

**A summary of ideas expressed via legislative survey completed
by Compact-signing Companies
(139 respondents; compiled January 8, 2009)**

I. Close labeling loopholes and Require full ingredient disclosure to FDA

- “Keep certification fees low, require transparency in ingredient labeling--if companies are using safe ingredients there should be nothing to hide, right (working around trade secret somehow...).”
- “I think legislation requiring detailed ingredient information from ingredient manufacturers --things like where does the ingredient come from, how is it made, what other chemicals or ingredients are involved in making it, how much of those additives or reagents remain in the final products, etc. would make a huge difference, but good luck getting that.”
- “We have learned that the "name" of a chemical is meaningless--that the chemical must be subject to the scrutiny of microscopic intervention. We have also learned that the words "organic" and "natural" are not only empty, they are vague and misleading. Ingredients must be clearly defined as to their actual chemical content, not adjectives which modify nouns.”
- “Set guidelines as they have now but with better definitions and protection against toxins in cosmetics - have disclosure of ALL ingredients. Make it very easy to access the information.”
- “Somehow, some way, some-body needs to monitor ingredient and marketing claims of at least the few larger corporations to verify the ingredients they have listed on their products and the claims they are making are in line with what is really in the product. Also, every component that makes up a final fragrance should have to be listed, whether it be on or inside the carton, or attached to the product. This, I believe, would help the conscious consumer to see the wheat from the chaffe a little better.”
- “Require that all ingredients be listed on the label, no matter how small the concentration. Require that fragrances disclose the ingredients in them.”
- “Require that ingredient manufacturers/suppliers provide detailed information about the ingredients they sell.”
- “Ingredients lists should be required for all products, with the exact ingredients. There should never be a label with "Proprietary blend of....." allowed. If extracts are used, they should also list the components ...”

II. Create a Ban on CMR (carcinogens, mutagens or reproductive toxins) Chemicals

- “Ban certain chemicals from being used in cosmetics. (Adopt European Union Guidelines).”

III. Create a list of “do not use” cosmetic ingredients that are linked to other serious health hazards or can be found through biomonitoring; or are in drinking water, indoor or outdoor air; or that persistent or bioaccumulate.

- “That Safety and Sustainability are interconnected so that the pain of regulation is not duplicated when the industry and regulatory bodies come to terms with the fact that their environmental impact is as important (or more) than the obvious safety issues.”

IV. Require Pre-Market Approval of Cosmetic Ingredients

- “Require pre-approval of any product containing synthetic chemicals with safety concerns and require that a warning be given if the product contains ingredient(s) with safety concerns.”

V. Require Suppliers of cosmetic ingredients to make available evidence of safety substantiation to any entity purchasing their cosmetic ingredients.

- “ It took almost a year to get my formulator, who is an internationally known company, to get us MSDS on each ingredient. They said that because they were a private label manufacturer, they didn’t need to provide me with this, and only did it as a "favor" to me. 1) Legislation should come down hard on the chemical companies and the manufacturers supplying formulations for companies. They should have guidelines and regulations on percentage amounts of each ingredient in a specific product, and what constitutes "safe". They should clean their products for trace levels of unwanted contaminants BEFORE selling them. 2) Suppliers should be held accountable for selling ingredients that have trace levels of contaminants during the production process. They should have clear documentation from chemical suppliers of the purity of the ingredient sold.”

VI. Any entity that manufactures cosmetic products should be required to provide evidence to the FDA that all ingredients, contaminants or impurities that make up the product have undergone safety testing prior to marketing a product.

- “Private label manufacturers should be held accountable for ensuring that chemical suppliers have provided proper documentation of the ingredient purity, and provide this to the company paying large sums of money to them for a safe product to be sold to the public. Files of all this documentation should be kept on the company's public website. That way the public and customers may have transparency.”

- “In the UK, we have a Safety Assessment done and that is it. I am a one woman band and this does not burden my business at all. It’s a simple case of preparing the product formulation, assessing for contraindications (I use a lot of essential oils and natural oils/butters etc), calculating the allergens and sending this paperwork and the sample to the Cosmetic Chemist. I am aware that there are imminent changes to EU Regs, so I don't know whether that will change the state of play or not as yet.”
- “Many synthetic chemicals have health risks. Some natural ones do too as well as huge impacts on native eco-systems. All 'synthetics' are not bad. All 'naturals' are not good. Companies are using both sides of this to their advantage, without regard for the safety of the public.”

VII. Promote Data Sharing

- Also, [need] complete information about ingredients so I can make informed choices about which ingredients to use and how to use them.”

VIII. Promote Community and Worker Right to Know

- “My concerns are more as a consumer than as a manufacturer. I would like to see unsafe chemicals removed this planet. I don't want industries producing them, I don't want workers handling them, and I don't want consumers using them. Even if I avoid them in my products, they are in the soil, air, and water if they are being produced anywhere. I do not believe the US will ever change its approach unless consumers demand it.”
- “I think there are important distinctions between safety for handling in a manufacturing environment vs. safety for use by the consumer --these are not always the same. For example, some ingredients may be potentially dangerous when inhaled in their raw powder form but when diluted in liquid and included in a product do not pose that safety concern or risk for the consumer.”

IX. Create fee structures so that small businesses don’t bear an undue burden of responsibility for stricter regulation of the cosmetics industry.

- “I am very concerned, as a small business owner that the burden will fall unfairly on small to medium businesses who are genuinely trying to provide a safer alternative. I am not against regulation (in fact I support it), only against regulation that would be unduly burdensome for small businesses to bear. If an ingredient is declared safe by the FDA/Government then I should be able to use it in my product as long as it is so-labeled.”
- “I don't mind registering my company with the government as long as I am not charged the same as a large company. I don't mind having my products checked out as long as I am not charged as heavily as a large company.”
- “Perhaps incentives for moving forward. Small companies like us play by the rules and have little leverage.”

- “Tax credits would be great for those who are not using harmful synthetics and are really creating companies that are making a difference in the quality of products.”
- “Small business incentives are essential for the continued growth of this movement.”
- “Make sure to scale whatever requirements or fees so micro-businesses are only affected to the degree that they can remain in the market.”

X. Create a Grants Program to support the design of Safe Alternatives

- “Preservatives. We make all natural plant-based products so we are confident that they are very safe. However, some of our water-based products (lotions and creams) require an antibacterial preservative of some kind to keep mold and other bacterial growth from ruining the product. There is a dearth of information about preservatives --how and why they are necessary, what quantities (concentrations) are acceptable/desirable, etc. There are no good choices on the market for small manufacturers who want to make a safe, holistic product. The industry at large seems poised to find new, alternative chemicals to do the job but hardly anyone is doing serious research on a natural alternative. This is our single biggest concern and frustration.”
- “Lack of availability of safe alternatives to less than natural or environmentally safe ingredients. It is difficult to find an acceptable conditioning emulsifier for hair conditioner.

XI. Hopes and Fears

- “My greatest hopes are that a clear set of workable guidelines will come into play. My fears are that large companies will dominate the legislation, like they do with SPF ingredients. Take a look at the rules for the EPA bug repellents, they make no sense; they look like a company wrote them, submitted them and created a testing format that no company can afford -- keeping everyone else out the game.”
- “I hope to see all safe cosmetic products in the market so that even the consumer that is not aware of the dangers of certain ingredients will be safe.”