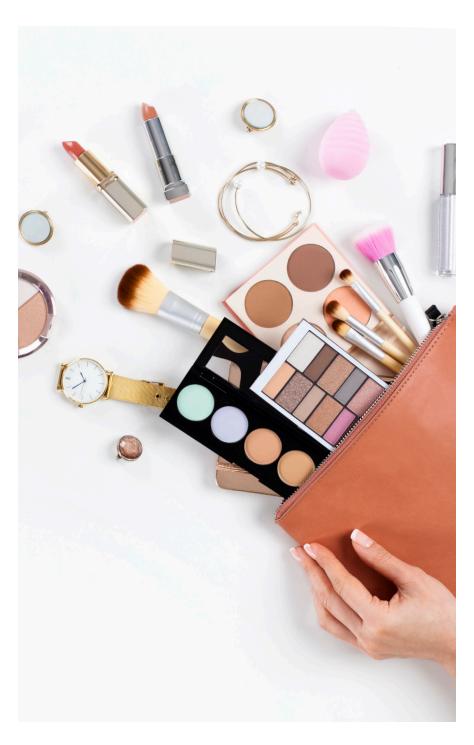
EDF's Clean Beauty Roadmap for Retailers

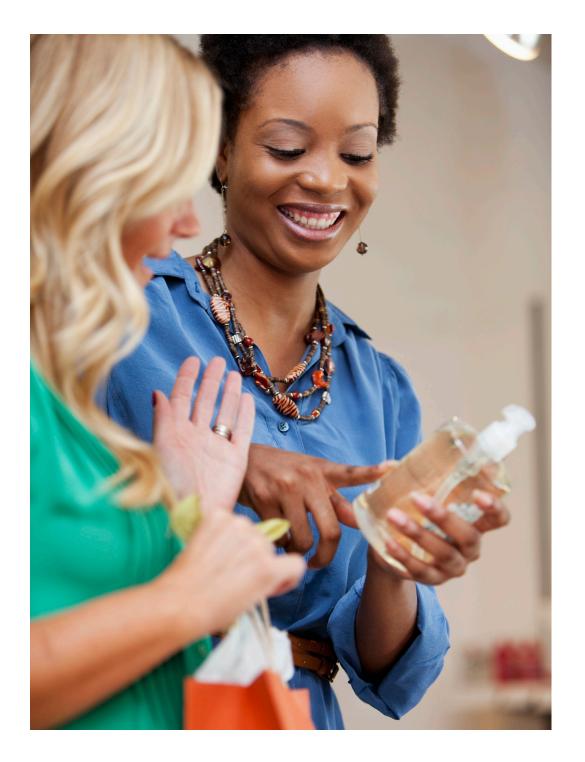




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Introduction

Concerns around the human health and environmental impact of beauty and personal care products is at an all-time high. Consumers are scrutinizing what's in the products they put on their skin to avoid exposure to harmful chemicals. This heightened ingredient awareness has fueled the growing "clean beauty" movement, a market <u>projected</u> to reach \$11 billion by 2027.

We're seeing a proliferation of boutique clean cosmetics brands and clean shops from leading retailers in response to consumer preference for safer products. Because the industry has been underregulated for so long, "clean" does not have a regulatory definition. This **lack of uniformity is undermining consumer confidence in what products truly are safer and free of hazardous ingredients.**

Industry trends

of consumers <u>prefer</u> paraben-free products

year-of-year growth in "prestige beauty" skincare

labels that positioned them-selves as "clean"

