and acrylic. The flame retardant barrier we had tested contained polyethylene terephthalate, nitrile, vinyl, rayon, and antimony. The core material we tested was polyurethane foam and contained undisclosed bromine, chlorine, and phosphorus. These are not considered non-toxic, natural, or substances that can be certified as "organic."

### Certifications

In at least some of L.A. Baby's item specifications, the company lists CertiPUR-US® as its only formal certification without describing what the certification means. Many claims are made about the products in badge images that appear alongside real certifications, making it seem that the products have received more certifications than they have, including claims that the product is organic and anti-microbial with "no chemical added."

L.A. Baby states that all mattresses and pads **could be** made with USDA certified organic cotton, Global Organic Textile Standard certified organic cotton, OEKO-TEX® certified organic cotton covers, medical grade covers or natural bamboo covers. This is inadequate and misleading; if these certifications apply only to certain products or components of certain

products, then these claims should only be used for those products or components, rather than being presented as a company-wide claim that may have widespread exceptions. Additionally, documentation verifying OEKO-TEX® and GOTS certifications is not available on the L.A. Baby website.

For their Triple Zero 2 in 1 Soy Foam with Blended Organic Cotton Cover product, they use an image of two leaves with the word "organic", which is not a seal for any organic certification program, and could falsely imply compliance with GOTS certification.

### Test Results

Based on our previous tests, the cover of the Triple Zero 2 in 1 mattress contained polyurethane, acrylic, and indications of a PFAS coating. At that time, their website claimed that mattress included a PFAS coating. The flame retardant barrier contained polyethylene terephthalate, nitrile, vinyl, rayon, and antimony. The polyurethane foam core contained undisclosed bromine, chlorine, and phosphorus.

### Additional Notes

L.A. Baby claims their foam core is "soy," obfuscating the fact that the material is in fact polyurethane (which is why it could receive certification from CertiPUR-US®). This is a claim we see repeated by many crib mattress makers, and of which shoppers should be wary.

### Summary

L.A. Baby's claims are very bold and appear to be without adequate basis. Tests have indicated that their claims that the products are made with no toxic materials, are naturally organic, and are anti-microbial with no chemicals added are false. Because of the strength of the company's claims in contrast to the chemicals present in the product, these marketing practices are unambiguously deceptive.

## NOOK SLEEP

### Boldest claims (as of November 6, 2020)<sup>17</sup>

Nook claims that "nature offers a natural defense against intrusion in the simplest yet most effective

ways” and that their “natural water and stain resistant barrier” mirrors the way plants repel water in nature.

However, test results of Nook Sleep’s now discontinued Pebble Lite Crib purchased in 2018 found the cover contained undisclosed PFAS, a synthetic water and stain resistant treatment, and the product page description of “nanosphere technology” is used in their 2019 description of the Pebble Lite Crib cover<sup>18</sup> and 2021’s Organic Cotton Pebble Crib Covers. Without disclosing the chemistry used to create the “natural water and stain resistant barrier,” this claim is dubious.

Nook’s language around its claims about which products or materials are “organic” are incredibly confusing. For example, on the “Organic Pure Crib Mattress” product page on its website, in some places it appears to claim organic certification for every component, and in other places some materials are identified as “natural.” In another place its definition of “organic” appears to point to what others might consider “plant-based.” If not all materials are certified organic, these different and conflicting messages could be considered deceptive.

By contrast, in our research for *The Mattress Still Matters*, we identified several companies that offer crib mattresses for which all materials are certified organic, as is the mattress as a whole.

### Certifications

On product pages, Nook touts Organic 100, Global Organic Textile Standard, and OEKO-TEX® Standard 100 seals. Nook does not provide verification of these certifications. Under ‘Care Instructions & Certifications’, they also present the UL GreenGuard Gold seal. Nook does not make any claims regarding the stringency of these certifications on crib mattress product pages.

### Test Results

A third-party test of an older product, Nook Sleep’s Pebble Lite Crib purchased in 2018, found the cotton & PET cover contained undisclosed PFAS. The polyurethane foam core contained undisclosed chlo-

rine. The PET “air spacers” contained undisclosed neoprene and plasticizer. We do not have evidence whether current models are made in the same way or that they have been reformulated.

### Summary

Nook’s branding leans very heavily on messaging about nature and health, which does not align closely with the test results of their products historically, and they do not provide clear verification of these claims.

## BABYLETTO

### Boldest claims (as of November 30, 2020)<sup>19</sup>

Across all product lines on their website, Babyletto claimed their crib mattresses were non-toxic. When we first reviewed their website in November, these claims were present in the title of each mattress. As of April 15, 2021, the claim of “non-toxic” was made in the graphics and text on the landing page for all mattresses they sell.<sup>20</sup> However, testing found products from 2018 contain modacrylic, latex, and polyethylene terephthalate. These substances are not considered unqualifiedly “non-toxic.”

### Certifications

Babyletto’s products are UL GreenGuard Gold certified, which they claim means the product “has been tested for over 10,000 chemicals and passes the most stringent emission standards.” The UL GreenGuard Gold testing is limited to detecting the Volatile Organic Compounds that are emitted from the product while inside a testing chamber (and therefore available for inhalation by someone using the product). They are not certifying content or presence/absence of any specific chemical. UL GreenGuard also merely states that their certification standards are among the most rigorous in the world.

