



**Kiss Off:
Saying “No” to
Toxic Lip Products**

U.S. PIRG
Education Fund

Kiss Off: Saying “No” to Toxic Lip Products

U.S. PIRG Education Fund

**Written by:
Dev Gowda and Kara Cook-Schultz, U.S. PIRG Education Fund**

February 2018

Acknowledgments

U.S. PIRG Education Fund thanks individual contributors for their generous support of our work on toxics, public health, and consumer issues. Special thanks to Sharima Rasanayagam, Ph.D. and Janet Nudelman of Breast Cancer Prevention Partners for their review, and Tara O’Gorman and Nathan Larkin for their research assistance.

The authors bear responsibility for any factual errors. Policy recommendations are those of U.S. PIRG Education Fund. The views expressed in this report are those of the authors and do not necessarily reflect the views of our funders or those who provided review.

2018 U.S. PIRG Education Fund. Some Rights Reserved. This work is licensed under the Creative Commons Attribution-NonCommercial-NoDerivatives 4.0 International License. To view a copy of this license, visit <http://creativecommons.org/licenses/by-nc-nd/4.0/> or send a letter to Creative Commons, PO Box 1866, Mountain View, CA 94042, USA. All images of products and labels were taken by U.S. PIRG Education Fund after purchasing the products.

With public debate around important issues often dominated by special interests pursuing their own narrow agendas, U.S. PIRG Education Fund offers an independent voice that works on behalf of the public interest. U.S. PIRG Education Fund, a 501(c)(3) organization, works to protect consumers and promote good government. We investigate problems, craft solutions, educate the public, and offer meaningful opportunities for civic participation. For more information about U.S. PIRG Education Fund or for additional copies of this report, please visit www.uspirgedfund.org.

Report layout and cover: Kathryn Lee

Contents

Executive summary.....	5
Introduction.....	6
Toxic chemicals found in lip products.....	6
Parabens and fragrance.....	7
Safer alternative products.....	14
Recommendations.....	21

Executive Summary

Lip products are used by most Americans every day. In fact, 81 percent of women and 39 percent of men use lipstick or lip balm products.¹ Unfortunately, the ingredients in these products are barely regulated, and many major brands use toxic chemicals in these products.

Research into major lip product brands sold across the United States reveal that big-name manufacturers such as L'Oréal, Maybelline, and Chapstick contain chemicals that are harmful. Some of these ingredients, like parabens and fragrance, are linked to cancer, reproductive problems, and other negative health effects.

Unfortunately, these toxic chemicals are also found in products that are intended for those most vulnerable: children. Up to 15 percent of girls under the age of 12 use lipstick – and more and more brands are selling “dessert-flavored” lip products to appeal to children.² These products contain many of the same dangerous ingredients that adult lipstick contains.

This consumer guide includes some potentially dangerous examples and a few “safer” alternative products that do not contain these toxic ingredients. With so many lip products that contain toxic chemicals, it is hard for the average consumer to know what is safe to use and what is not. The goal of this report is to help consumers choose a safe lip care product without having to worry about the safety of themselves or their family.

¹ Elaine Sciolino, “Sans Makeup, S’il Vous Plait”, the *New York Times*.

<http://www.nytimes.com/2006/05/25/fashion/thursdaystyles/25skin.html>; Rebecca Adams, “Male Makeup Isn’t Such A Strange Concept Anymore, Study Says,” *Huffington Post*.

“http://www.huffingtonpost.com/2013/06/19/male-makeup-study-men_n_3467482.html”

² Douglas Quenqua, “Graduating From Lip Smackers,” the *New York Times*,

<http://www.nytimes.com/2010/04/29/fashion/29tween.html>

I. Introduction

The United States first began to take steps to protect consumers from chemicals found in cosmetics in 1938 with the passage of the Food, Drug and Cosmetic Act (FDCA), which allowed the FDA to control for the safety of food, drug and cosmetic products.³ Almost 30 years later, the Fair Packaging and Labeling Act (FPLA) passed in 1967, which required manufacturers to disclose the net quantity of contents in consumer products.⁴ But not all ingredients in cosmetics are required to be disclosed. The ingredient “fragrance” or “parfum” refers to a mixture of scent chemicals and ingredients that don’t have to be disclosed.⁵ Some fragrance chemicals have been linked to cancer,⁶ reproductive and respiratory problems,⁷ and allergies.⁸

Many industries have undergone a renaissance in safer production of goods. The food industry has drastically changed to offer healthier options to consumers, such as the explosion in production and availability of organic foods. The cosmetic industry, on the other hand, is still lagging. While there are certain natural and toxic-free cosmetic brands, it’s shocking that some of the most popular lipstick brands were found to contain high levels of lead.⁹ Parabens and some of the ingredients in fragrance, linked to cancer in humans, are prevalent in lip care products as well.

