

Retailer Therapy



Ranking retailers on their commitment
to personal care product and cosmetics safety

The Campaign for Safe Cosmetics

www.SafeCosmetics.org

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About the Campaign for Safe Cosmetics

The Campaign for Safe Cosmetics is a broad-based national coalition of more than 170 nonprofit health, environmental, environmental justice, worker, women's, student, consumer and faith organizations. Our key partners include: Clean Water Action, the Breast Cancer Fund, Commonweal, Environmental Working Group, and Women's Voices for the Earth. The Breast Cancer Fund, a national 501(c)(3) organization focused on preventing breast cancer by identifying and eliminating the environmental links to the disease, serves as national coordinator of the Campaign. The Campaign's mission is to protect the health of consumers, workers and the environment by securing the corporate, regulatory and legislative reforms necessary to eliminate dangerous chemicals linked to cancer, reproductive harm and other adverse health impacts from cosmetics and personal care products.

Visit www.SafeCosmetics.org for more information.

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Retailers & Cosmetics Safety

The \$50 billion personal care product industry in the United States is largely unregulated. The U.S. Food and Drug Administration does not have the authority to test cosmetics product ingredients before they are marketed, unlike other products it regulates like pharmaceuticals.¹ As a result, products such as baby shampoo, lipstick, lotions, and nail products often contain chemicals linked to cancer, birth defects, infertility and other chronic diseases.

Retailers that sell these products become the de facto gatekeepers of safety: Do the companies allow products with harmful chemicals to be sold in their stores? Do they promote and expand the sales of safer alternatives? And do they help their customers understand their stores' commitment to health and safety?

This report looks at the policies and practices of some of the largest retailers in the United States to begin to answer these questions. Through direct communication with the companies, searches of their websites and corporate responsibility reports, and in-store shopper surveys across the country, the Campaign for Safe Cosmetics (the Campaign) provides a snapshot in time of retailers' progress toward meeting the growing consumer demand for safer cosmetics. (See Appendix A for the full methodology.)

The Case for Retailer Leadership

Retailers need to improve their policies on the safety of the cosmetics products they sell, including private label brands, in order to protect consumer health and reduce exposure to hazardous chemicals.

There is a compelling case to be made that increasing access to safer products will benefit retailers' bottom line. Market analysts at Packaged Facts forecast that the U.S. consumer market for natural and organic skincare, hair care, and makeup, which during 2005 to 2010 boomed 61% to \$7.7 billion, could top \$11 billion by 2016.² According to a 2011 Organic Monitor report, "Consumers are turning to natural personal care products because of health concerns about synthetic chemicals."³

Another area that needs attention is safer products for people of color. A 2012 Packaged Facts report found that during 2010 the ethnic health and beauty care products market "posted growth of nearly 13%, and during 2011 the market continued to advance at a healthy pace to reach almost \$3 billion."⁴ The report goes on to note that, "As of 2012, market drivers include a desire for more natural products." This is especially important as products marketed to women of color often contain some of the most toxic chemicals used by the cosmetics industry.

The market for safer alternatives weathered the hardest years of the recession and continues to grow stronger.⁵ Retailers should jump on board the safer personal care product bandwagon because consumers are demanding it.

How Did the Retailers Do?

- **Whole Foods Market** (Whole Foods) is by far the leader, with proactive policies in place to screen out more than 400 chemicals of concern from its premium products. It offers an extensive range of safer alternatives and communicates its safety commitments and progress clearly to the public.
- At the other end of the spectrum is **Macy's**, which stated that government regulations are adequate to address cosmetics safety and that it trusted its vendors to ensure the products the company sells are safe. The company has a very limited selection of safer alternatives, with some of its stores not offering any alternatives at all.
- **CVS Caremark** (CVS) leads the conventional retailers, having a publicly available policy on its cosmetics safety standards, a wide range of safer alternatives in many of its stores and a policy of phasing out chemicals of concern from its CVS brand baby products.
- **Walgreens** does not have a publicly available policy that addresses personal care product safety, and safer alternatives are not consistently available in its stores. The company did recently launch its own line of safer products, which to date includes two baby bath products and a few adult shampoos and conditioners. These products are screened to ensure they do not contain certain chemicals of concern.
- **Walmart** has invested considerably in setting up systems to identify chemicals of concern in products it sells, but has not made progress in translating that knowledge into not selling personal care products that contain potentially harmful chemicals. It also lacks a commitment to do so in the future. Additionally, shoppers found a limited selection of safer alternatives.
- **Target** carries a range of safer alternatives, but lacks a policy to address chemicals of concern in the full range of personal care products it sells. Target is currently determining what criteria would go into a personal care product standard.
- **Costco Wholesale** (Costco) has eliminated the use of several chemicals in its signature brand, but has done little else to screen the other cosmetics products it sells. It also does not have a policy to address chemicals of concern in its full range of personal care products and offers limited to no safer alternatives.
- **Kroger** touts its commitment to selling safer products, but shoppers had mixed experiences, with some not finding safer alternatives and one finding a wide range but indicating that this section was a new addition in her local store. Overall the company lacks a comprehensive policy to address personal care product safety.

The Power of Retailers

There is a rich history of retailers using their purchasing power to effect positive market change. In 1999 Home Depot agreed to Rainforest Action Network's request to phase out the purchase of old-growth wood. Major brands throughout the forest products industry soon followed suit, including companies like Lowe's, 84 Lumber, Centex and KB Home.⁶ In the early 2000s ForestEthics worked with retailers like Staples and Office Depot to increase their sales of environmentally preferable paper products. In 2005 independent reports indicated that recycled pulp mills were operating at an all-time high due to demand from these retailers.⁷ In 2008 when Walmart—the world's largest retailer—agreed to stop selling baby bottles, sippy cups and sports water bottles made with BPA, it forced manufacturers to reformulate in order to keep selling to this retail giant.⁸

Some of the retailers highlighted in this report have already started to contribute to positive market-wide changes in cosmetics safety. In releasing this report, we hope to further the dialogue on how to best approach this important public health issue.

How Can Retailers Distinguish Truly Safer Alternatives?

Products that are free of chemicals linked to cancer, birth defects, developmental harm, reproductive health problems and other health concerns are the healthier, safer choice. Unfortunately, distinguishing which products fit these criteria can be complex. There is a great deal of confusion and at times misinformation about product safety. Companies can make a wide range of claims about how safe, natural, herbal or organic their products are with little to no legal oversight. A range of independent, third-party certification systems have developed to offer some guidance in this area,⁹ though the Campaign has not officially endorsed any certification systems at this time. Given incomplete disclosure of ingredients in many personal care products and the lack of publicly available information regarding ingredient safety, it is often hard to fully assess product safety. Until we have meaningful federal regulation of the industry, we can expect this confusion to persist.

A Broken System

The personal care product industry in the United States lacks adequate, health protective regulation to ensure that products are safe and that all ingredients in these products are listed on labels so consumers can make informed choices. Major loopholes in federal law allow the cosmetics industry to put virtually any chemical into cosmetics with no pre-market safety assessment, no monitoring of health effects and inadequate labeling requirements.¹⁰ In the absence of government authority, the safety of personal care product ingredients is evaluated through an industry-funded and self-policing body, the Cosmetic Ingredient Review (CIR) Panel. In the more than 35 years since its creation, the CIR has evaluated fewer than 20 percent¹¹ of the more than 12,500 ingredients used in cosmetics¹² — meaning that the vast majority have not been assessed for safety by the FDA, CIR or any other body.

Currently Congress is considering several bills to regulate cosmetics ingredients. The Safe Cosmetics Act (H.R.2359) is the only legislation being considered that would significantly improve product safety and give the FDA the statutory authority and resources it needs to effectively regulate the cosmetics industry. The Act will make sure that cosmetics do not contain ingredients or contaminants linked to cancer, birth defects or other serious health problems.

However, as this report details, some retailers are working to answer the question of how to raise the safety bar for the products they sell. The bottom line is that it is in retailers' best interest to begin the process of requesting that their vendors eliminate hazardous ingredients. If vendors are unwilling to comply, the retailers should consider dropping the products from their offerings. Furthermore, many of the retailers we surveyed have their own private label brands—a logical place to start in terms of moving toward safer production. With more than 12,500 chemicals used in personal care products,¹³ it may be a long process to complete this transition, but eliminating chemicals with the highest risk factors—and ensuring that those chemicals are not replaced with hazardous substitutes—is the right place to start.

A Note on Retailer Responsibility

The Campaign for Safe Cosmetics recognizes that the retailers represented in this report are diverse and multifaceted. Our analysis is based solely on the companies' practices related to personal care products. We know that retailers may have considerably different track records on labor practices, sustainable supply chain management, or equality in the workplace for people of color, women, lesbians, gays, bisexuals, transsexuals and intersex individuals. It is beyond the scope of this report to analyze or comment on these issues, but we acknowledge there is an important and growing movement to address the overall sustainability and responsibility of major retailers' company-wide operations.

Quick Facts

- A 2011 Deloitte survey found that 57% of people responding said that safety was the number one concern when buying personal care products.¹⁴
- Almost 40% of adults read labels on personal care products.¹⁵
- One in 10 adults uses natural skincare products.¹⁶
- One in eight women uses natural makeup.¹⁷



How We Ranked the Retailers

Each retailer has its own considerations when deciding how to screen the personal care products it sell. There is no cookie cutter formula that will work for every retailer. However, there are core principles that should guide the direction all retailers need to move toward.

The Campaign ranks the retailers with a scale of one to 10 kisses: Leader (8-10 kisses), Making Progress (5-7 kisses), Shows Potential (3-4 kisses), Getting Started (2 kisses) and Falling Behind (1 kiss). To earn leadership status, a retailer must show significant progress in all of the following areas:

Adopting a policy and process to eliminate chemicals of concern

The retailer has a policy to source products that do not contain chemicals of concern, and/or instructs its vendors to avoid chemicals of concern, for example:

- known or suspected carcinogens, mutagens, reproductive toxicants (CMRs), endocrine disruptors
- persistent, bioaccumulative and toxic substances (PBTs)

These prohibitions should pertain to known ingredients as well as potential contaminants and the ingredient “fragrance,” which can contain hundreds of constituent ingredients, some of which are linked to cancer, allergies and other health concerns.¹⁸ Because the chemical makeup of “fragrance” is protected as a trade secret, retailers will have to require their suppliers to reveal the ingredients in fragrance in order to successfully screen products.

The retailer should also reformulate its private label products to ensure they do not

contain chemicals of concern, giving priority to reformulating baby products.

A company that states that current U.S. regulatory standards are adequate to ensure personal care product safety fails this portion of the ranking.

The Campaign recognizes that the absence of any meaningful screening standards for the products retailers sell doesn’t mean that all the products it sells contain potentially harmful chemicals. What it means is that customers have no way of knowing how safe the products are that they might consider purchasing.

Availability of safer alternatives

The retailer offers a selection of safer alternatives and seeks to expand availability of safer products, including options that are more affordable and cost competitive.

Transparency

The retailer is transparent about its policies and its progress in meeting its goals and it makes this information easy to find on its website, corporate social responsibility (CSR) reports, and/or in its stores. Retailers should also be responsive to stakeholders’ requests for information.

The Campaign went to great lengths to ensure the accuracy of what is in this report. Our attempts to reach each of the retailers before publication were a genuine effort to be fair and accurate in our reporting. We welcome further dialogue with any of the retailers highlighted in this report and welcome the opportunity to publish any relevant responses from the companies on the Campaign for Safe Cosmetics website.

Safe Cosmetics Retailer Goals

The following goals should guide all retailers’ approach to improving the safety of the personal care products sold in their stores:

- Commit to ongoing expansion of the sale of safer personal care products, i.e., products that are free of chemicals linked to cancer, birth defects, developmental harm and other health concerns.
- Adopt a list of chemicals that are banned from use in all products sold in its stores. Importantly, when chemicals are eliminated due to health concerns, only safer alternatives should be used as a substitute.
- Reformulate private label products to eliminate chemicals of concern, i.e., chemicals linked to cancer, birth defects, developmental harm and other healthy concerns. Place priority on reformulating baby products to meet these higher standards.
- Practice the highest level of transparency by sharing the company’s safe cosmetics policy, practices and progress on websites and in corporate responsibility reports.
- Develop policies with input from the Campaign for Safe Cosmetics and other stakeholders that do not have a financial stake in the sale of personal care products.
- Dedicate adequate staff to developing and implementing a meaningful policy.
- Strive for continuous improvements in policies and practices.

Johnson & Johnson recently announced that it will phase out the use of a range of harmful chemicals from its products. (See Appendix B.) As a priority action, retailers could commit to eliminating the sale of products that contain these chemicals or work with suppliers to ensure products are reformulated.

Retailer Ranking

Below is an overview of where the retailers rank in their commitment to safer personal care products. The highest ranking possible is 10 kisses. Details on each retailer are explained in the following sections.

Retailer	Policy	Safer Alternatives	Transparency	Ranking	
Whole Foods	<p>Clear, forward-thinking policy with more than 400 prohibited chemicals for its premium standards; basic chemical safety screening for all personal care products</p> <p>Has high standards for private label products</p>	Extensive availability of safer alternatives	Widely publicizes its goals, criteria and progress		Leader
CVS	<p>Has a publicly available policy that does not screen for specific chemicals but does acknowledge the need for the company to be proactive on cosmetics safety</p> <p>Bans a range of chemicals of concern from its private label baby products</p>	Wide selection of safer alternatives in many of its stores, compared to other conventional retailers, though not in all stores	Has clear description of its commitment to safer alternatives on its website and full transparency of its overall cosmetics policy in its corporate responsibility report		Making Progress
Walgreens	<p>Does not have a publicly available personal care product safety policy</p> <p>Introduced a limited line of products, which include two baby bath products and a few adult shampoos and conditioners that are screened for some chemicals of concern. This standard does not apply to all private label products</p>	Inconsistent availability of safer alternatives from store to store	No explanation of safe cosmetics policy on its website		Shows Potential
Target	<p>Does not have a policy to screen personal care products for chemicals of concern, but is currently determining what criteria would go into a personal care product standard</p> <p>Does not have a standard for its private label products</p>	Wide selection of safer alternatives in many of its stores, compared to other conventional retailers	Promotes its commitment to safer alternative on its website		Shows Potential
Walmart	Does not have a policy to screen for chemicals of concern in cosmetics, but has invested significantly in developing systems to help suppliers consider options for alternatives. No commitment to enforcing the use of these alternatives	Very limited offering of safer alternatives, with some stores not having any	Does not make details of goals or progress easily available and understandable to the public, but does provide some updates on its website and corporate responsibility reports		Getting Started
Kroger	Does not have a publicly available personal care product policy	Expressed a commitment to offering safer alternatives, though shoppers found inconsistent offerings at different stores	No explanation of safe cosmetics policy on its website		
Costco	<p>Does not have a policy to screen personal care products it sells for chemicals of concern, but does acknowledge that there are times the company should be proactive in screening out certain chemicals from products</p> <p>Prohibits the use of certain chemicals in its private label products</p>	Limited to no selection of safer alternatives	No explanation of safe cosmetics policy on its website		
Macy's	Does not have a policy to screen personal care products it sells for chemicals of concern. Has stated that current regulatory standards are adequate for ensuring personal care product safety and that the company relies on vendors to meet safety standards	Has a limited selection of safer alternatives in some stores; no availability in others	No explanation of safe cosmetics policy on its website		Falling Behind

Whole Foods Market

Whole Foods' central retail philosophy is to sell and promote products that meet higher health and sustainability standards than other retail chains. It was no surprise that the company prioritizes selling personal care products that are nontoxic, natural and organic. But these categories have long lacked clear and widely agreed upon definitions. What really sets Whole Foods apart from the other national retailers considered in this report is that it has implemented a rigorous and transparent approach to screening the personal care products it sells.