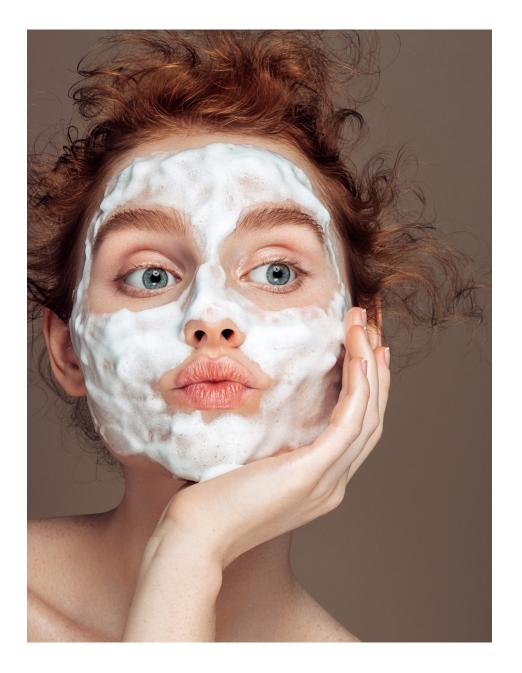
5 39%

(1) **623%**

<u>growth</u> in social media mentions of #cleanbeauty



of women would <u>buy</u> <u>products</u> marketed as clean, and **61%** <u>want</u> <u>greater transparency</u> about what the clean label means



"Clean" should describe beauty and personal care products that are made with the safest possible ingredients and have the lowest possible environmental impacts that the market can offer today.



The impacts of consumer products

Consumer products and their packaging have a large and detrimental effect on the health of humans and the environment – not just at the time of use, but throughout their entire lifecycle. This is true regardless of whether the ingredients are synthetic or natural. Often, the term "natural" is equated with safer, but the terms are not interchangeable. It's important to be specific about what these terms mean and how you're evaluating health and environmental impacts of products to reduce the potential for greenwashing.

Environmental

Ingredient sourcing and product manufacturing, use and disposal often cause or perpetuate deforestation, air and water pollution. In addition, shipping millions of products around the world on a daily basis has led to increased greenhouse gas emissions and packaging waste.

<u>Visit EDF's Supply Chain Solutions</u> <u>Center</u> for detailed guidance on how to reduce the environmental impact of consumer products.

Health

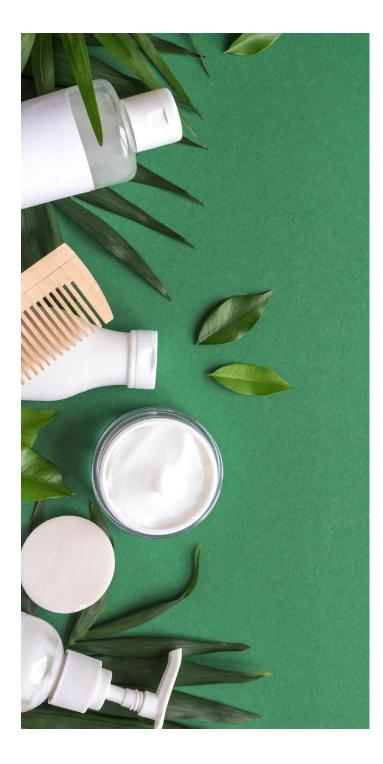
A number of commonly used ingredients in beauty products, such as phthalates and toluene, have been linked to diseases and disorders such as uterine fibroids and miscarriages. Just because a product may be considered sustainable in terms of its carbon footprint, doesn't mean it is safer for the health of the environment (e.g., its bioaccumulation potential) or for humans. Considering both is key.

What does it mean to identify safer ingredients?

The inherent hazard of a chemical, to humans and the environment, is a critical component in evaluating its relative safety. The reduction of hazard, while maintaining efficacy of function, is a defining element in the <u>12 Principles of Green Chemistry</u>.

For other key definitions, see our Glossary.