Babyletto also states that they comply with ASTM F1169 and 16 CFR 1219 in the Q&A portion of their website. These are standards, not certifications, and should be listed as such.

Babyletto’s widespread and unequivocal use of

“non-toxic” is not currently supported by the evidence collected. Babyletto has stated via email that they are seeking a robust third party certification to address this issue, but have not provided any evidence. As of April 15, 2021, their website did not make such a claim.

## COLGATE MATTRESS®

### Boldest Claims (as of September 27, 2020)<sup>21</sup>

In product descriptions, Colgate Mattress® claims all of its products are UL GreenGuard Gold certified, CPSIA compliant, Further, they claim to be compliant with all federal and state flammability requirements without the use of flame retardants. Third-party testing of previous models found antimony and chlorine, indicating that it is unlikely this was accurate.

### Certifications

Colgate Mattress® assures customers that they may “Rest Easy, it’s a Colgate”, displaying numerous graphics from the International Sleep Products Association, UL GreenGuard Gold, Juvenile Products Manufacturers Association (JPMA), CertiPUR-US®, and Consumer Product Safety Commission, which are a mix of certifications, memberships, and assertions. It includes a logo for the Consumer Products Safety Commission, which is a federal agency that sets regulatory requirements but does not issue certifications. While the Juvenile Products Manufacturers Association has a certification program, Colgate Mattress® simply lists membership in the association, as it includes a membership designation in the International Sleep Products Association. None of these should be interpreted to imply any assertion of product quality.

Colgate Mattress® also states that their products are UL GreenGuard Gold and CertiPUR-US® certified for no harmful emissions. This overstates the UL GreenGuard Gold and CertiPUR-US® standards. For example, the UL GreenGuard certification program does not make claims that the products tested have no harmful emissions; just that the products meet their thresholds for those emissions.

## Test Results

Despite the company’s claim that they do not use fire retardant chemicals, third-party testing of the Royale Crib purchased in 2018 found antimony and chlorine, likely indicating their presence, unless they have reformulated their materials.

### Summary

Colgate overstates the certification standards of UL GreenGuard Gold and CertiPUR-US®. Additionally, given the results of prior third-party testing, it seems likely that fire retardant chemicals were applied to the products or components thereof, despite their claim that their products are made without the use of fire retardant chemicals.

## DREAM ON ME

### Boldest Claims (as of November 6, 2020)<sup>22</sup>

Dream on Me claims that the UL GreenGuard Gold certification validates that their mattresses have been tested for thousands of individual chemicals and Volatile Organic Compounds (VOCs). UL GreenGuard is limited to detecting the VOCs that are emitted from the product while inside a testing chamber (and therefore available to be breathed in someone using the product). UL does not certify content or the presence or absence of any specific chemical in the product itself.

### Summary

While Dream on Me does not dramatically overstate the safety of their products relative to many of their competitors, their descriptions of the UL GreenGuard Gold overstates the certification.

## GRACO®

### Boldest claims (as of November 6, 2020)<sup>23</sup>

Graco® claimed that the UL GreenGuard Gold certification validates that their mattresses have been certified free of prohibited phthalates, lead, and mercury. UL GreenGuard Gold certification is based on testing of emissions, not the materials in the products themselves. While in past years, UL’s tests for this certification tested for phthalate emissions,

they no longer do so. Therefore, this overstates the requirements of the standard.

### Test Results

Responding to our request for information in late 2019 for *The Mattress Still Matters*, Graco claimed in private email correspondence to Clean and Healthy New York that their product is free of antimony. Third party testing found this claim to be untrue.

### Summary

Graco overstates the requirements of the UL Green-Guard Gold certification process and made inaccurate claims in private correspondence. UL Green-Guard Gold certifies emissions standards, not the materials in the products themselves.



## Anatomy of Greenwashing: Analysis of Brand Websites

**O**n the following pages, we share screenshots of the greenwashing claims companies made, how we identified those claims, and how you can use these screenshots to better understand any website or marketing claim you're viewing. As a reminder, here are the kinds of concerns we were evaluating on brand websites:

**Clear greenwashing:** Explicitly states something about the product that is verifiably untrue, or highly unlikely to be true based on available information, including claims that do not match testing.

**Moderate greenwashing:** May use language that is highly suggestive of safety without being explicitly false. May lean heavily on trade association certifica-

tions, or overstate the certifications' standards.

