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Assembly
California Legislature

ASSEMBLY COMMITTEE ON
ENVIRONMENTAL SAFETY AND TOXIC MATERIALS
BILL QUIRK, CHAIR
ASSEMBLYMEMBER, TWENTIETH DISTRICT

AGENDA

Tuesday, January 14, 2020
1:30 p.m. -- State Capitol, Room 444

1.	AB 495	Muratsuchi	Cosmetics: safety.

Date of Hearing: January 14, 2020

ASSEMBLY COMMITTEE ON ENVIRONMENTAL SAFETY AND TOXIC MATERIALS
Bill Quirk, Chair
AB 495 (Muratsuchi) – As Amended January 6, 2020

SUBJECT: Cosmetics: safety

SUMMARY: Amends the Sherman, Food, Drug and Cosmetic Act (Sherman Act) to define when a cosmetic is adulterated. Specifically, **this bill**:

1) Establishes the Toxic-Free Cosmetics Act.

2) Determines that a cosmetic is adulterated if it contains any of the following:

   a) Any amount of asbestos, either naturally occurring in, or intentionally added to the cosmetic;

   b) Beginning January 1, 2023, lead in exceedance of a de minimis amount in the cosmetic;

   c) Beginning January 1, 2022, any amount of the following intentionally added ingredients:
      i) Dibutyl phthalate;
      ii) Diethylhexyl phthalate;
      iii) Formaldehyde;
      iv) Paraormaldehyde;
      v) Methylene glycol;
      vi) Quaternium-15
      vii) Mercury;
      viii) Isobutylparaben;
      ix) Isopropylparaben;
      x) M-Phenylenediamine and O-Phenylenediamine;
      xi) The following long-chain per- and polyfluoroalkyl substances (PFASs) and their salts:
         (1) Perfluorooctane sulfonate (PFOS);
         (2) Perfluorooctanoic acid (PFOA);
         (3) Perfluorodecanoic acid (PFDA); and,
         (4) Perfluorononanoic acid (PFNA).
      xii) Any other chemical or contaminant identified in regulation by the California Department of Public Health (CDPH).

3) Requires, by January 1, 2022, the Office of Environmental Health Hazard Assessment (OEHHA) to, by July 1, 2021, adopt an allowable de minimis level of lead that may be in a cosmetic without adulterating the cosmetic.

4) Authorizes CDPH to identify additional chemicals and contaminants that warrant a cosmetic being determined as adulterated. Requires that chemicals and contaminants CDPH identifies as being adulterated are listed as a candidate chemical pursuant to the state's Green Chemistry program.

5) Requires, if CDPH adopts an allowable de minimis level of a chemical or contaminant that may be present in a cosmetic without adulterating the cosmetic, that the de minimis level is to be determined by OEHHA and to be protective of the health of sensitive subpopulations including, but not limited to, pregnant women, infants, and children.

6) Provides that failure to comply with any of the following is a violation of the Sherman Act:

   a) The requirements of the Sherman Act;
   b) A request by the Division of Environmental and Occupational Disease Control (Division) pursuant to existing statutory authority for information, data, or statistics; and,
   c) Guidelines or instructions issued by the Division to implement the Sherman Act.

7) Requires the Division to report all violations of the Sherman Act to the Department of Justice.

EXISTING LAW:

1) Requires, pursuant to the federal Food, Drug & Cosmetic Act (FD&C Act), cosmetics produced or distributed for retail sale to consumers for their personal care to bear an ingredient declaration. (21 Code of Federal Regulations (CFR) 701.3)

2) Pursuant to the Sherman Act:

   a) Defines "cosmetic" as any article, or its components, intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to, the human body, or any part of the human body, for cleansing, beautifying, promoting attractiveness, or altering the appearance. Provides that the term "cosmetic" does not include soap. (Health & Safety Code (HSC) § 10990)

   b) Considers any cosmetic to be adulterated if it bears or contains any poisonous or deleterious substance that may render it injurious to users under the conditions of use prescribed in the labeling or advertisement of the cosmetic, or under conditions of use as are customary or usual. (HSC § 111670)

3) Requires, pursuant to the Safe Consumer Cosmetic Act (Cosmetics Act), a manufacturer of a cosmetic subject to regulation by the federal Food and Drug Administration (FDA) to submit to CDPH a list of its cosmetic products sold in California that contain any ingredient that is a chemical identified as causing cancer or reproductive toxicity. (HSC § 111792)