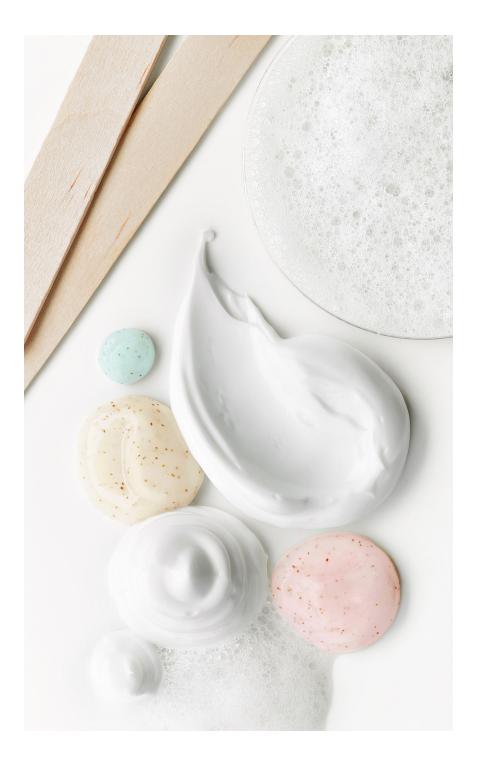




What does the path to "clean" leadership look like?

The following steps – focused on the health dimension of clean beauty – guide companies that are starting clean beauty programs and those that want to strengthen existing programs. These are framed in accordance with EDF's <u>Five Pillars</u> of Safer Chemicals Leadership Framework.

- 1)Create clear, credible criteria for prioritizing chemical safety.
- Commit to continuously challenging your business and your suppliers to offer the safest possible products and packaging for your customers.
- **3** Ensure that clean products are available, accessible and affordable for *all* of your customers, regardless of race or income.
- Require transparency from your suppliers regarding ingredient selection.
- **5** Be transparent with your customers about your methodology and make it easier for them to find the clean product offerings on the shelf.
- 6 Demonstrate the financial and reputational value of a clean product portfolio to key stakeholders.





Why are consumers increasingly searching for clean products? They want to know that the products they and their families use daily won't increase their exposure to toxic chemicals or take a toll on the environment. If your business is joining the clean beauty market, you need to do so authentically and responsibly.

Establishing a banned list signals a baseline commitment to your customers and supply chain. It is an essential first step. **Products under your "clean" banner should be the safest options for human health and the environment.** That means free of toxic chemical ingredients, such as carcinogens and reproductive toxicants. When considering the impacts of ingredients across their entire lifecycle, it's critical to evaluate the potential health impacts to consumers and workers.

In addition to banning the use of certain ingredients, **companies should strive for products to contain only verified safer ingredients**, which have been fully assessed for human and environmental impacts, have low hazards, and are optimized across the life cycle. For example, if a supplier replaces a chemical on your banned list with a regrettable substitute, an ingredient that poses the same or worse problems, then we've made no progress.

1 Create clear, credible criteria for prioritizing chemical safety.

Making your banned list

- Identify priority chemical hazards of concern. Beauty products are applied to the body regularly, often daily. Even if the ingredients appear in small amounts, the repeated exposure can add up. For such repeated exposures, it is critical to minimize products' potential contribution to reproductive and developmental toxicity, cancer, endocrine disruption, allergies and skin or respiratory sensitization. Beyond concerns to human health, chemicals that don't break down easily can be a problem for the environment or aquatic life and can pollute our waterways.
- Create a list of priority chemicals exhibiting these hazards that will be banned from your clean products and their packaging. It is important to include packaging because toxic ingredients, such as <u>phthalates</u>, commonly used in packaging can leach into products and expose consumers. When building your list of priority chemicals for product and packaging ingredients, consider toxicity concerns throughout the full life cycle, from manufacturing to end of life. In addition to

toxicity concerns, ubiquity in your product assortment and in the industry should be a factor in which chemicals make it to your list of priority chemicals.

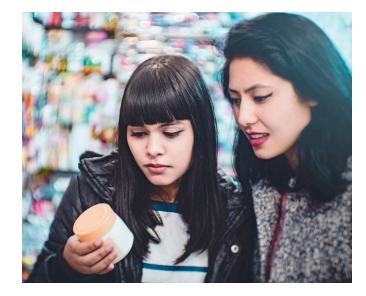
 Articulate a process for updating your banned list to keep it current with regulatory and scientific advancements. For example, if you rely on authoritative and regulatory lists of hazardous chemicals to inform your banned list, keep in mind that many of these lists are updated regularly.

