SANSNiK™

The Marketing & Environmental Claims Substantiation Dossier (FTC Framework)

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Introduction and Overview

As an exclusively direct-to-consumer (DTC) manufacturing and commerce ecosystem, SANSNiK LLC (operating as SANSNiK) controls the entire lifecycle of its physical products, from proprietary engineering in Sarasota to final digital distribution. Because our fulfillment and sales pipelines bypass traditional wholesale channels entirely, our relationship with the end consumer relies on absolute transparency and high-fidelity communication. This document serves as the definitive legal framework for our public-facing environmental and ethical marketing claims.

The Federal Trade Commission (FTC) enforces strict truth-in-advertising standards under 15 U.S.C. § 45, specifically governing environmental marketing through the FTC "Green Guides" (16 C.F.R. Part 260). These federal regulations, alongside rigorous state-level statutes like California's SB 343, dictate that an advertiser must possess "competent and reliable scientific evidence" to substantiate any objective claim before that claim is disseminated to the public.

The primary objective of this protocol is to compile, index, and organize the physical and scientific evidence proving that SANSNiK's active formulas are vegan, its flexible cleansing matrices are fully biodegradable, and its packaging architectures are structurally compostable. Adherence to these substantiation baselines is mandatory to mitigate regulatory exposure across all 50 US states.

"*(Note: In this document, the capitalized brand name **SANSNiK** is used to refer to the legal entity SANSNiK LLC, allowing for better alignment with our operational naming conventions.)*"

Section 1: The Veracity Mandate

SANSNiK's approach to brand marketing explicitly rejects "greenwashing", the practice of using vague, unqualified terms like "eco-friendly" or "sustainable" without specific, evidentiary backing.

Our operational mandate requires that every visual badge, symbol, and text claim printed on our physical packaging or displayed within our digital storefront possesses a direct, unbroken lineage to a verified supplier document or a third-party laboratory test. This dossier acts as that central repository, ensuring that all claims regarding the Contour Bar and the Contour Bar with Grit collections meet the FTC's threshold for objective substantiation.

Section 2: Physical and Chemical Specifications - The Flexibility Scale

To accurately substantiate the environmental impact of our products, we must first define their physical state. SANSNiK categorizes all cleansing compounds using a proprietary physical density taxonomy known as the SANSNiK Firmness Scale or **F-Scale**.

The F0-F10 Architecture: The F-Scale operates on an absolute continuum from F0 to F10. F0 represents a product that is entirely liquid in composition (analogous to a traditional body wash), while F10 represents a product that is entirely rigid and solid (analogous to a traditional milled bar soap).

Moving a product along the F-Scale (e.g., from an F3 to an F7) requires highly complex, proprietary adjustments to the ratios across the entire ingredient profile. Consequently, while the tactile outputs differ drastically, the foundational chemical biodegradability profile remains effectively identical across the scale, allowing our environmental claims to apply uniformly to the entire collection.

Section 3: Ethical Sourcing - Vegan Formulations and Animal Testing Policy

SANSNiK maintains strict internal ethical standards regarding raw material procurement. However, to maintain regulatory agility, we strictly delineate between our internal standards and our public-facing marketing claims.

3.1 The Vegan Scope (Cleansing Bars) The FTC requires that brands validating "free-of" claims ensure that the specified substances are not intentionally added and do not exceed acknowledged background levels.

- **Active Formulas:** The active Contour Bar and Contour Bar with Grit cleansing bar lines are 100% Vegan. While the SANSNiK physical compound density scale utilizes complex ratios of natural polysaccharides and surfactants, we mandate that no animal byproducts are introduced during their manufacturing process.
    - **The Glycerin Protocol:** Because commercial glycerin is frequently derived from animal tallow, SANSNiK explicitly mandates that all approved active suppliers source 100% plant-derived (or synthetic) glycerin.
- **Brand-Wide Limitation:** It is explicitly noted in this dossier that the SANSNiK brand is not exclusively vegan. Future product expansions (e.g., shaving products or hair care) may utilize ethically sourced animal byproducts (such as beeswax or lanolin). Vegan claims are localized strictly to the Contour Bar and Contour Bar with Grit lines.
- **Substantiation:** Maintained via active Certificates of Analysis (CoAs) and supplier declarations from our primary, secondary, and tertiary chemical vendors, securely logged within the SOL Business Operating System.

