

**Testimony of M. Isabelle Chaudry**  
**Senior Policy Manager**  
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**on**  
**Building Consumer Confidence by Empowering FDA to Improve Cosmetic Safety**  
**Before the**  
**Subcommittee on Health**  
**of the**  
**House Committee on Energy and Commerce**  
**December 4, 2019**

Thank you for the opportunity to testify. My name is M. Isabelle Chaudry and I am the Senior Policy Manager at the National Women's Health Network, a D.C. - based women's health advocacy organization. We are supported by a national network of individual members and do not accept financial support from drug- or device-makers or personal care product manufacturers. We shape policy, support consumer health decisions, and monitor the actions of federal regulatory and funding agencies, the health care industry, and the health professions. We also identify and expose health care abuses, and mobilize grassroots action for women's health issues.

There are several critical issues and loopholes in federal cosmetic regulation that allow manufacturers to use dangerous ingredients in their products and evade full disclosure of the chemicals contained in those products, and then sell those products to the American public, all of which puts consumers' health at risk. Understanding the safety of the ingredients in cosmetics is imperative to the overall health of women and girls, both their long-term health and the significant impact on their reproductive health. What is at issue here is the ability to conceive and carry a pregnancy to term as well as the ability to survive through and post menopause without experiencing certain diseases, such as ovarian cancer. Practicing good hygiene and self-care should not create a risk for infertility.

Cosmetics and personal care products include skin moisturizer, soap, perfume, lipstick, fingernail polish, makeup, hair products, and deodorant, as well as any substance intended for use as a component of a cosmetic or personal care product. Cosmetic and personal care products are a disproportionately large source of chemical exposure for women and girls in this country. On average, women use 12 products containing 168 unique ingredients every day.<sup>1</sup> By contrast, men use six products daily, with 85 unique ingredients.<sup>2</sup>

Vulnerable and underserved women, and girls in particular, may be disproportionately affected by environmental chemical exposures.<sup>3</sup> The data on U.S. reproductive-age women suggest that the bodies of women of color have higher levels of certain endocrine-disrupting chemicals, such as phthalates and parabens, than those of white women, and that these racial and ethnic differences are not explained by socioeconomic status.<sup>4</sup> Research shows that even low exposures to toxic chemicals during critical periods of development, such as pregnancy, can trigger adverse health consequences, including impacts on fertility and pregnancy, cancer, and neurodevelopment.<sup>5</sup> The Federation for Obstetrics and Gynecology recommended that reproductive health professionals recognize the disproportionate burden to toxic chemical

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<sup>1</sup> Environment Working Group, <https://www.ewg.org/Personal-Care-Products-Safety-Act-Would-Improve-Cosmetics-Safety>.

<sup>2</sup> Environmental Working Group, <https://www.ewg.org/Personal-Care-Products-Safety-Act-Would-Improve-Cosmetics-Safety>.

<sup>3</sup> Ami R. Zota and Bhavna Shamasunder, *The Injustice of Beauty: Framing Chemical Exposures From Beauty Products as a Health Disparities Concern*, AJOG, (2017) [https://www.ajog.org/article/S0002-9378\(17\)30862-1/fulltext](https://www.ajog.org/article/S0002-9378(17)30862-1/fulltext).

<sup>4</sup> James-Todd, T.M., Chiu, Y.-H., and Zota, A.R., *Racial/ethnic disparities in environmental endocrine disrupting chemicals and women's reproductive health outcomes: epidemiological examples across the life course*, *Curr Epidemiol Rep*, 2016; 3: 161–180, <https://www.ncbi.nlm.nih.gov/pubmed/28497013>; Varshavsky, J.R., Zota, A.R., and Woodruff, T.J. *A novel method for calculating potency-weighted cumulative phthalates exposure with implications for identifying racial/ethnic disparities among US reproductive-aged women in NHANES 2001-2012*, *Environ Sci Technol*, 2016, 50: 10616–10624, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5748889/>; Branch, F., Woodruff, T.J., Mitro, S.D., and Zota, A.R., *Vaginal douching and racial/ethnic disparities in phthalates exposures among reproductive-aged women: National Health and Nutrition Examination Survey 2001-2004*, *Environ Health*, 2015, 14: 1–8 <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-015-0043-6>; Kobrosly, R.W., Parlett, L.E., Stahlhut, R.W., Barrett, E.S., and Swan, S.H., *Socioeconomic factors and phthalate metabolite concentrations among United States women of reproductive age*, *Environ Res*, 2012; 115: 11–17, <https://www.sciencedirect.com/science/article/abs/pii/S0013935112000916>.