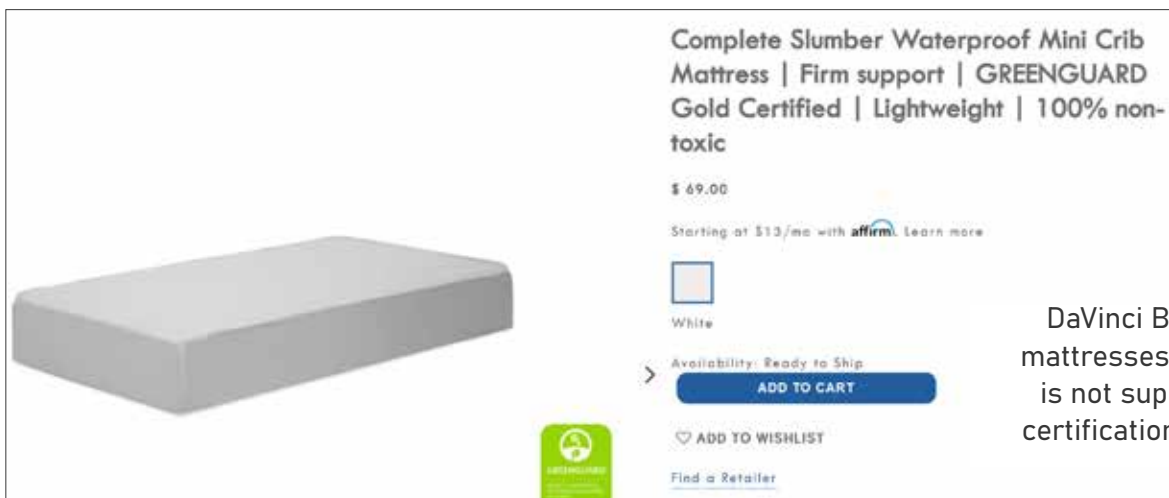
**Light greenwashing:** Does not disclose potentially toxic or concerning chemicals, misleading descriptions, and/or touts trade associations certifications without overstating the certifications' standards or requirements.

**Worth the followup:** Companies should provide documentation (such as PDF of the certification approval) that proves their certifications, and the extent of that certification, for any such logo they place on their website or brand marketing. None of the companies we reviewed in this report do this, and potential customers could call to ask for evidence to verify.

*“It is deceptive to misrepresent, directly or by implication, that a product, package, or service is non-toxic. Non-toxic claims should be clearly and prominently qualified to the extent necessary to avoid deception... marketers making non-toxic claims should have competent and reliable scientific evidence that the product, package, or service is non-toxic for humans and for the environment or should clearly and prominently qualify their claims to avoid deception.”*

- from the Green Guide published by the Federal Trade Commission<sup>24</sup>

## LESSONS FROM DAVINCI BABY



Complete Slumber Waterproof Mini Crib Mattress | Firm support | GREENGUARD Gold Certified | Lightweight | 100% non-toxic

\$ 49.00

Starting at \$13/mo with [affirm](#). [Learn more](#)

White

Availability: Ready to Ship

[ADD TO CART](#)

[ADD TO WISHLIST](#)

[Find a Retailer](#)

DaVinci Baby's claim that their mattresses are "100% non-toxic" is not supported by third-party certification of material content.

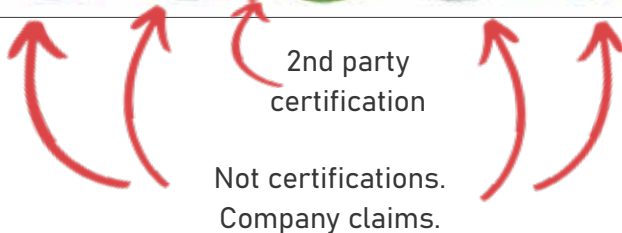
# LESSONS FROM L.A. BABY

**Q** ARE THERE ANY TOXIC MATERIALS USED IN L.A. BABY PRODUCTS ?

**A** No toxic materials are used in the making of any L.A. Baby product. All our products are also tested and pass all applicable Federal and State standards.

This is a very bold statement, from their “Frequently Asked Questions.” There is no robust third-party certification for all materials in all products to verify such a claim. Meeting government standards is important, but is not sufficient to demonstrate “no toxic materials” are used. Get curious when you see such claims - and look for documented third-party testing.

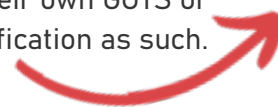
All L.A. Baby mattresses and pads are proudly made in the U.S.A. with a verity of quality component parts which could include CertiPUR-US® certified soy foams, USDA® certified organic cotton, Global Organic Textile Standard (GOTS) certified organic cotton, OEKO-TEX® certified organic cotton covers, medical grade covers or natural bamboo covers. All of our products also meet the most current U.S. Consumer Product Safety Commission (CPSC) standards. We are looking forward to bringing more new products to market for all the babies and parents in the L.A. Baby universe!



On their “About” page, L.A. Baby describes their products generally, with :

- 1) USDA certifies raw cotton as an agricultural product, but not in finished textiles.
- 2) “Soy Foam” implies an environmental benefit when the material is still ordinary polyurethane, with the same chemical concerns.
- 3) The CertiPUR US® certification was developed by the foam makers’ trade association.
- 4) They state that products “could” be made of any of these materials. Not all certifications apply to all products.
- 5) “Natural bamboo” again implies a natural material, but bamboo must be processed into rayon to make it a fabric, which can involve a highly toxic process. FTC took action against companies using this term over a decade ago.<sup>25</sup>

L.A. Baby includes this USDA logo, or includes text referencing this certification, on its product pages. While the raw cotton may have been grown to organic standards, finished textiles are not considered “organic” unless they have received their own GOTS or Oeko-tex certification as such.