And there is reason for Americans to be concerned about what they are putting on their lips. Lipstick and lip balm don’t disappear off of our lips--instead, some of that product is being ingested by the consumer. When we’re licking our lips, drinking our coffee, or eating our breakfast, Americans are ingesting lip product. The amount ingested is significant: on average, an American woman will apply lipstick 2.35 times per day, and some women apply as much as 14 times per day.¹⁰ The result is that some women are ingesting a pound of lipstick every two

³ FDA History - Part II. U.S. Food and Drug Administration. Available at <https://www.fda.gov/AboutFDA/WhatWeDo/History/Origin/ucm054826.htm>.

⁴ Fair Packaging and Labeling Act. Federal Trade Commission. Available at <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/fair-packaging-labeling-act>.

⁵ Steinemann AC. “Fragranced Consumer Products and Undisclosed Ingredients.” *Environmental Impact Assessment Review*, 29 (1): 32-38, 2009. Available at https://www.researchgate.net/publication/222553829_Fragranced_Consumer_Products_and_Undisclosed_Ingredients.

⁶ National Toxicology Program. Report on Carcinogens, Thirteenth Edition. U.S. Department of Health and Human Services, 2014. Available at http://ntp.niehs.nih.gov/ntp/roc/content/listed_substances_508.pdf.

⁷ CDC. Acetaldehyde. NIOSH Pocket Guide to Chemical Hazards, 2015. Available at <http://www.cdc.gov/niosh/npg/npgd0001.html>

See more at: <http://www.safecosmetics.org/get-the-facts/chemicals-of-concern/fragrance/>

⁸ European Commission. Opinion concerning fragrance allergy in consumers. Scientific Committee on Cosmetic Products and Non-Food Products Intended for Consumers, 1999. Available at http://ec.europa.eu/health/ph_risk/committees/sccp/documents/out98_en.pdf. -

See more at: <http://www.safecosmetics.org/get-the-facts/chemicals-of-concern/fragrance/>

⁹ Limiting Lead in Lipstick and Other Cosmetics. FDA. Available at https://www.fda.gov/Cosmetics/ProductsIngredients/Products/ucm137224.htm#expanded_survey. See also Lead in Lipstick. Campaign for Safe Cosmetics. Available at <http://www.safecosmetics.org/get-the-facts/regulations/us-laws/lead-in-lipstick/>.

¹⁰ Sa Liu et al., “Concentrations and Potential Health Risks of Metals in Lip Products,” *Environmental Health Perspectives*, <https://ehp.niehs.nih.gov/1205518/>

years (or as much as 87 milligrams of lip product per day). Over the course of a lifetime, that usage can have serious consequences for a person's health.¹¹

In the 50 years since the FPLA passed, we have learned that long term exposure to toxic chemicals in cosmetics and other consumer products can cause significant harm to human health. Unfortunately, policy decisions have not caught up with the science. Until the law does catch up, it is imperative for consumers to learn about the most harmful ingredients in their favorite lipstick, lip gloss, and lip balm products. In particular, people should carefully monitor the use of unsafe lip products used by children. Consumers should hold manufacturers accountable for removing harmful chemicals from their products and replacing them with safer alternatives.

We looked at many brands and types of lip products currently on the market and evaluated them for safety. We have broken this report into three sections: 1) toxic chemicals found in lip products; 2) lip products that are safer alternatives and do not contain common chemicals of concern; and 3) recommendations for manufacturers and policy makers.

II. Parabens and Fragrance in Lip Products

Some popular lip products contain ingredients such as “fragrance” and parabens. The ingredient “fragrance” or “parfum” refers to a mixture of scent chemicals and ingredients that are not disclosed.¹² According to the International Fragrance Association (IFRA) approximately 3,000 chemicals can be used to make fragrance.¹³ Some of them are linked to cancer,¹⁴ reproductive and respiratory problems,¹⁵ and allergies.¹⁶ Propylparaben is a

¹¹ Sarah Yang, “Poison lips? Troubling levels of toxic metals found in cosmetics,” *Berkeley News* <http://news.berkeley.edu/2013/05/02/toxic-metals-in-lipstick/>

¹² See note 6.

