

**Compact Signer Implementation meeting
Boston, MA, October 15, 2008**

Introductions

Lisa Archer, The Breast Cancer Fund, opened with a welcome and expression of appreciation for the time signers take to attend this meeting and to do Compact-related work. Lisa noted that we now have over 1000 Compact Signers, and that this group is leading the way in innovation toward greater cosmetic safety.

Compact for Safe Cosmetics 101

Jane Houlihan, Environmental Working Group, opened by describing the Environmental Working Group's recent research exploring the Body burden of toxic chemicals found in some cosmetics in 20 young women. They tested for 25 chemicals in cosmetics via one sample taken on one day. From those 25 chemicals tested, they found 16 chemicals in the blood of the 20 young women, including parabens and 5 other preservatives, 7 plasticizers found in nail polish and perfumes, the antibacterial (and hormone disrupting chemical) triclosan, and two fragrances from the musk family. These chemicals have a broad range of health issues, and ALL have the potential to disrupt hormones. Since they are being found in teen girls at a time when hormones are driving development, they may throw natural systems into disarray.

This is powerful information, given that it is now considered "normal" to see the early stages of puberty in African American girls age 6, and white girls age 7, and those girls beginning to menstruate before age 12 have 50% higher likelihood of developing Breast Cancer than girls who start menstruate at age 16 and beyond. Currently, the FDA has no concrete authority to verify product safety, no testing requirements, no review, no approval, and no recall, leading to a situation where 90% of ingredients are not assessed, and 23,000 products not assessed for safety.

Change in this realm begins with one gentle action – for instance, choosing products with fewer ingredients, avoiding hair dyes, and finding safe and effective sunscreens. Some companies, such as Compact signers, are leading the way in creating possibilities that give consumers options for greater safety, and legislation such as the Kid Safe Chemicals Act can shift chemicals policy to protect the health of children and others with unique sensitivities. KSCA assumes chemicals can be harmful until proven otherwise, and prioritizes based on what's in people and what's hazardous.

Compact Compliance Progress Tracker on Skin Deep

EWG has come up with a progress tracker to illustrate each company's progress toward meeting the Compact goals, as those goals relate to the 3-year timeline set forth by the Compact and will reflect the following:

- 1) Involvement in the Compact – as illustrated by attendance at Compact signer meetings and calls and/or entering ingredients and products into Skin Deep
- 2) Entering all products and ingredients into your manufacturer’s page on Skin Deep. By having this completed and up to date information in Skin Deep, we are able to assess how close your company is to being in compliance with the Compact, including:
 - a) An assessment of compliance with EU Cosmetic Directive formulation standards
 - b) The creation of an ingredient inventory to identify potential chemicals/ingredients of concern that your company can then use to prioritize ingredients for substitution
 - c) Disclosure of all ingredients, including constituent formulations or proprietary ingredients (for public transparency)
- 3) Submission of any studies or data that your company uses to assess the hazards of the ingredients in its products on your manufacturer’s page of Skin Deep (this helps to demonstrate your company is conducting these assessments in house to determine the safety of ingredients).

From discussion:

- Company comment: Full ingredient disclosure is something “we” companies can do; puts us at an advantage, let’s consumers understand what’s contained; This what we use, you can pronounce it, you can say it;
- One of the benefits of Skin Deep is the ability to hold a large body of data that companies can share, and that is available to consumers. Asking companies to contribute to this effort goes the extra step to make ingredients public and basic level of safety substantiation.
- Companies can submit safety substantiation information or if supplier certifies the manufacturing process – submit study or certification. This becomes a public document and makes product ratings more robust.
- Want safety studies from suppliers – the safety data is important here, the supplier company is not.
- Requesting safety studies from suppliers, when using suppliers, making those studies public. Get basic health and safety data in the public record; Skin absorption, basic toxicity data, estrogenicity assays, etc.; Some companies contract their own studies to see penetration and “dose”; MSDS sheets are not developed for this; Campaign will provide some guidance; Essential oils – request; Upload MSDS as a first step; If using a mineral and tested for nano-scale, very helpful; Federal requirement for safety substantiation; Compact requiring that this information made public; Skin Deep can become a resource for these resources; Federal law ... no requirement for product testing; PCPC requiring dossiers; Have to sell products that have gone through safety substantiation; but NO DEFINITION of what “safety substantiation” means