## LESSONS FROM DELTA CHILDREN

**You Can Feel Good Because All Of Our Mattresses Are...**



**ASTM Certified for Safety**



**Stain Resistant, Odor Resistant, Waterproof**



**GREENGUARD**



**Made in USA**



**Non-Toxic**



**Free of Chemical Flame Retardants**



**Backed by a Warranty**

Delta Children claims that their mattresses are “Non-Toxic.” Prior testing found undisclosed vinyl materials in the cover of a 2018 product. Some products are made with polyurethane foam. Without any robust third-party certification of material content, this claim cannot be verified.

The text appears with a leafy graphic that looks like - but isn't - a certification logo. Look for the name of the institution that certifies a claim is true. (Such as UL for the GreenGuard Gold certification, here.)

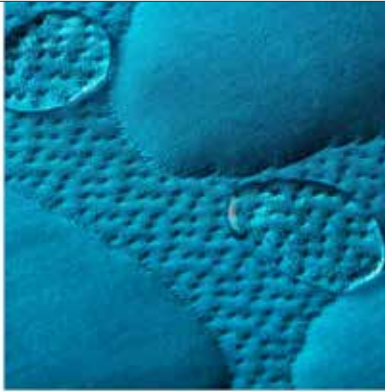
## LESSONS FROM NOOK SLEEP

**The SafeSleep™ Cover**

Whether paired with our mattresses or accessories, the Pebble, Dimple or Print SafeSleep™ Cover Wrap delivers all the same amazing benefits regardless of the Nook product.

Made only from the best of the best, every material in this special fabric is sourced with your baby's safety and comfort in mind. The organic cotton provides luxurious softness and breathability while the inherent moisture wicking capability of eucalyptus keeps baby cool and comfortable.

The inspiration behind the products we make does not stop with the materials we source. We have discovered that nature offers a natural defense against intrusion in the simplest yet most effective ways. Using all natural low impact Zinc, mother earth's first anti-microbial safeguard, the SafeSleep™ material is completely protected against mites, bed bugs, fungi and mold. We take it one step further by incorporating a water and stain resistant barrier that mirrors the way plants repel water in nature, all while offering the highest level of breathability.



*Every material in this special fabric is sourced with your baby's safety and comfort in mind.*

This language has been on Nook's website since 2018, and documented in January 2019 and is still present as of April 15, 2021.<sup>26</sup> The cover product purchased in late 2018 contained undisclosed PFAS chemicals. To this date, Nook Sleep does not disclose the chemicals or materials that confer the water repellent properties.

**As Organic As It Gets**

From its organic wool fire barrier to the organic coconut coir and natural rubber tree latex core, the Pure Organic is the most organic crib mattress. Give your baby the best with the Pure Organic crib mattress!

Nook uses confusing language on its “Pure Organic” product page. Look for certifications to verify “organic” claims.<sup>27</sup>

## LESSONS FROM BABYLETTO



Babyletto states on the main page for their mattresses<sup>28</sup> that their products are un-qualifiedly non-toxic, but their flame barrier is made of modacrylic, a material made from a possible cancer causing chemical with known health impacts for workers.<sup>29</sup> Further, they only currently have a Green-Guard Gold certification for emissions, and no third-party certification of materials, so the claim of non-toxic is unverified.

There is a big difference between technically “recyclable” and actually being able to do so easily. There is no curb-side or community recycling of polyester fibers.<sup>31</sup>

Modacrylic is used as a barrier material, not an additive to foam, but it is a synthetic material with health concerns due to acrylonitrile and vinyl chloride components.<sup>30</sup>

## LESSONS FROM COLGATE MATTRESS®

The photo gallery for Colgate’s mattress products includes this image. It mixes logos for certifications, memberships, and company claims.



Certification designed by polyurethane foam trade association

Membership in product trade association.

Self-certification for use of this logo<sup>32</sup>

Company claim

This is the logo for the US CPSC, which enforces product laws. It does not certify products.

Third-party independent certification of air emissions from products.

Membership in product trade association.

## LESSONS FROM DREAM ON ME

While Dream on Me does not dramatically overstate the safety of their products relative to many of their competitors, their descriptions of the UL GreenGuard Gold certification implies that the process to receive this certification tests the materials. Instead, the process only tests for chemicals emitted into nearby air.

### GREENGUARD GOLD CERTIFICATE



**GREENGUARD**  
PRODUCT CERTIFIED FOR  
LOW CHEMICAL EMISSIONS  
UL COM/CC  
UL 2618  
GOLD

This Greenguard Gold Certification validates that this Dream On Me mattress has been tested for thousands of chemicals and VOCs and helps in providing a safe and healthy environment for your baby and family.

[Learn more about Greenguard Gold Certification](#)

## LESSONS FROM GRACO®

- GREENGUARD Gold certified free of prohibited phthalates, lead, and mercury; meets or exceeds all applicable ASTM International and CPSC safety standards; and meets all applicable federal flammability standards
- Exclusively manufactured for Graco by Storkcraft
- Material: Polyurethane foam

Graco® overstates the requirements of the UL GreenGuard Gold certification process and made inaccurate claims in private correspondence. UL GreenGuard Gold certifies emissions standards, not the materials in the products themselves. Further, UL GreenGuard Gold used to test for phthalate emissions, but does not any longer. It never tested for heavy metals like lead or mercury.