For many years Whole Foods sold products that met the company's Body Care Quality Standards,¹⁹ which set out a range of criteria, including encouraging its vendor partners to use plant-based and naturally derived ingredients. These baseline standards prohibit artificial colors, several unacceptable preservatives and a number of other ingredients in all the personal care products the company sells.²⁰

In March 2008 Whole Foods announced a new, more rigorous standard, its Premium Body Care Standards,²¹ which is the first private standard for personal care products created by a major retailer in the United States (see page 14). It screens products for safety, efficacy, environmental impact and labeling. The standards are readily available on the company's

website. More than 3,800 products on Whole Foods' shelves²² meet these standards, which is up from the 1,200 products when the company started the program. A core element of the standard is the prohibition of more than 400 ingredients,²³ such as triclosan, quaternium-15 and others. (See Appendix C for details on the chemicals highlighted in this report). Only natural essential oils and components of natural essential oils are allowed in fragrance. This is especially significant as "fragrance" can contain any of hundreds of chemicals, some of which are linked to cancer, reproductive problems and other health concerns, but because of a legal loophole, manufacturers are not required to disclose them.²⁴ Whole Foods has even produced a nine-minute public education video explaining the program.²⁵

In addition to its safety standards, Whole Foods has also proactively addressed the ambiguity of "organic" claims on products. While there is a great deal of clarity on labeling organic food, non-food items such as personal care products can make organic claims with a small percentage of the ingredients actually being organic. Whole Foods has established clear guidelines that ensure that when it sells products marketed as organic, it is meaningful. The United States Department of Agriculture certification system is widely considered the gold standard for organic certification.²⁶

Whole Foods at a Glance

What we like

- Whole Foods has been proactive in setting a very high bar for safety standards, shares its goals with the public, offers a clear way to differentiate the products that meet the Premium Body Care Standards and is continuously expanding the list of prohibited chemicals and the products it sells that meet these higher standards.
- Even the products that have not yet met the Premium Body Care Standards have a baseline for product safety that goes beyond all other retailers.
- Whole Foods has an extensive selection of 365 Everyday Value personal care products, which is their private label and is one of the most affordable brands the store carries. All of the 365 products meet the company's Body Care Quality Standards. Some of the private label brand products go beyond that and meet the Premium Body Care Standard.²⁷

Areas for improvement

- Whole Foods has earned a reputation for carrying expensive products. Many products that meet higher standards often are more expensive, and this is true at Whole Foods. Because of higher prices, access to safer products is minimal for low- and moderate-income families. But Whole Foods has a big enough market share that we would like to see the company work with its suppliers to expand sales of safer, affordable products.
- We look forward to the day when all the products Whole Foods sells meet the Premium Body Care Standards. There is room for customer confusion when some products meet higher standards and others do not.

Ranking:
Leader!



Whole Foods Premium Body Care Standards

Whole Foods Premium Body Care Standards, which are available on the company's website, are quoted below.²⁸

It took our experts more than two years to meticulously examine each and every personal care ingredient in Whole Body™. Using the most current safety and efficacy data, research and resources available they evaluated each product ingredient in four key areas, searching for the excellence that we believe makes for a premium product.

1. Results

Does it work? Yes! All items that meet our Premium Body Care standard are made with ingredients that must be necessary for the product to function well and look appealing while providing real results. We also look for higher concentrations of botanically derived ingredients that actually nourish your skin and body.

2. Source

When it comes to personal care, the word "natural" is on labels everywhere, yet there is no regulated definition. All the more reason for us to aim high! Premium Body Care is made to meet strict criteria with ingredients as close to nature and as minimally processed as possible.

3. Environmental Impact

In reality the body care products that everyone uses eventually go right down the drain and into our environment. Therefore, all products that meet our Premium Body Care standard must have little environmental impact during manufacturing and also when released into the environment.

4. Safety

What goes on the body goes in the body. So, because personal care products are not regulated like food in this country, we have done the research and made the tough calls ourselves. All Premium Body Care product ingredients are labeled accurately with little risk of contaminants, have established safety data or are less likely to cause skin irritation or allergies.

We identified more than 400 ingredients unacceptable for Premium Body Care. These include parabens, polypropylene and polyethylene glycols, sodium lauryl and laureth sulfates. Our research also yielded crucial information about the effects of ingredients in several categories of public interest.

Preservatives are necessary in body care products, especially water-based products. Our Premium Body Care standard allows only milder preservatives. They must be shown to function properly, yet have a lower likelihood of causing cosmetic-related allergies and sensitivities.

Surfactants are used for cleaning, degreasing, emulsifying, conditioning and creating foam. They also remove essential fatty acids and may be irritating to the skin. Our Premium standard allows only the safest, most gentle types available.

Fragrance is a component that most people expect in premium products and, if naturally derived, may have aromatherapy benefits as well. For philosophical and safety reasons, only natural essential oils and components of natural essential oils are allowed as fragrances in our Premium standard.

Below are the standards Whole Foods uses to ensure that the organic claims on products its sell are reliable:²⁹

- All personal care products making an "organic" product claim are required to contain at least 95% organic ingredients and be certified to the USDA National Organic Standards.
- Products labeled "made with organic (ingredient)" must be certified to the USDA National Organic Standards and include at least 70% organic ingredients.
- Products that make "contains organic (ingredient)" claims must be at least 70% organic and certified to NSF/ANSI 305, a consensus-based private standard for organic personal care products.
- Aside from the three certified claims above, no other use of the word "organic" is allowed on the front panel of the packaging.

concern include Naturtint permanent hair color, which contained p-Phenylenediamine, and Every Man Jack face lotion with sunscreen, which contained oxybenzone. (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Whole Foods).

Summary

Whole Foods is clearly the leading national retailer on personal care product safety standards and process transparency. The company also should be commended for being proactive—it initiated its higher screening standards without investor or consumer pressure. It engaged with relevant stakeholders, including the Campaign, when determining its policy and its internal standards. No other national retailer comes close to rivaling its leadership in the realm of safer personal care products.

What Shoppers Found

Shoppers who surveyed Whole Foods stores reported that overall, there were not many examples of personal care products that contained chemicals of concern. The few examples of products that contained chemicals that the Campaign identified as chemicals of

No other national retailer comes close to rivaling Whole Foods Market's leadership in the realm of safer personal care products.



CVS

In 2008, as a result of shareholder and grassroots pressure, CVS became the first major drugstore retailer in the United States to establish a cosmetics safety policy.^{30,31} The Campaign applauded its leadership then, and while we still see a great deal of room for improvement in implementing its policy, we do believe it has made some meaningful progress. Primarily it has greatly increased the availability of safer personal care products on its shelves. Additionally, it has set higher safety standards for its private label baby products.³² Like most other retailers, however, the company's commitment to higher safe cosmetics standards does not appear to have penetrated the full range of cosmetics products it sells.

CVS's stated commitment to safer products is readily available on its Sustainable Products web page:

"We recognize that natural and environmentally friendly products are growing in importance to our customers, and we are committed to expanding our range of offerings to meet this demand. This includes natural beauty products that meet the European Union standards for reduced environmental risk and impact, including Avalon® Natural Products, Yes to Carrots®, Dr. Bronners and Weleda. These beauty brands have also signed the Compact for Safe Cosmetics."³³

Aside from Whole Foods, CVS is the only retailer that makes such an overt recognition of the inadequacy of safety standards in the U.S. (by pointing to the European Union's better standards). Also, it recognizes leadership of the companies that signed the Compact for Safe Cosmetics. The Compact was a program that the Campaign ran from 2004 to 2011, where companies signed a pledge to meet a higher level of safety and transparency. Many of the brands CVS sells in its naturals section were true leaders in this program. For more details on the Compact, see the Campaign's 2011 report

MarketShift: The story of the Compact for Safe Cosmetics and the growing demand for safer products.³⁴

Additionally, the company has a publicly available policy on cosmetics safety that was included in its 2011 Corporate Responsibility Report (see page 18), in which it details its commitment to ingredient safety. The policy addresses many aspects of product safety, including concerns over contamination and setting a high bar for the CVS private label products.

In a recent communication with CVS, the Campaign learned of some important progress that the company is making in reformulating its private label products. Specifically:

"As part of our process, we evaluate the ingredients in our CVS brand products. For example, we phased out the use of parabens and formaldehyde-releasers in all CVS brand baby care products. These products do not contain triclosan or phthalates, including diethyl phthalate (DEP). The levels of 1,4 dioxane are less than 5 parts per million in our baby care products.

"In addition, we recently created seven new baby care products which are now available in our stores. The products are quaternium-15 free, cruelty free and gluten free, as well as dermatologist and pediatrician tested.

"We will continue to evaluate and replace ingredients of concern in our branded and private label products when safer alternatives are available. And we will urge similar action by our supplier partners."³⁵

We applaud CVS for its leadership in reformulating its CVS brand baby products.

CVS at a Glance

What we like

- CVS has a publicly available policy on its website that recognizes that current regulatory standards are not adequate protection for consumers and that the company is seeking to expand options that meet the higher standards of the European Union.
- In some stores, the company has significant, clearly marked shelf space dedicated to safer alternatives.
- CVS proactively reformulated its private label baby products, eliminating some of the better-known chemicals of concern.

Areas for improvement

- We would like to see CVS commit to improving store-wide health and safety standards for all the personal care products it sells.
- We would also like CVS to apply a higher safety standard to all its private label products, not just its baby products.

Ranking: Making Progress



There is still a long way to go to ensure that all the products sold at CVS meet the highest safety standards, but we see these early advances as a good sign of continual improvements and commitment to the policy it set several years ago.



CVS Cosmetics Safety Commitment

CVS' cosmetics safety commitment is available in the company's 2011 Corporate Responsibility report and is copied below.³⁶

Our cosmetics supplier partners are actively engaged in ingredient and product safety and provide industry-wide thought leadership on these issues. We require our cosmetics vendors to supply CVS/pharmacy with products that comply with our Cosmetic Safety Policy and applicable regulations in regard to banned substances and packaging requirements. In evaluating vendor compliance to ensure cosmetics safety, products must be formulated to ensure they present no risk of contamination and each production batch must be tested to meet FDA requirements and CVS/pharmacy specifications. In addition, product ingredients are identified and each ingredient is evaluated based on available safety information before it is considered for sale. Colorants are confirmed to ensure they are acceptable for use by FDA requirements. Testing is performed to assess and confirm skin compatibility as well as to confirm the absence of lead, bisphenol A and phthalates as required by regulation.

To further ensure safety and promote education across the retail industry, our Product Development Managers participate in professional organizations and consult with third-party experts on specific questions related to ingredient and product safety facing the industry. Our Government Affairs team and third-party quality assurance labs keep us apprised of current and potential legislation that would impact our protocols, as well as developments around the world that may eventually impact U.S. standards. We are also monitoring the Food Safety Modernization Act and Reasonable Testing program to understand what impact that will have on us and our suppliers.

CVS/Pharmacy Cosmetic Safety Policy

Our company is dedicated to improving the lives of those we serve through innovative and high-quality health and pharmacy services. That is why we are dedicated to staying abreast of new conclusive research related to cosmetic safety, to assessing findings that demonstrate a linkage between certain health and environmental risks and specific chemical ingredients used in beauty and personal care products, and to evaluating how these findings impact the products we sell. We are committed to:

- Providing our customers with innovative products from around the world that have been hand-selected and tested to meet or exceed regulatory standards.
- Building relationships with partners who educate us on scientific research and developments related to ingredients of concern in cosmetic products.
- Continuously evaluating our CVS Brand and private label products based on new research findings.
- Partnering with our cosmetic suppliers to ensure proper protocols are used to ensure cosmetic safety.
- Developing action plans to replace ingredients of concern in our branded and private label products when safer alternatives are available and prompting similar action by our supplier partners.
- Educating consumers on our cosmetic safety standards and on product evaluation tools that will enable them to take an active role in maintaining good health.

What Shoppers Found

CVS's commitment to selling safer alternatives was mostly confirmed by shoppers who visited their local CVS, though it seems there is inconsistency in how easy it is to find these products and how available they are. For example, in one CVS there is a significant naturals section that is well marked and easy to find. Shoppers at other locations said that the safer products were mixed in with conventional products, and one shopper said that there was no natural section.

However, there was no shortage of examples of products with chemicals of concern sold at CVS. One area that we are watching is CVS brand baby products. CVS told the Campaign that it had set higher standards for its private label baby products, yet CVS Vapor Bath for babies and CVS Baby Shampoo both contained quaternium-15 (the Campaign has widely publicized that baby products containing this chemical are often contaminated with formaldehyde).³⁷ The Campaign believes that these are from inventories that will be phased out as the new private label standards take hold, but it is something we will monitor into the future.

Shoppers also found body care products that contained problematic chemicals. CVS Baby Wipes and CVS Toddler Ultra-Strong Cleansing Wipes both contained

2-bromo-2-nitropropane-1,3-diol. CVS Antibacterial Hand Soap and Dial Complete Hand Soap contained triclosan. Soft & Beautiful Just for Me no lye conditioning cream relaxer for children contained DMDM Hydantoin. Palmer's Skin Success - Eventone Fade Cream and Porcelana Day Skin Lightening Cream both contained hydroquinone. (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at CVS.)

Summary

We continue to applaud CVS for breaking away from the pack early in making its public commitment to cosmetics safety known. We recognize that change can be incremental, and we are happy to see that CVS has made strides in providing a range of safer alternatives and in reformulating its private label baby products. There is still a long way to go to ensure that all the products sold at CVS meet the highest safety standards, but we see these early advances as a good sign of continual improvements and commitment to the policy it adopted several years ago.



Walgreens

In November 2012 Walgreens announced it was launching a new line of products that are screened for some chemicals of concern. Ology, as the brand is called, is made by Walgreens and is being marketed as healthy home products that are affordable and nationally available.³⁸ The company initially introduced the line with two baby products (a lotion and a two-in-one baby wash) as well as several adult shampoos and conditioners. These products are made without parabens, phthalates, formaldehyde, triclosan, sodium lauryl sulfate or sodium laureth sulfate.³⁹ This is an important step in demonstrating leadership in personal care product safety.

However, this important step does not paint a complete picture of Walgreens' commitment to personal care product safety. A thorough search of both the company's website and annual reports indicates that Walgreens has no publicly available policy on ingredient safety for the personal care products it sells. Despite multiple requests, the company did not provide the Campaign with any additional information to indicate what its policy is. Without this information, consumers, as well as the Campaign, have no way of knowing what Walgreens' safety standards are for the personal care products it sells and its private label brands.

What Shoppers Found

Walgreens is inconsistent in its commitment to selling safer alternatives. Some shoppers reported that there was a small but clearly marked section of these products. Other shoppers said they didn't find any such section, nor did they find safer alternatives mixed in with "conventional" products.