4) Prohibits, pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), a person, in the course of doing business, from knowingly and intentionally exposing any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual. (HSC § 25249.6)

5) Requires the Department of Toxic Substances Control (DTSC), under the State's Green Chemistry regulations, to establish a process to identify and prioritize chemicals or chemical ingredients in consumer products that may be considered a chemical of concern. (HSC § 25252) Requires DTSC to develop and maintain a list of Candidate Chemicals that exhibit a hazard trait and/or an environmental or toxicological endpoint and is either 1) found on one

or more of the statutorily specified authoritative lists or 2) is listed by DTSC using specified criteria. (California Code of Regulations (CCR) § 69502.2 (b))

FISCAL EFFECT: Unknown.

COMMENTS:

Need for the bill: According to the author, "No one knowingly wants to use face powder contaminated with asbestos, lipstick that contains lead, or baby shampoo with formaldehyde. AB 495 would clarify in statute that cosmetics containing some of the most well-known carcinogens, reproductive toxicants, and endocrine disruptors are adulterated cosmetics, and cannot be sold in the state, protecting Californians against harmful chemicals in cosmetic products they use every day."

Public health concerns with cosmetics: Cosmetic products are sold to consumers across California, including to children who are still in the formative years of development. These products are used as part of daily beauty and cleansing routines, often times on the skin's most sensitive areas, like the face, eyelids, and lips. Cosmetic products are most heavily used by women, including those of childbearing age, increasing the likelihood of exposing mothers, fetuses, and nursing children to substances that can cause cancer and reproductive toxicity. That is why it is so important that cosmetic products are safe, properly labeled, and free of contamination.

Cosmetic products contain a wide variety of chemical ingredients to which cosmetic users and workers are exposed on a daily basis. According to the United States Department of Labor, "These exposures can 'add up,' especially when many products are being used at the same time [and] the products are used day after day."

Specific dangers of cosmetics sold in California: Various cosmetic products have been found to be toxic and, in some instances, acutely harmful to people. Asbestos in children's cosmetic products is a recent example. As a part of routine monitoring, the FDA, in 2017, first became aware of reports of asbestos contamination in certain cosmetic products sold by Claire's and Justice retailers. Those tests confirmed the presence of asbestos in three of the product samples collected from Claire's and one of the product samples collected from Justice. (Claire's, which sells, according to its website, "the latest trends in jewelry & accessories for girls, teens, & tweens," had more than 2,400 locations in North America and Europe as of last August.)

No amount of asbestos exposure is safe. More asbestos accumulates in the body with every exposure, and there is no known way to reverse the cellular damage it causes. Asbestos is believed to cause mesothelioma, a type of cancer affecting the lining of the chest and abdomen, and is linked to an increased risk of other forms of cancer and lung disease.

State cosmetic regulatory requirements: California has two laws governing the safety of cosmetics.

The first is the Sherman Act, which is administered by CDPH to regulate cosmetics. It broadly defines a cosmetic as any article, or its components, intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to, the human body, or any part of the human body, for cleansing, beautifying, promoting attractiveness, or altering the appearance.

Pursuant to the Sherman Act, any cosmetic is considered to be adulterated "if it bears or contains any poisonous or deleterious substance that may render it injurious to users."

It is not perfectly clear how CDPH defines "poisonous," "deleterious," or "injurious;" CDPH has not promulgated regulations concerning this provision. Generally, the terms are used in reference to a substance that causes injury, illness, or death, and to something that is damaging or harmful. In theory, any cosmetic that contains an ingredient, for instance, on the Proposition 65 list as a chemical known to the state of California to cause cancer or reproductive toxicity, such as mercury, formaldehyde, or asbestos – depending on dosage and how much is applied per the label's instructions – could be considered "adulterated" under the Sherman Act.

Since 2014, CDPH's Food and Drug's program has issued 11 enforcement actions under the Sherman Act for adulterated or mislabeled cosmetics due to the *presence* of a contaminant, including five for mercury contamination in face creams; microbial adulteration in tattoo ink; and, other actions based on pharmaceutical or biological contaminants.