## Making Sense of Certifications

**C**ertifications are used to verify claims of superior quality. However, it is important to understand the strength and stringency of each certification, because not all certifications are equally protective. Then, you need to verify that the company holds the certifications it promotes for the products you're interested in. More and more companies are including PDFs of their certification documentation on their website.

Here are some of the kinds of certifications you may come across. It is useful to separate them into categories by what entity issues the certification, based on how closely they are financially tied to the company itself.

### CERTIFICATIONS BY COMPANIES FOR THEIR OWN PRODUCTS

"First-party certifications" are created by the company who makes and markets the product and is not verified by any outside source. The Federal Trade Commission has cracked down on these self-certifying programs. (See page 25, "Greenwashing has Consequences".) We do not recommend relying on such a certification. To determine if an unusual certification is "first party," search for the term in a search engine to see if any other company also uses it or there is an independent website. If not, it's entirely possible that the company just made it up to fit the products they sell, and may gloss over important concerns. Companies may also make bold proclamations about their products that do not include a formal certification (using terms like "nontoxic" and "eco-friendly") without providing any verification.

### CERTIFICATIONS BY TRADE ASSOCIATIONS FOR THEIR MEMBERS

"Second-party certifications" are those created by direct members of the industry certified. For example, CertiPUR-US® was created by the Polyurethane Foam Association. This is one step away from the company, but often second party certifications are written in the best interests of industry members,

not public health or the environment. In many instances, first- and second-party certifications attest that the mattress is free of contaminants, chemicals and elements which never would have been in a mattress anyway.

### CERTIFICATIONS BY UNRELATED ENTITIES

"Third party certifications" are those that are independent of the company and are not controlled by a single industry trade association, though they often include laboratories, trade associations, and others that work closely with the relevant industry. There is a range of third party certifications, from rigorous to lax, as described below. Third-party certifications are more likely to reflect meaningful quality improvements over the broad marketplace, with verification by independent laboratories required.

There are a surprisingly large number of certification programs used to verify a wide range of product qualities. In this section, we highlight the most common certifications claimed by crib mattress makers. We identify companies in this section when we have confirmed they hold certifications for whole crib mattresses (not just components) in the name of the mattress manufacturer (not in the name of suppliers). Other companies may also hold these certifications, but we were not able to publicly verify those claims.

## Certifications Used by Crib Mattress Makers

### THIRD PARTY CERTIFIERS

For crib mattresses and other related consumer goods, the following are common independent certification programs. The scope of their requirements vary widely.

#### Robust certifications

The following three certifications cover a broader array of chemicals and are applied across the supply chain.



**MADE SAFE®** is an independent nonprofit organization that provides a human health-focused certification for nontoxic products, from baby to personal care to household and more. To earn the certification, products must not contain known carcinogens, behavioral developmental, or reproductive toxicants, endocrine disruptors, flame retardants, neurotoxins, high risk pesticides, toxic solvents, VOCs, or nanoparticles. If grown, they must not involve genetically modified organisms. Chemicals are also screened to ensure they do not bioaccumulate or persist in the environment. Certified products are listed on their website.

Learn more: [www.madesafe.org](http://www.madesafe.org)



**GOTS—Global Organic Textile Standard** is a global standard for textiles made from organic fibers such as cotton, wool, and kapok that covers the entire processing chain. Products must contain a minimum of 70% organically grown natural fibers to be certified. It establishes restrictions on chemical inputs with an extensive Restricted Substances List, and prohibits phthalates, PFAS, heavy metals, flame retardants, and more. To make a claim that a product is “organic,” at least 95% of the fiber content must be of certified organic origin. Certified companies are listed on their website.

Learn more: [www.global-standard.org](http://www.global-standard.org)



**GOLS—Global Organic Latex Standard** is a global standard for raw latex, latex foam, and products made with latex foam, administered by Control Union Certifications. It requires a minimum of 95% certified organic raw material, and sets limits on harmful chemical additives, processing agents, and fillers, as well as setting emissions standards, following the GOTS and Eco-Label Institute standard for materials other than latex used to make the final product. GOLS does not list certified companies. Note: while organic latex is environmentally preferable to conventional or synthetic latex, parents may wish to avoid crib mattresses with latex as it can trigger serious allergic response.

Learn more: [certifications.controlunion.com/en/certification-programs/certification-programs/gols-global-organic-latex-standard](http://certifications.controlunion.com/en/certification-programs/certification-programs/gols-global-organic-latex-standard)

Only companies that are verified on the GOTS website can claim to offer “organic” mattresses. Despite that, many companies use the word, or claim one or more component is made of organic content. If they don’t provide a dated certificate, as well as a GOTS or GOLS logo, you should not consider their claim to be accurate.

The **USDA Organic** certification is set through federal regulation and applies to agricultural goods, including cotton. Independent labs verify the goods are free of many fertilizers and pesticides, but don’t address processing into textiles. Companies may claim USDA organic cotton, but the true test for products like mattresses is the GOTS certification.