3.2 Internal Non-Animal Testing Standard While SANSNiK mandates internally that our raw material vendors do not conduct animal testing, we explicitly do not advertise our products as "Cruelty-Free" on our packaging, nor do we utilize generic bunny iconography. This strategic omission bypasses the requirement for costly third-party certifications (e.g., Leaping Bunny) and shields the brand from FTC scrutiny regarding complex downstream supply-chain audits.

Section 4: Biodegradable Matrix Engineering - The Cleansing Bar

The FTC Green Guides state that an unqualified "biodegradable" claim is deceptive unless a marketer has competent and reliable scientific evidence proving the entire product will completely break down and return to nature within one year after customary disposal.

4.1 Aqueous Biodegradation Mechanics Because the Contour Bar and the Contour Bar with Grit are wash-off cosmetics, their customary disposal route is through municipal wastewater systems. The proprietary F-Scale cleansing matrices (ranging from F3 to F7) are engineered utilizing water-soluble components and natural food-grade binders (Zea Mays and Solanum Tuberosum starch).

- **The Defense:** The natural degradation of these starchy polysaccharides, combined with readily biodegradable surfactants (SLES and Cocamidopropyl Betaine), ensures the compound density matrices rapidly metabolize and break down in aqueous wastewater treatment environments well within the FTC's one-year threshold. Furthermore, binding

agents such as Chondrus Crispus (carrageenan) are inherently biodegradable natural seaweed polysaccharides.

- **The Pumice Exception:** The Contour Bar with Girt collection contains granulated pumice. Because pumice is a naturally occurring, inert volcanic rock, it is already "returned to nature" and does not negatively impact the biological breakdown of the surrounding matrix.
- **The Fragrance Exception:** Cosmetic fragrance oils are utilized at statistically insignificant volumes (typically <2% of the matrix mass), ensuring they dissipate without inhibiting the overarching biological breakdown of the cleansing bar.

4.2 Third-Party Testing Substantiation (OECD 301B) To legally bulletproof this claim, SANSNiK relies on the OECD 301B Ready Biodegradability Test. This is the global standard laboratory test that measures the evolution of carbon dioxide (CO_2) produced when microbes consume a product in water over a 28-day period.

- **Future Testing Directive:** As the brand scales, operations will commission an accredited environmental laboratory (e.g., Eurofins or SGS) to run the OECD 301B test on the Contour Bar F5 master base. Upon successful completion (>60% degradation in 28 days), the lab report will be appended to this section.
- **Current Substantiation:** Pending formal OECD 301B laboratory execution, SANSNiK maintains legal substantiation through reliance on established stoichiometric and peer-reviewed environmental fate data. The core matrix relies entirely on organic, carbon-based materials (polysaccharides and polyols). Scientific literature confirms that Zea Mays, Solanum Tuberosum, Chondrus Crispus, and vegetable glycerin achieve rapid biodegradation in standard aqueous environments. Furthermore, the primary surfactants—SLES and Cocamidopropyl Betaine—are globally classified by chemical safety databases as "readily biodegradable" under standard OECD guidelines.

Section 5: Compostable Packaging Architecture

Packaging substantiation carries the highest regulatory risk. The FTC mandates that a "compostable" claim requires scientific evidence that the materials will break down into natural elements in a timely manner within a composting environment, leaving no toxic residue.

Section 5.1 Material Composition and Degradation The SANSNIK packaging dielines utilize structurally compostable materials, specifically engineered to enhance product survivability while meeting environmental thresholds. Our packaging architecture allows for operational flexibility based on supply chain availability and specific product needs.

- **The Outer Carton (YBS Packaging and additional suppliers):** The primary dieline is constructed from natural, biodegradable Kraft paperboard or Solid Bleached Sulfate

(SBS) carton board, sourced from YBS Packaging in Washington state (or any additional suppliers). Both substrates are selected for their environmental degradation profiles.