The other law is the California's Cosmetics Act, established by SB 484 (Migden, Chapter 729, Statutes of 2005). It requires that for all cosmetic products sold in California, the manufacturer, packer, and/or distributor named on the product label shall provide CDPH a list of all cosmetic products that contain any ingredients known or suspected to cause cancer, birth defects, or other reproductive harm. CDPH maintains an active, searchable database with all of the data collected from manufacturers under the Cosmetics Act. It is required to make that data user-friendly and available to the public. Anyone can search the database for a type of product; a specific product name; or, a brand or company name to get more information about whether a product contains a covered chemical. To date, 613 companies have reported 75,279 products to CDPH. CDPH does not have any enforcement authority or penalty authority over the manufacturers that are covered, so not all manufacturers are currently complying and submitting their products' information. There is no way to compel these manufacturers to comply.

Federal cosmetics regulatory requirements: Neither the FDA nor CDPH require premarket safety testing, review, or approval of cosmetic products.

Under the FD&C Act, cosmetics and their ingredients are not required to be approved before they are sold to the public, and the FDA does not have the authority to require manufacturers to file health and safety data on cosmetic ingredients or to order a recall of a dangerous cosmetic product.

As it relates to labeling under the federal law, cosmetics produced or distributed for retail sale to consumers for personal use are required to have an ingredient declaration. Under the FD&C Act, cosmetic ingredients are required to be identified by the names established or adopted by regulation; those determined by the FDA as exempt from public disclosure may be stated as "and other ingredients" (21 CFR 701.3(a)). The FD&C Act exempts chemicals used as fragrances or flavoring from being identified as ingredients on the labels of cosmetic products. Therefore, not only do products not have to be approved as safe by the FDA before they are sold, but they are not even required to disclose their ingredients, thereby denying consumers the ability to determine a product's safety.

The FDA conceded about the asbestos in products sold at Claire's, "that it did not have the authority to force Claire's to pull the potentially dangerous products off store shelves."

According to the New York Times (NYT), the American cosmetics industry is a $70 billion per year industry. The FDA's Office of Cosmetics and Colors (Office) has an annual budget of just $8 million and 27 staff members. The FDA does not have the resources to ensure the safety of imported cosmetics; it inspects less than one percent of the three million cosmetics shipments that come into the United States every year. Among those that it does test, roughly 15 percent are found to be contaminated or to contain dangerous ingredients.

The NYT states, "The laws governing the [Office's] authority run just two pages long and have not been updated since 1938, when they were first enacted. Such meager tools leave federal officials nearly powerless to regulate the makeup, lotions, toothpastes, deodorants and other elixirs that often are applied to the most intimate parts of the human body."

On March 5, 2019, the FDA stated, "When it comes to cosmetics, our authority hasn't changed in many years even as the industry has undergone rapid evolution. Right now, when it comes to cosmetics, companies and individuals who market these products in the U.S. hold the responsibility for the safety and labeling of their products. This means that ultimately a cosmetic manufacturer can decide if they'd like to test their product for safety and register it with the FDA. To be clear, there are currently no legal requirements for any cosmetic manufacturer marketing products to American consumers to test their products for safety."

Enhancing government oversight of cosmetic safety: Under the Sherman Act, it is unlawful for any person to manufacture, sell, deliver, hold, or offer for sale any cosmetic that is adulterated, and it is unlawful for any person to adulterate any cosmetic. (HSC § 111700 and 111705)

AB 495 would augment the definition of "adulterated" by providing direction to CDPH on how to enforce that provision of the law.

Specifically, the bill would define an adulterated cosmetic as having any of the following: any amount of asbestos, either naturally occurring in, or intentionally added to, the cosmetic; lead in exceedance of a to be determined de minimis amount (beginning January 1, 2023); and, the following intentionally added ingredients: dibutyl phthalate; diethylhexyl phthalate; formaldehyde; paraformaldehyde; methylene glycol; quaternium-15; mercury; isobutylparaben; isopropylparaben; m-Phenylenediamine and o-Phenylenediamine; PFOS; PFOA; PFNA; and, PFNA and their salts.

What we know about the chemicals listed in the bill vis-à-vis the EU: The EU, which includes 28 member countries mostly across Europe, develops policies to ensure the free movement of people, goods, services and capital within the internal market, and enacts legislation to maintain common policies to have cohesion amongst the 28 members on things from trade to agriculture. The EU Cosmetics Directive (Directive) was adopted in 1976 and formed on the basis of commonly agreed to safety standards relative to cosmetics. This Directive was reevaluated in 2009 and an EU-wide Cosmetics Products Regulation was enacted in July 2013.

