



March 23, 2017

The Honorable Ricardo Lara
California State Senate
State Capitol, Room 5050
Sacramento, CA 95814

Re: CA Cleaning Product Right to Know Act (SB 258/Lara) - SUPPORT

Dear Senator Lara:

As Co-Founder and Chief Purpose Officer of The Honest Company, I am writing to thank you for making cleaning product transparency a top priority in the California legislature. I appreciate this opportunity to express our company's support for the Cleaning Product Right to Know Act (SB 258) and offer an industry perspective on why ingredient labeling is good for consumers – and good for business.

At The Honest Company, we have seen first hand the growing demand for clarity into the products people use every day. Recognizing this consumer mandate for transparency, we made the decision from day one to list the ingredients in our cleaning products on our labels. We are not required to do so under current law, but we know it's what consumers are looking for and we believe it is the right thing to do. We work diligently to identify suppliers and manufacturers who share our standards for safety and transparency, and we will not partner with those who insist on keeping ingredients – including fragrance ingredients – secret.

The reason is simple: we believe people have the right to know. This goes for consumers who are purchasing products to use in their own homes; and it is especially important for those in the workforce who are disproportionately exposed to chemicals in cleaning products. As opponents of SB 258 have stated, it is true that certain federal and state regulatory programs (e.g. Federal Hazardous Substances Act and Prop 65) already exist to provide some safeguards via warnings for proper use, storage, and handling of hazardous chemicals based on usage thresholds. But it is also true that many ingredients in cleaning products are not deemed hazardous yet can still trigger serious respiratory reactions in users. The Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) warn that "Chemicals in some cleaning products can cause asthma or trigger asthma attacks. Some cleaning products contain hazardous chemicals that can enter the body through skin contact or from breathing gases into the lungs." (Source: <https://www.cdc.gov/niosh/docs/2012-126/>). This is especially concerning for people who have allergies or increased sensitivity to certain common chemicals – much like allergies to certain common foods. Without mandatory ingredient labeling, people are unaware if any of their own specific triggers are present in the cleaning products they are using in their homes or workplaces.

To be clear, we are not advocating for disclosure of confidential business information (CBI) or trade secrets, such as product formulations, ingredient percentages, or composition. The fact is that today's technology is sophisticated enough that any cleaning product manufacturer can reverse



engineer a competitor's product to determine the chemicals used therein. What we don't know – and what no one is arguing should be disclosed – is the “recipe” each of us uses to make our products.

Moreover, the actions of many of the biggest companies in the cleaning industry – including Clorox, SC Johnson, and others – show that CBI concerns are overstated. These companies are already listing ingredients in their cleaning products on their websites or via third parties like Smart Label. While this information is still relatively hard to find for the average consumer, these companies clearly recognize the consumer demand for ingredient transparency and are voluntarily responding with online ingredient lists. Therefore these companies are not genuinely concerned that such disclosure equates to revelation of trade secrets.

The fact remains, however, that consumers do not have easy access to ingredient information when these lists are only available online. In terms of enabling consumers to make informed decisions about the products they are buying – particularly when it comes to avoiding chemicals that may trigger allergic or respiratory reactions – it is critical that manufacturers list the ingredients *on label* so that consumers have access to ingredient information at point of sale.

Finally, it is simply untrue that listing ingredients on label would be logistically complicated or too costly for manufacturers to comply. Label updates are part of the standard portfolio management for any product. So long as manufacturers are given a reasonable period of time from enactment to enforcement of SB 258, including an allowance for sell-through of inventory already in market, companies will be able to incorporate ingredient lists into their label updates without bearing any additional costs associated with compliance.

In closing, we believe people have the right to know what goes into the cleaning products they are using every day. And we believe that transparency will ultimately spur innovation, promote business growth, and pave the way for even better consumer protection. As you work to move SB 258 through the State Legislature, The Honest Company looks forward to serving as resource to you and your colleagues. Thank you again for your leadership on this important right-to-know issue.

Sincerely,

Christopher Gavigan

Co-Founder and Chief Purpose Officer

The Honest Company