Additionally, the conventional items sold contained numerous chemicals of concern. Like other retailers, Walgreens sells Esoterica Fade Cream and Porcelana Skin Lightening Cream, both of which contained hydroquinone. Shoppers found L'Oreal Feria Multifaceted Shimmering Color, which contained p-Phenylenediamine. Funky Fro Transition Natural Springing Gel and Doo Gro Smooth & Straight, Anti-Breakage No-Lye Hair Relaxer System Regular both contained DMDM hydantoin. Shoppers also found chemicals of concern in Walgreens' private label baby products, such as DMDM hydantoin in Walgreens Premium Comfort Smooth Baby Wipes and quaternium-15 in Walgreens Baby Shampoo. (Note: Walgreens makes both a "Walgreens" brand line of personal care products as well as the Ology line of products. It appears these two lines have different safety standards, given the presence of chemicals of concern in the Walgreens brand products.) (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Walgreens.)

Summary

The introduction of Ology products indicates that the company is interested in keeping up with current trends in consumer demand for safer products, but its lack of a publicly available policy and its inconsistent commitment to offering safer alternatives indicates that there is more work to be done.

The Campaign will be watching progress with the Ology line. At the time of this report's publication there were fewer than 10 Ology personal care products available, so without a robust offering of other

Walgreens at a Glance

What we like

- The introduction of its Ology line shows an inclination toward providing safer products.
- In the stores where it does carry safer alternatives, there seems to be a small but well-chosen selection of items.

Areas for improvement

- Walgreens should be more transparent about what its commitment to personal care product safety is.
- There should be more consistent offerings of safer alternatives in all of its stores.
- Despite the innovation of the Ology line, Walgreens' private label personal care products still contain chemicals of concern. Reformulating these products to higher safety standards is an important next step, starting with the Walgreens brand baby products.

Ranking:
Shows Potential



brands of safer alternatives, Walgreens cannot claim that it is making a comprehensive commitment to offering safer alternatives. Additionally, these Ology products contained "All Natural Fragrance."⁴⁰ As explained elsewhere in this report, without full disclosure of what the constituent ingredients in fragrance are, consumers have no way of knowing what is in there. Even manufactures may have a difficult

time ensuring the safety of natural fragrance, as some suppliers use undisclosed and potentially synthetic preservatives in "natural fragrance."⁴¹ It may well be that the ingredients in Ology are fine, but without full transparency it is impossible to know.



Target

Currently Target does not have a publicly available policy on chemical safety for the personal care products it sells. However, in correspondence with the company, we learned:

“the company is committed to expanding its assortment of sustainable products that effectively balance price, performance and convenience. This will include adult and children’s personal care products. Target is currently determining what criteria would go into a personal care product standard. It is too early to define what the criteria will be or what the process will look like.”⁴²

Target does carry a range of safer alternatives. It screens products in its alternatives section (identified as “naturals” in the stores) to ensure that they are paraben, phthalate and sodium lauryl sulfate free. Additionally, the company is “committed to expanding the type and volume of product choices if consumer demand increases.”⁴³

Currently Target does not have an explicit policy to address the safety of its private label brand of “Up and Up” health and beauty products.⁴⁴ Shoppers did notice that the Up & Up baby products they found were labeled as paraben-free. While it may not be a strict policy to make paraben-free baby products, we take it as a good sign that Target is going in this direction.

What Shoppers Found

Shoppers found a strong selection of safer alternatives of personal care products and baby care products. Based on these responses, Target is among the leaders of the conventional retailers in this regard. Whole Foods still leads considerably in this area, but for a store that does not specialize in organic and natural products, we were pleased to hear these results.

On the other hand, shoppers did find a wide range of products that contained chemicals of concern, and Target’s private label, Up & Up, was no exception. Up & Up Sport Sunscreen Broad Spectrum SPF 30 contained retinyl palmitate, Up & Up Diaper Rash Ointment contained BHA, Up & Up Baby Wipes contained 2-bromo-2-nitropropane-1,3-diol.

Target also carries skin lighteners that contain hydroquinone, including Ambi Fade Cream and Esoterica Fade Cream. Target also sells Garnier Nutrisse Nourishing Color Crème Black, which contains p-Phenylenediamine, and Africa’s Best Dual Conditioning Hair Relaxer which contains DMDM hydantoin. (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Target.)

Summary

Target has taken proactive stances on health issues related to the products it sells. For example, in 2007 Target agreed publicly to phase out the sale of products containing PVC, which is known to contain harmful chemicals.⁴⁵ We look forward to the company taking similar leadership around personal care products.

Overall, we think Target has the potential to make real progress, but it will need to be more aggressive in considering all the products it sells and not just the natural and alternative section.

Target at a Glance

What we like

- Target’s commitment to selling safer alternatives is strong, with a wide range of brands that the Campaign for Safe Cosmetics has worked with and that have shown real dedication to setting and maintaining high safety standards throughout their product lines.
- Target has indicated that it is exploring improving the overall safety of the products it sells, though it is too early in the process to comment on how strong this effort really is.
- Its baby products are widely labeled paraben-free.

Areas for improvement

- Target should make a public commitment to eliminating harmful chemicals in the personal care products it sells. This commitment should extend to all products, not just those marketed as natural or safer alternatives.
- Target should begin the process by reformulating its private label, Up & Up, to eliminate harmful chemicals, and this process should start by expanding the prohibited chemicals list in its baby products.

Ranking:
Shows Potential



Overall, we think Target has the potential to make real progress, but it will need to be more aggressive in considering all the personal care products it sells and not just the natural and alternative section.



Walmart

Since 2005 Walmart has made very public commitments to improve the sustainability of its store operations and the products it sells.⁴⁶ As the world's largest retail chain, this is no small undertaking, and the Campaign recognizes that change at that scale does not happen overnight.

The company has spent the past several years setting up systems to assess product safety via the Sustainability Consortium,⁴⁷ a multi-stakeholder working group to address corporate sustainability. The group has built a sustainability index, which will help suppliers identify key information to improve the sustainability of its products.⁴⁸

Additionally, and perhaps more importantly, Walmart has been involved in developing GreenWERCS, a tool which it will eventually use to evaluate the safety of chemical ingredients in personal care products and other non-cosmetic products that it sells. GreenWERCS identifies 3,500 substances of concern from 30 authoritative lists from the U.S. and Europe against which products would be reviewed.⁴⁹ GreenWERCS's website states priority areas for chemicals safety, which include:

- Persistent, bioaccumulative and toxic substances (PBTs)
- Carcinogens, mutagens or reproductive toxicants (CMRs)
- Probable endocrine disruptors
- Potential hazardous waste^{50,51}

As for Walmart's progress, what remains to be seen is how quickly these chemicals of concern are phased out of the products it sells. The company lacks a clear path for decision-making when it finds these chemicals of concern in products. Will it prohibit these chemicals? Will it force suppliers to reformulate? How will it prioritize which chemicals to take action on? After three years in development, what is the plan for applying GreenWERCS to specific

product categories? And when will cosmetics safety be addressed? All these questions have yet to be answered.

When the Campaign recently asked Walmart for an update on its progress, the company responded as follows:

"We do not currently have plans to use GreenWERCS as a stand alone tool for merchants. Walmart's Chemical In Products Sustainability Value Network is, however, assisting in the development of questions which will be incorporated into the [Sustainability] Consortium's Key Performance Indicator questions for suppliers to answer in the cosmetics category as well as other categories; Walmart merchants will then review these results with suppliers... We do not have a formal policy on how GreenWERCS will be used and continue to evaluate how the data can best be used in development of more sustainable products by each category."⁵²

What Shoppers Found

Most of the shoppers found that Walmart had a very small sampling of safer alternatives, though one shopper did not find any. Unfortunately, shoppers did find a wide range of products that contain chemicals of concern: Palmer's Skin Success Eventone Face Cream and Nadinola Skin Discoloration Fade Cream contained hydroquinone; Splat Rebellious Color Complete Hair Color Kit contained p-Phenylenediamine; Desitin Maximum Strength Paste (diaper cream) contained BHA; and Dial Complete Foaming Anti-Bacterial contained triclosan.

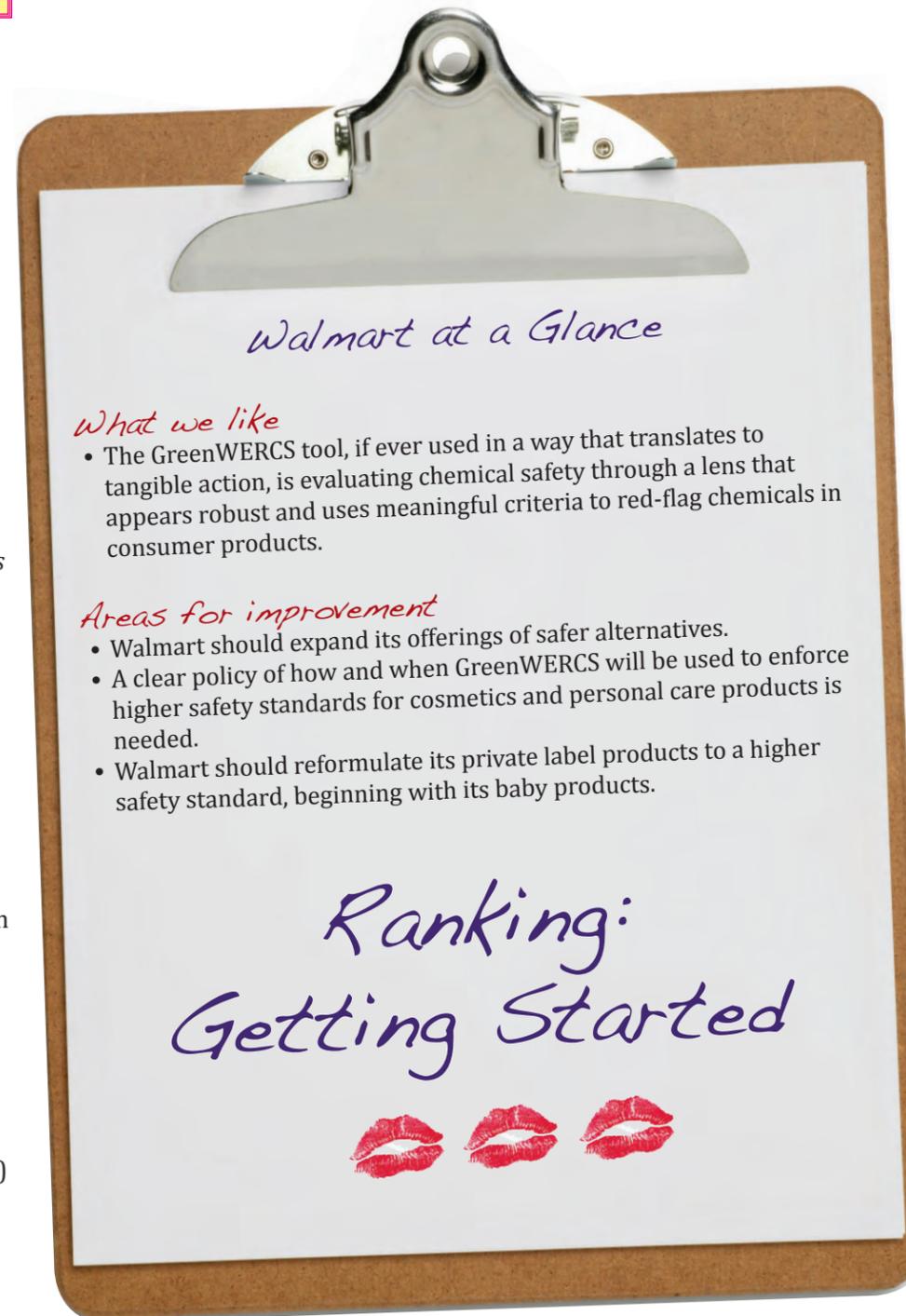
Additionally, a wide range of private label products contained chemicals of concern, especially baby products. Walmart's private label Equate Tear-Free Baby Shampoo contained quaternium-15, as did two of its other private label products, Parent's Choice Baby Shampoo

Tear Free and Parent's Choice Baby Shampoo Tear Free with Natural Lavender. Equate Everyday Clean Fragrance Free Baby Wipes contained DMDM Hydantoin and Equate Diaper Rash Ointment contained BHA. (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Walmart.)

Summary

Walmart's ranking is complicated. The company is so big that even a little shift in its standards could create a tsunami of change industry-wide. So we give it credit for being willing to consider making some waves. However, with as much market power as it holds, Walmart could easily demand changes from its suppliers and expect results much more quickly than it has thus far.

After approximately six years, Walmart has built a number of tools and systems that could address personal care product safety but so far has not applied those tools to assessing the safety of the personal care products it sells. We think it is time to shift the focus from developing lists of chemicals of concern to using those lists to screen out products that contain those hazardous chemicals. We would also like to see the company be more forthright in explaining its progress to the public. This is especially important for Walmart because of the wide range of concerns stakeholders of many kinds raise about the company's operations. Transparency is critical to ensure the public's trust that this is not simply a greenwashing and delay tactic.



Kroger

Kroger is the largest grocery retailer in the country⁵³ and the parent company for a wide range of grocery and convenience stores across the United States. A search of its corporate website gave no indication that the company is screening its personal care and cosmetics offerings for chemicals of concern or otherwise requiring its suppliers to take any additional steps to ensure that the products Kroger sells are free of chemicals of concern.

In a letter to the Campaign, Kroger confirmed its stance:

"Our regulatory compliance team works to ensure that we follow all laws and rules regarding cosmetics and other health and beauty care items sold in our stores. All of our products meet or exceed the standards required by the U.S. government.... We also sell a variety of health and beauty care items in our natural foods departments. This includes shampoos, soaps, lip balms, and other health and beauty care items. We carry many of the most popular natural health and beauty care brands, including Burt's Bees, Tom's of Maine, Avalon and Kiss My Face."⁵⁴

What Shoppers Found

Shoppers found a wide range of products with chemicals of concern in them, many of them Kroger private label products, especially baby products. Comforts for Baby baby wash (which is a Kroger brand item), Kroger Baby

Wash and Kroger Baby Shampoo all contained quaternium-15. Dial Complete Foaming Anti-Bacterial Liquid Soap, Kroger Lemongrass & Basil Liquid Soap and Kroger's Antibacterial Soap contained triclosan. And Desitin Maximum Strength Original Paste Diaper Cream contained BHA. Two of the shoppers said they didn't find any naturals section, and one shopper stated that she did find a naturals section, but it had only recently been added (she was a regular shopper at that store). (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Kroger.)

Summary

Kroger does not have a proactive policy that goes beyond the inadequate FDA standards for personal care product safety. Kroger's response indicates that it is moving in the direction of selling more safer alternatives, and the brands the company highlighted in its letter to us are certainly companies that have shown leadership in reaching a higher safety standard over the years. The inconsistency in shoppers' experiences in finding safer alternatives indicates that Kroger is a little late in meeting the demand for safer alternatives, but is finally starting to catch up. We encourage Kroger to continue to pursue this commitment and make these safer alternatives more consistently available to its customers.

The inconsistency in shoppers' experiences in finding safer alternatives indicates that Kroger is a little late in meeting the demand for safer alternatives, but is finally starting to catch up.

Kroger at a Glance

What we like

- Making safer alternatives available is on Kroger's radar as important, even if it is inconsistently implemented.

Areas for improvement

- Make safer alternatives available in all Kroger stores and its subsidiaries.
- Develop a policy that sets health and safety standards for personal care products. For example, we know the company has proactively banned a list of 101 ingredients from the foods sold in its natural food section.⁵⁵ We hope the company can apply this same forward thinking to its personal care products.
- Improve the safety of Kroger's private label products, starting with the baby products.

