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Public comment in response to the *Modernization of Cosmetics Regulation Act*, Title VIII of the Food and Drug Administration Safety and Landmark Advancements Act of 2022 Discussion Draft

Based upon our analysis, we urge you to strengthen the discussion draft in the following ways:

1. **Definitions (Sec. 604).**

   a. We support the discussion draft's definition of serious adverse event; it is a strong definition. However, we recommend that the language be stricken that requires a serious adverse event to result from "conditions of use (of the product), that are customary or usual" and recommend it be replaced with the more commonly accepted "under conditions of foreseeable use or mis-use of the product." This is a standard that is used in a variety of settings, including by the FDA which requires medical device manufacturers to consider and design to mitigate against "foreseeable use or mis-use;" and by the Cosmetic Ingredient Review (CIR), which includes "foreseeable use" in their definition of conditions of use. This concept was also incorporated into the Frank Lautenberg Chemical Safety Act, which reformed the EPA's Toxic Substances Control Act under a broader condition of use standard that includes: "intended, known and reasonably foreseen conditions of use." Either of these existing standards would be stronger than "conditions of use, that are customary or usual," which creates a loophole for cosmetic companies to skirt responsibility for their use of unsafe ingredients, given that people use cosmetic and personal care products in a myriad of ways that are not "intended."

   (5) SERIOUS ADVERSE EVENT.—The term 'serious adverse event' means an adverse event that— ''(A) results in— ''(i) death; ''(ii) a life-threatening experience; ''(iii) inpatient hospitalization; ''(iv) a persistent or significant disability or incapacity; ''(v) a congenital anomaly or birth defect; or ''(vi) significant disfigurement (including serious and persistent rashes or infections, second- or third-degree burns, significant hair loss, or permanent or significant alteration of appearance), other than as intended, under conditions of foreseeable use or mis-use of the product ~~of use that are customary or usual~~;

   b. A definition of "vulnerable populations" that includes pregnant women, infants, children, and workers should be added to the bill, requiring that they be considered by the FDA and manufacturers when determining ingredient safety. Our suggested definition would read: "The term vulnerable population means a group of individuals within the general population who, due to either greater susceptibility or greater exposure, may be at greater risk than the general population of adverse health effects from exposure to a chemical substance or mixture, such as infants, children, pregnant women, workers, or the elderly."

2. **Adverse Event Reporting (Sec. 605)**.

We support the bill's requirement that serious adverse events be reported to the FDA within 15 days after the report is received by the responsible party. We also support the FDA's ability to get expedited access to a complete list of fragrance or flavor ingredients in the cosmetic product from the responsible person if the agency suspects the ingredients has caused a serious adverse event.

However, we think the reporting of adverse and serious adverse events should be expanded in the following ways:

i. The bill should require public notification and a summary of serious adverse event reports and product recalls, facility suspensions, and cosmetic ingredient suspensions through the FDA Adverse Event Reporting System (FAERS).
ii. The bill should also require non-serious adverse events — such as acute reactions to a cosmetic product — be reported to the FDA annually.

3. **Registration and Product Listing (Sec 607).**

a. We support the requirement that companies to disclose fragrance ingredients to the FDA as a part of their cosmetic ingredient statements. This is critically important information for the FDA to receive because fragrance ingredients make up the majority of the ingredients in a cosmetic product, and the FDA cannot effectively regulate an industry if it does not have knowledge of, and access to, the full universe of ingredients being used to formulate cosmetic products.

> *''(iv) a list of ingredients in the cosmetic product, including any fragrances, flavors, or colors, with each ingredient identified by the name adopted in regulations promulgated by the Secretary, if any, or by the common or usual name of the ingredient; (p. 97)*

b. We also support the other requirements for product and facility registration outlined in the discussion draft; and further support the discussion draft's requirement that a full cosmetic product listing be submitted to the FDA one (1) year after the bill's enactment; and after the bill is enacted, within 120 days after a new product is first marketed, and annually thereafter.

c. We do not, support, however the allowance for companies to "Provide a single listing submission for a cosmetic product (that) may include multiple cosmetic products with identical formulations or formulations that differ only with respect to colors, fragrances, flavors, or quantity of contents." <u>This is extremely problematic because differences in both the constituent ingredients that make up fragrance and flavor formulations as well as the concentration of specific ingredients themselves can have major impacts on human health</u>. This is especially true for vulnerable populations.