Learn more: [www.usda.gov/topics/organic](http://www.usda.gov/topics/organic)

#### Additional Third Party Certifications

When certifications are developed by people independent of the industries making the product, they are considered “Third-party” certifications. All organic standards on the previous page fit this description. The following are additional standards that

remain independent of the industries they certify.



**OEKO-TEX®** is comprised of 18 independent research and test institutes in Eu-

rope and Japan. It offers certifications to textile and leather companies to have their products tested for harmful substances by independent institutes, and to make their production conditions and their supply chains more sustainable.

The OEKO-TEX® Association has developed six certifications: Standard 100 is the one claimed by crib mattress makers we surveyed; Sustainable Textile & Leather Production—STeP; MADE IN GREEN, ECO PASSPORT, DETOX TO ZERO, LEATHER STANDARD.

Standard 100 sets limits on a wide range of harmful chemicals, many based on government regulations, though some go further, including forbidding flame retardants and setting limits on PFAS chemicals in baby products, including crib mattresses.

Learn more: [www.oeko-tex.com](http://www.oeko-tex.com)

UL runs numerous certification programs. Of those, crib mattress makers claim UL GreenGuard, UL GreenGuard Gold, and UL Formaldehyde Free.



**UL GreenGuard** sets emissions limits—not content limits—on 360 volatile organic compounds (VOCs). This means placing the entire product in a testing chamber and testing the air.



**UL GreenGuard Gold** has more stringent emissions levels, setting them at 1/100th of the concentration for Threshold Limit Values for VOCs as established by American Conference of Governmental Industrial Hygienists

(ACGIH®) and will not certify if emissions are above half of California's Chronic Reference Exposures Levels. UL used to include phthalates in this more stringent testing protocol, but no longer does so.

**Formaldehyde Free** certification can be earned in addition to the UL GreenGuard Gold certification (but

not separately) through a process that audits raw materials for formaldehyde or chemicals that can turn into formaldehyde and testing the final product for formaldehyde emissions.

Learn more: [greenguard.org](http://greenguard.org)

To find UL certified products, visit: [spot.ul.com/main-app/products/catalog/](http://spot.ul.com/main-app/products/catalog/)

## Second Party Certifications

These are certifications that come from the trade associations that represent the companies they certify.



**CertiPUR-US®** is a certification created by the Polyurethane Foam Association and is now run by the Alliance for Flexible Polyurethane Foam. That alliance no longer has an

independent website, and no longer discloses its leadership. The certification tests for content and emissions for banned ozone-depleters and chloro-fluorocarbons, flame retardants restricted in the US, heavy metals and phthalates prohibited by federal law, and limits VOCs to 0.5 parts per million. In essence, this certification does not go beyond legal limitations.

Learn more: [certipur.us](http://certipur.us)



**Juvenile Products Manufacturers Association (JPMA)** is a trade association that certifies projects to various ASTM standards. Specification 2399 covers crib mattresses. The scope is the design requirements for full-sized mattresses.

ASTM states, “this standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.”

Learn more: [www.jpma.org](http://www.jpma.org)  
[www.astm.org/Standards/F2933.htm](http://www.astm.org/Standards/F2933.htm)

## First Party Certifiers

We did not identify any first-party, self-certification

programs in any of the mattress brands we included in our report, but we did identify one asserted by a company that was excluded because no independent website for the brand was available, and products appear only available in the US via Amazon. The company, OrganicDream, asserts that its four mattress models meet an unknown “nontoxic BABYSAFE certification.”

However, the use of logos that say “nontoxic” or “eco-friendly” should be considered with the same skepticism as more elaborate programs created by companies for themselves.

Note that many companies mix graphics to highlight marketing claims (“dust-mite proof” or “antibacterial”) in with logos from certifications programs.

### CONFIRMING COMPLIANCE WITH LAW

**CPSIA Compliance** is frequently cited by mattress manufacturers similar to the use of certifications. This simply means that the company is complying with a relatively recent federal law, the Consumer

Product Safety Improvement Act, which set limits on lead, other heavy metals, and certain phthalates.

**Federal Flammability Standard** As above, this standard is a matter of federal law, the Flammable Products Act of 1953, which was amended in 1972 the Act was interpreted to expand its’ scope to mattresses. According to CPSC, “the standard sets forth a test to determine the ignition resistance of a mattress or mattress pad when exposed to a lighted cigarette. Lighted cigarettes are placed at specified locations on the surface of a mattress (or mattress pad). The Standard establishes pass/fail criteria for the tests. Until the amendment that passed in 2011, the standard specified the ignition source for these tests by its physical properties. These properties were originally selected to represent an unfiltered Pall Mall cigarette, which was identified as the most severe smoldering ignition source.”



## Recommendations

**O**ur research found a persistent trend among crib mattress manufacturers of massaging the truth about the safety and sustainability of their products. Many of those greenwashing claims could be easily corrected and removed from digital marketing, as several manufacturers did, and without hesitation. We will continue a dialogue with those who rejected our suggested changes.

The practice of greenwashing extends well beyond crib mattresses. This limited case study is intended to illuminate the kinds of common greenwashing claims, to help people recognize it when they see it in other contexts. We who have written this report notice with a better sense of not only the companies reported upon, but also what to look for in other companies and product sectors.