EU regulation No 1223/2009 on cosmetics establishes rules to be complied with by any cosmetic product made available on the market, in order to ensure the functioning of the internal market and a high level of protection of human health. The regulation defines "cosmetic product" as "any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the

mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odors." The scope of products covered under the EU's definition is broader than the scope of products covered under California's definition.

Annex II of regulation No 1223/2009 lists the substances prohibited in cosmetic products. All of the chemicals listed in AB 495 have been fully banned in the EU under Annex II.

Given the global market place and manufacturers distributing products worldwide, AB 495 proposes to follow the EU's science and ban chemicals that have been banned by the EU for use in cosmetic products. Manufacturers that sell products in both the United States and Europe, like Lancôme or Estée Lauder, that are complying with the EU cosmetics regulation could sell those EU-compliant products in California under this bill.

Furthermore, safe and affordable cosmetic products are currently sold in California without the chemicals listed in the bill. Many of the alternative ingredients are comparable in price or more affordable (see chart in Assembly Environmental Safety & Toxic Materials Committee analysis for AB 495, page 9, April 9, 2019).

Intentionally added ingredients versus naturally occurring contaminants: With some cosmetics, heavy metals can remain a concern. Many contaminants in our environment are naturally occurring, like arsenic and hexavalent chromium, as well as asbestos and lead. These naturally occurring contaminants can be present in minerals or absorbed by plants used to make cosmetic ingredients. Beautycounter, a cosmetics manufacturer, acknowledges on its website that "companies are not intentionally adding heavy metals to cosmetics. Instead, they are typically contaminants that tag along with both mineral and synthetic ingredients used to give products color." Beautycounter further states, "...it became clear that getting to zero heavy metal contamination – while always the goal – simply wasn't going to be an option across the board."

In recognition of the distinction between intentionally added or not, AB 495 proposes to acknowledge that lead is naturally occurring and provides it can be present in a cosmetic at a de minimums level, to be determined by OEHHA. The bill bans all of the rest of the chemicals, save asbestos, as intentionally added. The FDA is actively working with cosmetic manufacturers to help them ensure "that talc used in any cosmetic product is free from asbestos." With respect to that federal position, AB 495 prohibits the presence of asbestos whether naturally occurring or intentionally added.

But how does this jive with the EU cosmetics regulation? Article 17 of Annex II of the EU cosmetic regulation 1223/2009 states: "The non-intended presence of a small quantity of a prohibited substance, stemming from impurities of natural or synthetic ingredients, the manufacturing process, storage, migration from packaging, which is technically unavoidable in good manufacturing practice, shall be permitted provided that such presence is in conformity with Article 3." (Article 3 provides that a cosmetic product made available on the market shall be safe for human health when used under normal or reasonably foreseeable conditions of use.)

Since AB 495 is following the EU's lead on chemical bans to simplify what rules global manufacturers must comply with, this presents a conflict for banning chemicals in California without a similar clause. The chemicals listed in Section 111673 would not be provided a safe harbor for "technically unavoidable" trace amounts, as the EU provides in Article 17.

To better conform with the EU's approach, the bill should acknowledge that some natural contaminants may be unavoidable in cosmetic production (while others may be avoidable) and provide immunity from violation of selling an adulterated product in the event that trace amounts of certain naturally occurring contaminants are present.

The Committee may wish to consider adopting the following amendment to clarify how trace amounts of unintentionally added ingredients should be treated:

> Add to §111673: *(e) If any cosmetic product, made through good manufacturing processes intended to comply with this Part, contains a chemical listed in (c) or identified by (d) that is not intentionally added and is technically unavoidable or present due to migration from other sources, the chemical shall not cause the product to be considered adulterated under this Part.*

Option to add more chemicals to the list: The chemicals listed in the bill do not represent a finite list of chemicals that can determine adulteration. Section 111673(d) allows CDPH to ban additional chemicals and/or contaminants if they are listed as a candidate chemical on the DTSC Green Chemistry list. Additionally, it would require CDPH, if it adopted an allowable de minimis level of a chemical or contaminant that may be in a cosmetic without adulterating the cosmetic, the de minimis level shall be determined by OEHHA.