4. **Safety Standard (Sec. 608).** The discussion draft establishes the following safety standard for cosmetic products:

''(1) ADEQUATE SUBSTANTIATION OF SAFETY.—The term 'adequate substantiation of safety' means tests or studies, research, analyses, or other evidence or information that is considered, among experts qualified by scientific training and experience to evaluate the safety of cosmetic products and their ingredients, sufficient to support a reasonable certainty that a cosmetic product is safe.

For this or any cosmetic safety bill to be truly health protective and meaningful, it must contain a strong, robust safety standard. This definition falls short in safeguarding consumers' health. We recommend it be strengthened in the following ways:

- Safety should be defined as *a reasonable certainty of no harm*, which has been the standard for the safety of food additives and the colors in cosmetics for more than 50 years.= The bill should include a definition of 'safe' using a "reasonable certainty of no harm" safety standard to guide the safety substantiation of ingredients.

- The safety standard should clearly direct manufacturers to consider long term health effects of ingredient use, including links to cancer and to reproductive and developmental harm, instead of considering only acute reactions like rashes or eye irritation.

- The bill should define and require manufacturers to utilize a definition of 'vulnerable populations' when determining ingredient safety, that would include and protect pregnant women, infants, children, and workers.

- The discussion draft states the Secretary may consider "cumulative or other relevant exposures" but doesn't direct companies to do so even though they are responsible for substantiating the safety of the lion's share of cosmetic ingredients.

- The bill should require that manufacturers to include warning labels for ingredients and products that are not safe — or should be restricted — for use by children and pregnant women.

- The bill should require fragrance suppliers to substantiate the safety of the fragrance and flavorings they formulate and sell to cosmetic companies and to provide the safety data for those safety substantiations to manufacturers.

It appears the discussion draft continues the 80-year exemption that prevents the FDA from taking action to protect the public from coal-tar hair dyes, as long as the label includes a special caution statement, and the product comes with adequate directions for consumers to do a skin test before they dye their hair. This is not acceptable given that these chemicals have been proven to be dangerous to the health of consumers and hair stylists. Coal tar is a known human carcinogen derived from burning coal. It is a complex mixture of hundreds of compounds, many of which are polycyclic aromatic hydrocarbons (PAHs). Coal tar is used in food, textiles, cosmetics, and personal care products. Experimental studies have found that application of and exposure to coal tar produce skin tumors and neurological damage. Coal tar was specifically exempted from the 1938 passage of the Food, Drug and Cosmetic Act because of lobbying by the petroleum industry, despite the fact that even then people understood the dangers of this family of hazardous compounds. We are calling for the coal tar exemption to be removed.

This section of the discussion draft is also problematic because the safety standard for cosmetics and cosmetic products states such products are considered safe "if there is a reasonable certainty that the cosmetic or cosmetic product is not injurious to health under conditions of use suggested or recommended in the labeling, or under ordinary conditions of use if no conditions of use are suggested or recommended in the label."

This definition does not take into account real life uses of cosmetic products. Furthermore, historically this safety standard has primarily been used to address pathogens, bacteria in food and cosmetic products or known toxins not chronic health effects (21 U.S. Code § 342). We instead support tying the safety standard to the EPA's condition of use standard which is defined as "intended, known and reasonably foreseen conditions of use" as opposed to label instructions or the FDA's own condition of use standard for medical device manufacturers to consider and design to mitigate against "foreseeable use or mis-use."

5. **Ingredient Labeling (Sec. 609)**.

We fully support the discussion draft's requirement that the ingredients in professional salon products appear on the product label. Nail and hair salon professionals work on a daily basis with a multitude of cosmetic products made with chemicals known or suspected to cause cancer, respiratory, and neurological and reproductive harm. They need and deserve the same level of ingredient disclosure required by law for cosmetic products marketed to consumers so they can make informed choices about the products they use and determine how to protect their health.

However, we also would like to see the labeling section of the discussion draft expanded to require ingredient disclosure for any web-based sale of a cosmetic or personal care product. On-pack disclosure of the ingredients in retail consumer cosmetic products became the law of the land with the passage of the Fair Packaging and Labeling Act (FPLA) in 1967; but because e-commerce did not even become possible until 25 years later in 1991, the FPLA does not explicitly require nor address this type of ingredient disclosure. This is a problem because more and more consumers are doing their shopping online and are often in the dark as to what the ingredients are in the cosmetic products they are buying online.

