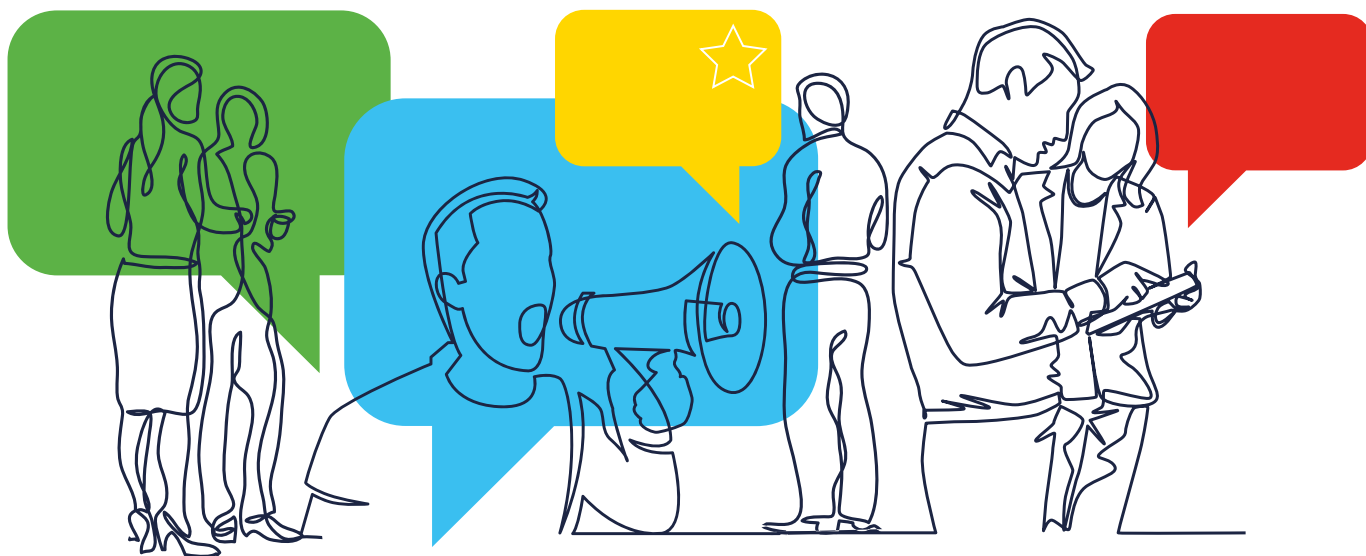




## EUROPEAN CITIZENS' INITIATIVE FORUM

SAVE CRUELTY FREE COSMETICS  
– COMMIT TO A EUROPE  
WITHOUT ANIMAL TESTING



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# 1

## The Initiative: 'Save Cruelty Free Cosmetics – Commit to a Europe Without Animal Testing'



'Save Cruelty Free Cosmetics – Commit to a Europe Without Animal Testing' is the ninth successful European citizens' initiative (ECI). It calls on the European Commission to take action on the use of animals for scientific research, regulatory testing and educational purposes.

The objectives of the initiative are to:

- protect and strengthen the ban on cosmetics animal testing: initiate legislative change to achieve consumer, worker, and environmental protection for all cosmetics ingredients without testing on animals for any purpose at any time;
- transform EU chemicals legislation: ensure that human health and the environment are protected by managing chemicals without the addition of new animal testing requirements;
- modernise science in the EU: commit to issuing a legislative proposal plotting a roadmap to phase out all animal testing in the EU before the end of the current legislative term.

The 'Save Cruelty Free Cosmetics' initiative was registered on 30 June 2021 and its signature collection period started on 31 August 2021. It succeeded in gathering **1 217 916 million verified statements of support and the minimum thresholds were reached in 21 Member States.**

It was formally submitted to the Commission on 25 January 2023 ([press announcement](#)). The Commission published a communication replying to this initiative on 25 July 2023.



