



## IMPEX International Corporation

23401 Caraway Lakes Dr., Bonita Springs, Florida 34135  
Phone: (239) 495-8500 ~ Fax: 239-495-0122 ~ Toll Free: 800-229-3719  
Email: [info@melansol.com](mailto:info@melansol.com) ~ Website: [www.melansol.com](http://www.melansol.com)

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Jane Houlihan  
Senior VP for Research  
Environmental Working Group  
1436 U Street NW, Suite 100  
Washington, DC 20009

**Subject: MelanSol® Natural Sunscreen SPF-30**

Dear Jane Houlihan,

You are receiving this letter because you are in charge of research for EWG.

We have discovered that one of our products, MelanSol® SPF-30, is now listed in the EWG/ Skin Deep Cosmetic Safety Database. What concerns us is that your organizations *research* to give our product a rating consisted of a simple list of ingredients from our website. How could you establish a rating without ever having contacted us to obtain the independent test results and data (research) necessary to make a proper assessment of our product?

At the bottom of the product page of your database, you state the following:

“EWG’s sunscreen database is dynamic, which means that the sunscreen ranking numbers may change based on evolving science, new information on UVA, UVB radiation and sunscreen ingredients, market conditions, or other factors.”

What we would like you to know is that the complete line of MelanSol® Natural Skin Care *is* based on “*evolving science*”. MelanSol®, invented by a man who suffered from both basal cell and squamous cell carcinoma skin cancer, has revolutionized the way sunscreen protects skin from oxidative stress (sunburn and skin damage). The *evolving science* that supports the formulation of MelanSol® Natural Skin Care is outlined in a 2003 Continuing Education Report, published in *The Journal of the American Academy of Dermatology*. Among other things, the report states the following:

“Sunscreens are useful, but their protection is not ideal because of inadequate use, incomplete spectral protection, and toxicity. Skin naturally uses antioxidants (AO’s) to protect itself from photodamage. This scientific review summarizes what is known about how photodamage occurs; why sunscreens—the current gold standard of photoprotection—are inadequate; and how topical AO’s help protect skin against skin cancer and photoaging changes.”

It would behoove you to read this report, which we can provide, in order to better understand the reason why MelanSol® was formulated with the three specific natural topical antioxidants it contains.

What follows are the specific inaccuracies in your assessment and subsequent rating of MelanSol® SPF-30.

- MelanSol® SPF-30 was formulated to comply with the new EU rules about sunscreen (UVA protection factor = 1/3 of the labeled SPF). It has been approved by a European Government Agency. The owner of the MelanSol® brand and manufacturer is Impex International Corp. Oceana Naturals, LLC, is the authorized distributor in the US. With regard to the ingredients, our intent has always been to provide the utmost transparency to the consumer.
- What surprises us is that your evaluation took place using only the list of ingredients published on [www.PureSunscreen.com](http://www.PureSunscreen.com). We know this to be true because our SPF-30 did not even exist at the time of your evaluation. It became available for sale the week of July 12. How is it possible to assess and rate a sunscreen without having seen it and without having consulted the Ingredients Specifications and Material Safety Data Sheets?
- Because your research did not include asking for the proper data, **your UVA rating of "Moderate" is completely inaccurate.** We test and label each of our sunscreen products for their UVA protection--something very few of the sunscreen brands do. The UVA Protection factor and the SPF of the MelanSol® SPF-30 have been evaluated by an independent Test and Research Laboratory with the following results: SPF mean value 32.2 and UVA-PF mean 10.69. How can you rate the "UV-Absorbance" without having seen these test results? Obviously, your rating criteria flawed at best.
- **Lecithin:** We have no concerns about our lecithin being contaminated with nitrosamines.

A safety review of lecithin does indicate that lecithin should not be used in formulas that include nitrosating agents. The following link <http://www.inspireliving.com/organic/skincare/a~skincarechemicals.htm> indicates the compounds that are nitrosating agents:

- 2-bromo-2-nitropropane-1,3-diol
- Cocoyl Sarcosine
- DEA compounds
- Imidazolidinyl Urea
- Formaldehyde
- Hydrolysed Animal Protein
- Lauryl Sarcosine
- MEA compounds
- Quaternium-7, 15, 31, 60, etc
- Sodium Lauryl Sulfate
- Ammonium Lauryl Sulfate
- Sodium Laureth Sulfate
- Ammonium Laureth Sulfate