We would also like to see the labeling provision expanded to require disclosure of the ingredients in any fragrances, flavors, or colors used in consumer or professional use cosmetic product that are harmful to human health or the environment; and a website disclosure requirement for all fragrance ingredients present in a product at or above 100 ppm. Three of the world's biggest cosmetic companies — Unilever, Procter & Gamble, and Johnson & Johnson — and hundreds of smaller safe cosmetic companies have adopted voluntary fragrance ingredient disclosure policies, responding to consumer and worker demand for greater ingredient transparency and proving in the process of doing so that fragrance disclosure is not only possible, but also profitable.

We support the discussion draft's requirement of disclosing fragrance allergens on product labels. This is a critically important health protection that is already in place in the European Union (EU). Fragrance allergens are responsible for half of all cases of contact dermatitis in the US. These substances pose a risk of harm to a significant proportion of the US population, between 11 and 14 percent. Thus, it is reasonable to require that the presence of fragrance allergens be disclosed on product labels so that consumers who suffer from fragrance allergies have the information they need to avoid these unsafe and, in some cases, life threatening exposures.

However, the draft unnecessarily directs the FDA to determine via regulation one (1) year after bill enactment the list of fragrance allergens to be disclosed under this provision. In 2012, the European Commission Scientific Committee on Consumer Safety reviewed multiple peer-reviewed studies, through a meta-analysis, on the concentrations of fragrance chemicals that cause allergic responses and then used statistical analysis to come up with "safe limits" of 100ppm for rinse-off products and 10ppm for leave-on products. The EU's current list of fragrance allergens is made up of 26 chemicals and there are regulations in place to expand that list to 83 fragrance ingredients well known to be allergens.

We feel strongly that the European Union utilized a sound scientific methodology, and the FDA does not need to invest its limited resources in recreating this list of widely-accepted fragrance allergens and thresholds for disclosure that is already being followed by the world's largest multinationals.

Resource: https://ec.europa.eu/health/scientific_committees/opinions_layman/perfume-allergies/en/about-perfume-allergies.htm#29

SCCS's Formal Opinion:
https://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_102.pdf

Fact sheet: https://ec.europa.eu/health/scientific_committees/opinions_layman/perfume-allergies/en/citizens-summary-allergens.pdf

6. **Records Review (Sec. 610).**

This provision provides the FDA with the authority to inspect records of cosmetic facilities and responsible persons if the agency has reasonable grounds to believe a cosmetic product is adulterated and can cause serious adverse health consequences.

This provision requires the FDA "to provide written notice, at reasonable times, within reasonable limits and in a reasonable manner" in order to gain access to the records of facilities suspected of producing adulterated products that it has reason to believe present a serious adverse health consequence or death. This requirement is far too restrictive and could result in even further harm to public health.

In addition, the section stating that this provision "shall not be construed to extend to recipes (or formulas) for cosmetics…" should be stricken. This is exactly the information the FDA needs to understand and identify the problematic ingredients or concentrations of ingredients in a cosmetic product that is threatening public health.

We also strongly propose the following changes to this section:

- Record-keeping should be a mandatory part of safety substantiation.
- FDA should have access to records, including safety substantiation records, if there are reasonable grounds to believe a cosmetic is adulterated, without the need for an inspection.
- FDA should have electronic access to records.

7. **Mandatory Recall Authority (Sec. 611).**

This is a strong and necessary provision within the discussion draft. We especially appreciate the public notification provision that directs the FDA to issue a press release, public notices, and website descriptions of cosmetic products that have been recalled that include the name of the cosmetic product and the description of risks associated with use of the product.

8. **Federal Preemption (Sec. 614)**

The Senate HELP Committee cosmetic safety discussion draft provides that no state or political subdivision of a state may establish or continue in effect any requirement for cosmetics that is different from or in addition to any requirement laid out in the bill with respect to registration and product listing, good manufacturing practice, recordkeeping, recalls, adverse event report, or safety substantiation.

