

April 1, 2024

Chair Wood and Vice-Chair Brumsted  
House Human Services Committee  
Vermont State House  
115 State Street, Room 46  
Montpelier, VT 05633-5301

**RE: Comments on amendment for S.25**

Chair Wood and Vice-Chair Brumsted,

On behalf of the members of the Personal Care Products Council (PCPC)<sup>1</sup> I am writing to express our support for recent amendments and request further clarity for S.25 as passed by the Senate, which aims to ban chemicals in cosmetics and other product categories. PCPC appreciates the intent of the bill and seeks additional amendments to harmonize the bill with other recently enacted state laws.

PCPC is the leading national trade association representing cosmetics and personal care products companies and serving as the voice on scientific, regulatory, legislative and international issues for the global cosmetics industry. PCPC and its member companies have a long history of going above and beyond what is required by law and working on public policy with various stakeholders at all levels of government. In Vermont, the industry employs more than 9,530 residents and contributes more than \$665 million to the state's GDP.

**PCPC seeks harmonization with other recently enacted state laws**

Having successfully worked with other jurisdictions, PCPC supports a phase out of intentionally added PFAS in cosmetics and is seeking amendments to S.25 to provide regulatory certainty and harmonization with other states. For example, California AB 2771 was signed by Gov. Newsom in September 2022, phasing out all PFAS in cosmetics as of 2025.

PCPC supported the Modernization of Cosmetics Regulation Act (MoCRA) of 2022, which was signed into law by President Biden on Dec. 29, 2022 and several provisions went into effect Dec. 29, 2023. MoCRA establishes a comprehensive regulatory framework for cosmetics products and ingredients and also requires the U.S. Food and Drug Administration (FDA) to conduct a comprehensive safety study on PFAS in cosmetics.

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<sup>1</sup> Founded in 1894, the Personal Care Products Council (PCPC) is the voice and advocate for 600 member companies representing the \$529.3 billion global cosmetics and personal care products industry. PCPC's members represent approximately 90% of the U.S. beauty industry and are some of the most beloved and trusted brands in beauty and personal care today. As the manufacturers, distributors and suppliers of a diverse range of products millions of consumers rely on every day – from sunscreens, toothpaste and shampoo to moisturizer, makeup and fragrance – PCPC's member companies are global leaders committed to product safety, quality and innovation.

**Specific concerns with draft 1.1 of S.25 amendment as currently drafted:**

- 1. PCPC requests removing formaldehyde releasing agents' class and the definition (FRA) in § 1681 (3) and supports the addition of specific FRA's in § 1682 (a)(4), (16), and (17). PCPC requests removing words following "formaldehyde."**
- 2. PCPC requests deleting ortho-phthalates as a class in §1682 (a)(1) and the definition in § 1681 (7). PCPC supports the addition of specific phthalates in § 1682 (a)(11) and (15).**

PCPC thanks the committee for the new amendments and requests minor amendments to S.25 to harmonize with other state laws. We welcome the opportunity for further dialogue. Thank you for your consideration and the opportunity to comment.

Sincerely,



Kelsey Johnson  
Vice President, State Government Affairs

Cc: Necrason Group  
Associated Industries of Vermont