

Testimony in support of SB 478 – The Toxic Free Kids Act

March 2nd, 2015

To: Members of the Oregon Senate Committee on Environment and Natural Resources
Submitted by: Lindsay Dahl, Director of Policy & Partnerships for Beautycounter

Chair Edwards and Members of the committee, thank you for the opportunity to testify in support of the Toxic Free Kids Act. My name is Lindsay Dahl and I'm the Director of Policy & Partnerships at Beautycounter, an American skin care and cosmetic company.

A few years ago, Beautycounter's founder set out to see if it was possible to make products that would meet the performance demands of the American consumer, without using harmful or toxic ingredients, all while fully disclosing all ingredients used in the product. Our company believes that chemicals linked to harm have no place in the products we put on our bodies every single day. In the two years since the company has launched, we have brought over 70 products to market, created partnerships with established retailers like J.Crew and attracted a major investment from one of the top global investment firms. We have a product line that ranges from children's shampoo to color cosmetics - we make nearly all of our products in the United States - and we would be regulated under this proposed legislation.

For context I would like to shed some light on the current regulatory landscape of our industry. The last time the federal government passed a law to regulate the \$200 billion dollar cosmetics industry was in 1938. The bill text overseeing our industry is a mere 1.5 pages long. The few pieces of oversight that do exist are full of loopholes or are not adhered to.

For example, some will say that ingredients are required to be listed on personal care product packaging, but what they won't tell you is it is common practice for companies to selectively list ingredients. This is one of the reasons we believe the Oregon Health Authority needs to have the ability to require disclosure of chemicals of concern and should be able to enforce such a law.

When Beautycounter formulates a new product, it must meet a few key criteria: does the product perform the way we want it to, are the ingredients safe and do our decisions make good business sense. We define safety much in the same way that Oregon proposes to define safe: using credible, independent science to evaluate a range of hazard end points like cancer, hormone-disruption, and impacts to brain development. Safety isn't just about immediate reactions, it is about long-term health.

Our Ingredient Selection Process uses chemical hazard and alternatives assessment in addition to incorporating appropriate exposure data; all of which are similar in nature to the types of tools outlined in the Toxic Free Kids Act. We use these tools to create safe and beautiful products, but we also use them because it will save our company money over the long term. By looking for the inherent hazards associated with particular

ingredients we stave off costly reformulations and ensure that any alternative ingredients we use are actually safe for the public.

The Toxic Free Kids Act lists 66 chemicals of concern for children's health, which is a really good starting point. None of those chemicals are a surprise to the business community. By comparison, Beautycounter has a list of 1,500 ingredients we will never use in our products, and that's just the first step in our health-protective Ingredients Selection Process.

From Beautycounter's perspective, the Toxic Free Kids Act is a common sense, practical, and achievable approach for the state of Oregon to address chemicals of concern. You can play a much needed leadership role in protecting children from harmful ingredients. You have the opportunity to level the playing field for the business community. And you can help move the market towards safer products.

Chair Edwards and Committee Members, thank you again for the opportunity to share Beautycounter's perspective on Senate Bill 478.