¹³ IFRA. IFRA Ingredients, 2015. Available at <http://www.ifraorg.org/en-us/ingredients#.VW-Cdc-6eUk>.

¹⁴ National Toxicology Program. Report on Carcinogens, Thirteenth Edition. U.S. Department of Health and Human Services, 2014. Available at http://ntp.niehs.nih.gov/ntp/roc/content/listed_substances_508.pdf.

¹⁵ CDC. Acetaldehyde. NIOSH Pocket Guide to Chemical Hazards, 2015. Available at <http://www.cdc.gov/niosh/npg/npgd0001.html>. See more at: <http://www.safecosmetics.org/get-the-facts/chemicals-of-concern/fragrance/>

¹⁶ European Commission. Opinion concerning fragrance allergy in consumers. Scientific Committee on Cosmetic Products and Non-Food Products Intended for Consumers, 1999. Available at http://ec.europa.eu/health/ph_risk/committees/sccp/documents/out98_en.pdf. - See more at: <http://www.safecosmetics.org/get-the-facts/chemicals-of-concern/fragrance/>

preservative that has been linked to reproductive toxicity¹⁷ and hormone disruption.^{18 19} Methylparaben is also a preservative that has been linked to skin cancer²⁰ and hormone disruption.^{21 22}

III. Lip products containing fragrance or parabens

The following lip products contain fragrance or parabens:²³

1. Maybelline Baby Lips Moisturizing Lip Balm

Contains fragrance and is specially marketed towards children.

Flavors that contain fragrance: Cherry Me, Peach Kiss, Peppermint, Pink Punch, Quenched

Product can be purchased at: Walmart²⁴, Target²⁵

Estimated cost: \$4

¹⁷ Oishi S, 2002. "Effects of propyl paraben on the male reproductive system." Food Chem Toxicol. 2002 Dec; 40(12):1807-13. Available at <http://www.ncbi.nlm.nih.gov/pubmed/12419695>. See more at: <http://www.ewg.org/skindeep/ingredient/705335/PROPYLPARABEN/#>

¹⁸ Darbre PD., et a., Paraben esters: review of recent studies of endocrine toxicity, absorption, esterase and human exposure, and discussion of potential human health risks. Journal of Applied Toxicology, 2008. Available at <http://www.ncbi.nlm.nih.gov/pubmed/18484575>. See more at: <http://www.safecosmetics.org/get-the-facts/chemicals-of-concern/fragrance/>

¹⁹ Byford JR, Shaw LE, Drew MG, Pope GS, Sauer MJ, Darbre PD. 2002. Oestrogenic activity of parabens in MCF7 human breast cancer cells. Journal of Steroid Biochemistry & Molecular Biology 80(1):49-60. EWG Ingredient Propylparaben, available at: <http://www.ewg.org/skindeep/ingredient/705335/PROPYLPARABEN/#>
The Endocrine Disruption Exchange (TEDX). Propyl paraben. Available online: <http://endocrinedisruption.org/popup-chemical-details?chemid=795> August 7, 2014.

²⁰ See note 43.

²¹ See note 43.

²² Byford JR, Shaw LE, Drew MG, Pope GS, Sauer MJ, Darbre PD. 2002. Oestrogenic activity of parabens in MCF7 human breast cancer cells. Journal of Steroid Biochemistry & Molecular Biology 80(1):49-60. EWG Ingredient Methylparaben, available at: <http://www.ewg.org/skindeep/ingredient/703937/METHYLPARABEN/>
The Endocrine Disruption Exchange (TEDX). Methyl paraben. Available online: <http://endocrinedisruption.org/popup-chemical-details?chemid=667>

²³ Products were available for sale as of Jan. 16, 2018.