### Success factors

- Developing a target number of signatures for each Member State based on experience gained from previous ECIs, and adapting the marketing strategy as the campaign progressed;
- Drafting clear, pragmatic and achievable objectives that were in line with the EU treaties and relevant across the EU. The initiative achieved the minimum signature threshold in a record-breaking 21 Member States, thus demonstrating pan-EU support for ending animal testing;
- Establishing a strong network of partners (animal protection organisations and companies) and making it as easy as possible for these actors to use and adapt the communication resources prepared by the organisers.



## 2

# The Campaign

## Preparation

In 2014, the European Chemicals Agency and the Commission released a joint statement, which clarified their understanding that cosmetics ingredients may still be tested on animals under certain limited circumstances. This news came just 18 months after the full implementation of the cosmetics testing and marketing bans, which sparked outrage and condemnation across the EU. Following years of campaigning that had not achieved any policy change, the five largest EU-wide animal protection organisations (PETA, Cruelty Free Europe, Eurogroup for Animals, the European Coalition to End Animal Experimentation, and the Humane Society International/Europe) came together with a proposal for an ECI against animal testing.

The organisers of the 'Save Cruelty Free Cosmetics' initiative carefully drafted the goals and objectives of the initiative to ensure that they were pragmatic, achievable and (most importantly) in line with the EU treaties. The organisers also **obtained legal advice**<sup>1</sup> to help ensure that the initiative was successfully registered.

During the preparation phase, the organisers of the 'Save Cruelty Free Cosmetics' campaign benefited from speaking to previous ECI organisers in order to **learn from their experience** in preparing and implementing their campaigns.

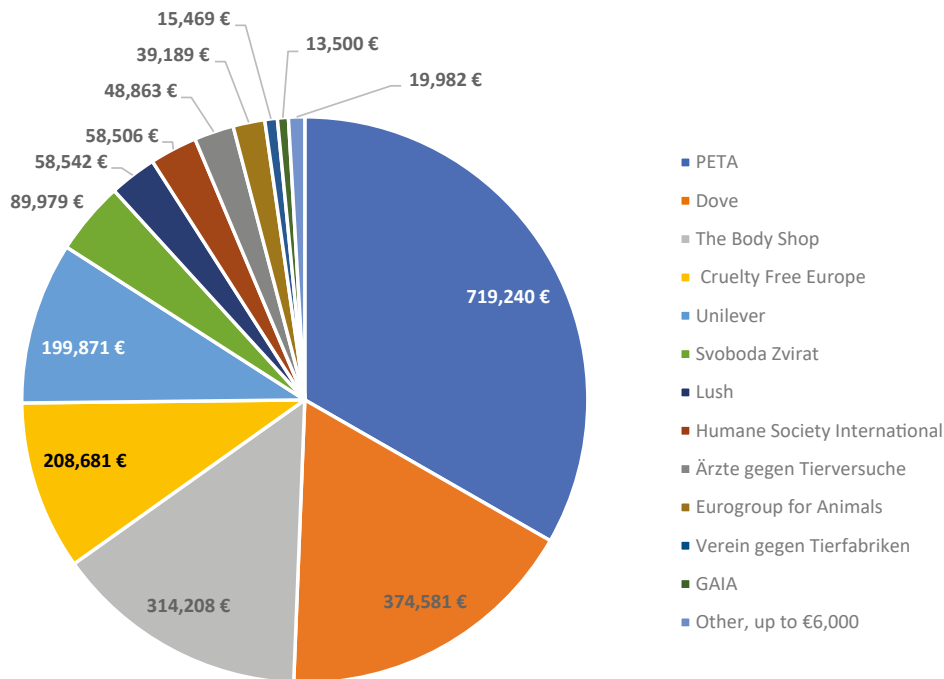
Before implementing the campaign, it was important **to build a network of partners to help drive forward the online campaign**. The organisers contacted a number of animal protection organisations and companies, whose values aligned with the 'Save Cruelty Free Cosmetics' campaign, in order to help promote the initiative's message. One of the key factors ensuring that this network of partners was active and engaged throughout the campaign was the **constant communication** and **communication resources** provided by the organisers to their partners.