<sup>5</sup> Ami R. Zota, Bhavna Shamasunder, *The environmental injustice of beauty: framing chemical exposures from beauty products as a health disparities concern*, AJOG, (2017) [https://www.ajog.org/article/S0002-9378\(17\)30862-1/fulltext](https://www.ajog.org/article/S0002-9378(17)30862-1/fulltext).

exposure in certain patient populations and also to champion policies that secure environmental justice.<sup>6</sup> Their report concludes that:

Policies to address toxic chemicals must shift the burden of proof of safety of chemicals from the individual healthcare provider, the patient, and the public to the manufacturers before they are released into the environment.<sup>7</sup>

Under current law, dangerous chemicals used in personal care products are still not banned, restricted, or even required to be studied for their safety. Take talc, for instance, which can be contaminated with asbestos and also can be linked to cancer. It is typically found in cosmetic products such as facial powders and personal care products, including baby powder. The FDA was first warned about this type of contamination in the early 1970s, and it has gotten renewed attention in recent years.

In December of 2017, independent testing uncovered possible asbestos contamination in makeup kits sold by Claire's, a national makeup and accessories retail store for girls.<sup>8</sup> Independent testing in 2019 once again found asbestos contamination in products sold by Claire's, Justice – another national retail chain for girls – and cosmetics maker Beauty Plus Global.<sup>9</sup> Just as recently as October of this year, Johnson & Johnson recalled 33,000 bottles of a product after the FDA discovered evidence of asbestos in one of the bottles.<sup>10</sup>

As with many public policy issues, however, Black women are disproportionately affected. According to a 2015 case control study conducted in Los Angeles, 44 percent of Black women use talcum powder as part of a feminine hygiene routine, compared to only 30 percent of white

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<sup>6</sup> Di Renzo, G.C., Conry, J.A., Blake, J. et al., *International Federation of Gynecology and Obstetrics opinion on reproductive health impacts of exposure to toxic environmental chemicals*, Int J Gynaecol Obstet, 2015; 131: 219–225, [https://www.figo.org/sites/default/files/uploads/News/Final%20PDF\\_8462.pdf](https://www.figo.org/sites/default/files/uploads/News/Final%20PDF_8462.pdf).

<sup>7</sup> Di Renzo, G.C., Conry, J.A., Blake, J. et al., *International Federation of Gynecology and Obstetrics opinion on reproductive health impacts of exposure to toxic environmental chemicals*, Int J Gynaecol Obstet, 2015; 131: 219–225, [https://www.figo.org/sites/default/files/uploads/News/Final%20PDF\\_8462.pdf](https://www.figo.org/sites/default/files/uploads/News/Final%20PDF_8462.pdf).

<sup>8</sup> Emily Volz, Wjar , *Consumer Advocate: Claire's pulls children's makeup after family finds asbestos*, (December 22, 2017) <https://turnto10.com/i-team/consumer-advocate/claures-pulls-childrens-makeup-after-barrington-family-finds-asbestos>.

<sup>9</sup> *Asbestos found in Claire's, Beauty Plus Global cosmetics*, beasleyallen, (June 11, 2019) <https://www.beasleyallen.com/news/asbestos-found-in-claires-beauty-plus-global-cosmetics/>.