Skin Deep Product Entry 101

Sean Gray, Environmental Working Group

Direct email address – skindeep.technical@ewg.org for mechanics of Skin Deep

Ingredient questions – skindeep@ewg.org

Guide to Compact Compliance and entering products can be downloaded at www.safecosmetics.org/cstools

Log in to Skin Deep at http://www.cosmeticsdatabase.com/Compact_signers/

Contact: cengel@breastcancerfund.org for your login if you don't have this

Skin Deep started as a very basic study to see what's in cosmetics, and now receives 200,000 searches each day.

Sean then walked through the basics of product entries to show the process of entering products. Generally, menus are intuitive and walk you through the process.

Some key points:

- 1) Company/User login on lower left
- 2) Menu moves on the left – this lets you control where in your data pages you are working
- 3) The first question is: “How many products do you have?” This question must be answered, and the number of products entered into Skin Deep should match this value. This acts as a double-check for compliance.
- 4) Compact signer products are now reviewed on a continual basis, instead of the original quarterly review. Signers should resubmit for review if a significant change (from liquid to powder). Skin Deep re-runs every 24 hours, but if companies submit a spreadsheet then that may take a week to be entered and to show up in the database.
- 5) From here, you can edit your profile, to change the name and contact email (this should be the person who is coordinating Skin Deep entry, rather than the Compact signer, if this information is different). You can change your password and company representative, and you can enter new brands here.
- 6) Then it walks you through the process of entering your data on products and ingredients, stepping you through options to find ingredient matches if what you enter doesn't show up immediately in Skin Deep. This includes links of various ingredients to the botanical names or INCI names, so you can match the database.
- 7) EWG working to correct discrepancies in the scoring of various ingredients that depend upon how they are entered ... these are an artifact of using various databases for the toxics data.
- 8) Further work will allow signers to identify fair trade, wild crafted, sustainable, non-GMO – options to consider
- 9) There is the option to enter your company website and other purchase options, such as dealer locators.

10) To submit studies for safety substantiation, there is another menu, that again walks you through the process, this allows companies to enter the abstract and to upload pdf and word files, and allows for internal comments that will not be made public.

Green Chemistry

Amy Cannon, Beyond Benign

One of the biggest places we can make an impact is at the research and development stage. Designing a new product does have impact, so this moment matters
Polymers, micelles, semiconductors- all matter latter

Chemists often start with set of design criteria. Green chemistry includes “toxicity” and “environmental impact” as part of these criteria.

Alternatives must perform just as good or better, more environmentally benign, cost competitiveness

12 principles of Green Chemistry:

1. prevention
2. atom economy
3. less hazardous chem. synthesis
4. designing safe chems
5. safer solvents
6. energy efficiency
7. renewable feedstocks
8. reduce derivatives
9. catalyst
10. design for degradation
11. real time analysis for pollution prevention
12. inherently safer chemistry for accident prevention

90-95% of the materials we use come from petroleum; Efforts are to move toward biopolymers, including corn and potato waste.

Using nature-inspired solutions, known as biomimicry. Ex: irradiated polymers for nail polish alternatives; hair perms (one of the most toxic chemistries known!); Using static charges as ways to affix dyes to hair