Overall, the organisers of the 'Save Cruelty Free Cosmetics' initiative collected EUR 2 160 615 in funds and other support.



<sup>1</sup> Using the Seek Advice service on the ECI Forum

Sources of Funding (€)



## | Implementation of the campaign

The organisers of the 'Save Cruelty Free Cosmetics' initiative prioritised engaging their network of partners by **hosting informational webinars**, having a **dedicated digital resource area** and communicating via email. However, as the campaign progressed, the organisers moved from email to Slack (an online collaboration platform) in order to post regular updates, share information, answer questions and reach out to partners for help.

Besides **maintaining constant communication** with their network of partners, the organisers enabled partners to **adapt communication materials** with their own logos. For press and public engagement, the organisers provided materials to highlight certain international days relevant to the objectives of the initiative (e.g. International Cat Day) and **developed materials that focused on each of the three objectives of the initiative**. The organisers also provided **informational videos and resources to help people navigate the signature collection platform**, and shared compelling **videos in different languages** using well-known influencers and celebrities, such as Sir Paul McCartney,

the comedian Ricky Gervais, the Finnish heavy metal band Lordi, the actor Evanna Lynch and the singer Red Canzian. The organisers also engaged with local press and ran public-facing campaigns with demos and street art.

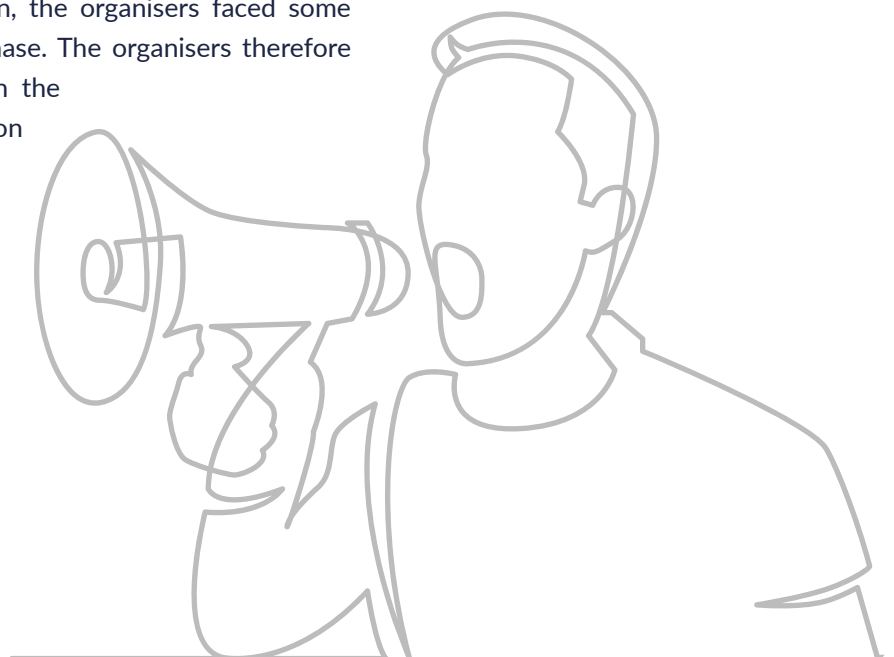
Besides coordinating with several stakeholders and multipliers in their campaign, the organisers also made sure to collect the necessary data (when possible) to evaluate their performance and improve as the campaign progressed. The organisers monitored the performance of advertisements and applied successful strategies from one Member State to other Member States.

The initiative was promoted by 100 national organisations and their supporters as well as global cruelty free brands, such as Dove and The Body Shop.