<sup>10</sup> Tiffany Hsu and Roni Caryn Rabin , *Johnson & Johnson Recalls Baby Powder Over Asbestos Worry*, (October 18, 2019) <https://www.nytimes.com/2019/10/18/business/johnson-johnson-baby-powder-recall.html>.

women.<sup>11</sup> Feminine hygiene use of talcum powder is part of a self-care routine for many Black women. Genital powder use, however, may be a modifiable risk factor for epithelial ovarian cancer, the deadliest of all gynecologic cancers.<sup>12</sup> In 2016, a University of Virginia study found that African American women who used talcum powder for feminine hygiene had more than a 40 percent increased risk of cancer.<sup>13</sup>

We know that, in many cases, companies have actively targeted and marketed talc-based products contaminated with asbestos to Black and Latina women,<sup>14</sup> who remain most affected by a range of reproductive health and comprehensive care barriers and related adverse maternal health risks and outcomes.

And we now know more about how companies targeted certain populations, despite having evidence that their products may be harmful. Internal documents Johnson & Johnson, one of the country's largest producers of personal care products containing talc, showed how its marketing efforts focused on the "right place," and "under developed geographical areas with hot weather, and higher AA [African American] population."<sup>15</sup> Johnson & Johnson distributed Baby Powder samples through churches and beauty salons in African-American and Hispanic neighborhoods, ran digital and print promotions with weight-loss and wellness company Weight Watchers, and launched a \$300,000 radio advertising campaign in a half-dozen markets aimed at reaching "curvy Southern women 18-49 skewing African American."<sup>16</sup>

Black women and women of color are particularly at risk because the cosmetic and personal care products marketed and sold to them often contain the most harmful ingredients. In one study by the Environmental Working Group "of 1,177 beauty and personal care products marketed to

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<sup>11</sup> Ronnie Cohen, *Why You Shouldn't Put Baby Powder Down There*, Huffington Post, (June 3, 2016) [https://www.huffpost.com/entry/talc-linked-to-ovarian-cancer-risk-in-african-american-women\\_n\\_5751a1d8e4b0ed593f142915](https://www.huffpost.com/entry/talc-linked-to-ovarian-cancer-risk-in-african-american-women_n_5751a1d8e4b0ed593f142915).

<sup>12</sup> *Association between Body Powder Use and Ovarian Cancer: the African American Cancer Epidemiology Study*, AACES, (2016), <https://cebp.aacrjournals.org/content/early/2016/05/12/1055-9965.EPI-15-1281.full-text.pdf>.

<sup>13</sup> *Association between Body Powder Use and Ovarian Cancer: the African American Cancer Epidemiology Study*, AACES, (2017), <https://cebp.aacrjournals.org/content/early/2016/05/12/1055-9965.EPI-15-1281.full-text.pdf>.

<sup>14</sup> Susan Berfield, Jef Feeley, and Margaret Cronin Fisk, *Johnson & Johnson Has a Baby Powder Problem*, Bloomberg, (March 31, 2016) <https://www.bloomberg.com/features/2016-baby-powder-cancer-lawsuits/>.

<sup>15</sup> Chris Kirkham and Lisa Girion, *As worries about Baby Powder's safety mounted, J&J focused its pitches on minority, overweight women*, Reuters, (April 9, 2019) <https://www.reuters.com/investigates/special-report/johnsonandjohnson-marketing/>.

<sup>16</sup> Chris Kirkham and Lisa Girion, *As worries about Baby Powder's safety mounted, J&J focused its pitches on minority, overweight women*, Reuters, (April 9, 2019) <https://www.reuters.com/investigates/special-report/johnsonandjohnson-marketing/>.

Black women, about one in 12 was ranked highly hazardous.”<sup>17</sup> Another study found similar results – personal care products marketed to Black women were found to include “highly hazardous” ingredients at a far higher rate than products marketed to the general population.<sup>18</sup>

Under current law, the FDA is not required to review any of these ingredients and indeed has not done so. What’s more, many of these ingredients do not have to be disclosed to consumers but can instead be hidden behind words such as “fragrance.” Companies are not required to disclose the ingredients in the fragrances used in their products, which leaves consumers unaware of the actual chemicals included in the products they purchase. Studies have shown the harmful ingredients often used to formulate “fragrance” are linked to cancer, reproductive health effects, developmental health effects, birth defects and more.<sup>19</sup> We know that “fragrance” can include one or more of about 3,000 chemicals. In 2015, Woman Voices for the Earth published a study examining the thousands of chemicals used by the fragrance industry and demonstrating that many have been identified as chemicals of concern by authoritative governing bodies but were not being examined by the International Fragrance Association and its research arm.<sup>20</sup> Many of the chemicals were linked to cancer or reproductive harm. The report was a result of more than six years of research and persistent watchdogging of the fragrance and cosmetic industries.