²⁴ Available for sale at https://www.walmart.com/ip/Maybelline-Baby-Lips-Moisturizing-Lip-Balm-Peach-Kiss-0-15-oz/17324481?wmlspartner=wmtlabs&adid=2222222222014489190&wmlspartner=wmtlabs&w10=e&w11=o&w12=c&w13=10358657371&w14=kwd-1105782834977&w112=17324481_10000003357&w114=kids%20lip%20gloss&veh=sem#about-item

²⁵ Available for sale at <https://www.target.com/p/maybelline-174-baby-lips-174-moisturizing-lip-balm/-/A-14418640#lnk=sametab&preselect=13521058>



INGREDIENTS: G676800 2 POLYBUTENE, OCTYLDODECANOL, PETROLATUM, ISOPROPYL MYRISTATE, POLYETHYLENE, OZOKERITE, DIISOSTEARYL MALATE, BUTYROSPERMUM PARKII BUTTER/SHEA BUTTER, CANDELILLA CERA/CANDELILLA WAX/CIRE DE CANDELILLA, VP/HEXADECENE COPOLYMER, ALUMINA, SYNTHETIC FLUORPHLOGOPITE, AROMA/FLAVOR, PENTAERYTHRITYL TETRA-DI-T-BUTYL HYDROXYHYDROCINNAMATE, TOCOPHEROL, TOCOPHERYL ACETATE, CALCIUM ALUMINUM BOROSILICATE, LIMONENE, SILICA, BENZYL ALCOHOL, MEL/HONEY/MIEL, CENTELLA ASIATICA EXTRACT, ALUMINUM HYDROXIDE, LINALOOL, CITRAL, BENZYL BENZOATE, TIN OXIDE, HEXYL CINNAMAL, EUGENOL, CALCIUM SODIUM BOROSILICATE, BHT, DIMETHICONE, CITRIC ACID, PARFUM/FRAGRANCE. [+/- MAY CONTAIN/PEUT CONTENIR: CI 77891/TITANIUM DIOXIDE, CI 45410/RED 28 LAKE, CI 45380/RED 22 LAKE, MICA, CI 77491, CI 77492, CI 77499/IRON OXIDES, CI 15850/RED 7, CI 15985/YELLOW 6 LAKE, CI 19140/YELLOW 5 LAKE, CI 42090/BLUE 1 LAKE, CI 75470/CARMINE] F.L.L.# D54547/26

2. e.l.f. Pout Perfecter

Contains propylparaben, and methylparaben.²⁶

Product can be purchased at: elfcosmetics.com,²⁷ Walmart²⁸

Estimated cost: \$3



3. Hello Kitty Ice Cream Flavored Lip Balm Trio

Contains fragrance and is specially marketed towards children

Product can be purchased at: Target²⁹

Estimated cost: \$5

²⁶ Ingredients list available at <https://www.elfcosmetics.com/p/pout-perfecter?dept=lip-lipgloss>. Accessed on Aug. 29, 2017.

²⁷ Available for sale at <https://www.elfcosmetics.com/p/pout-perfecter?dept=lip-lipgloss>

²⁸ Available for sale at <https://www.walmart.com/ip/e-l-f-Cosmetics-Pout-Perfecter-Lip-Color-Glow-0-31-oz/24520380#about-item>

²⁹ Available for sale at <https://www.target.com/p/hello-kitty-ice-cream-flavored-lip-balm-trio/-/A-51467693#lnk=sametab>



KEEP OUT OF REACH OF CHILDREN
INGREDIENTS: Mineral Oil (Paraffinum Liquidum), Polyisobutene, Ethylhexyl Palmitate, Hydrogenated Styrene/Isoprene Copolymer, Hydroxystearic Acid, Fragrance, Tocopherol.
MAY CONTAIN: Yellow 10 Lake, Blue 1 Lake, Red 27 Lake.

4. Chapstick Classic Original

Contains fragrance, methylparaben, and propylparaben

Product can be purchased at: Target³⁰, Walmart³¹, Walgreens³², ShopChapStick.com³³

Estimated cost: \$2

³⁰ Available for sale at <https://www.target.com/p/chapstick-original-classic-lip-balm/-/A-15839608#lnk=sametab&preselect=13964560>

³¹ Available for sale at <https://www.walmart.com/ip/Chapstick-Skin-Protectant-Sunscreen-Spf4-Classic-Original-Chapstick-3-Ea-Value-Bundle-Pack-of-2/12338386>

³² Available for sale at <https://www.walgreens.com/store/c/chapstick-classic-skinprotectant/sunscreen-spf-4-original/ID=prod1392666-product>

³³ Available for sale at http://www.shopchapstick.com/classic-original?_ga=2.260283338.639304513.1503360217-1341089496.1503360217