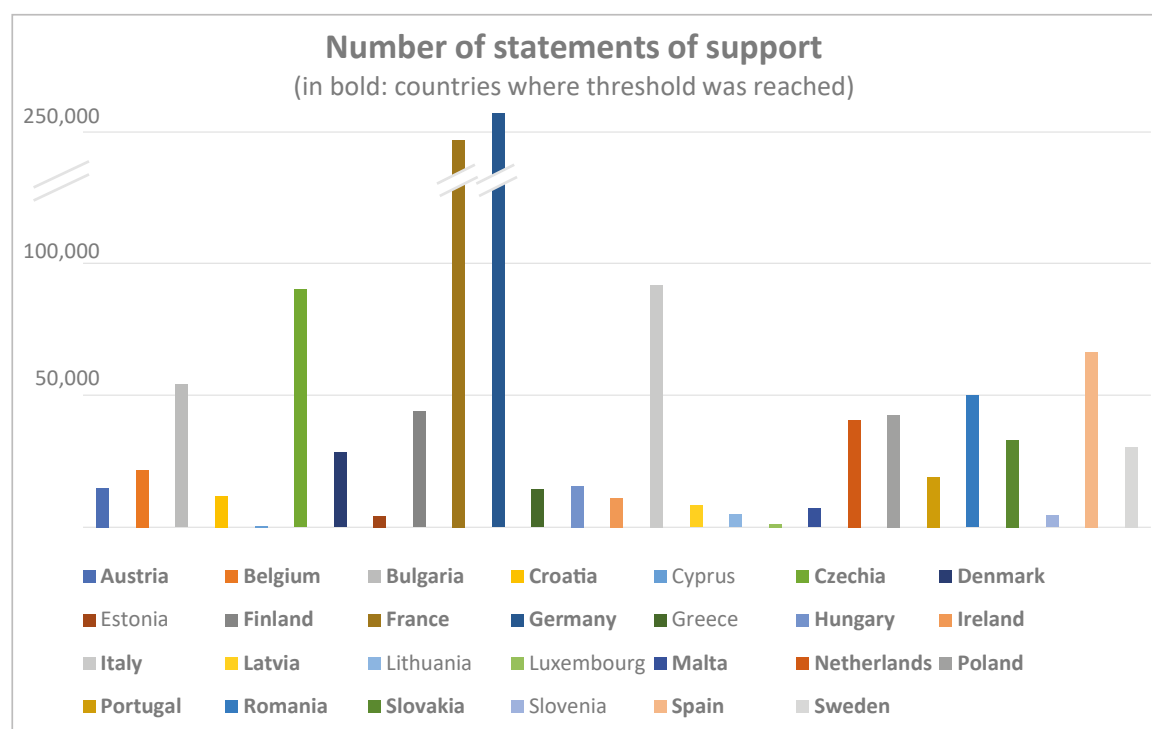
## | Collection of Signatures

The organisers approached the signature collection phase with careful planning and consideration. The organisers set targets for each Member State based on several factors, including the **number of signatures previously collected** in that Member State on similar campaigns, the **number of supporting organisations** in that Member State, and the **online outreach capacity** of local organisations. The organisers also considered **potential barriers** faced by citizens to signing the initiative, such as technological gaps and the need to provide personal identification online. After assessing these factors, the organisers **identified key target countries that informed their marketing strategy** and would ensure that the initiative received at least 1 000 000 signatures.

Despite meticulous planning and preparation, the organisers faced some difficulties during the signature collection phase. The organisers therefore needed to **adapt their campaign strategy** in the Member States where signature collection was slow and to crisis situations, such as the ongoing war in Ukraine, which required partner organisations to divert energy and resources to help those in need. The organisers prepared informational 'how-to' videos on signing the initiative through the central online collection system provided by the Commission, but still received feedback from citizens saying that they did not understand what was required of them or why they had to provide such extensive personal information. Furthermore (as already mentioned), the



organisers used advert performance to help improve their marketing strategy throughout the course of the campaign. However, the organisers found that the central online collection system did not allow them to track data metrics with sufficient details<sup>1</sup> to inform the social media campaign, and this limited their ability to use this information to improve their strategy. The organisers nevertheless continued to adapt their strategy when possible.