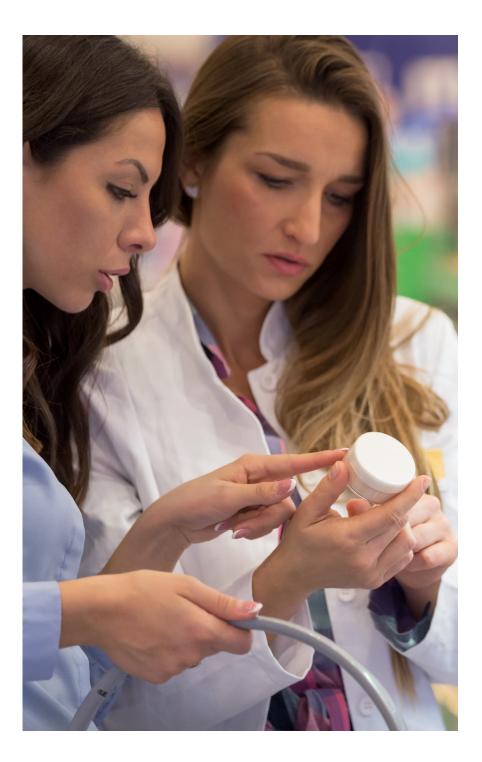
Actively championing the use of safer ingredients

- Set requirements for what characterizes safer ingredients such as meeting <u>GreenScreen's</u> Benchmark 3 or 4 status, <u>ChemFORWARD's A or B status</u>, or point to reputable safer alternative ingredient lists such as full-green circle ingredients on the <u>Safer Choice Ingredient List</u>.
- Ensure you apply the same criteria to all types of beauty ingredients. For example, toxic chemicals can lurk in fragrance components, which are often made up of dozens of ingredients, so these ingredients need the

same scrutiny as others (e.g. emollients) regardless of whether they are natural or synthetic. "Natural" refers to the source of the ingredient and not it's safety profile.

One option for reinforcing the credibility of your clean program is to utilize certifications from reputable third-parties, such as <u>Cradle-to-Cradle</u> or <u>EWG Verified</u>. Recognized certifications should explicitly prioritize chemical safety in their certification criteria, feature a comprehensive chemical ban list and implement a rigorous protocol to verify the absence of banned ingredients.





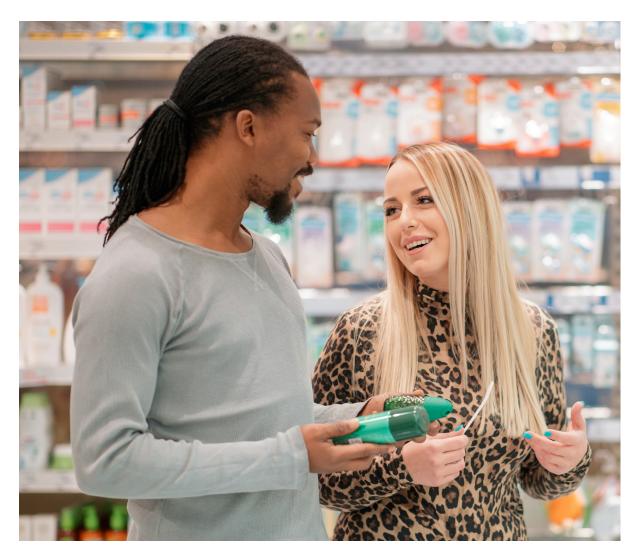


Leading on safer chemicals requires ambitious commitments that are supported across the organization – from the C-suite to middle management. But commitment alone isn't enough. Leadership requires action, strategies and road map for *how* you plan to meet those targets.

Affirming your company's commitment to clean products also requires looking beyond your four walls by ensuring a clear market signal is sent to suppliers.



2 Commit to continuously challenging yourself and your suppliers to offer the safest possible products and packaging for your customers.