CLASSIC ORIGINAL	
Drug Facts	
Active ingredient	Purpose
White Petrolatum 45%.....	Skin Protectant
Uses	
<ul style="list-style-type: none"> ■ helps prevent and temporarily protects chafed, chapped or cracked lips ■ helps prevent and protect from the drying effects of wind and cold weather 	
Warnings	
For external use only	
Keep out of reach of children. If swallowed, get medical help or contact a Poison Control Center right away.	
Directions apply as needed	
Other Information store at 20-25°C (68-77°F)	
Inactive ingredients	
arachidyl propionate, camphor, carnauba wax, cetyl alcohol, fragrance, isopropyl lanolate, isopropyl myristate, lanolin, light mineral oil, methylparaben, octyldodecanol, oleyl alcohol, paraffin, phenyl trimethicone, propylparaben, red 6 lake, titanium dioxide, white wax, yellow 5 lake	

5. Maybelline New York Color Sensational Powder Matte Lipstick in Nocturnal Rose

Contains fragrance³⁴

Can be purchased at: Ulta³⁵, Target³⁶, Maybelline.com³⁷

Estimated cost: \$6-8



6. L'Oréal Paris Colour Riche Shine Lipstick in Dazzling Doe

³⁴ Ingredients list available at <https://www.maybelline.com/lip-makeup/lipstick/color-sensational-powder-matte-lipstick/nocturnal-rose>

³⁵ Available for sale at https://www.ulta.com/color-sensational-powder-matte-lipstick?productId=xlsImpprod17161529&irgwc=1&AID=165159&PID=10078&CID=af_165159_10078_#

³⁶ Available for sale at <https://www.target.com/p/maybelline-color-sensational-powder-matte-lipstick-0-15oz/-/A-53186224#lnk=sametab&preselect=52446973>

³⁷ Available for sale at <https://www.maybelline.com/lip-makeup/lipstick/color-sensational-powder-matte-lipstick/nocturnal-rose>

Contains fragrance³⁸

Can be purchased at: Ulta³⁹, LorealParisUSA.com⁴⁰, Amazon.com⁴¹

Estimated cost: \$8-10



III. Safer Alternative Products

Below are some alternative lip products that are formulated without major chemicals of concern. U.S. PIRG Education Fund can't definitively say that any particular product is 100 percent safe for all users. We chose to highlight these products because they are formulated without major chemicals of concern that are found in many lip products. Of course, in addition to the toxic concerns that we are raising, it's possible for people to be allergic to specific ingredients, or have other kinds of sensitivities depending on genetic or environmental factors. It's best to look for products with low-hazard ingredients, like the ones we highlight on our list and to avoid ingredients such as fragrance/parfum, methylparaben, and propylparaben.

³⁸ Ingredients list available at <https://www.lorealparisusa.com/products/makeup/lip-color/lip-gloss/colour-riche-shine-lipstick.aspx?&shade=lacquered-strawberry>

³⁹ Available for sale at https://www.ulta.com/colour-riche-shine-lipstick?productId=xlsImpprod17161499&irgwc=1&AID=165159&PID=10078&CID=af_165159_10078_#

⁴⁰ Available for sale at <https://www.lorealparisusa.com/products/makeup/lip-color/lip-gloss/colour-riche-shine-lipstick.aspx?&shade=dazzling-doe>

⁴¹ Available for sale at <https://www.amazon.com/L'Oreal-Paris-Cosmetics-Lipstick-Dazzling/dp/B074PQ146G?th=1>

Safer lip products

Here are four examples of safer alternative lip products.⁴²

1. Maia's Mineral Galaxy Mineral Lipstick, Forever Friend

Product can be purchased at: maiasminerals.com⁴³

Estimated cost: \$18



Ingredients:⁴⁴ Boron Nitride, Kaolin, Euphorbia Cerifera (Candelilla) Wax, Copernicia Cerifera (Carnauba) Wax, Theobroma Cacao (Cacao) Seed Butter, *Butyrospermum Parkii (Shea Butter), *Simmondsia Chinensis (Jojoba) Seed Oil, Persea Gratissima (Avocado) Oil, Castor Oil, Prunus Amygdalus Dulcis (Sweet Almond) Oil, Punica Granatum (Pomegranate) Seed Oil, Hydrogenated Polyisobutene, Tocopherol (Vitamin E), Mica and Iron Oxide (CI 77491)

*USDA Certified Organic

2. Coastal Classic Creations Pure Classic Lipstick Conch

Product can be purchased at: coastalclassiccreations.com⁴⁵

Estimated cost: \$22

⁴² Products were available for sale as of Aug. 28, 2017.

⁴³ Available for sale at <https://www.maiasminerals.com/Mineral-Lipstick-p/lipst.htm> as of Aug. 29, 2017.