### TIPS FOR PARENTS

**1** Get curious when you see claims of “nontoxic,” “organic,” “natural,” or similar. Look for verifiable certifications – not just graphics/logos – to confirm these claims.

**2** Be wary of marketing that tells you specifically what isn't present: If it says “BPA-free” or “PFOA and PFOS-free,” it's possible it's made with very similar chemicals, which have similar impacts on our health and environment.

**3** Watch out for misrepresentations about materials. For example, any foam that claims to have plant-based oils or is “soy foam” is really polyurethane, with a little bit of vegetable oil mixed in. These foams still contain all the blowing agents, fillers, and more needed to make all polyurethane.

**4** Remember that not all certifications are the same. Pick brands with strong certifications like MADE SAFE®, GOTS, and GOLS, and check to be sure the company proves that certification. Prioritize certifications for the whole product, not just claims about one material.

### MUST-DOS FOR MANUFACTURERS AND BRANDS

**1** If you want to claim your product is better for human health and the environment, make sure you design and make your products to meet that aspiration. Then document that by securing robust certifications.

**2** When you've gotten a third-party certification, don't just put their logo on your website. Explain what the certification means and provide the documentation necessary to confirm which products are covered. Don't make it hard for your potential customers to find this information – include it wherever you share the certification.

**3** Don't use meaningless terms like “natural” or “eco-friendly.” Use third-party certifications to prove the benefits of your products.

**4** Unless you have evidence that every single component and process aid used to make your product from raw material to final products is free of all known or suspected harmful chemicals, don't claim your product is non-toxic.

**5** Stop confusing consumers by telling them what isn't in your product. Be up front and provide full transparency about what is in your product.

**6** Don't mislead consumers by focusing on a minor improvement in one component of your product. This includes claiming polyurethane foam is “soy foam,” and mentioning that the raw cotton used to make your cover was grown in conditions that qualify it for a USDA organic certification.

That greenwashing has become such a prevalent trend is itself evidence that consumers demand products that are right for their health and for their environment, but manufacturers need to keep up. Manufacturers cannot merely pretend to produce the products consumers want. As consumers be-



come more judicious and knowledgeable about their health, brands that authentically practice sustainability and safety will be rewarded and those that mislead and deceive their clients will be punished.

### RETAILER ADVICE

Think like a parent when stocking your (physical or virtual) shelves. When retailers earn a reputation for selling misrepresented or greenwashing products, customers learn to look elsewhere. 65% of consumers state they want to buy from purpose-driven brands that advocate sustainability, not ones that pretend to. The marketplace is very competitive, and consumers are learning to tell the difference.

### URGENT REQUESTS OF REGULATORS, I.E., THE FEDERAL TRADE COMMISSION

Take a more proactive stance in pursuing manufacturers that engage in greenwashing. Manufacturers only misrepresent the sustainability and health of their products because they believe they can do so with impunity, or that any financial consequences from their behavior will be compensated for by increased sales. The Federal Trade Commission has all the legal authority it needs to punish bad actors, had done so in the past, and it should do so more vigorously now.

## Greenwashing Has Consequences

In 2012, in response to heightened consumer demand for “green” products, Congress expanded the Federal Trade Commission’s scope of powers to empower federal regulators to go after “greenwashing,” or making misleading claims about consumer products including crib mattresses. In short, lying to consumers about a product’s health or environmental benefits was now against the law.

On September 28, 2017 the federal government entered into a settlement with Moonlight Slumber for misrepresenting their products’ composition and safety. The company had advertised their mattresses as being made with “no foam, no plastics, no polyesters, and no harsh chemicals.” However, the mattress cores were made of foam derived from petroleum. The company had advertised that their products had been tested for chemical emissions in a lab. In actuality, no such testing existed.

Moonlight Slumber also described their prod-

ucts as “organic,” made of “plant-based foam,” and free of volatile organic compounds. As FTC announced when the consent order was finalized that December, “The Commission order settling the charges prohibits Moonlight Slumber from making the misleading representations alleged in the complaint and requires it to have competent and reliable evidence to support any claims it makes in these areas. The order also prohibits the company from representing that covered products are emissions-free or VOC-free, unless it has evidence to back up such claims.”

“The order further bars the company from misrepresenting the results of any tests or studies, or that any claimed benefit is scientifically or clinically proven. It also prohibits the company from disseminating misleading certifications, or from failing to disclose that the company has a material connection to an endorser.” The order is in force until at least 2037.