- **The Optional Inner Sleeve (ClearBags):** Depending on the specific SKU (such as potential moisture-sensitive variants), the bar *may* be wrapped in a wood pulp-derived, cellophane-like heat-sealable sleeve sourced from ClearBags. If utilized, this cellulose film is intrinsically compostable and improves transit survivability. It is not a mandatory default for the initial Contour Bar or Contour Bar with Grit lines.
- **The Ink Exception (Petroleum-based):** The Kraft or SBS boxes are printed using standard digital petroleum-based inks. Under ASTM D6868 (the standard for compostable packaging), non-compostable additives like ink are legally permitted provided they constitute less than 1% of the total dry weight of the package and pass ecotoxicity limits (they do not poison the soil). SANSNIK relies on the minimal surface-area coverage of our minimalist design to satisfy this exemption.

5.2 The "Substantial Majority" Qualification Because industrial composting access across the 50 United States does not currently meet the FTC's 60% threshold, SANSNiK strictly adheres to the requirement for qualifying language. All packaging bearing compostability claims is explicitly qualified with the consumer directive: *"For more information on how to recycle in your area, visit how2recycle.info."*

Section 6: Active Product Taxonomy and Claims Mapping

SANSNiK is executing a phased commercial rollout. The following matrix maps the product architecture to its active marketing claims, capturing the active Phase 1 SKU and the Phase 2 future SKUs.

Product Name	F-Scale	Tactile Profile	Environmental Claims	Operational Status
The Contour Bar	**F5**	Medium Flexibility	Vegan, Biodegradable	**Phase 1: Active Launch**
The Contour Bar	**F3**	High Flexibility	Vegan, Biodegradable	*Phase 2: Target Q4 2026*
The Contour Bar	**F7**	Low Flexibility	Vegan, Biodegradable	*Phase 2: Target Q4 2026*
The Contour Bar with Grit	**F3**	High Flexibility	Vegan, Biodegradable	*Phase 2: Target Q4 2026*

The Contour Bar with Grit	**F5**	Medium Flexibility	Vegan, Biodegradable	*Phase 2: Target Q4 2026*
The Contour Bar with Grit	**F7**	Low Flexibility	Vegan, Biodegradable	*Phase 2: Target Q4 2026*

6.1 The Claims Taxonomy and Badging Matrix This matrix dictates exactly what visual assets are permitted for use on the packaging and digital storefront.

Target Claim	Visual Symbol / Badge	Intended Target Asset	Legal Regulatory Constraint
Vegan	None (Text Only)	Finished Matrix	FTC Truth in Advertising
Phthalate & Paraben-Free	"PF" Circular Badge	Finished Matrix	FTC "Free-Of" Guides § 260.9
Compostable	Mobius Loop / Text	Outer Box (and Inner Sleeve, if applicable)	FTC Green Guides § 260.7
Biodegradable	Text Callout	Rinse-off Compound	FTC Green Guides § 260.8

Section 7: Quality Control Safety Rails and Ad-Copy Auditing

To ensure that marketing velocity does not outpace legal substantiation, SANSNiK enforces a strict internal auditing protocol. The SOL Business Operating System and TERRa rely on immutable data; our marketing must operate with the same rigor.

1. **Digital Gating:** No employee or executive operator may activate a new digital product listing or deploy digital advertising copy containing environmental claims unless the evidentiary documentation (Supplier CoAs, OECD tests) is actively logged within this dossier.
2. **Dieline Audits:** Before any new packaging dieline is transmitted to YBS Packaging for a production print run, the graphic files must be cross-referenced against the Badging

Matrix (Section 6.1) to ensure no unauthorized visual claims (such as a Leaping Bunny logo) have been introduced by the design team.

Section 8: Conclusion, Governance, and Phased Material Updates

This FTC Substantiation Dossier is a living document. Any changes to raw material procurement, packaging supplier contracts, or ink compositions must trigger an immediate review of Sections 3, 4, and 5.

If packaging materials are fundamentally altered outside the approved Kraft/SBS scope (e.g., shifting to non-biodegradable plastics), this document must be revised to version 1.1, locking the new material safety data sheets into our compliance repository before the newly packaged inventory is cleared for consumer fulfillment.

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Adherence to this protocol is mandatory for all system operators. The integrity of SANSNIK's product safety depends on the disciplined execution of the workflows detailed above.