⁴⁴ Ingredients list available at <https://www.maiasminerals.com/Mineral-Lipstick-p/lipst.htm>. Accessed on Aug. 29, 2017.

⁴⁵ Available for sale at <https://www.coastalclassiccreations.com/makeup/lips/pure-classic-lipstick/conch-lipstick.html>



3. Burt's Bees Beeswax Lip Balm

This Burt's Bees lip balm does not contain the ingredient fragrance. Product can be purchased at: Burtsbees.com⁴⁶, Walgreens⁴⁷, Walmart⁴⁸, Target⁴⁹
 Estimated cost: \$3



⁴⁶ Available for sale at http://www.burtsbees.com/product/beeswax-lip-balm/11099-00-1.html?gclid=CNq0qJDC59UCFWSfMgod5ssEhw&gclidsrc=ds#navlvl=4&start=7&utm_source=bing&utm_medium=cpc&utm_campaign=BLB%20-%20IMC%20-%20Lip%20Balm%20-%20Brand%20-%20Exact&utm_term=burt%27s%20bees%20beeswax%20lip%20balm&utm_content=Beeswax

⁴⁷ Available for sale at [https://www.walgreens.com/store/c/burts-bees-lip-balm-beeswax/ID=prod6192585-product?ext=msnPLA_-_Personal_Care\(BSC\)&kpid=sku6156600&sst=06de2f75-6b47-469b-a73d-2a5251b67262](https://www.walgreens.com/store/c/burts-bees-lip-balm-beeswax/ID=prod6192585-product?ext=msnPLA_-_Personal_Care(BSC)&kpid=sku6156600&sst=06de2f75-6b47-469b-a73d-2a5251b67262)

⁴⁸ Available for sale at <https://www.walmart.com/ip/Burt-s-Bees-Beeswax-Lip-Balm-0-15-Ounce/22700566>

⁴⁹ Available for sale at <https://www.target.com/p/burt-s-bees-lip-balm-blister-box-0-15-oz/-/A-51852041#lnk=sametab&preselect=14898121>

4. Mineral Fusion Lip Sheer – Flashy

Product can be purchased at: Target⁵⁰, Whole Foods⁵¹, Mineralfusion.com⁵²

Estimated cost: \$14



⁵⁰ Available for sale at <https://www.target.com/p/mineral-fusion-lip-sheer-flashy-14oz/-/A-15419942#lnk=sametab>

⁵¹ Purchased in-store at Whole Foods in Denver, Colorado.

⁵² Available for sale at <https://www.mineralfusion.com/collections/cosmetics/products/vegan-mineral-lipstick?variant=1224337635>

Recommendations

We should be able to trust that the lip products we buy and use daily for ourselves and our families are safe. However, until that's the case, U.S. PIRG Education Fund has the following recommendations for manufacturers, FDA, and state lawmakers:

1. Manufacturers should identify and remove harmful ingredients from their products and replace them with safer alternatives.

2. Manufacturers should disclose all fragrance ingredients in their cosmetic products.

3. Manufacturers of lipsticks should ensure that their lipsticks do not contain lead, asbestos, or other manufacturing contaminants. Manufacturers should do a better job of ensuring their lip products do not contain lead by closely monitoring the raw materials and the pigments and colorants they use.



4. FDA should do a new study to see if lipsticks sold today contain lead.

5. The FDA should mandate a limit of one ppm of lead in lipsticks to ensure that our products do not contain the toxic metal. FDA has currently proposed guidance that would set the

legal limit of lead in lipsticks to 10 ppm. This proposal is extremely dangerous. First and foremost, the CDC has explicitly stated that lead consumption at any level is dangerous. A product that is applied on the mouth and is easily ingested with food and

drinks should not contain any lead. Furthermore, the rule is short-sighted since the FDA itself tested 400 lipsticks and found the highest level of lead to be 7.19 ppm. In theory, if this guidance were passed, it would give manufacturers the go-ahead to be even more lax with their lead policies since they would have a buffer zone, when in reality, we should be forcing manufacturers to limit the amount of lead that is currently in their lip products.

6. Policymakers at the state-level should mandate manufacturers to disclose fragrance ingredients in cosmetics. Currently, manufacturers are not required to disclose fragrances and some fragrance chemicals have been linked to negative health effects such as cancer. Consumers have a right to know which chemicals are in fragrance mixtures to protect themselves from harmful fragrance chemicals.



