



September 11, 2023

VIA EMAIL

Liz Rumsey
Deputy Attorney General
California Attorney General's Office
1515 Clay Street, 20th Floor
Oakland, CA 94612
liz.rumsey@doj.ca.gov

Re: Colgate-Palmolive's Deceptive "Recyclable" Toothpaste Tube Campaign

Dear Ms. Rumsey:

A recent Truth in Advertising, Inc. ("TINA.org") investigation into Colgate-Palmolive has revealed that the company is engaged in a greenwashing campaign to gain market advantage and persuade consumers to purchase its Colgate and Tom's of Maine toothpastes. Specifically, the products are marketed as being packaged in "the first of its kind recyclable toothpaste tube," which prominently bears the chasing arrows symbol. The reality, however, is that these toothpaste tubes, while recyclable in theory as they are made with a widely-recycled material,¹ end up in landfills due to a number of factors, including contamination issues, size and shape, and visual similarity to non-recyclable products. As such, Colgate's recycling claims violate California law.²

TINA.org filed a complaint regarding Colgate's deceptive marketing campaign with the Federal Trade Commission, which is attached here in its entirety, but we bring this matter to your attention as well in light of the State of California's strong focus on environmental marketing issues in general, and the improper use of the chasing arrows logo and recyclability claims on products and packaging in particular.³

TINA.org urges your office to open an investigation into Colgate and Tom's of Maine and take appropriate enforcement action.

¹ The Colgate and Tom's of Maine toothpaste tubes are made of HDPE, or high-density polyethylene, plastic.

² Cal. Bus. & Prof. Code §§17580, 17580.5.

³ TINA.org has also notified regulators in the state of Connecticut of these marketing issues.

If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Cc via email: Candace Sady, Chief Marketing Counsel, North America, Colgate-
Palmolive Company

Tom O'Brien, Chief Executive Officer, Tom's of Maine