- Commit to make the requirements of your program more ambitious over time.
- Hold your business accountable by setting a schedule for how often you will revisit your criteria and program.
- Set a time-based goal to influence your entire product portfolio as opposed to treating clean products as a niche product segment. Start with interim goals around what percentage of your product assortment will achieve clean status. Once you hit this goal, celebrate, and then set a more ambitious target.

3 Ensure that clean products are available, accessible and affordable for *all* of your customers, regardless of race or income.

Racial inequities in the beauty market

Consider who your clean products are made by and for. Unfortunately, clean beauty today <u>doesn't feature</u> many brands that are founded by or made for people of color. Worse, there is <u>ample</u> <u>evidence</u> that women of color face far greater exposure to toxic ingredients used in personal care products. Independent of socio-economic status, women of color have <u>higher levels</u> of beauty product related chemicals in

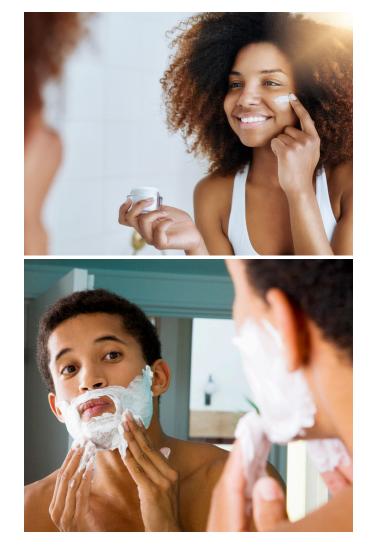
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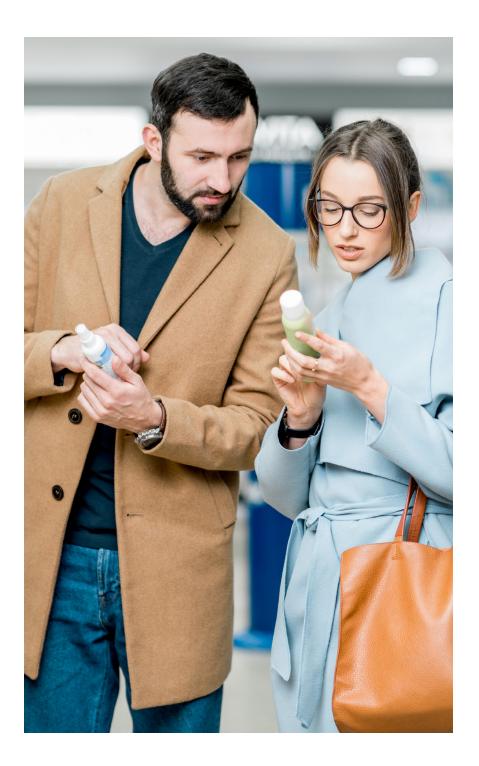
their bodies. For example, women of color have up to two times <u>higher</u> <u>levels</u> of methyl paraben, a common ingredient, in their bodies compared to non-Hispanic white women. This has led to an unacceptable inequality in the access to safer products. Making clean beauty products readily available to every ethnicity and race (e.g. inclusive of different skin tones and hair types), can and must help erase this toxic disparity.

Economic inequities in the beauty market

Consumers also shouldn't be priced out of safer products. A safer marketplace must be affordable and accessible to everyone no matter socio-economic status. However, the clean beauty market is <u>often associated</u> with premium priced products, reach of low-wealth consumers.

- Commit to advancing racial equity when it comes to driving safer products across your product portfolio.
- Rather than only offering clean products at the top market price, commit to offering clean products at every price point.
- Set a specific, time-bound goal upfront for when clean products will be available for every consumer.







The clean beauty movement is built on trust that a company is offering the best available products when it comes to safety and sustainability. You can't meet your customers' expectations unless you are confident in your clean product assortment. Supply chain transparency and verification are key to reinforcing this.