In 2016, the Breast Cancer Prevention Partners, the BCPP, set out to investigate whether some of the biggest beauty, personal care, and cleaning brands were hiding unlabeled toxic ingredients in their products.<sup>21</sup> Their report tested 140 cleaning products and personal care products for volatile organic compounds, and 32 personal care and cleaning products for hidden fragrance ingredients.

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<sup>17</sup> Paul Pestano, Nneka Leiba, and Brit’ny Hawkins, *Big Market For Black Cosmetics, But Less Hazardous Choices Limited*, Environmental Working Group (2016), <https://www.ewg.org/research/big-market-black-cosmetics-less-hazardous-choices-limited>.

<sup>18</sup> Helm, Nishioka, Brody et al., *Measurement of endocrine disrupting and asthma-associated chemicals in hair products used by Black women*, Environmental Research 2018 (165): 448-458. [www.sciencedirect.com/science/article/pii/S0013935118301518](http://www.sciencedirect.com/science/article/pii/S0013935118301518).

<sup>19</sup> Paula I. Johnson et al., *Cosmetics Containing Ingredients Linked to Cancer or Reproductive Harm*, Data Reported to the California Safe Cosmetics Program 2009-2015, <https://www.cdph.ca.gov/Programs/CCDCPHP/DEODC/OHB/CSCP/CDPH%20Document%20Library/DataReport.pdf>.

<sup>20</sup> Alexandra Scranton, *Unpacking the Fragrance Industry: Policy Failures, the Trade Secret Myth and Public Health*, *Woman’s Voices for the Earth*, Women’s Voices for the Earth, (2015) [https://www.womensvoices.org/wp-content/uploads/2015/11/Fragrance\\_Industry\\_Report\\_Final.pdf](https://www.womensvoices.org/wp-content/uploads/2015/11/Fragrance_Industry_Report_Final.pdf).

<sup>21</sup> Janet Nudelman and Connie Engel, *Right to Know: Exposing toxic fragrance chemicals in beauty, personal care and cleaning products*, Breast Cancer Prevention Partners (2018) [https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP\\_Right-To-Know-Report\\_Secret-Toxic-Fragrance-Ingredients\\_9\\_26\\_2018.pdf](https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP_Right-To-Know-Report_Secret-Toxic-Fragrance-Ingredients_9_26_2018.pdf).

Shockingly, out of the 25 personal care and beauty products BCPP tested, the product with the most toxic chemicals was a children's shampoo marketed to Black girls, in a hair relaxing kit called Just For Me.<sup>22</sup> This product, made by an international hair products manufacturer called Strength of Nature, contained 24 chemicals linked to chronic health effects, 71 percent of which were fragrance chemicals that did not appear on the label. This is especially concerning since the product is marketed to and used by children, whose bodies are especially vulnerable to endocrine-disrupting chemicals.<sup>23</sup> This kids shampoo was found to be even more toxic than some of the cleaning products that were tested.<sup>24</sup>

Black women experience one of the highest rates of pre-term births, preeclampsia, fibroids and a host of other maternal health issues. Many factors contribute to the disproportionate disease burden Black women experience, including structural racism and discrimination in the health care system.

Other vulnerable populations affected by this issue include workers. Research shows that salon workers are at greater risk for certain health problems compared to other occupations.<sup>25</sup> Salon workers<sup>26</sup> face disproportionate incidence of cancer, neurological diseases, immune diseases, birth defects, reproductive disorders, skin diseases, asthma, and breathing problems.<sup>27</sup> Workers

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<sup>22</sup> Janet Nudelman and Connie Engel, *Right to Know Exposing toxic fragrance chemicals in beauty, personal care and cleaning products*, Breast Cancer Prevention Partners (2018) [https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP\\_Right-To-Know-Report\\_Secret-Toxic-Fragrance-Ingredients\\_9\\_26\\_2018.pdf](https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP_Right-To-Know-Report_Secret-Toxic-Fragrance-Ingredients_9_26_2018.pdf).