As the language is written, CDPH is given broad authority to consider other chemicals/contaminants, yet that authority could be considered discretionary due to the word "may." Therefore, the Committee may wish to consider reconciling those two sentences as follows:

> (d) The department may identify additional chemicals and contaminants ~~*that*~~ *only if such chemicals and contaminants* satisfy the following conditions:

In addition, the bill requires CDPH to only consider chemicals and contaminants that are listed on DTSC's Green Chemistry Candidate Chemical List. The Candidate Chemical list is an amalgam of 22 designated, authoritative lists of chemical health hazard traits. To more closely conform the bill to the EU's cosmetic regulatory chemical bans, which are risk-based, and are what informed the language in §111673 (a)-(c), a reference to the EU regulation should replace the Candidate Chemical list reference.

Amend Section 111673 (d) (1) as follows:

> (1) The contaminant or chemical is listed *under Annex II of the European Union's Regulation No 1223/2009 of the European Parliament and of the Council of 30 November 30, 2009, on cosmetic products and its updates* ~~as a candidate chemical pursuant to Article 2 (commencing with Section 69502) of Chapter 55 of Division 4.5 of Title 22 of the California Code of Regulations~~.

Developing de minimis levels for lead and other potential chemicals: In §111673 (b) and (d)(2), OEHHA would be required to develop a de minimis level for chemicals in cosmetics that is an amount that would not constitute an adulteration of the product under the Sherman Act.

OEHHA would likely evaluate the types of exposures associated with different types of cosmetics for this new mandate, such as pathways of exposure (e.g., direct application to and

uptake by the skin, potential for oral exposure); the physical nature of the cosmetic (e.g., whether it affects skin absorption); quantities of the type of cosmetic typically used; 'receptors' – types of people on which it is applied (infants, women, children, etc.); and, toxicology literature.

Given all of those factors, it is important to note that not all cosmetics would necessarily have the same level of a particular chemical. Therefore, the Committee may wish to consider changing "de minimis level" to "de minimis concentration" throughout the bill.

Also, with respect to OEHHA's timing for determining the de minimis levels, the dates in Section 111673 (b) are confusing, and OEHHA could be provided more time to meet the mandate. The Committee may wish to clarify the timing in §111673 (b) and to clean up the language in both (b) and (d)(2) as follows:

> (b) Beginning ~~January~~ *July* 1, 2023, lead above a de minimis amount in the cosmetic. ~~By January 1, 2022,~~ the Office of Environmental Health Hazard Assessment shall, by July 1, 2021, adopt an allowable de minimis ~~level~~ *concentration* of lead that may be in a cosmetic without adulterating the cosmetic. The allowable de minimis ~~level~~ *concentration* shall comply with the requirements specified in paragraph (2) of subdivision (d).
>
> (d)(2) If the department adopts an allowable de minimis ~~level~~ *concentration* of a chemical or contaminant that may be in a cosmetic without adulterating the cosmetic, the de minimis ~~level~~ *concentration* shall be determined by the Office of Environmental Health Hazard Assessment and shall be protective of the health of sensitive subpopulations, including, but not limited to, pregnant women, infants, and children.

Furthermore, the author may wish to consider working with OEHHA on the timelines in the bill to ensure they are prudent and workable given fiscal resources and the implementation date in the bill.

Enforcement on adulterated cosmetics: The bill adds these provisions to the Sherman Act, thereby placing enforcement under the current enforcement authorities of CDPH pursuant to the Sherman Act. Under current law, if any person violates the Sherman Act, CDPH can assess a civil penalty against that person of up to $1,000 (HSC § 111855). Furthermore, if a cosmetic is alleged to be adulterated, CDPH is required to commence proceedings in the superior court in the jurisdiction in which the cosmetic is located (HSC § 111880).

Arguments in support: According to CALPIRG, Environmental Working Group, and Breast Cancer Prevention Partners, "Unlike many other countries around the world, personal care and cosmetics products sold in California and the United States today are largely unregulated. Federal and state laws do not require regulators to ensure that these products are safe, and manufacturers do not have to share any safety information with government entities … Californians, unfortunately, remain unprotected. According to the California Safe Cosmetics Program, at least 88 different carcinogens and reproductive toxicants are intentionally added to cosmetics sold in California today … Because their harmful health effects are well documented, all of the chemicals listed in AB 495 are banned from use in cosmetics sold in the European Union."