Ranking: Getting Started



Costco

Costco is an interesting case. On the one hand, the company has no publicly available policy about its personal care products safety standards on its website, and it has a very limited range of safer alternatives available. The Campaign's online research only resulted in finding one corporate sustainability report, released in 2009, where no mention was made of screening personal care products for chemicals of concern.⁵⁶

However, in a correspondence with the company, Costco indicated that there are times when it is appropriate to prohibit the use of some chemicals in personal care products, indirectly acknowledging that there are currently inadequate cosmetics safety regulations. Specifically, the company has prohibited the use of parabens in all its private label products and fragrance in almost all of its private label products (emphasis ours):

"As you are aware, which chemical ingredients are permissible in personal care products and in what quantities is a heavily regulated area. At a minimum we require our suppliers, of both branded and Kirkland Signature products, to be compliant with Food and Drug Administration regulations and any other applicable regulations. In addition to regulations, there is evidence to support the safety or lack thereof pertaining to many personal care ingredients, and often this evidence is inconclusive or even contradictory. We work only with reputable and established suppliers who employ chemists and maintain research and development departments. We expect for them to be up-to-date on the evolving scientific research and consensus on ingredients

*their companies use. In general we do not substitute judgment for their expertise, although on occasion we will identify a particular ingredient or chemical and seek to eliminate its presence in Kirkland Signature products. For example, our new formulations for Kirkland Signature cosmetic colors and skin care will not contain parabens, nor does our Kirkland Signature shampoo and conditioner. Similarly, we have eliminated fragrance from all Kirkland Signature cosmetics except the facial cleanser (which contains only a minimal amount)."*⁵⁷

A search of the website and shoppers' experiences confirm these paraben-free and fragrance-free commitments for the company's private label brands.⁵⁸

What Shoppers Found

There were limited safer alternatives offered at Costco, but one shopper mentioned that she knows people who seek out the Kirkland brand products because the company does at least some limited ingredient screening. Another shopper did find a small selection of body butters from the Body Shop, a brand that uses safer ingredients in many of its products. Other shoppers did not find any safer alternatives.

As for products with chemicals of concern, Kirkland Unscented Baby Wipes contained 2-bromo-2-nitropropane-1,3-diol. There were examples of sunscreen, such as Coppertone Sport Spray High Performance SPF 30 and Neutrogena Helioplex Wet Skin Kids SPF 70 that contained oxybenzone. Costco also sells Softsoap Advanced Clean Hand Soap, which contained DMDM hydantoin. (Note: Softsoap has been reformulated to not contain triclosan, which is progress.⁵⁹) (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Costco.)

Costco at a Glance

What we like

- The company admits that current regulations can be inadequate to ensure product safety and that there is a need to independently screen for some chemicals of concern.
- The company has phased out some chemicals of concern from most private label personal care products.

Areas for improvement

- We want to see Costco commit to a more expansive personal care product safety policy that would include a ban on a more expanded list of chemicals of concern and would apply to all brands it sells, not just signature brands.
- We want to see the company expand its selection of safer alternatives.

Ranking:
Getting Started



Summary

The fact that Costco screens its private label products for even a couple of chemicals of concern indicates the company's ability to consider and respond to consumer concerns and demands for safer products. We hope the

company will continue on in this spirit and expand the chemicals it prohibits in its private label products, adopt an overall personal care product safety policy and make safer alternatives available at all its stores.

Macy's

Overall, it seems that Macy's has not kept up with the times. In correspondence with the Campaign, Macy's essentially stated that it relies solely on the standards of the FDA to screen the products it sells:

"As a retailer selling thousands of different products of all types, Macy's relies on its vendors to provide products that comply with all laws and regulations, and that they are labeled correctly. Our vendors are industry leaders that operate under significant public scrutiny, and we believe they are better positioned and qualified to verify the safety of their products."⁶⁰

As mentioned in the opening of this report, the FDA does a woefully inadequate job in ensuring personal care product safety. Major loopholes in federal law allow the industry to put virtually any chemical into cosmetics with no pre-market safety assessment, no monitoring of health effects and inadequate labeling requirements.

What Shoppers Found

Macy's is unique among the other retailers in the report in several respects. First, nearly all cosmetics products it sells are displayed behind counters that require sales people to show each product. This set up makes it difficult for shoppers to compare product ingredient lists to make informed decisions about ingredient safety.

Additionally, fragrance spraying is widespread. The Campaign released a report in 2010, *Not So Sexy: The Health Risks of Secret Chemicals in Fragrance*,⁶¹

uncovering the hidden ingredients in fragrance and highlighting several brands of perfume and cologne sold at Macy's, including Clinique Happy, Coco Mademoiselle Chanel, Calvin Klein Eternity for men and Giorgio Armani Acqua Di Gio. All of these products contained a range of sensitizers and hormone disrupting chemicals, though due to legal loopholes that do not require disclosure of ingredients in fragrance, these chemicals are not listed on the ingredient labels. One of our shoppers commented, "Oppressive fragrance throughout the whole section. Both people conducting the survey left feeling light-headed."

Shoppers found other examples of products that contained chemicals of concern. For example, many of the sunscreens sold contained oxybenzone, including Clarins SPF 50+ Sunscreen for Face Wrinkle Control Crème, Clinique SPF 30 with Solar Smart face cream and Lancome Bienfait UV Super Fluid Facial Sunscreen SPF 50+. Fashion Fair Vantex Skin Bleaching Cream contained hydroquinone. (See Appendix C for health concerns related to these chemicals. See Appendix D for a more complete list of the products found at Macy's.)

Beyond that, Macy's stores have a limited offering of safer alternatives, with some stores not offering any products that could be recognized as safer alternatives. Origins is the primary brand Macy's sells that markets itself as a safer alternative. Origins' website states its products are "formulated with natural and certified organic ingredients and 100% natural essential oils and formulated without parabens, phthalates, propylene glycol, mineral oil, PABA, petrolatum, paraffin, DEA and animal ingredients."⁶² A full assessment of the Origins brand is beyond the scope of this report, but we are glad to see at least one brand with a higher bar for safety is being sold in some Macy's

Macy's at a Glance

What we like

- The Campaign does not endorse or promote the sale of Origins products; however, we recognize that the brand screens some chemicals of concern from its products. We are glad to see that Macy's has at least this minimal offering in some of its stores.

Areas for improvement

- Macy's should expand its offering of safer alternatives.
- Macy's should develop a policy to screen the personal care products it sells to ensure they do not contain chemicals of concern.
- Macy's should stop extensive fragrance spraying.

Ranking: Falling Behind



stores. Unfortunately, one shopper noted that the Macy's she visited did not carry Origins products or anything else that was recognizable as a safer alternative, so the offering of this brand appears to be inconsistent.

Summary

Overall, Macy's is a great disappointment when it comes to cosmetics safety. It has a limited supply of safer alternatives, or in some stores offers no safer alternatives, and has shown no leadership in developing store policies

regarding overall ingredient safety. It exposes its customers and employees to perfume spray that likely contain hazardous ingredients, and its physical setup makes it difficult for customers to do comparison-shopping for ingredient safety. Clearly some of what sets Macy's apart from the other retailers in this report is the shopping experience of feeling luxurious from these "amenities", yet there are secondary effects that result in shortcomings in ensuring their customers have a safe and healthy shopping experience.

Dollar Stores

This report is not ranking dollar and discount stores in relation to the leading retailers, but the Campaign recognizes that they are an important segment of the retail industry when it comes to cosmetics safety. Discount stores were one of the few sectors that grew through the recent years of recession, and forecasts are that they will continue to grow.⁶³

Dollar stores have a checkered past in terms of product safety. In 2007 there was a scare when counterfeit Colgate toothpaste was sold at dollar stores that contained diethylene glycol, an ingredient used in antifreeze.⁶⁴ The product was immediately recalled, but to this day Forbes still recommends not buying toothpaste from dollar stores.⁶⁵

More recently, in March 2012, the U.S. Consumer Product Safety Commission issued a warning that a range of products that were recalled due to safety concerns had been resold at discount retailers.⁶⁶ While none of these were personal care products, the findings show a weak link in the ability to ensure products sold in dollar stores meet the same standards as other stores.

In response to safety breaches such as these, many of the dollar stores now have easy-to-find notices of product recalls on their websites.⁶⁷ But product recalls are only useful when a problem has been brought to the attention of the authorities.

Shoppers surveyed a range of dollar stores across the country for this report. Products were a mix of well-known brand name products and lesser-known products. Overall, the products often contained similar chemicals of concern as many of the other retailers. For a list of products found at dollar stores that contain chemicals of concern, see Appendix E.

The Campaign believes that safer personal care products should be available to all people, regardless of income. We hope that the discount store sector will ensure that all products they sell meet the highest safety standards. Over time, we also hope that discount stores will take leadership in providing safer alternatives and screening the products they sell for chemicals of concern.

Paying More Doesn't Ensure Safety

Products from the cheapest to the most expensive can contain chemicals of concern or be contaminated with harmful chemicals. A clear example of this was testing done by the FDA on lead in lipstick.⁶⁸ These tests, published in December 2011, showed the results from testing 400 lipsticks. Lead was found in virtually all samples. The results did not follow any cost patterns. For example, Wet 'n Wild lipsticks, one of the more affordable brands, contained lower lead levels than many of the more expensive brands sold at Macy's, such as Clinique, Origins, Lancome and Estee Lauder. Findings like these demonstrate that spending more doesn't always provide greater protection.⁶⁹

Conclusion

Everyone should have access to personal care products that are free of harmful ingredients and that are affordable. Retailers can and should play a leading role in expanding availability of these products. With thousands of products available to choose from, there are numerous options to sell safer products and opportunities for retailers to influence their vendors' formulations.

In highlighting the areas where some retailers are demonstrating leadership, we have shown that it is possible to make safer products available at a significant scale. As more retailers expand their shelf space for safer products, we expect that the cost of many safer products will come down as manufacturers reach economies of scale. Currently there is great variation in the price range of safer alternatives, with some brands being cost competitive with conventional brands.

The Campaign recognizes that changing a retailer's policy and purchasing practices doesn't happen overnight. Even a leader like Whole Foods still has room for improvement. But the time has come for all retailers to demonstrate leadership in the realm of setting a high safety standard for the products they sell. With forecasts of growing demand for

safer alternatives and with the increasing awareness that current regulatory standards are inadequate to ensure that personal care products are safe for everyday use, the time has come for this industry-wide shift to happen.

If there was meaningful, health-protective regulation of the personal care product industry in place, it would take the onus off retailers to have extensive product screening systems. With that, we call on retailers to support the Safe Cosmetics Act,⁷⁰ the only legislation currently being considered that would provide meaningful improvements to personal care product safety. It would improve the safety of what is on the market and would reduce the effort retailers need to undertake to ensure the products on their shelves are free from harmful chemicals.

We applaud any and all efforts that retailers have made to provide safer products to their customers. In outlining clear goals of what retailers should aim for, we hope that this report will encourage all retailers to take personal care product safety seriously, to commit to continuous improvements in their purchasing priorities, and to ensure that everyone has access to safe and affordable personal care products.

If there was meaningful, health-protective regulation of the personal care product industry in place, it would take the onus off retailers to have extensive product screening systems. With that, we call on retailers to support the Safe Cosmetics Act, the only legislation currently being considered that would provide meaningful improvements to personal care product safety.

What Consumers Can Do

Shoppers shouldn't have to be chemists to figure out how to avoid toxic ingredients in cosmetics. That's why the Campaign works with companies to make safer products and urges the government to safeguard our health by ensuring that all personal care products are safe. In the meantime, here are some tips and a wallet card to carry with you.

- Support smarter laws for safer products. Learn more and take action at www.SafeCosmetics.org.
- Use fewer products with simpler ingredients.
- Read labels for information on product ingredients. Don't rely on natural or organic claims.
- Find out what's in your products and find safer alternatives by using Environmental Working Group's Skin Deep database (www.ewg.org/skindeep). To find companies that the Campaign for Safe Cosmetics knows has made significant progress toward meeting the highest safety standards, see our list of Champions and Innovators.⁷¹
- Shop at retailers that are committed to safer personal care products. In addition to the retailers featured in this report, many natural food stores and coops sell safer products. The Organic Consumers Association compiled a national list of these stores.⁷² Additionally, there are a growing number of online retailers specializing in safer alternatives.⁷³

Cut this out and keep it in your wallet



- Products to avoid**
- Anti-aging creams with lactic, glycolic, AHA and BHA acids
 - Hair dyes, especially dark permanent hair dyes
 - Liquid hand soaps with triclosan/triclocarban
 - Nail polish and removers with formaldehyde,
 - dibutyl phthalate or toluene
 - Skin lighteners with hydroquinone
 - Heavily scented products

- Ingredients to avoid**
- Synthetic fragrance, as well as perfumes in lotions, shampoos, etc. (allergies, cancer)
 - DMDM hydantoin and imidazolidinyl urea (toxic contaminants)
 - Parabens or "paraben" (hormone disruption, linked to cancer)
 - "PEG" and "-eth" (these ingredients can come with hidden toxic contaminants)
 - Triclosan and triclocarban (thyroid, reproductive and environmental concerns)
 - Triethanolamine (TEA) (allergies, toxic contaminants)
 - Hydroquinone (cancer, reproductive toxicity, allergies)
 - Oxybenzone (allergies, developmental toxicity, hormone disruption)
- From Environmental Working Group's Skin Deep database

Actions you can take to protect yourself

- Support smarter laws for safer products. Learn more and take action at www.safecosmetics.org.
- Use fewer products with simpler ingredients.
- Read ingredient labels for information on product ingredients rather than relying on claims like "organic" or "natural."
- Shop at the retailers that show their commitment to safer personal care products.

See what's in your products and find safer alternatives with Environmental Working Group's Skin Deep database

www.ewg.org/skindeep

To find companies that the Campaign for Safe Cosmetics knows has made significant progress toward meeting the highest safety standards, see our list of Champions and Innovators.

www.safecosmetics.org

Appendix A: Methodology

The Campaign for Safe Cosmetics determined which retailers to highlight in this report by including the six largest retailers that sell personal care products (Walmart, Kroger, Target, Walgreens and Costco are the top five overall retailers; CVS is seventh. The sixth largest, Home Depot, was not included since the company does not sell personal care products). We also included Whole Foods because it is the largest retailer known for natural and organic products (it ranks 37th overall). We included Macy's because it is the largest department store that focuses on higher-end products (it ranks 16th overall).⁷⁴ This combination of retailers shows a diverse cross-section of the industry leaders.

Our research involved communicating directly with retailer employees, web research and on-the-ground research. We sent initial inquiries to retailers on April 5, 2011, and on August 20, 2011, we sent follow-up inquiries to those that had not yet responded. We incorporated responses we received from the retailers into our analysis.

We followed this with extensive online research, including review of the corporate social responsibility reports and corporate responsibility portions of retailers' websites, when available. We also searched for news reports and other stories that could provide more details about the retailers' philosophies or commitments around personal care product safety. On September 28, 2012, we sent letters to the retailers highlighted in this report and asked that they verify if there were any updates to the personal care product policies (if they had previously sent a response) and if we accurately captured the publicly available information. We also gave them an opportunity to add any further details that would help us describe their progress to date.