<sup>1</sup> This functionality has since been improved in the system.

## | Verification and submission

The 'Save Cruelty Free Cosmetics' signature collection closed on 31 August 2022. The statements of support were sent to the national authorities responsible for their verification in each Member State. After the formal process, a final figure of **1 217 916 signatures** was validated by national authorities. The required thresholds were reached in a record 21 Member States.

The initiative was then formally submitted to the Commission on 25 January 2023, opening the 6 month examination period.

As the organisers entered the lobbying phase of their campaign, it was crucial to **maintain strong momentum**. This involved **engaging with Members of the European Parliament (MEPs) and key decision-makers**. The organisers **created various resources**, including materials and letters for their partners to present to authorities in their regions. They **prepared a detailed briefing document** for circulation before the meeting with Commissioners and the hearing in the European Parliament. They also developed a Q&A document to address and refute any statements they found unfounded or misleading.

Furthermore, the organisers **introduced their initiative at a meeting of the Intergroup on the Welfare and Conservation of Animals** in the European Parliament. They actively collaborated with members of this group to ensure they were well-prepared for the plenary debate on 10 July 2023.





# 3

## The Impact of the Campaign

### Examination and Commission reply

After the formal submission of the 'Save Cruelty Free Cosmetics' initiative on 25 January 2023, the organisers met with **Věra Jourová, Vice-President of the Commission in charge of Values and Transparency** and **Thierry Breton, European Commissioner for Internal Market**, on 17 March 2023 ([photo coverage](#)).



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On 25 May 2023, the European Parliament held a public hearing on the 'Save Cruelty Free Cosmetics' initiative ([public hearing](#)). The organisers presented the initiative objectives and engaged with the MEPs ([Cruelty Free Europe Takeaways](#)). On 10 July 2023, the 'Save Cruelty Free Cosmetics' initiative was debated at the European Parliament's plenary session ([recording](#)).

The Commission adopted a [communication](#) on 25 July 2023 setting out its response to the initiative. The Commission welcomed the initiative and acknowledged that animal welfare remains a strong concern for EU citizens. The Communication assessed the merits of each of the initiative's proposals ([press release](#)).

The Communication highlights the leading role of the EU in phasing out the use of animals in testing and improving animal welfare in general. More specifically, the Commission proposed the following legislative and non-legislative actions in response to the objectives of the 'Save Cruelty Free Cosmetics' initiative:

- continue to apply and enforce the animal testing ban within the framework of the EU Cosmetics Regulation;
- consider the need for legislative changes to further clarify the interface between the EU Cosmetics and REACH regulations based on the outcome of an ongoing judicial review;
- begin work on a roadmap towards replacing animal testing in chemical safety assessments, with multiple actions and a step-by-step path to replacing animal testing, involving all relevant stakeholders;
- initiate a series of actions to accelerate the reduction of animal testing in research, education and training (including exploratory workshops) and to sustain new training initiatives for scientists in the early stage of their careers;
- continue to support research on alternatives to animal testing with EU funding.

On 8 November 2023, the organisers met with Commissioner Sinkevičius to discuss the Commission's response to the ECI.





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## Hints and tips for future organisers

- Preparation is key!
- Make it as easy as possible for other organisations to participate in your campaign (for example, by translating adverts and digital resources and allowing personalisation of materials);
- You don't just need people in your team that are knowledgeable about your campaign issue – you also need people who can create engaging content, analyse campaign results, foster cooperation with others, and engage with relevant MEPs;
- keep track of expenditure (including in-kind support) because you are legally required to declare contributions over EUR 500 (as well as in-kind support that would amount to that value or more).