<sup>23</sup> Janet Nudelman and Connie Engel, *Right to Know Exposing toxic fragrance chemicals in beauty, personal care and cleaning products*, Breast Cancer Prevention Partners (2018) [https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP\\_Right-To-Know-Report\\_Secret-Toxic-Fragrance-Ingredients\\_9\\_26\\_2018.pdf](https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP_Right-To-Know-Report_Secret-Toxic-Fragrance-Ingredients_9_26_2018.pdf).

<sup>24</sup> Janet Nudelman and Connie Engel, *Right to Know Exposing toxic fragrance chemicals in beauty, personal care and cleaning products*, Breast Cancer Prevention Partners (2018) [https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP\\_Right-To-Know-Report\\_Secret-Toxic-Fragrance-Ingredients\\_9\\_26\\_2018.pdf](https://d124kohvtz1951.cloudfront.net/wp-content/uploads/2018/09/26092837/BCPP_Right-To-Know-Report_Secret-Toxic-Fragrance-Ingredients_9_26_2018.pdf).

<sup>25</sup> *Beauty and It's Beast: Unmasking the Impacts of toxic chemicals on salon workers*, Women's Voices for the Earth (2014) <https://womensvoices.org/wp-content/uploads/2014/11/Beauty-and-Its-Beast.pdf>.

<sup>26</sup> The U.S. Bureau of Labor Statistics estimates there are 1.2 million people employed in this sector working as hairdressers, hairstylists, cosmetologists, barbers, nail salon workers, and other beauty and personal care workers. 94.8% of hairstylists and hairdressers and 85.1% of other personal appearance workers are women. House Hold Data Annual Averages, Bureau of Labor Statistic, <https://www.bls.gov/cps/cpsaat11.pdf>.

<sup>27</sup> *Beauty and It's Beast: Unmasking the Impacts of toxic chemicals on salon workers*, Women's Voices for the Earth (2014) <https://womensvoices.org/wp-content/uploads/2014/11/Beauty-and-Its-Beast.pdf>.

in the beauty industry, who are predominantly women of color and immigrant women, can also face occupational health hazards from chemicals in professional cosmetic products.<sup>28</sup>

Other countries have far surpassed the U.S. in assuring cosmetic safety. The EU<sup>29</sup> and Canada<sup>30</sup> require cosmetic manufacturers to list any fragrance allergen on the package. The EU has also banned or restricted more than thirteen hundred (1,300) toxic ingredients for cosmetic use.<sup>31</sup> Numerous states, including Minnesota,<sup>32</sup> California,<sup>33</sup> and Washington,<sup>34</sup> have adopted safe cosmetics legislation. The state of California passed the Cleaning Product Right to Know Act, S.B. 258, which requires cleaning companies to disclose all of the chemicals linked to cancer or reproductive or developmental harm, either on the package or on their website.<sup>35</sup> Starting January 1, 2020, the manufacturer of a cleaning product will now have to disclose whether any of the chemicals in its products are linked to these issues. Why are we doing this for cleaning products and not for cosmetic and personal care products? Most people use cleaning products once a week, but we use cosmetic and personal care products every day. It seems that the only

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<sup>28</sup> Adewumi-Gunn, T.A., Ponce, E., Flint, N., and Robbins, W. *A preliminary community-based occupational health survey of black hair salon workers in South Los Angeles*, J Immigr Minor Health. 2016; 1–7 [https://www.ajog.org/article/S0002-9378\(17\)30862-1/fulltext#back-bib21](https://www.ajog.org/article/S0002-9378(17)30862-1/fulltext#back-bib21) ; Quach, T., Gunier, R., Tran, A. et al., *Characterizing workplace exposures in Vietnamese women working in California nail salons*, Am J Public Health, 2011; 101: S271–S276, [https://www.ajog.org/article/S0002-9378\(17\)30862-1/fulltext#back-bib22](https://www.ajog.org/article/S0002-9378(17)30862-1/fulltext#back-bib22); Quach, T., Tsoh, J.Y., Le, G. et al., *Identifying and understanding the role of key stakeholders in promoting worker health and safety in nail salons*, J Health Care Poor Underserved, 2015; 26: 104–115, [https://www.ajog.org/article/S0002-9378\(17\)30862-1/fulltext#back-bib23](https://www.ajog.org/article/S0002-9378(17)30862-1/fulltext#back-bib23).