Additionally, volunteers from across the country visited retailers in their regions and filled out questionnaires. We asked them to describe what type of products they found in the different retailers, including products that contained chemicals of concern. We also asked them to describe the availability of safer alternatives. Volunteers from the following organizations participated: Alaska Community Action on Toxics, Breast Cancer Fund, Clean Water Action, Coalition for a Safe & Healthy Connecticut, Commonweal, Ecology Center, Health Legacy Coalition, Kentucky Environmental Foundation, Oregon Environmental Council, Physicians for Social Responsibility Florida, Women for a Healthy Environment and Women's Voices for the Earth. Each retailer was visited in at least three different locations.

Appendix B: Johnson & Johnson's commitment to product reformulation

On November 11, 2011, Johnson & Johnson announced that the company will:

- Remove quaternium-15 and other formaldehyde-releasing preservatives from all of its baby products worldwide within two years.
- Reduce 1,4-dioxane in all of its baby products to less than 4 parts per million (ppm). Long term, the company indicated it will replace the chemical process, called ethoxylation, that results in 1,4-dioxane contamination.

The company had already removed phthalates—a hormone disruptor—from all its baby products worldwide, including fragrance.

On August 15, 2012, the company expanded its commitment to include reformulation of its adult products by the end of 2015, and to use safe alternatives when reformulating. It will:

- Reduce 1,4 dioxane to a maximum of 10 ppm in adult products.
- Phase out formaldehyde-releasers in adult products.
- Limit parabens in adult products to methyl-, ethyl- and propyl-.
- Complete phase-out of triclosan from all products.
- Phase out diethyl phthalate (DEP) from all products (no other phthalates are currently used).
- Phase out polycyclic musks, animal derived ingredients, tagates, rose crystal and diacetyl from fragrances.

For more details about Johnson & Johnson's commitment to reformulate, see its website:
<http://www.safetyandcarecommitment.com>.⁷⁵

Appendix C: Chemicals of concern highlighted in the shoppers survey and throughout this report

BHA

Butylated hydroxyanisole (BHA) is used as a preservative in a range of personal care products. The State of California recognizes it as known to cause cancer.⁷⁶ The National Toxicology Program, Department of Health and Human Services recognizes BHA as reasonably anticipated to be a human carcinogen.⁷⁷ NTP also indicates that BHA can be absorbed through dermal contact, making exposure from products like the diaper creams highlighted in this report a concern. BHA is also a widely-used preservative in processed food, making it possible if not likely that people are exposed to multiple sources on a regular basis.

Formaldehyde-releasing preservatives (2-bromo-2 nitropropane-1, 3-diol, DMDM hydantoin and Quaternium-15)

Quaternium-15, DMDM hydantoin, 2-bromo-2-nitropropane-1,3-diol (bronopol) are formaldehyde releasing preservatives (FRP). FRPs help prevent bacteria from growing in water-based products, but can be absorbed through the skin and have been linked to both skin sensitivity and cancer.

Formaldehyde in cosmetics is widely understood to cause allergic skin reactions and rashes in some people.^{78, 79, 80} Although concentrations of formaldehyde in personal care products are generally low, everyday products can contain enough formaldehyde to trigger a reaction in people with formaldehyde sensitivities.⁸¹ Formaldehyde sensitivity may develop over time, due to repeated low-level exposures from an early age.⁸²

Formaldehyde is considered a known human carcinogen by many expert and government bodies, including the United States Department of Health and Human Services⁸³ and the International Agency for Research on Cancer.⁸⁴ A recent review of the literature on occupational exposures and formaldehyde shows a link between formaldehyde and leukemia.⁸⁵

Most studies of the cancer potency of formaldehyde have focused on risks from inhaling it; cancer risks from ingesting formaldehyde or absorbing it through the skin are not as well studied.⁸⁶ When formaldehyde is present in personal care products, people can be exposed by inhaling the formaldehyde that is off-gassed from the product, by ingesting it or by absorbing it through the skin. Animal studies indicate that formaldehyde can be absorbed through the skin when formaldehyde-containing personal care products, including formaldehyde-releasing preservatives, are applied.⁸⁷

Fragrance

According to the International Fragrance Association, there are 3,194 different materials that may be used in “fragrance.”⁸⁸ Due to a legal loophole, manufacturers in the United States are not required to disclose these ingredients. The Campaign has conducted several studies to identify what the hidden ingredients are. We found a wide range of allergens and hormone disruptors, which can increase risk of cancer, reproductive toxicity and effects on a developing fetus. For more details, see *Not So Sexy: The Health Risks of Secret Chemicals in Fragrance*.⁸⁹

Hydroquinone

Hydroquinone works by decreasing the production of melanin pigments in the skin. Because the chemical lightens skin by reducing melanin, it simultaneously increases exposure to UVA and UVB rays deep in the skin.⁹⁰ This increases skin cancer risks due to UV exposure, in addition to the carcinogenic effects of the chemical itself. The chemical is allowed in personal care products in the United States in concentrations up to 2%.

The U.S. Cosmetics Ingredient Review Panel indicates that hydroquinone is unsafe for use in products that are left on the skin,^{91, 92} but due to lax enforcement, directions for skin lightening products containing hydroquinone encourage frequent and consistent use on the skin.⁹³

The Environmental Working Group's Skin Deep database, which compares cosmetic ingredients to more than 50 international toxics databases, identifies hydroquinone as a carcinogen, immunotoxicant and developmental and reproductive toxicant, and also identifies concerns regarding the ingredient's risks for various organ systems, the endocrine system and neurotoxicity.⁹⁴

In addition to concerns about long-term toxicity, hydroquinone is linked to a skin condition called ochronosis in which the skin becomes dark and thick.⁹⁵

Oxybenzone

Oxybenzone is a very common ingredient in sunscreens. It can trigger allergic reactions,⁹⁶ is a potential hormone disrupter^{97,98} and penetrates the skin in relatively large amounts.^{99,100,101,102} Some experts caution that it should not be used on children. (Adapted from Environmental Working Group’s Skin Deep Sunscreens 2012 report.¹⁰³)

Parabens

Parabens are used to prevent the growth of microbes in cosmetics products and can be absorbed through the skin, blood and digestive system.¹⁰⁴ They have been found in biopsies from breast tumors¹⁰⁵ at concentrations similar to those found in consumer products.¹⁰⁶ Parabens are found in nearly all urine samples from U.S. adults of a variety of ethnic, socioeconomic and geographic backgrounds.¹⁰⁷

EWG’s Skin Deep database, which compares cosmetic ingredients to over 50 international toxicity databases, indicates that parabens are linked to cancer, endocrine disruption, reproductive toxicity, immunotoxicity, neurotoxicity and skin irritation.¹⁰⁸

A 2004 UK study detected traces of five parabens in the breast cancer tumors of 19 out of 20 women studied.¹⁰⁹ This small study does not prove a causal relationship between parabens and breast cancer, but it is important because it detected the presence of intact parabens—unaltered by the body’s metabolism—which is an indication of the chemicals’ ability to penetrate skin and remain in breast tissue.

Of greatest concern is that parabens are known to disrupt hormone function, an effect that is linked to increased risk of breast cancer and reproductive toxicity. Parabens mimic estrogen by binding to estrogen receptors on cells. They also increase the expression of genes usually regulated by estradiol (a form of estrogen); these genes cause human breast tumor cells to grow and multiply in cellular studies.¹¹⁰

Phthalates

Most personal care products that contain phthalates don’t list them on the label, as they are used as a constituent ingredient in fragrance. Because fragrance occurs in the majority of products sold, consumers have no way of knowing whether their personal care products contain phthalates.

Phthalates may disrupt hormonal systems, which can cause harm during critical periods of development. Phthalate exposure in pregnant women, as measured by urine samples, has been associated with a shortened distance between the anus and genitals in male babies, indicating a feminization had occurred during genital development.¹¹¹ Shorter anogenital distance is characteristic of female sex in both humans and animals. Other research in humans has shown that baby boys exposed to phthalates in breast milk had alterations in their hormone levels.¹¹²

Other research in adult human males has found exposure to some phthalates is associated with poor sperm quality and infertility.¹¹³ Female laboratory animals exposed to phthalates also have been found to have alterations in sex hormones and experience fetal loss.¹¹⁴

One of the ways that phthalates interfere with reproductive functioning is by reducing the levels of sex hormones, which are critical for development and functioning of the sex organs.¹¹⁵ Additional research suggests that these same mechanisms may link phthalates to breast cancer.¹¹⁶ Phthalates have also been shown to cause proliferation of breast tumor cells and to render anti-estrogen treatments, such as tamoxifen, less effective against tumors.¹¹⁷

p-Phenylenediamine

p-Phenylenediamine is commonly used in hair dyes. The Environmental Working Group’s Skin Deep database ranks this chemical as high hazard,¹¹⁸ citing high concern related to organ system toxicity and irritation and moderate concern related to neurotoxicity.¹¹⁹ The European Union classifies it as an irritant,¹²⁰ the U.S. Environmental Protection Agency lists it as a known human respiratory toxicant¹²¹ and the Cosmetic Ingredient Review Panel indicates there is strong evidence that it is a human skin toxicant.¹²²

Retinyl palmitate

A 2009 study by U.S. government scientists suggests that a form of vitamin A, retinyl palmitate, when applied to the skin in the presence of sunlight, may speed the development of skin tumors and lesions.^{123,124} Scientists have known for some time that vitamin A can spur excess skin growth (hyperplasia), and that in sunlight it can form free radicals that damage DNA.¹²⁵ In December 2010, the FDA and NTP teams published a joint draft report on the vitamin A study, titled “Photocarcinogenesis Study of Retinoic Acid and Retinyl Palmitate.” It concluded that retinyl palmitate resulted in earlier onset and greater numbers of skin lesions and squamous cell tumors. On January 26, 2011, the NTP Board of Scientific Counselors reviewed the study and voted unanimously to support the FDA and NTP scientists’ analysis.^{126,127} (Adapted from Environmental Working Group’s Skin Deep Sunscreens 2012 report.¹²⁸)

Sodium laureth sulfate (potential for 1,4-dioxane contamination)

Sodium laureth sulfate (sometimes referred to as SLES) is used in cosmetics as a surfactant and helps make products bubble and foam. SLES can be contaminated with 1,4-dioxane, which is widely recognized as a known or probable human carcinogen:

- The Environmental Protection Agency classifies 1,4-dioxane as a “probable human carcinogen.”¹²⁹
- The U.S. Department of Health and Human Services, National Toxicology Program, lists 1,4-dioxane as “reasonably anticipated to be a human carcinogen.”¹³⁰
- According to the International Agency for Research on Cancer, an initiative of the World Health Organization, 1,4-dioxane is “possibly carcinogenic to humans.”¹³¹
- The State of California’s Environmental Protection Agency lists 1,4-dioxane on its publicly mandated annual list of chemicals known to cause cancer or reproductive toxicity (often referred to as the Proposition 65 list).¹³²

According to a 1998 memorandum from a California State health official, 1,4-dioxane “is readily absorbed through the lungs, skin and gastrointestinal tract of mammals.”¹³³ The federal Consumer Product Safety Commission reports that “the presence of 1,4-dioxane, even as a trace contaminant, is cause for concern.”¹³⁴

In lab analysis of baby products the Campaign found multiple examples of products that contained SLES that were contaminated with 1,4-dioxane. See *No More Toxic Tub: Getting Contaminants Out Of Children’s Bath & Personal Care Products*.¹³⁵

Sodium lauryl sulfate

Sodium Lauryl Sulfate (SLS) is a surfactant that is used in soaps, shampoos and toothpastes that improves foaming activity. SLS can irritate skin.¹³⁶ It should not be confused with sodium laureth sulfate and is not known to be contaminated with 1,4-dioxane or have other known links to increased risk for cancer.¹³⁷

Triclosan

Triclosan is found in a wide variety of antibacterial soaps and detergents, as well as in many deodorants, toothpastes, cosmetics, fabrics and plastics. Triclosan has proved to be both dangerous and unnecessary—in 2005, the FDA found no evidence that antibacterial washes containing triclosan were superior to plain soap and water for protecting consumers from bacteria.

There is evidence that triclosan is an endocrine disruptor and impacts thyroid function and thyroid homeostasis. One recent study found that triclosan had an effect on thyroid hormone concentrations,¹³⁸ and another showed that triclosan interacted with androgen and estrogen hormone receptors.¹³⁹

A recent report by the European Commission’s Scientific Committee on Consumer Safety determined that even low concentrations of triclosan can trigger antibiotic resistance in bacteria.¹⁴⁰

Appendix D: Products shoppers highlighted in their surveys

Listed below are products that volunteers from across the country highlighted in their surveys when visiting retailers. They were given a sample list of chemicals of concern and the types of products that they might find these chemicals in and were asked to note if they found such products in the stores. As a result, most products listed below only have one chemical of concern highlighted. Results are reported directly from survey responses.

These results show only a small sliver of the potential problem with what is in the products, as many personal care products contain anywhere from several to several dozen different ingredients, many of which may have their own hazardous properties. Additionally, listing only one chemical does not do justice to the complexity of the interaction of all the chemicals people are exposed to throughout the day, whether through personal care product use or exposures from other products, workplace environments, air pollution or other sources. For health concerns linked to the chemicals listed below, see Appendix B.

Also note that the vast majority of these products contain “fragrance,” which, as noted elsewhere in this report, can contain numerous chemicals of concern that are not required to be disclosed on the ingredient list.

Costco

The products listed below were found in Costco stores in Anchorage, AK; Everett, MA; or Richmond, CA.

Coppertone Sport Spray High Performance SPF 30	oxybenzone	Richmond, CA & Anchorage, AK
Dove Damage Therapy Daily Moisture Shampoo	DMDM hydantoin	Everette, MA
Kirkland Beauty Essentials – Borghese Color Palette	retinyl palmitate	Everette, MA
Kirkland Unscented Baby Wipes	2-bromo-2-nitropropane-1,3-diol	Richmond, CA & Anchorage, AK
Neutrogena Helioplex Wet Skin - kids SPF 70	oxybenzone	Richmond, CA & Anchorage, AK
Neutrogena Rainbath Refreshing Shower & Bath Gel:	DMDM hydantoin	Everette, MA
ROC Retinyl Correxion Deep Wrinkle Daily Moisturizer SPF 30	oxybenzone	Everette, MA
Softsoap advanced clean hand soap refill	DMDM hydantoin	Richmond, CA

CVS

The products listed below were found in CVS stores in Acton, MA; Berkeley, CA; Campbell, CA; Indian Rocks Beach, FL; Missoula, MT; or St. Paul, MN.