Amy_cannon@beyondbenign.org

Policy efforts

Janet Nudelman, Breast Cancer Fund

Goal: to reduce hazardous chemicals we use daily

- We know no one is keeping hazardous chemicals off the shelf
- Unregulated system burdens everyone - Manufacturers need help identifying safe chemicals and getting straight answers from suppliers
- Most consumers assume that cosmetic products are regulated much like food; but FDA, adopted in 1938, does not require pre-market regulatory testing
- \$50 billion industry; only two attempts to strengthen federal oversight, both were defeated by the CTFA/PCPC, with a promise of tighter self-oversight, via CIR. But CIR has only reviewed 11% of ingredients, and has only found 9 chemicals unsafe. In addition, the CIR does not look at cumulative effect or timing of exposure.
- Voluntary self-regulation does not work, and consumers deserve protection from unsafe chemicals
- Today – decades after last attempt.
 - State safety has emerged to fill regulatory gaps – CA requires disclosure of known or suspected carcinogens and toxins; last year 10 states introduced safe cosmetics legislation
 - Increased consumer awareness has shifted this conversation to Washington, DC. People want gov't to address the problem.
 - Campaign recently approached by policymakers to develop set of policy recommendations to make cosmetics safer
 - Legislative survey of Compact Signers – based upon 10% of signers voluntarily responding to date (so this is not a formal scientific survey, but still informative)
 - 73% agreed ingredients undergo pre-market safety testing
 - 83% agreed legislation should prohibit the use of ingredients leading to adverse health effects
 - 88% agreed that toxic impurities should be prohibited
 - 87% agreed that full listing of constituent ingredients be listed.
 - 81% agreed that full labeling of nanomaterials should be required.
 - 78% agree FDA should issue standards for substantiating safety of ingredients.
 - Requiring safety data from cosmetic manufacturers should be made widely available to government, other companies and consumers. Majority of Compact signers agree with this.
 - 61% thought government should stimulate innovation. Majority also thought grants for green chemistry and small business incentives.

Ways Compact Signers can help:

Testify to Congress

Meet with Congresspeople

Review draft legislation

Comments

- Legislation should not disadvantage small businesses; some is cost; some is regulation
- FDA already has a lot of issues knowing how to do a good job regulating; Regulation has to be on scale.
- Last year 12 states introduced legislation banning phthalates from Kid's toys. The US Congress paid attention because 12 states were proposing the same legislation. As a result, states moving legislation captures Federal attention ... Federal government knows that patchwork doesn't work.
- REACH ... does it make anything the US does irrelevant? No-REACH is not a health-based standard, which is what is lacking in current US regulation as well.

Grassroots and Public Education

Mia Davis, Clean Water Fund

A key element of the Campaign focuses on public education. In the past year, we used Stacy Malkan's *Not Just a Pretty Face* as a vehicle to visit 30 cities, and reach 3,000 people. Many Compact signers very active in supporting this work.

Compact Signers and public education

- Contact Mia at Mia@safecosmetics.org for more information or ideas
- Compact signers put links on their websites to current events
- Share with networks
- Compact signers might be a voice for change to speak with legislators
- New calendar regarding events on the website: www.SafeCosmetics.org
- Share samples at local and national events – this illustrates that safer products are available and lets consumers see the quality of your products; Ship to us (contact Connie at cengel@breastcancerfund.org)
- Link to Campaign on your website, send the link in your newsletters, use our action alerts...share those with others. Also sign up for our Action campaign at www.SafeCosmetics.org
- Unmasked distribution ... 200 free a year to share with consumers or in retail space; more than 200 – ask to offset costs .25 each plus shipping
- Helping with local media – lots of mention about natural or green. Tell media about your work ... safer products and changing the system so that there is greater safety across the board.
- Help with municipal, state, or federal policy.

Brainstorm – share this info with buyers/retailers. They need this info, too. Event at Expo for buyers to highlight Campaign and Compact Signer work.

Final remarks

Lisa Archer, Breast Cancer Fund

Brainstorm of ways the Campaign can support Compact signing companies

- 1) Tech support calls –graded for newer companies or longer-term signers
- 2) Compact signer web forum to opt-in to talk and discuss things
 - a. Network to share information more directly/networking
 - b. Identify companies willing to be contacted by other companies regarding their work toward safety
- 3) Information-gathering about companies that have signed the Compact:
 - a. Company-size (by number of employees, perhaps)
 - b. In-home manufacture or a registered facility.
- 4) Ongoing communication via: RSS feeds, Compact Signer Newsletter, updates on events, legislation and ways to get involved.