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The webpage was captured in the Internet Archive's Wayback Machine on November 11, 2020, available here: <https://web.archive.org/web/20201112174213/https://davincibaby.com/collections/mattresses-and-pads/products/deluxe-coil-firm-support-mini-crib-mattress-greenguard-gold-certified-lightweight-100-non-toxic-waterproof>
- 13 The website for Delta Children's crib mattresses is available here: <https://www.deltachildren.com/pages/mattresses>  
The webpage was captured in the Internet Archive's Wayback Machine on November 30, 2020, available here: <https://web.archive.org/web/20200518144302/https://www.deltachildren.com/pages/mattresses>
- 14 15 U.S.C. 1251, et seq. and 16 CFR 1500, et seq.
- 15 15 U.S.C 2057 and 16 CFR 1307
- 16 The website for L.A. Baby's Triple Zone 2-in-1 Crib Mattress is available here: <https://www.lababyco.com/products/item/292>  
The webpage was captured in the Internet Archive's Wayback Machine on November 6, 2020, available here: <https://web.archive.org/web/20201106130126/https://www.lababyco.com/products/item/292>
- 17 The website for Nook Sleep's mattresses is available here: <https://nooksleep.com/pages/the-nook-difference>  
The webpage was captured in the Internet Archive's Wayback Machine on November 6, 2020, available here: <https://web.archive.org/web/20201106130243/https://nooksleep.com/pages/the-nook-difference>
- 18 This claim is made on Nook's website on January 4, 2019, which appears to be before the company changed their product offerings: <https://web.archive.org/web/20190104003317/https://nooksleep.com/pages/the-nook-difference>
- 19 The website for Babyletto's Pure Core Non-Toxic Crib Mattress with Dry Waterproof Cover is available here: <https://babyletto.com/products/pure-core-non-toxic-crib-mattress-with-dry-waterproof-cover>  
The webpage was captured in the Internet Archive's Wayback Machine on November 30, 2020, available here: <https://web.archive.org/web/20201130130523/https://babyletto.com/products/pure-core-non-toxic-crib-mattress-with-dry-waterproof-cover>
- 20 The updated depiction of Babyletto's claims of "non-toxic" from December 2020, per the Wayback machine: <https://web.archive.org/web/20201204195147/https://babyletto.com/pages/pure-mattresses>
- 21 The website for Colgate's crib mattresses is available here: <https://colgatekids.com/mattresses/>  
The webpage was captured in the Internet Archive's Wayback Machine on September 27, 2020, available here: <https://web.archive.org/web/20200927215333/https://colgatekids.com/mattresses/>
- 22 The website for Dream on Me's Twilight 5-inch Coil Spring Crib and Toddler Bed Mattress is available here: <https://dreamonme.com/catalog/full-size-crib-mattresses/twilight-spring-coil-mattress/>  
The webpage was captured in the Internet Archive's Wayback Machine on November 6, 2020, available here: <https://web.archive.org/web/20201106133621/https://dreamonme.com/catalog/full-size-crib-mattresses/twilight-spring-coil-mattress/>
- 23 The live website for Graco's Premium Foam Crib & Toddler Mattress is available here: [https://www.gracobaby.com/home-and-gear/nursery/premium-foam-crib-and-toddler-mattress/SAP\\_2140358.html](https://www.gracobaby.com/home-and-gear/nursery/premium-foam-crib-and-toddler-mattress/SAP_2140358.html)  
The webpage was captured in the Internet Archive's Wayback Machine on November 6, 2020, available here: [https://web.archive.org/web/20201106131818/http://www.gracobaby.com/home-and-gear/nursery/premium-foam-crib-and-toddler-mattress/SAP\\_2140358.html](https://web.archive.org/web/20201106131818/http://www.gracobaby.com/home-and-gear/nursery/premium-foam-crib-and-toddler-mattress/SAP_2140358.html)
- 24 Federal Trade Commission. Green Guides. <https://www.ftc.gov/news-events/media-resources/truth-advertising/green-guides>
- 25 Federal Trade Commission. "FTC Charges Companies with 'Bamboo-zling' Consumers with False Product Claims" release August 11, 2009. <https://www.ftc.gov/news-events/press-releases/2009/08/ftc-charges-companies-bamboo-zling-consumers-false-product-claims>
- 26 Nook makes assertions about its cover here: <https://nooksleep.com/pages/the-nook-difference>
- 27 We did not raise this issue in our communications with Nook Sleep.
- 28 Babyletto's main mattress page contained the graphic shown as of April 15, 2021. <https://babyletto.com/pages/pure-mattresses>
- 29 US EPA. Acrylonitrile Hazard Summary. <https://www.epa.gov/sites/production/files/2016-09/documents/acrylonitrile.pdf>
- 30 <http://polymerdatabase.com/Fibers/Modacrylic.html> shows the common chemicals that add to fire retardancy, including vinyl chloride. Vinyl chloride is a known carcinogen. <https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/vinyl-chloride>
- 31 We did not raise this issue in our communications with Babyletto.
- 32 The logo is described here: [https://www.prosalesmagazine.com/products/build-american-movement-gains-momentum\\_o](https://www.prosalesmagazine.com/products/build-american-movement-gains-momentum_o)  
We did not raise this issue in our communications with Colgate Mattress.

# GETTING READY FOR BABY

The Getting Ready for Baby campaign is a national collaboration of over 100 organizations working to ensure all products made for babies are free of harmful chemicals.

Simply put: every baby product should be a healthy product.

[gettingready4baby.org](http://gettingready4baby.org)

**CLEAN &  
HEALTHY  
NEW YORK**

Clean and Healthy New York is an advocacy organization building a just and sustainable society in which toxic chemicals are unthinkable. Our work changes laws, shifts markets, and empowers people to advance innovative solutions and create a sustainable economy.

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