Banana Boat Sport Performance Sun-screen Lotion	retinyl palmitate	Acton, MA
CVS Antibacterial Hand Soap	triclosan	Missoula, MT
CVS Baby Shampoo	quaternium-15	Berkeley, CA
CVS Baby Wipes (Hands & Face)	2-bromo-2-nitropropane-1,3-diol	Campbell, CA
CVS Brand Sunscreen	oxybenzone	Indian Rocks Beach, FL & Campbell, CA
CVS Men’s Shampoo-in Hair Color	p-Phenylenediamine	Berkeley, CA
CVS Pharmacy SPF 70+ Sunscreen with Solatec	oxybenzone retinyl palmitate	Missoula, MT
CVS pharmacy toddler ultra strong cleansing wipes	2-bromo-2 nitropropane-1, 3-diol	Missoula, MT
CVS Pharmacy Ultra –Soft Cleansing Wipes, Unscented, with aloe and vitamin E	2-bromo-2 nitropropane-1, 3-diol	Acton, MA
CVS Vapor Bath (for babies)	quaternium-15	Berkeley, CA
Desitin Maximum Strength 40 % Zinc Oxide Diaper Rash Paste, Original Paste	BHA	Acton, MA
Dial Complete Foaming Antibacterial Hand Wash- Soothing White Tea	triclosan	St. Paul, MN
Dial Complete Hand Soap	triclosan	Indian Rocks Beach, FL
Huggies Shea Butter Soft Skin Baby Wipes (Refill pack)	DMDM hydantoin	Campbell, CA
Neutrogena Age Shield Face Sunblock Lotion	oxybenzone	Acton, MA
Garnier Nutrisse Nourishing Color Foam Dark Brown	p-Phenylenediamine	Missoula, MT
Organic Root Stimulator, Olive Oil, No Lye Relaxer – Extra Strength	DMDM hydantoin	Campbell, CA
Palmer’s Skin Success - Eventone Fade Cream, Regular	hydroquinone	Missoula, MT
Porcelana Day Skin Lightening Cream	hydroquinone	Missoula, MT
Revlon ColorSilk Beautiful Color Natural Blue Black	p-Phenylenediamine	Missoula, MT
Soft & Beautiful Botanicals w/ natural plant extracts no lye sensitive scalp relaxer	DMDM hydantoin	Missoula, MT
Soft & Beautiful Just for me – no lye conditioning cream relaxer for children	DMDM hydantoin	Missoula, MT
Splat Jet Black	p-Phenylenediamine	St. Paul, MN

Kroger

The products listed below were found in Kroger stores in either Ann Arbor, MI; Evanston, IL (Food4Less/Krogers); or Richmond, KY.

Clairol Nice n' Easy 118 Natural Medium Brown	p-Phenylenediamine	Ann Arbor, MI
Comforts for Baby Wash	quaternium-15 sodium laureth sulfate	Ann Arbor, MI
Coppertone Water Babies SPF 50	oxybenzone	Ann Arbor, MI
Desitin Maximum Strength Original Paste (diaper cream)	BHA	Ann Arbor, MI
Dial Complete Foaming Anti-bacterial Liquid Soap	triclosan	Ann Arbor, MI
Garnier Nutrisse Ultra Color B3 Golden Brown	p-Phenylenediamine	Richmond, KY
Genuine Black & White Bleaching Cream	hydroquinone	Richmond, KY
Kroger Baby Shampoo	quaternium-15	Evanston, IL
Kroger Baby Wash	quaternium-15	Evanston, IL
Kroger Baby Wipes (fragrance-free)	DMDM hydantoin	Evanston, IL
Kroger Lemongrass & Basil Liquid Soap	triclosan	Evanston, IL
Kroger's Antibacterial Soap	triclosan DMDM hydantoin	Evanston, IL
Organic Roots stimulator Olive Oil Girls (hair relaxer)	DMDM hydantoin	Richmond, KY

Macy's

The products listed below were found in Macy's stores in either Boston, MA; Monroeville, PA; Pleasant Hill, CA; or Richmond, CA.

Calvin Klein Eternity for Men	A range of hidden, harmful chemicals detected in lab tests	Richmond, CA
Cargo Tinted Moisturizer SPF 20	retinyl palmitate	Boston, MA
Clarins SPF 50+ Sunscreen for Face Wrinkle Control Creme	oxybenzone	Monroeville, PA
Clinique Happy	A range of hidden, harmful chemicals detected in lab tests	Richmond, CA
Clinique SPF 30 with Solar Smart face cream	oxybenzone	Monroeville, PA
Coco Mademoiselle Chanel	A range of hidden, harmful chemicals detected in lab tests	Boston, MA
Fashion Fair Vantex Skin Bleaching Cream	hydroquinone	Boston, MA
Georgio Armani Acqua Di Gio	A range of hidden, harmful chemicals detected in lab tests	Boston, MA
Lancome Bienfait UV Super Fluid Facial Sunscreen SPF 50+	oxybenzone	Pleasant Hill, CA
Peter Thomas Roth Fusion Moisturizer SPF 30	oxybenzone	Pleasant Hill, CA
Peter Thomas Roth Max Sheer All Day Moisture Defense Lotion SPF 30	oxybenzone	Boston, MA
Philosophy Here Comes the Sun Age Defense Water Resistant SPF 40 Broad Spectrum	oxybenzone	Boston, MA
Philosophy Here Comes the Sun Age-Defense Water Resistant SPF 30	retinyl palmitate	Boston, MA

Target

The products listed below were found in Target stores in Albany, CA; Beaverton, OR; Dorchester, MA; E. Homestead, PA; Los Angeles, CA; Largo, FL; Missoula, MT; Portland, OR; or Southington, CT.

Africa's Best Dual Conditioning Hair Relaxer	DMDM hydantoin	Dorchester, MA & E. Homestead, PA
Ambi fade cream	hydroquinone	Portland, OR
Clairol Nice 'n Easy	p-Phenylenediamine	Dorchester, MA & E. Homestead, PA
Coppertone Water Babies Sun Screens	oxybenzone	Beaverton, OR
Desitin Maximum Strength Diaper Cream	BHA	E. Homestead, PA, Largo, FL & Portland, OR
Dial and Dial Complete antibacterial hand soaps (Gold/white tea/cranberry/pear)	triclosan	Beaverton, OR
Esoterica fade cream	hydroquinone	E. Homestead, PA Portland, OR & Dorchester, MA
Garnier Nutrisse Nourishing Color Crème Black	p-Phenylenediamine	Portland, OR
L'Oreal Feria hair color	p-Phenylenediamine	E. Homestead, PA Portland, OR & Dorchester, MA
Motions Salon Haircare Silkening Shine Relaxer System	DMDM hydantoin	Dorchester, MA & Missoula, MT
Nadinola Skin Discoloration Fade Cream	hydroquinone	Portland, OR
Organica Root Stimulator Olive Oil Edge Control	DMDM hydantoin	Portland, OR
Porcelana Skin Lightening Cream	hydroquinone	Portland, OR
Revlon Color Silk	p-Phenylenediamine	Dorchester, MA
Soft & Beautiful Just for Me hair relaxer	DMDM hydantoin	Dorchester, MA & Portland, OR
Up & Up Baby Wipes (scented, sensitive, and unscented)	2-bromo-2-nitropropane-1,3-diol	Beaverton, OR, Los Angeles, CA, Southington, CT, Portland, OR, E. Homestead, PA, Missoula, MT, Albany, CA & Dorchester, MA, Largo, FL
Up & Up Diaper Rash Ointment	BHA	Portland, OR, Albany, CA, Southington, CT & Missoula, MT
Up & Up Sport sunscreen broad spectrum spf 50	oxybenzone	Missoula, MT
Up & Up sport sunscreen broad spectrum SPF 30	retinyl palmitate	Albany, CA

Walgreens

The products listed below were found in Walgreens stores in Berkeley, CA; Boston, MA; Chicago, IL; Largo, FL; Homestead, PA; or Portland, OR (1) 5420 NE 33rd Ave., or (2) 3 NE 82nd Ave.

ActiFade Skin Cream	DMDM hydantoin	Portland, OR (1) & Portland, OR (2)
Africa's Best Organics Touch-Up Plus Organic Conditioning Relaxer System Regular	DMDM hydantoin	Portland, OR (1)
Ambi fade cream	hydroquinone	Portland, OR (1)
Banana Boat Broad Spectrum SPF 50	oxybenzone	Homestead, PA,
Banana Boat Sport Performance Sunscreen	oxybenzone	Largo, FL
Clairol Nice 'n Easy	p-Phenylenediamine	Portland, OR (2)& Boston, MA, Portland, OR (1)
Daggett & Ramsdell Skin Lightening Cream	hydroquinone	Boston, MA
Desitin Maximum Strength diaper cream	BHA	Homestead, PA, & Portland, OR (1)
Dial Complete anti-bacterial foaming hand wash	triclosan	Homestead, PA & Chicago, IL
Dial Hand Soap Gold	triclosan	Portland, OR (1) & Portland, OR (2)
Dial Hello Kitty Foaming Hand Wash	triclosan	Missoula, MT
Doo Gro Smooth & Straight, Anti-Breakage No-Lye Hair Relaxer System Regular	DMDM hydantoin	Boston, MA
Esoterica Fade Cream Daytime	hydroquinone	Portland, OR (1) Homestead, PA, Missoula, MT
Funky Fro Transition Natural Springing Gel	DMDM hydantoin	Boston, MA
L'Oreal Feria Multifaceted Shimmering Color	p-Phenylenediamine	Largo, FL
L'Oreal Paris Feria	p-Phenylenediamine	Homestead, PA
Motions Super Silkening Shine Relaxer System	DMDM hydantoin	Boston, MA & Portland, OR (1)
Neutrogena Kids Beach and Pool	oxybenzone	Portland, OR (1)
Olive Oil Smooth-n-Hold Pudding Organic Root Simulator	DMDM hydantoin	Boston, MA
Porcelana Skin Lightening Cream	hydroquinone	Portland, OR (1), Portland, OR (2)Homestead, PA, Boston, MA
Profectiv Mega-Growth Therapeutic No-Lye Hair Relaxer	DMDM hydantoin	Boston, MA & Portland, OR (1) & Portland, OR (2)
Revlon Color Silk	p-Phenylenediamine	Portland, OR (2)& Portland, OR (1)
Softsoap : coconut & warm ginger	DMDM hydantoin	Chicago, IL
Walgreens Baby Shampoo	quaternium 15	Berkeley, CA
Walgreens Premium Comfort Smooth baby wipes, unscented and with shea butter	DMDM hydantoin	Missoula, MT & Chicago, IL & Portland, OR (1)
Walgreens sunscreen lotion SPF 30	oxybenzone	Portland, OR (1)

Walmart

The products listed below were found in Walmart stores in Anchorage, AK; Portland, OR; St. Paul, MN; Missoula, MT; or Richmond, CA.

Africa's Best No-Lye Dual Conditioning Relaxer System	DMDM hydantoin	Anchorage, AK
Clairol Nice 'n Easy	p-Phenylenediamine	Portland, OR
Desitin Maximum Strength Paste	BHA	Portland, OR
Dial antibacterials spring water hand soap	DMDM hydantoin	Missoula, MT
Dial Complete Foaming Anti-Bacterial	triclosan	Portland, OR & St. Paul, MN
Equate Diaper Rash Ointment	BHA	Richmond, CA
Equate Enriched Body Wash	DMDM hydantoin	Richmond, CA
Equate Everyday Clean Fragrance Free Baby Wipes	DMDM hydantoin	Portland, OR & Richmond, CA
Equate Tear-Free Baby Shampoo	quaternium-15	Richmond, CA
L'oreal Paris Excellence Crème	p-Phenylenediamine	Portland, OR
Motions Salon Haircare Silkening Shine Relaxer System	DMDM hydantoin	Portland, OR
Nadinola Skin Discoloration Fade Cream	hydroquinone	Portland, OR
Organic Root Stimulator, Olive Oil, No Lye Relaxer – Extra Strength	DMDM hydantoin	Portland, OR
Palmer's Skin Success Eventone Fade Cream	hydroquinone	Anchorage, AK
Palmer's Skin Success Eventone Fade Milk	hydroquinone	Portland, OR
Parent's Choice Baby Shampoo Tear Free	quaternium-15	Richmond, CA
Parent's Choice Baby Shampoo Tear Free with Natural Lavender	quaternium-15	Richmond, CA
Revlon Color Silk	p-Phenylenediamine	Portland, OR
Splat Rebellious Color Complete Hair Color Kit, Jet black	p-Phenylenediamine	Missoula, MT,
White Cloud Unscented Baby Wipes with natural aloe	2-Bromo-2-Nitropropane-1, 3-Diol	Missoula, MT & Portland, OR

Whole Foods

The products listed below were found in Whole Foods stores in either Boston, MA; Pittsburgh, PA; Portland, OR; or Santa Monica, CA.

Every Man Jack Face Lotion with Sun-screen	oxybenzone	Boston, MA & Pittsburgh, PA
Naturtint Permanent Hair Color	p-Phenylenediamine	Boston, MA, Pittsburgh, PA, Portland, OR & Santa Monica, CA
Tints of Nature	p-Phenylenediamine	Boston, MA, Portland, OR & Santa Monica, CA

Endnotes

1. Campaign for Safe Cosmetics FDA Regulations Page. <http://safecosmetics.org/section.php?id=75> Viewed November 11, 2012.
2. Natural and Organic Personal Care Products in the U.S., 5th Edition. Packaged Facts. December, 2011. http://marketpublishers.com/report/consumers_goods/household_personal_products/natural_n_organic_personal_care_products_in_us_5th_edition.html
3. #7001-60 Global Market for Natural & Organic Personal Care Products. Organic Monitor. December 2011. <http://www.organicmonitor.com/700160.htm>
4. Ethnic Hair, Skin, and Cosmetics Products in the U.S., 8th Edition. Packaged Facts. Published June 8, 2012. <https://www.packagedfacts.com/Ethnic-Hair-Skin-6690874/>
5. Nichol, Katie. March 29, 2010. CosmeticsDesign.com. Green personal care market set to experience 'rapid growth', Mintel. Available at: <http://www.cosmeticsdesign.com/Market-Trends/Green-personal-care-market-set-toexperience-rapid-growth-Mintel>. Viewed November 4, 2011.
6. Rainforest Action Network. The Old Growth Campaign Victory – how did we do that? Webpage.<http://understory.ran.org/2008/06/20/the-old-growth-campaign-victory-how-did-we-do-that/>. Viewed November 11, 2012.
7. ForestEthics. Our Proudest Achievements. <http://forestethics.org/proudest-achievements>. Viewed November 11, 2012.
8. Breast Cancer Fund press release. Environmental Health Groups Prevail: Wal-Mart Is Removing Toxic Baby Bottles, Nalgene To Phase Out Toxic Water Bottles. April 18, 2008. <http://www.breastcancerfund.org/media/press-releases/walmart-toxic-bottles.html>. Viewed November 8, 2012.
9. Natural Cosmetics News. Natural & Organic Cosmetic Standards Buildup Continues. <http://www.naturalcosmeticnews.com/organic-label/natural-organic-cosmetic-standards-buildup-continues/>. Viewed November 11, 2012.
10. Food and Drug Administration. FDA Authority Over Cosmetics. <http://www.fda.gov/Cosmetics/GuidanceComplianceRegulatoryInformation/ucm074162.htm>. Viewed November 4, 2011. For more explanation, see Campaign for Safe Cosmetics. FDA Regulations. <http://safecosmetics.org/section.php?id=75>.
11. EWG. Myths on cosmetics safety. <http://www.ewg.org/skindeep/myths-on-cosmetics-safety/>. Viewed November 4, 2011.
12. Congresswoman Jan Schakowsky. June 24, 2011. Reps. Schakowsky, Markey, Baldwin Introduce Bill to Protect Consumers and Workers From Harmful Chemicals in Cosmetics. Press release available at: http://schakowsky.house.gov/index.php?option=com_content&view=article&id=2948:schakowsky-markey-baldwin-introducebill-to-protect-consumers-and-workers-from-harmfulchemicals-in-cosmetics-&catid=22:2011-pressreleases. Viewed November 4, 2011.
13. Congresswoman Jan Schakowsky. June 24, 2011. Reps. Schakowsky, Markey, Baldwin Introduce Bill to Protect Consumers and Workers From Harmful Chemicals in Cosmetics. Press release available at: http://schakowsky.house.gov/index.php?option=com_content&view=article&id=2948:schakowsky-markey-baldwin-introducebill-to-protect-consumers-and-workers-from-harmfulchemicals-in-cosmetics-&catid=22:2011-pressreleases. Viewed November 4, 2011.
14. Deloitte. 2011. 2011 Consumer Food and Product Insights Survey. Available at: http://www.deloitte.com/assets/Dcom-UnitedStates/Local%20Assets/Documents/Consumer%20Business/us_cp_2011foodsafetyurvey_041511.pdf.
15. Natural and Organic Personal Care Products in the U.S., 5th Edition. Packaged Facts. December, 2011. http://marketpublishers.com/report/consumers_goods/household_personal_products/natural_n_organic_personal_care_products_in_us_5th_edition.html
16. Natural and Organic Personal Care Products in the U.S., 5th Edition. Packaged Facts. December, 2011. http://marketpublishers.com/report/consumers_goods/household_personal_products/natural_n_organic_personal_care_products_in_us_5th_edition.html
17. Natural and Organic Personal Care Products in the U.S., 5th Edition. Packaged Facts. December, 2011. http://marketpublishers.com/report/consumers_goods/household_personal_products/natural_n_organic_personal_care_products_in_us_5th_edition.html
18. Campaign for Safe Cosmetics. Not So Sexy: The Health Risks of Secret Chemicals in Fragrance. Available at www.safecosmetics.org/notsosexy.
19. Whole Foods. Whole Body Quality Standards webpage. <http://www.wholefoodsmarket.com/department/article/whole-body-quality-standards>. Viewed November 11, 2012.
20. "Whole Foods Market's baseline Body Care Quality Standards prohibit artificial colors in body care products, several unacceptable preservatives (such as BHT, iodopropynyl butylcarbamate, methylchloroisothiazolinone, bronopol, methylisothiazolinone) and a number of other ingredients (such as synthetic aluminum ingredients, hydroquinone, triclosan)." Per email from Jody Villecco, Quality Standards Coordinator, Whole Foods Market, September 5, 2012.