Ensuring that the federal government does not preempt states' ability to legislate on the issue of cosmetic safety is a core priority of the undersigned organizations and businesses. We are opposed to federal preemption of the states' ability to legislate on cosmetic safety because of the unacceptable precedent it would set, and because it is contrary to the beliefs of federal and state lawmakers on both sides of the aisle who support the inalienable right of the states to protect the health and safety of their citizens. The states have long served as learning laboratories for Congress, accomplishing important pioneering work, including the disclosure and stricter regulation of unsafe cosmetic chemical exposures. It is crucial that this continue.

Dozens of states across the country — including the Senate HELP Committee Chair's and Ranking Member's own states of Washington and North Carolina —- have been at the forefront of protecting their citizens from toxic chemical exposures, passing state-level protections that reflect current science in a nimbler and more health-protective manner than the federal government has been able to accomplish. There needs to be a strong federal standard that protects everyone from unsafe chemicals in beauty and personal care products. When there is a federal high bar for cosmetic safety and transparency in place, Congress does not have to worry that the states will enact contradictory or conflicting legislation, as they will have no reason to do so. Congress should support federal cosmetic safety reform that builds on that state leadership, not legislate to take it away.

9. **Create Fee Authority** (Sec. 806).

We support the creation of a sliding scale fee structure assessed on any entity required to register by the Modernization of Cosmetics Regulation Act of 2022, to support the costs of this program.

10. **Additional Recommendations**

Finally, we feel strongly that this bill should include language that will fill critical gaps in cosmetic safety that affect everyone, but especially communities of color and professional salon workers. Specifically, we encourage your staff to incorporate into the *Modernization of Cosmetics Regulation Act of 2022* the cosmetic safety protections proposed in the four bills that make up the Safer Beauty bill package:

HR 5537: Toxic Free Beauty Act.

The Senate cosmetics safety bill should direct the FDA to promulgate regulations that deem as adulterated the use of the following chemicals in both retail and professional use cosmetics sold in the United States:

1. Dibutyl phthalate (DBP)
2. Diethylhexyl phthalate (DEHP)
3. Formaldehyde
4. Paraformaldehyde

5. Methylene glycol
6. Quaternium-15
7. Mercury
8. Isobutylparaben
9. Isopropylparaben 1
0. m-Phenylenediamine and its salts
11. o-Phenylenediamine and its salts

These 11 chemicals have been banned from cosmetic products by the states of California and Maryland as well as the European Union because of their direct links to cancer, birth defects and reproductive harm, yet they are present in beauty and personal care products sold legally in the United States.

The Senate cosmetic safety bill should also ban the entire class of perfluoroalkyl and polyfluoroalkyl substances (PFAS) chemicals from cosmetic products sold in the United States. PFAS chemicals are linked to breast cancer, birth defects, thyroid disease, liver damage, decreased fertility, and hormone disruption. They pollute the air and water and persist in the environment forever. A recent Clearya search of 50,000 beauty and personal care products found 1,000 products from 120 brands contained at least one intentionally added PFAS chemical. PFAS that wash down the drain because of their use in personal care and beauty products contribute to the PFAS-contaminated drinking water that millions of Americans are dealing with.

Colorado lawmakers approved legislation on May 11 that would ban the entire class of PFAS chemicals from cosmetics sold in the state. The sweeping legislation which also includes a ban on PFAS in carpets and rugs, fabric treatments, food packaging, juvenile products, oil and gas products, textiles furnishings and upholstered furniture, among other things, is awaiting the governor's signature. Furthermore, there are four other states poised to enact legislation that would also prohibit the use of PFAS chemicals in cosmetics (CA, MN, NY and MA). These toxic chemicals have been banned by a number of states from firefighter foam, food packaging, juvenile products and textiles, and have no business being in personal care products we slather on our bodies and children.

HR 5538: Cosmetic Fragrance and Flavor Ingredient Right to Know Act.

The Senate cosmetic safety bill should require the disclosure of the secret, unlabeled fragrance and flavor chemicals in personal care products that are toxic to human health and the environment.

No federal law currently requires the disclosure of fragrance or flavor ingredients to consumers or regulatory agencies. This loophole allows dozens – sometimes even hundreds – of chemicals to hide under the word "fragrance" on the labels of beauty and personal care products with no regulatory oversight of the safety of those ingredients. The same loophole exists for flavors, which appear frequently in products like flavored lip gloss and chap-sticks marketed to children. Anyone using personal care or beauty products is at risk of being exposed to secret hazardous fragrance and flavor chemicals and related harmful chronic health concerns, particularly vulnerable populations such as babies, children, communities of color, professional salon workers and pregnant women. The presence of unknown, unlabeled toxicants is cause for serious concern because scientific evidence suggests that unsafe chemical exposures in our everyday lives can harm human and environmental health.