Arguments in opposition: According to the Personal Care Products Council, American Chemistry Council, et al, "Decades of consumer experience and post-market surveillance have shown that our products are among the safest product categories regulated by the U.S. Food And

Drug Administration (FDA) … In addition to federal law, the personal care products industry has collaborated with a variety of stakeholders to establish strong California regulations that provide consumers with the confidence they need to purchase a product … The personal care products industry holds sacred the trust families put in the safety of their products. Companies take their responsibility for safety very seriously. While the stated intent of AB 495 is to align with current European Union regulation, the bill fails to do so and, consequently, is fatally flawed."

Double referral: Should this bill be approved by the Assembly Environmental Safety & Toxic Materials Committee with the committee amendments, it will be referred to the Assembly Health Committee, where the amendments shall be adopted.

Related legislation:

1) AB 228 (Aguiar-Curry). Would provide that, under the Sherman Act, a cosmetic is *not* adulterated because it includes industrial hemp, or cannabinoids, extracts, or derivatives from industrial hemp. This bill was held in the Assembly Appropriations Committee.

2) SB 574 (Leyva). Would require a cosmetics manufacturer to disclose to CDPH any cosmetic products that contain a fragrance ingredient or flavor ingredient that is included on one of 27 state, federal, and international designated lists of chemicals, and a list of each fragrance ingredient and flavor ingredient in the cosmetic product. This bill was held in the Assembly Appropriations Committee.

3) AB 2775 (Kalra, Chapter 393, Statutes of 2018). Requires a professional cosmetic manufactured on or after July 1, 2020, for sale in this state to have a label affixed on the container that satisfies all of the labeling requirements for any other cosmetic pursuant to the FD&C Act and the federal Fair Packaging and Labeling Act.

4) SB 258 (Lara, Chapter 830, Statutes of 2017). Requires a manufacturer of a cleaning product manufactured or sold in California on or after July 1, 2018, to disclose each ingredient contained in the product on the product label.

5) AB 2125 (Chu, Chapter 564, Statutes of 2016). Requires DTSC to publish guidelines for cities, counties, and cities and counties to voluntarily implement local Healthy Nail Salon programs. Requires the guidelines to include, but not be limited to, specified criteria, such as the potential for exposure of nail salon workers and customers to chemicals.

6) SB 928 (Simitian, 2010). Would have required manufacturers to disclosure the chemical content of specified types of cleaning products sold in California. This bill was held in the Assembly Appropriations Committee.

REGISTERED SUPPORT / OPPOSITION:

Support

Environmental Working Group-EWG (Cosponsor)
California Public Interest Research Group-CalPIRG (Cosponsor)
Breast Cancer Prevention Partners (Cosponsor)

7th Generation Advisors
American College of Obstetricians and Gynecologists District IX
Badger Body Care
Beautycounter
Biossance
Black Women for Wellness
Breast Cancer Action
Breast Cancer Over Time
C'est Moi
California Alliance for Retired Americans
California Baby
California Clean
California Health Coalition Advocacy
California Healthy Nail Salon Collaborative
California League of Conservation Voters
California Product Stewardship Council
Center for Environmental Health
Clean Water Action
Coalition for Clean Air
Consumer Attorneys of California
Consumer Federation of California
Earth Mama
Eco Plum Sustainable Swag
Educate. Advocate.
Eighty2degrees Design Studio
Environment America
Environment California
Empower Family California
EO Essential Oils
Everyone for Everybody
Friends Committee on Legislation of California
Han Skincare
Innersense Organic Beauty
Juice Beauty
Just the Goods
Makes 3 Organics
Marin Bee
National Stewardship Action Council
Natural Resources Defense Council (NRDC)
One Hundred Percent Pure
Oz Naturals
Physicians for Social Responsibility - San Francisco Bay Area Chapter
Seventh Generation
Seventh Generation Advisors
Sierra Club
Sierra Club California
Skin Owl
Smart Oakland
Sprout San Francisco

US PIRG
Women's Voices for the Earth

Opposition

American Chemistry Council
California Chamber of Commerce
California Manufacturers & Technology Association
Fragrance Creators Association
Household and Commercial Products Association
Personal Care Products Council
Southwest California Legislative Council

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