- Sodium Methyl Cocoyl Taurate
- TEA compounds

**MelanSol SPF-30 does NOT contain any such compounds and the lecithin used in this sunscreen product is NOT contaminated with NITROSAMINES.**

- **Clay Minerals:** Your lack of an appropriate description with regard to this ingredient has led to an inaccurate depiction of what our products contain. The INCI name for the clay mineral we use is Bentonite. A pure and natural product that is in full compliance with the rules established by the USDA and National Organic Program (NOP), which is the reason why Bentonite is recommended for use in organic personal care products. This Bentonite is a raw material authorized by ECOCERT, complying with the standards for ecological and organic cosmetics. What concerns us is how you came to rate this ingredient with a "4." What does "Miscellaneous" in connection with "Concerns" really mean? This kind of language casts doubt without proper clarification.
- **Tocopherol:** There are several different versions of Tocopherol. In rating our MelanSol® SPF-30, you have completely neglected the specifics of the tocopherol we use in this and all of our products. Why is this case? Consumers have a right to know whether the tocopherol being used is natural or synthetic. The form of Vitamin E we use is natural-- d-tocopherol. It's the mixed version with the 4 components d-alpha, d-Beta, d-Gamma and d-Delta. This natural vitamin E has a significantly higher bio-activity than synthetic Vitamin E. We include this specific form of vitamin E because it's a potent antioxidant. **You may be thinking of synthetic vitamin E where HYDROQUINONE might be one of the starting materials for that reaction.**
- **Oryza Sativa (Rice) Bran Oil:** We have no concerns about our Rice Bran Oil being contaminated with GOSSYPOL, HEAVY METALS, ORGANOCHLORINES, and PESTICIDES as stated on your database. Certificate of Analysis Results: Arsenic, Heavy Metal, Cadmium Mercury and PCB: **NOT DETECTABLE**. Analysis for Pesticide Residue: 68 tested with Gas Chromatography-Mass Spectrometer. Result: **NONE DETECTED**. This Certificate of Analysis is available on request. It is just unbelievable how perfunctory your assessment of a specific product is.
- **Green Tea:** See the Continuing Education Report previously mentioned for the merits of using a pure natural green tea with a high % of active ingredients with proven antioxidant capabilities as follows: Min. 35% Epigallocatechin gallate, min. 60% total catechins, min. 70% total polyphenols. Why do you put "Restrictions & Warnings" next to the ingredient green tea? What are the concerns?
- When you list our ingredients, and then proceed to put comments about each of them to the right, you *directly* associate these comments with the ingredients we use. Readers are then led to believe the ingredients in our product have the issues you state, when in fact your comments are quite general in nature. This approach casts a shadow of doubt over the quality of the ingredients we use. If you want to make readers aware of the dangers associated with a specific ingredient, it would be better to do it on another page. We know many manufacturers don't want to reveal the exact nature and form of



each ingredient; however, we operate with complete transparency, giving the recognized INCI name for every ingredient we use. It is the only way people can really know what they are applying to their skin. If you need clarification about an ingredient, we welcome your inquiry. Your *research* dictates that you have all the facts before deciding on a rating.

Overall, we are very disappointed with the way MelanSol® Natural Sunscreen SPF-30 has been assessed and rated by your organization, especially in its relationship to other sunscreens you rate. For example, *Blue Lizard Australian Sunscreen Baby, SPF-30* received an overall safety rating of 2, even though it contains many cautious and potentially irritating ingredients.

We believe MelanSol® SPF-30 has been assessed in an unprofessional and nonfactual way that does not give credit to its independently verified ability to protect skin from photodamage. You give us the impression that your rating system places a higher emphasis on the percentage of active ingredients as a determining factor for rating a sunscreen as more protective, instead of actual test data.

We did not ask to have our product rated by your organization and feel disrespected by the way you have gone about arriving at your conclusions.

In conclusion, because we feel your rating system lacks validity, we respectfully request that you immediately remove MelanSol® SPF-30 from your database until you adopt a rating system that takes into account the proper data necessary to arrive at a rating system that is in line with the actual ingredients used in a product.

A response to this communication would be appreciated as soon as possible. You have built the EWG brand by leading people to believe you are a credible resource that tests and weighs factual evidence before arriving at a satisfactory rating. We firmly believe this is not the case with MelanSol® SPF-30.

Sincerely,



Peter Zahner  
President  
Impex International Corp.