<sup>29</sup> Fragrance Allergens Labelling, European Commission, [https://ec.europa.eu/growth/sectors/cosmetics/products/fragrance-allergens-labelling\\_en](https://ec.europa.eu/growth/sectors/cosmetics/products/fragrance-allergens-labelling_en).

<sup>30</sup> Cosmetic advertising, labelling and ingredients, Government of Canada, <https://www.canada.ca/en/health-canada/services/cosmetics/cosmetic-advertising-labelling-ingredients.html>.

<sup>31</sup> Oliver Milman, *US cosmetics are full of chemicals banned by Europe – why?*, The Guardian, (May 22, 2019) <https://www.theguardian.com/us-news/2019/may/22/chemicals-in-cosmetics-us-restricted-eu>.

<sup>32</sup> Minnesota (House Bill 458) banned formaldehyde, a cancer-causing chemical, in children’s personal care products like lotions, shampoos and bubble baths in 2013. The ban against the use of formaldehyde and formaldehyde-releasing preservatives applies to products intended for children under eight. <https://legiscan.com/MN/text/HF458/id/731206>.

<sup>33</sup> California passed state legislation governing the safety and reporting of cosmetic ingredients. The California Safe Cosmetics Act requires manufacturers to disclose to the state any product ingredient that is on state or federal lists of chemicals that cause cancer or birth defects. [http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb\\_0451-0500/sb\\_484\\_bill\\_20051007\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb_0451-0500/sb_484_bill_20051007_chaptered.pdf).

<sup>34</sup> The state of Washington adopted the Children’s Safe Product Act (CSPA – Chapter 70.240 RCW), which requires manufacturers of children’s products, including personal care products, sold in Washington to report to the state if their product contains a Chemical of High Concern to Children. <https://app.leg.wa.gov/RCW/default.aspx?cite=70.240>

<sup>35</sup> California Legislative Information, [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180SB258](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB258).

reason this category is not regulated is that it is a category that overwhelmingly serves women and disproportionately affects women of color.

At the federal level, proposals such as Rep. Schakowsky's Safe Cosmetics and Personal Care Products Act of 2019 provide meaningful protections for consumers. For example, Ms. Schakowsky's bill would mandate full fragrance ingredient disclosure by manufacturers, the FDA, the suppliers to manufacturers, and by manufacturers to consumers. Dangerous fragrance ingredients, including allergens and chemicals linked to cancer and reproductive harm, should be disclosed to consumers to allow them to protect their health and avoid the substances they wish to avoid. Chairman Pallone has also introduced a proposal on cosmetic safety that would finally give the FDA the power to review cosmetic ingredients and actually recall products that pose a health risk.

I strongly recommend that this committee continue to consider legislation that meaningfully protects women and girls from harmful cosmetic ingredients. Optimally, cosmetics companies should be required to prove that their products are safe before they can market them to consumers. However, at a minimum, FDA must have the capacity to ban or restrict chemicals that are known to be dangerous to human health must be able to be banned or restricted. Legislation should allow consumers to be able to know what is in the products they use. Cosmetic companies should be forced to actively monitor the safety of their products and to alert the FDA about dangerous products, like talc products contaminated with asbestos. The FDA should absolutely have the power to recall products that threaten our health. Finally, states should not be precluded from providing additional protections against harmful cosmetic products to their residents.

For far too long, women and girls have been subject to dangerous products that negatively affect their health. In June of this year, the National Women's Health Network wrote a letter to the Energy and Commerce Committee, which was signed by 42 other national, state, and local organizations. Today we urge you, as we did in June, "to include the strongest possible safeguards to protect women's health," in cosmetics legislation.

We thank you, Chairman Pallone, for your efforts to modernize cosmetics law, and we stand ready to work with the committee to pass meaningful legislation that fully protects the public health.