The magnitude of the potential danger to human health is worsened by the fact that fragrance chemicals are found in more than 95% of personal care products such as shampoos, conditioners, hair styling products, antiperspirants and shaving products, as well as fine fragrances, body sprays

and lotions. In a national survey, over 34% of respondents in the U.S. reported health problems, such as migraine headaches and respiratory difficulties, in response to exposure to fragranced products. Recent data compiled by Women's Voices for the Earth reveals that a third of all fragrance chemicals currently in use have been flagged as potentially toxic by scientists around the world. Additionally, personal care product testing conducted by Breast Cancer Prevention Partners in 2018 revealed that three out of four hazardous chemicals identified in the products tested were fragrance ingredients. Fragrance chemicals also pose significant occupational risks. Professional salon workers are disproportionately exposed to fragrances in the workplace. Hairdressers and beauticians have a 47-fold higher risk of fragrance skin allergies than people in other occupations. The California Work-Related Asthma Prevention Program has documented that the use of fragranced products in the workplace is associated with work-related asthma. Chemicals intended to impart flavor can also have harmful health impacts. flavors listed on the International Organization of the Flavorings Industry (IOFI) list are on the California Department of Toxic Substances Control's Candidate Chemicals List linking them to human health or environmental harm.

The Modernization of Cosmetics Regulation Act of 2022 should require:

- On pack disclosure of any fragrance or flavor chemicals that appear on the 21 designated hazard lists referenced by the bill (including any updates to these designated lists).
- On pack disclosure of EU 26 fragrance allergens (including any updates to this regulation).
- Website disclosure of the hazardous chemicals that are required to appear on product labels, plus any other fragrance or flavor ingredients intentionally added to the finished cosmetic product at or above 100 ppm (the current mainstream industry best practice represented by what P&G and Unilever and J&J are currently doing; and the fragrance disclosure requirement for cleaning products sold in California and New York).

HR 5540: Cosmetic Safety for Communities of Color and Professional Salon Workers Act of 2021.

The Senate cosmetic safety bill should also create cosmetic safety protections for communities of color and professional salon workers, two vulnerable populations who are most at risk of unsafe exposures because of toxic chemicals in the products marketed to them or commonly found in their workplaces.

Potentially hazardous exposures for nail and hair salon workers include, but are not limited to, polish hardeners, thinners, plasticizers, bleaches, conditioners, detergents, dyes, fixatives, relaxers, and straighteners that are most often used as commercially prepared mixtures. For six days a week and 8 to 10 hours a day, nail and hair salon workers are exposed to an array of dangerous chemicals from professional/personal care products, and the cumulative impact of these exposures over time are cause for concern. One survey showed that 10% of nail salon staff worked while they were pregnant, and 8% of workers knew a worker who had reproductive complications, such as birth defects, miscarriages, stillbirths, and difficulty with conceiving. In a population-based retrospective study of cosmetologists and manicurists in California, researchers found that women who work in this industry are at greater risk for adverse birth outcomes and maternal health complications. Additionally, those working with acrylic nails were more likely to report health problems, such as nose irritation, allergies, skin irritation, stress, pain, coughing, nausea, difficulty breathing, asthma as well as miscarriages. The work environment of hairdressers has also been reported to contain exposures that can be harmful for reproductive health and can cause cancer, skin irritation, and allergic diseases.vi The combination of hazardous chemicals, inadequate access to information, lax regulatory standards and enforcement, and a large immigrant workforce with cultural and language

obstacles underscores the need for stronger federal cosmetic safety protections for this particularly vulnerable population.

