



April 22, 2024

Dear Chair Lyons and members of the Senate Health and Welfare Committee:

Thank you for your work on S.25 and for your attention to the safety of cosmetic and personal care products. It is our understanding that the Senate Health and Welfare committee will be considering the House passed version of S.25 and may be seeking to change the limits on lead from 10ppm to below the current allowable lead limit.

To borrow from the FDA website: “Lead occurs naturally in the environment, and its occurrence, as an impurity, in cosmetic products can’t be avoided.”¹

The reason we support the current version with lead at a 10ppm limit is because our raw material and packaging suppliers will not commit to a limit that is below industry standard for a small company in Vermont. The lowered limits will require Autumn Harp to ensure a lower standard to which we cannot hold our supply chain accountable. Please don’t set a new standard for lead without understanding what the consequences would be for small manufacturers like Autumn Harp. A new lead standard, or any new standards that stray from market leaders like California or the EU, could place many of our manufacturing relationships at risk which could have ripple effects on our workforce.

This limit might go against someone trying to do the environmentally positive thing. For example, you would see higher lead content with a natural mineral sunscreen in a post-consumer recycled content plastic tube than you would with a chemical sunscreen in a virgin plastic tube.

We currently do everything in our power to ensure that we make safe products. We are committed to protecting the environment and our employees while providing safe, quality consumer products. That will not change.

Thank you,

Hillary Burrows

Hillary Burrows
President

¹ <https://www.fda.gov/cosmetics/cosmetic-products/limiting-lead-lipstick-and-other-cosmetics>