21. Whole Foods. Premium Body Quality Standards webpage. <http://www.wholefoodsmarket.com/department/article/premium-body-care-standards>. Viewed November 11, 2012.
22. Per email from Jody Villecco, Quality Standards Coordinator, Whole Foods Market, September 5, 2012.
23. Whole Foods Market – Quality Standards Body Care Premium unacceptable ingredient lists for premium body care products. http://www.wholefoodsmarket.com/sites/default/files/media/Global/PDFs/unacceptable_pbc.pdf
24. Campaign for Safe Cosmetics. Not So Sexy: The Health Risks of Secret Chemicals in Fragrance. Available at www.safecosmetics.org/notsosexy.
25. Whole Foods Premium Body Care Quality Standards video. <http://www.wholefoodsmarket.com/blog/whole-story/premium-body-care-quality-standards>.
26. United States Department of Agriculture. National Organic Program factsheet. <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5068442>.
27. Per email from Jody Villecco, Quality Standards Coordinator, Whole Foods Market, November 5, 2012.
28. Whole Foods. Premium Body Quality Standards webpage. <http://www.wholefoodsmarket.com/department/article/premium-body-care-standards>. Viewed November 11, 2012.
29. Whole Foods. Organic Body Care Standards. <http://www.wholefoodsmarket.com/department/article/organic-body-care-standards>. Viewed November 11, 2012.
30. Campaign for Safe Cosmetics press release: CVS Joins Retail Push for Non-toxic Personal Care Products. May 7, 2008. <http://safecosmetics.org/article.php?id=253>. Viewed November 11, 2012.
31. Pitman, Simon. Retailer moves to wipe out ‘unsafe’ cosmetics. *Cosmetic Design*. April 4, 2006. <http://www.cosmeticsdesign.com/Formulation-Science/Retailer-moves-to-wipe-out-unsafe-cosmetics>.
32. Letter from Cheryl Mahoney, Vice President of Beauty, CVS/pharmacy to Janet Nudelman of the Campaign for Safe Cosmetics, October 23, 2012.
33. CVS Caremark “Sustainable Products” webpage. <http://info.cvscaremark.com/our-company/corporate-responsibility/environment/sustainable-products>. Viewed August 17, 2012.
34. Campaign for Safe Cosmetics. MarketShift: The story of the Compact for Safe Cosmetics and the growing demand for safer products. http://safecosmetics.org/downloads/MarketShift_CSC_June15_2012.pdf.
35. Letter from Cheryl Mahoney, Vice President of Beauty, CVS/pharmacy to Janet Nudelman of the Campaign for Safe Cosmetics, October 23, 2012.
36. CVS Caremark 2011 Corporate Responsibility Report. Page 17. http://info.cvscaremark.com/sites/cvscaremark.com/files/2011_CVS_Caremark_CSR-Report_Secured.pdf
37. Campaign for Safe Cosmetics. No More Toxic Tub. http://safecosmetics.org/downloads/Babys-Tub-Is-Still-Toxic_Nov2011.pdf.
38. Walgreens’ press release “Walgreens Introduces the “Ology™” Brand of Healthy Home Products” November 5, 2012. http://news.walgreens.com/article_display.cfm?article_id=5666. Viewed November 5, 2012.
39. From Walgreens’ Happy and Healthy Holiday 2012, page 8. Available at: http://walgreens.shoplocal.com/walgreens/default.aspx?action=entryflash&sneakpeek=y&stop_mobi=yes&ec=hncx20353_sneakpeekbutton&adref=weeklyemail&ep_rid=AABSiz&ep_mid=_BQZf00B8uUTZ20. Viewed November 5, 2012.
40. Ingredients are available online for Ology products. See <http://www.walgreens.com/search/results.jsp?Ntt=ology&x=0&y=0> for further information.
41. Per email with Mia Davis of Beauty Counter, November 9, 2012. For further reading, see Natural Preservative Systems: Almost 100% Natural by Jennifer Kwok in *CPC Packaging*. http://www.cpcpkg.com/magazine/09_03_natural_feature.php
42. Based on conversation on October 12, 2012 and confirmed by email with Chad Davis, Sustainability Manager at Target on October 30, 2012.
43. Based on conversation on October 12, 2012 and confirmed by email with Chad Davis, Sustainability Manager at Target on October 30, 2012.
44. Based on conversation on October 12, 2012 and confirmed by email with Chad Davis, Sustainability Manager at Target on October 30, 2012.
45. Environmental Leader. Target to Reduce PVC Use. November 8, 2007. <http://www.environmentalleader.com/2007/11/08/target-to-reduce-pvc-use/>. Viewed November 11, 2012.
46. Rosenbloom, Stephanie and Michael Barbaro. Environmental sustainability, now at Wal-Mart. *New York Times*. February 5, 2009. <http://www.nytimes.com/2009/01/25/business/worldbusiness/25iht-25walmart.19647095.html?pagewanted=all>
47. Sustainability Consortium. Home & Personal Care Sector Working Group. <http://www.sustainabilityconsortium.org/home-personal-care/>. Viewed November 11, 2012.
48. Walmart 2011 Global Responsibility Report. Sustainable product index webpage. http://www.walmartstores.com/sites/ResponsibilityReport/2011/environment_products_SustainableProductsIndex.aspx. Viewed November 11, 2012.
49. Presentation by Michelle Mauthe Harvey of Environmental Defense. GreenWERCS: An Alternatives Assessment Approach to Chemical Intensive Products. Product Chemicals Management for Retailers. May 3, 2011. <http://chemicalspolicy.org/downloads/GreenWERCS-AnAlternativesAssessmentApproachtoChemicalIntensiveProducts.pdf>.

50. The WerCS Products and Services webpage. <http://www.thewerCS.com/products-and-services/greenwerCS>. Viewed November 11, 2012.
51. These are very promising categories to assess chemical safety. However, one concern about GreenWERCS that was flagged by the Green Chemistry and Commerce Council, a business-to-business forum led by the Lowell Center for Sustainable Production at University of Massachusetts, is that chemicals that do not appear on any of the authoritative lists used to develop the GreenWERCS tool receive a better score, which can indicate a preferable ingredient. This may be misleading, as chemicals not on any lists may not have been adequately assessed for human health and environmental hazards. As mentioned previously, lack of safety assessment is a key concern about the chemicals used in personal care products. This challenge is not unique to GreenWERCS, as chemicals used in a wide range of commercial applications are largely understudied. Green Chemistry & Commerce Council. GreenWERCS webpage. <http://www.greenchemistryandcommerce.org/retailer.companies.php?prodid=2>. Viewed November 11, 2012.
52. From a letter dated October 12, 2012 from Carmen Bauza, Vice President, Beauty and Personal Care, Walmart to Janet Nudelman of the Campaign of Safe Cosmetics.
53. NRF Stores. 2012 Top 100 Retailers. <http://www.stores.org/2012/Top-100-Retailers>. Viewed November 11, 2012.
54. From letter dated October 12, 2012 from Brendon Cull, Director of Government Relations, The Kroger Co., to Janet Nudelman of the Campaign for Safe Cosmetics.
55. Simple Truth Free From 101 webpage. <http://www.simpletruth.com/about-simple-truth/101-free-from-ingredients/>. Viewed November 11, 2012.
56. Costco Wholesale Corporate Sustainability Report, 2009. <http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MTU2NDF8Q2hpbGRJRDR0tMXxUeXBIPtM=&t=1>
57. Letter from S. Leigh Fulwood, Costco Corporate Counsel to Lisa Archer, Campaign for Safe Cosmetics dated May 20, 2011. Reconfirmed in a letter from Arthur D. Jackson, Jr. Vice President, General Administration, Costco Wholesale to Janet Nudelman Campaign for Safe Cosmetics on October 12, 2012.
58. Examples of Kirkland products that are free of parabens and fragrance include “The Glamour Set II by Kirkland Signature Borghese” <http://www.costco.com/newurl.product.11762238.html> and “Fairly Light Shade The Look Collection II by Kirkland Signature™ Borghese” <http://www.costco.com/newurl.product.11762241.html>.
59. Martin, Andrew. Antibacterial Chemical Raises Safety Issues. *New York Times*. August 19, 2011. <http://www.nytimes.com/2011/08/20/business/triclosan-an-antibacterial-chemical-in-consumer-products-raises-safety-issues.html?pagewanted=all>. Viewed November 11, 2012.
60. From a letter dated May 26, 2011 from Jim Sluzewski, Senior Vice President Corporate Communications and External Affairs for Macy’s to Lisa Archer Campaign for Safe Cosmetics.
61. Campaign for Safe Cosmetics. Not So Sexy: The Health Risks of Secret Chemicals in Fragrance. Available at www.safecosmetics.org/notsosexy.
62. Origins “About Origins” webpage, “Our Purity” section. http://www.origins.com/customer_service/aboutus.tml#/Landing. Viewed November 11, 2012.
63. Tseng, Nin-Hai. Why dollar stores are thriving, even post-recession. *CNN Money*. April 2, 2012. <http://finance.fortune.cnn.com/2012/04/02/dollar-stores/>. Viewed November 11, 2012.
64. FDA Safety webpage. Toothpaste imported from China may contain diethylene glycol. <http://www.fda.gov/Safety/MedWatch/SafetyInformation/SafetyAlertsforHumanMedicalProducts/ucm153155.htm>. Viewed November 11, 2012.
65. Forbes. Are dollar stores really a bargain? April 2, 2012. <http://www.forbes.com/sites/investopedia/2012/04/02/are-dollar-stores-really-a-bargain/3/>. Viewed November 11, 2012.
66. Consumer Product Safety Commission press release Recalled Products Originally Sold By Meijer Found to Have Been Resold By Discounters After Recall Date. March 6, 2012. <http://www.cpsc.gov/cpsc/pub/prerel/prhtml12/12126.html>. Viewed November 11, 2012.
67. Consumer Reports. Get the best dollar-store deals: These discount destinations help you save more on everyday products. August 2012. <http://www.consumerreports.org/cro/2012/08/get-the-best-dollar-store-deals/index.htm>. Viewed November 11, 2012.
68. Food and Drug Administration. Lipstick and Lead: Questions and Answers. <http://www.fda.gov/Cosmetics/ProductandIngredientSafety/ProductInformation/ucm137224.htm#expanalyses>. Viewed November 11, 2012.
69. For more on the Campaigns coverage of lead in lipstick, see Lead in Lipstick webpage: <http://safecosmetics.org/article.php?id=223>.
70. See Campaign for Safe Cosmetics page Support the Safe Cosmetics Act. http://org2.democracyinaction.org/o/5500/p/dia/action/public/?action_KEY=7022.
71. Campaign for Safe Cosmetics. MarketShift: The story of the Compact for Safe Cosmetics and the growing demand for safer