In their personal lives, women of color also suffer from a higher level of exposure to unsafe chemicals in the beauty products aggressively marketed to them – including hair dyes, hair relaxers and straighteners, skin lighteners, feminine douches, and some deodorants. These products contain chemicals linked to breast and ovarian cancer, uterine fibroids, reproductive harm, and more. This toxic exposure is of particular concern to Black women because they purchase and use more beauty products per capita than any other demographic and face many health disparities, including the highest breast cancer mortality rate of any U.S. racial or ethnic group. Studies show that women of color have higher levels of beauty product-related environmental chemicals in their bodies and even small exposures to toxic chemicals over time can trigger adverse health consequences. For instance, a recent NIEHS study found higher rates of breast cancer associated with the use of hair straighteners and permanent hair dye among black women: African American women who regularly dye their hair face a 60% increased risk of breast cancer compared to an 8% increased risk for white women.

The Modernization of Cosmetics Regulation Act of 2022 should:

- Create a grants program to research the chemicals of concern in products marketed to communities of color and used by professional beauty, hair, and nail salon workers; the marketing tactics used by companies to sell these products; and develop community and salon education and interventions to respond to the problem.
- Create an EPA grants program to create green chemistry solutions to hazardous chemicals in beauty products marketed to women of color and used by professional salon workers. Require the increased access to Safety Data Sheets (SDS) by salon owners and salon workers; and translated SDS in English, Chinese, Korean, Vietnamese, Spanish and other languages upon request.
- Create an Interagency Council for the purpose of sharing data and promoting collaboration on cosmetic safety concerns impacting communities of color, salon workers and other vulnerable populations.
- Authorize the Secretary to request and utilize toxicity, use, exposure, and safety data for chemicals used in cosmetics from other federal agencies and reputable sources.
  Direct the FDA to consult with the Office of Minority Health and convene a meeting and advisory committee of community stakeholders to identify and consider ingredients linked to adverse health effects in salon workers and women and girls of color.

HR 5539: Cosmetic Supply Chain Transparency Act.

Finally, the Senate cosmetic safety bill should require upstream suppliers to provide ingredient disclosure and safety data to cosmetic companies so that the companies have the information they need to make safer products.

The cosmetic supply chain is made up of multiple entities ranging from suppliers of raw materials, formulating laboratories responsible for manufacturing private label products, suppliers of fragrance and flavor formulations, packagers and chemical companies to the brand owner who puts its name on the product label. Not surprisingly, transparency, ingredient disclosure and quality control within the cosmetic supply chain varies enormously. However, regardless of whether the flow of information along the cosmetic supply chain is accurate or not, it is the brand owner who carries the ultimate liability for the safety of the constituent ingredients and final product. Conversely, upstream

contract manufacturers and ingredient suppliers are hidden from public scrutiny, review, and accountability, even from the FDA.

No federal law currently requires the disclosure of ingredients or any other kind of transparency among entities in the cosmetic industry supply chain. Both large and small brand owners carry reputational risk in the marketplace when they cannot obtain the accurate and reliable information they need from their suppliers to ensure they are making and selling the safest beauty and personal care products possible.

The Modernization of Cosmetics Regulation Act of 2022 should require:

- That upstream supplier, including fragrance houses, formulating laboratories, contract manufacturers, and suppliers of ingredients, raw materials, and finished products, to provide to cosmetic companies upon request
- Full ingredient disclosure including ingredient names and chemical identity numbers (Chemical Abstract Service or CAS).
- Toxicity and safety data for each chemical ingredient.
- Certificate of analysis for raw materials.
- Contaminant testing results.
- That suppliers of fragrance or flavor or preservative systems or other ingredient formulations provide full ingredient disclosure to brand owners.
- That formulating laboratories and contract manufacturers provide full ingredient disclosure and contaminant reports for private label, finished cosmetic products sold to retailers and other cosmetic companies.
- Certificates of analyses and contaminant testing reports for the raw materials suppliers sell to cosmetic companies, including the analytical testing method used and limits of detection.
- Toxicity and safety data for cosmetic ingredients and finished cosmetic products including contaminants that the supplier suspects might be present.
- Penalties on suppliers who do not provide this data and information to brand owners who request it.

On behalf of the ninety-six businesses, environmental health and justice organizations, consumer groups, worker rights and health care organizations that endorsed this public comment, we appreciate your attention and the opportunity to submit this in-depth feedback to the *Modernization of Cosmetics Regulation Act,* Title VIII of the Food and Drug Administration Safety and Landmark Advancements Act of 2022 discussion draft of the FDASLA Act of 2022. Breast Cancer Prevention Partners and its Campaign for Safe Cosmetics stand ready to work with you to implement these important recommendations.

Sincerely,

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