

April 30, 2024

Chair Ginny Lyons and Vice Chair David Weeks
Senate Committee of Health and Welfare
Vermont State House
115 State Street, Room 17
Montpelier, VT 05633-5301

RE: Coalition Comments on House passed version of S.25

Chair Lyons, Vice Chair Weeks, and Committee Members:

On behalf of the members of the undersigned organizations, we are writing to express opposition to any changes to the internationally recognized 10ppm limit on lead contamination in cosmetic and menstrual products currently in S.25 as passed by the House.

The undersigned organizations represent business and community interests throughout Vermont and the nation. There are local cosmetic and personal care manufacturers that would be negatively affected by changes to the lead limit, and Vermont consumers would be denied access to products widely recognized as safe. In Vermont, the cosmetic and personal care industry employs more than 9,530 residents and contributes more than \$665 million to the state's GDP.

We request that the 10ppm lead limit be retained to harmonize with Federal guidance and countries such as Canada and many others. Lead is never intentionally added to cosmetics, personal care products or menstrual products. Any reduction in the 10ppm lead abandons federal and international regulatory precedent for these products.

Lead is a naturally occurring heavy metal and ubiquitous in the environment, including soil, air, and water. It even exists within the earth's crust at more than 10ppm.¹ Indeed, no other regulatory body prohibits lead in cosmetics below 10ppm, in recognition of the fact that lead occurs naturally in the environment. Reducing this standard would impose unrealistic, unreasonable, and likely unachievable requirements for the development and production of many personal care products.

The organizations below hold sacred the trust families have put in the safety of their products. Local manufacturers have invested tremendous resources in scientific research and safety processes to ensure they are complying with all laws and regulations while providing safe products to consumers.

For all the reasons above, we ask that you retain the House-passed provisions addressing lead in cosmetics and menstrual products. We would welcome the opportunity to continue working with you on this legislation. Thank you for your consideration.

Sincerely,

Personal Care Products Council | Associated Industries of Vermont | Vermont Retail & Grocers Association

¹ National Institutes of Health - [Lead | Pb \(Element\) - PubChem \(nih.gov\)](#)