- products. http://safecosmetics.org/downloads/MarketShift_CSC_June15_2012.pdf.
72. Organic Consumers Association Natural Food Listings. <http://organicconsumers.org/state/greenbiz.cfm?all=NaturalFood>. Viewed November 11, 2012.
 73. For example, Amazon just launched Vine.com, which is focused on selling green products. While “green” means wildly different things to different people, the beauty products sold at the site “are made primarily of plant-based, naturally-derived and non-petroleum ingredients, pure essential oils and gentle preservatives... and do not contain any substances on our Banned Ingredient List.” While the list only contains 20 ingredients, the fact that the site comes out of the gate with standards such as these are a sign of changing times and consumer demand for safer products. <http://www.vine.com/green-philosophy/overview.qs>. And <http://www.vine.com/green-philosophy/banned-ingredients.qs>. Viewed November 11, 2012.
 74. NRF Stores. 2012 Top 100 Retailers. <http://www.stores.org/2012/Top-100-Retailers>. Viewed November 11, 2012.
 75. Also see Campaign for Safe Cosmetics press releases on J&J’s announcement: Johnson & Johnson Makes Historic Commitment to Remove Cancer-Causing Chemicals Other Cosmetics Giants Challenged to Follow Suit. <http://safecosmetics.org/article.php?id=1054> August 15, 2012 and Johnson & Johnson Promises to Remove Carcinogens from Baby Products: Health groups applaud move; demand other baby brands follow suit <http://safecosmetics.org/article.php?id=903> November 16th, 2011.
 76. State of California Office of Environmental Health Hazard Assessment Proposition 65 list of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity, November 2, 2012. http://oehha.ca.gov/prop65/prop65_list/newlist.html.
 77. National Toxicology Program, Department of Health and Human Services Report on Carcinogens, Twelfth Edition (2011). <http://ntp.niehs.nih.gov/ntp/roc/twelfth/profiles/ButylatedHydroxyanisole.pdf>
 78. Flyvholm MA, Menné T. Allergic contact dermatitis from formaldehyde. A case study focusing on sources of formaldehyde exposure. *Contact Dermatitis*. 1992 Jul; 27(1):27-36.
 79. Boyvat A, Akyol A, Gürgey E. Contact sensitivity to preservatives in Turkey. *Contact Dermatitis*. 2005; 52(6):333-337.
 80. Pratt MD, Belsito DV, DeLeo VA, Fowler JF Jr, Fransway AF, Maibach HI, Marks JG, Mathias CG, Rietschel RL, Sasseville D, Sherertz EF, Storrs FJ, Taylor JS, Zug K. North American Contact Dermatitis Group patch-test results, 2001-2002 study period. *Dermatitis*. 2004; 15(4):176-83. Erratum in: *Dermatitis*. 2005; 16(2):106.
 81. Australian Government Department of Health and Ageing. Priority Existing Chemical Assessment Report No. 28: Formaldehyde. November 2006. Page 193. Available at: http://www.nicnas.gov.au/Publications/CAR/PEC/PEC28/PEC_28_Full_Report_PDF.pdf. Accessed January 9, 2009.
 82. Jacob SE and Steele T. Avoiding Formaldehyde Allergic Reactions in Children. *Pediatric Annals* 2007;36(1):55-6.
 83. U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program. “Formaldehyde (Gas) CAS No. 50-00-0: Reasonably anticipated to be a human carcinogen.” Eleventh Report on Carcinogens. December 2002. Available at: <http://ntp.niehs.nih.gov/ntp/roc/eleventh/profiles/s089form.pdf>. Accessed October 16, 2009.
 84. International Agency for Research on Cancer. “IARC classifies formaldehyde as carcinogenic to humans.” Press release. June 15, 2004. www.iarc.fr/en/Media-Centre/IARC-Press-Releases/Archives-2006-2004/2004/IARC-classifies-formaldehyde-as-carcinogenic-to-humans. Accessed January 9, 2009.
 85. Zhang et al 2009. Meta-analysis of formaldehyde and hematologic cancers in humans. *Mutation Research* 681: 150-168.
 86. Australian Government Department of Health and Ageing. Priority Existing Chemical Assessment Report No. 28: Formaldehyde. November 2006. Page 68. Available at: http://www.nicnas.gov.au/Publications/CAR/PEC/PEC28/PEC_28_Full_Report_PDF.pdf. Accessed January 9, 2009.
 87. Bartnik FG, Gloxhuber C, Zimmermann V. Percutaneous absorption of formaldehyde in rats. *Toxicol Lett*. 1985; 25(2):167-72.
 88. International Fragrance Association. Ingredients. http://www.ifraorg.org/en-us/Ingredients_2. Viewed November 10, 2012.
 89. Campaign for Safe Cosmetics. Not So Sexy: The Health Risks of Secret Chemicals in Fragrance. Available at www.safecosmetics.org/notsosexy.
 90. Jimbow, K., Obata, H., Pathak, M. A. and Fitzpatrick, T. B., 1974. Mechanisms of depigmentation by hydroquinone. *Journal of Investigative Dermatology* 62, pp. 436-449.
 91. CIR (Cosmetic Ingredient Review Expert Panel) Final report on the safety assessment of t-butyl hydroquinone. 1986. *Journal of the American College of Toxicology* 5, pp. 329-351.
 92. CIR (Cosmetic Ingredient Review Expert Panel) Final report on the safety assessment of t-butyl hydroquinone, 1991. *Journal of the American College of Toxicology* 10, pp. 1-7.
 93. Environmental Working Group. Skin Deep. Product search for Physicians Complex 6% Skin Bleaching Cream owned by CosMed. Online at www.cosmeticsdatabase.com. Accessed July 23, 2008.
 94. Environmental Working Group. Skin Deep. Hydroquinone. Available online: <http://www.cosmeticsdatabase.com/ingredient.php?ingred06=703041>. Accessed December 9, 2008.
 95. Burkhart CG (2007). Ochronosis. *Emedicine*. <http://www.emedicine.com/DERM/topic476.htm>. Accessed July 23, 2008.
 96. Rodriguez E, Valbuena MC, Rey M, Porrás de Quintana L. 2006. Causal agents of photoallergic contact dermatitis diagnosed in the national institute of dermatology of Colombia. *Photodermatol Photoimmunol Photomed* 22(4): 189-92.
 97. Schlumpf M, Cotton B, Conscience M, Haller V, Steinmann B, Lichtensteiger W. 2001. In vitro and in vivo estrogenicity of UV screens. *Environmental Health Perspectives* 109(3): 239-44.
 98. Ma RS, Cotton B, Lichtensteiger, Schlumpf M. 2003. UV filters with antagonistic action at androgen receptors in the MDA-kb2 cell transcriptional-activation assay. *Toxicological Sciences* 74(1): 43-50.
 99. Janjua NR, Mogensen B, Andersson AM, Petersen JH, Henriksen M, Skakkebaek NE, Wulf HC. 2004. Systemic absorption of the sunscreens benzophenone-3, octyl-methoxycinnamate, and 3-(4-methyl-benzylidene) camphor after whole-body topical application and reproductive hormone levels in humans. *Journal of Investigative Dermatology* 123(1): 57-61.
 100. Janjua NR, Kongshoj B, Andersson AM, Wulf HC. 2008. Sunscreens in human plasma and urine after repeated whole-body topical application. *J Eur Acad Dermatol Venereol* 22(4): 456-61.
 101. Gonzalez H, Farbroth A, Larko O, Wennberg AM. 2006. Percutaneous absorption of the sunscreen benzophenone-3 after repeated whole-body applications, with and without ultraviolet irradiation. *Br J Dermatol*. 154(2): 337-40.
 102. Sarveiya V, Risk S, Benson HAE. 2004. Liquid chromatographic assay for common sunscreen agents: application to in vivo assessment of skin penetration and systemic absorption in human volunteers. *Journal of Chromatography B-Analytical Technologies in the Biomedical and Life Sciences*. 803(2): 225-231.
 103. Environmental Working Group’s Skin Deep Sunscreens 2012 report. *Nanomaterials and Hormone Disruptors in Sunscreens*. <http://breakingnews.ewg.org/2012sunscreens/sunscreens-exposed/nanomaterials-and-hormone-disruptors-in-sunscreens/>. Viewed November 11, 2012.
 104. Gray, J (2008). *State of the Evidence: The Connection between Breast Cancer and the Environment*. San Francisco, CA: The Breast Cancer Fund.
 105. Daubre PD, Aljarrah A, Miller WR, Coldham NG, Sauer MJ, Pope GS (2004). Concentrations of parabens in human breast tumours. *Journal of Applied Toxicology* 24:5-13.
 106. Rastogi SC, Schouten A, Dekruif N, Weijland JW (1995). Contents of methylparaben, ethylparaben, propylparaben, butylparaben and benzylparaben in cosmetic products. *Contact Dermatitis* 32: 28-30.
 107. Ye X, Bishop AM, Reidy JA, Needham LL, Calafat AM (2006). Parabens as urinary biomarkers of exposure in humans. *Environmental Health Perspectives* 114: 1843-1846.
 108. Environmental Working Group. Skin Deep. Parabens. Available online: http://www.cosmeticsdatabase.com/ingredient.php?ingred06=704450&refurl=%2Fproduct.php%3Fprod_id%3D17311%26. Accessed December 9, 2008. Environmental Working Group. Skin Deep. Methylparaben. Available online: Environmental Working Group. Skin Deep. Parabens. Available online: http://www.cosmeticsdatabase.com/ingredient.php?ingred06=704450&refurl=%2Fproduct.php%3Fprod_id%3D17311%26. Accessed December 9, 2008. Environmental Working Group. Skin Deep. Butylparaben. Available online: <http://www.cosmeticsdatabase.com/ingredient.php?ingred06=700868>. Accessed December 9, 2008. Environmental Working Group. Skin Deep. Propylparaben. Available online: <http://www.cosmeticsdatabase.com/ingredient.php?ingred06=705335>. Accessed December 9, 2008.
 109. Darbre PD, Aljarrah A, Miller WR, Coldham NG, Sauer MJ, Pope GS (2004). Concentrations of parabens in human breast tumors. *Journal of Applied Toxicology* 24:5-13.
 110. Byford JR, Shaw LE, Drew MGB, Pope GS, Sauer MJ, Darbre PD (2002). Oestrogenic activity of parabens in MCF7 human breast cancer cells. *Journal of Steroid Biochemistry & Molecular Biology* 80:49-60.
 111. Swann SH, et al. (2005). Decrease in Anogenital Distance among Male Infants with Prenatal Phthalate Exposure. *Environmental Health Perspectives*, 113: 1056-1061. Available online: <http://www.ehponline.org/members/2005/8100/8100.pdf>. Accessed July 24, 2008.
 112. Main KM, et al. (2006). Human breast milk contamination with phthalates and alterations of endogenous reproductive hormones in infants three months of age. *Environmental Health Perspectives* 114:270-276.
 113. Hauser R, et al. (2007). DNA damage in human sperm is related to urinary levels of phthalate monoester and oxidative metabolites. *Human Reproduction*. 22:688-695.
 114. Gray LE, et al. (2006). Chronic di-n-butyl phthalate exposure in rats reduces fertility and alters ovarian function during pregnancy in female Long Evans hooded rats. *Toxicological Science* 93(1):189-95.
 115. Borch J, Axelstad M, Vinggaard AM, Delgaard M (2006). Mechanisms underlying the anti-androgenic effects of diethylhexyl phthalate in fetal rat testis. *Toxicology* 223: 144-155.
 116. Jobling S, Reynolds T, White R, Parker MG, Sumpter JP (1995). A variety of environmentally persistent chemicals, including some phthalate plasticizers, are weakly estrogenic. *Environmental Health Perspectives* 103(6):582-7.
 117. Kim IY, Han SY, Moon A (2004). Phthalates inhibit tamoxifen-induced apoptosis in MCF-7 human breast cancer cells. *Journal of Toxicology and Environmental Health* 67: 2025-2035.
 118. Environmental Working Group Skin Deep website. P-Phenylenediamine. <http://webcache.googleusercontent.com/search?q=cache:TZS-JtldZKIJ:74.84.128.63/skindeep/ingredient/704389/P-PHENYLENEDIAMINE/+&cd=8&hl=en&ct=clnk&gl=us&client=firefox-a>. Viewed November 11, 2012.

119. From Skin Deep: Grandjean P and PJ Landrigan. 2006. Developmental neurotoxicity of industrial chemicals. *Lancet*. 2006 Dec 16; 368(9553):2167-78.
120. From Skin Deep: CPS&Q (Consumer Products Safety & Quality) formerly known as ECB (European Chemicals Bureau). 2008. Classification and Labelling: Chemicals: Annex VI of Directive 67/548/EEC through the 31st ATP.
121. From Skin Deep: EPA (U.S. Environmental Protection Agency). 2005. Office of Air. The 112(b)1 Hazardous Air Pollutants List (as modified). Last modified: 12 Dec 2005.
122. From Skin Deep: CIR (Cosmetic Ingredient Review). 2006. CIR Compendium, containing abstracts, discussions, and conclusions of CIR cosmetic ingredient safety assessments. Washington DC.
123. NTP (National Toxicology Program). 2009. Pathology Tables, Survival and Growth Curves from NTP Long-Term Studies. TR-568 All-trans-retinyl palmitate. National Toxicology Program. Available: <http://ntp.niehs.nih.gov/index.cfm?objectid=555571BB-F1F6-975E-76F2BC5E369EB6F7>.
124. NTP (National Toxicology Program). 2011. Findings of NTP Board of Scientific Counselors on Retinoic Acid and Retinyl Palmitate – TR 568. Meeting, January 26, 2011. Research Triangle, North Carolina. <http://ntp.niehs.nih.gov/?objectid=BD2CA47D-F1F6-975E-74AA99197B7CB205>
125. NTP (National Toxicology Program). 2000. All-Trans-Retinyl Palmitate [CASRN 79-81-2]. Nomination for National Toxicology Program testing. Available: http://ntp.niehs.nih.gov/ntp/htdocs/Chem_Background/ExSumPdf/RetinylPalmitate.pdf
126. NTP (National Toxicology Program). 2010. Draft Technical Report on the Photocarcinogenesis Study of Retinoic Acid and Retinyl Palmitate [CAS Nos. 302-79-4 (All-Trans-Retinoic Acid) and 79-81-2 (All-Trans-Retinyl Palmitate)] in SKH-1 Mice (Simulated Solar Light And Topical Application Study). Scheduled Peer Review Date: January 26, 2011. NTP TR 568. NIH Publication No. 11-5910. Available: <http://ntp.niehs.nih.gov/index.cfm?objectid=A73F2BD6-F1F6-975E-789930D86CD3C2E1>.
127. NTP (National Toxicology Program). 2011. Findings of NTP Board of Scientific Counselors on Retinoic Acid and Retinyl Palmitate – TR 568. Meeting, January 26, 2011. Research Triangle, North Carolina. <http://ntp.niehs.nih.gov/?objectid=BD2CA47D-F1F6-975E-74AA99197B7CB205>
128. Environmental Working Group's Skin Deep Sunscreens 2012 report. The Problem with Vitamin A. <http://breakingnews.ewg.org/2012sunscreens/sunscreens-exposed/the-problem-with-vitamin-a/>. Viewed November 11, 2012.
129. U.S. Environmental Protection Agency. Technology Transfer Network Air Toxics Web site. "1,4-Dioxane (1,4-Diethyleneoxide)." www.epa.gov/ttn/atw/hlthef/dioxane.html. Viewed December 20, 2008.
130. U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program. "1,4-Dioxane, CAS No. 123-91-1: Reasonably Anticipated to be a Human Carcinogen." Eleventh Report on Carcinogens. December 2002. Available at: <http://ntp.niehs.nih.gov/ntp/roc/eleventh/profiles/s080diox.pdf>.
131. International Agency for Research on Cancer. "1,4-Dioxane (Group 2B)." Volume 71, 1999: 589. Available at: <http://monographs.iarc.fr/ENG/Monographs/vol71/mono71-25.pdf>.
132. State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment. "Chemicals Known to the State to Cause Cancer or Reproductive Toxicity." Available at: [_www.oehha.ca.gov/prop65/prop65_list/files/P65single120806.pdf](http://www.oehha.ca.gov/prop65/prop65_list/files/P65single120806.pdf).
133. Spath DP. "1,4-Dioxane Action Level." Memorandum from Spath, Chief of the Division of Drinking Water and Environmental Management, Department of Health Services, 601 North 7th Street, Sacramento, California 95814 to George Alexeeff, Deputy Director for Scientific Affairs, Office of Environmental Health Hazard Assessment. March 24, 1998. Available at: www.oehha.ca.gov/water/pals/pdf/PAL14DIOXAN.pdf.
134. U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program. "1,4-Dioxane, CAS No. 123-91-1: Reasonably Anticipated to be a Human Carcinogen."
135. Campaign for Safe Cosmetics. No More Toxic Tub: Getting Contaminants Out of Children's Bath & Personal Care Products. http://safecosmetics.org/downloads/NoMoreToxicTub_Mar09Report.pdf.
136. National Industrial Chemicals Notification and Assessment Scheme. Existing Chemicals Information Sheet on Sodium Lauryl Sulfate factsheet. http://www.dweckdata.com/Research_files/SLS_compendium.pdf
137. For further exploration, see <http://www.treehugger.com/style/common-eco-myth-sodium-lauryl-sulfate-sls-causes-cancer.html>
138. Zorrilla, L., et al (2009). The effects of Triclosan on Puberty and Thyroid Hormones in Male Wistar Rats. *Toxicological Sciences*. 107(1) 56-64.
139. Ahn et al (2008). In Vitro Biologic Activities of the Antimicrobials Triclocarban, Its Analogs, and Triclosan in Bioassay Screens: Receptor-Based Bioassay Screens. *Environ Health Perspectives*. 116(9): 1203–1210.
140. SCCS (Scientific Committee on Consumer Safety), Preliminary opinion on triclosan antimicrobial resistance), 23 March, 2010. European Commission, Brussels.