4 Require transparency from your suppliers regarding ingredient selection.

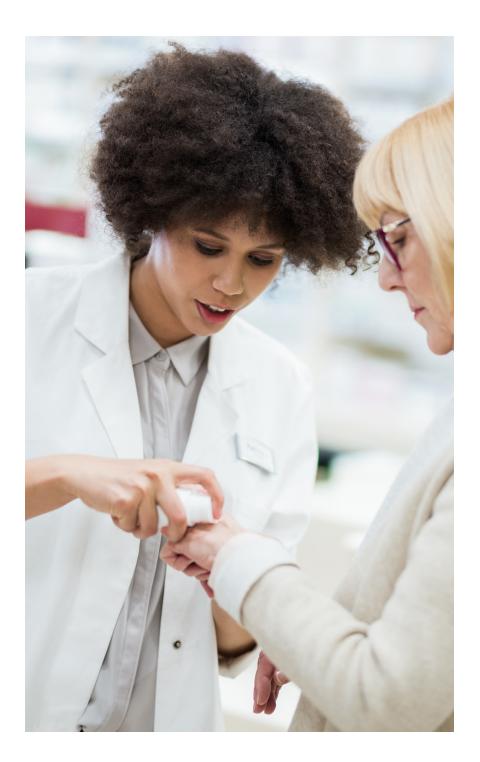
- At a minimum, you should require full ingredient disclosure from your suppliers for every intentionally added ingredient in products. This means no generic ingredient names, like "flavor" or "fragrance". You can't truly determine if a product is clean if you don't have confidence about what it contains.
- Work with your suppliers to understand possible unintentional contaminants that may lurk in products because of ingredient sourcing or manufacturing processes. Then, form plans to minimize or eradicate them. For example, <u>1,4-dioxane</u> is a byproduct of the manufacturing of common ethoxylated ingredients (e.g. polyethylene glycol) used in beauty products and can tag along when these ingredients are used in products.
- Credible verification starts with asking your suppliers to sign company declarations or certificates of analysis that their products meet the requirements for banned and restricted ingredients on your list. Leadership, too, includes continuous

improvement of verification practices, like working with suppliers to complete a documentation audit to ensure compliance, requiring third party verification from suppliers that products meet your criteria and conducting product testing.

- Once you've verified that suppliers are meeting your criteria for banned ingredients, require that they follow your criteria for finding safer ingredient replacements. For example, your suppliers can point to third-party chemical hazard assessments, via services such as <u>ChemForward</u>, which demonstrate that new ingredients present lower hazards.
- Work towards achieving the same transparency and verification for the ingredients in product packaging, leveraging methods mentioned above. For packaging, seek information on materials used and the likely end-of-life of that package.
- Build trust with your suppliers by clearly communicating your banned list, transparency



expectations, and requirements for verifications processes. Actively engage suppliers on their ingredient decisions by informing them of the health hazards you're hoping to avoid and the data on health and environmental hazards you'd like to see. This can help inform design criteria for product formulators and give brands a data point they can share in support of their products' clean claims.





Today, what constitutes a "clean" product varies from company to company, leaving it up to the consumer to find out what's really "clean" and what isn't. Companies can make it easier for shoppers to make informed purchasing decisions by offering a program that is both transparent and credible. A handful of retailers are <u>leading</u> when it comes to clearly communicating their definitions, standards, and processes with consumers.



5 Be transparent with your customers about your methodology and make it easier for them to find clean product offerings on the shelf.

Demonstrate that your commitment to a clean product portfolio is not a marketing gimmick, but rather real action toward driving a safer marketplace.

- Communicate clearly to consumers what "clean" means for your products. Share your list of banned ingredients and the criteria used to identify ingredients of concern and your process for vetting products and evaluating ingredient safety. Provide enough context for consumers to be able to interpret the information without having to do additional research. Be transparent as well with how you define and verify other claims that are often used in the clean beauty space, like "natural", to avoid the potential for greenwashing.
- Strive for sharing full ingredient lists with your customers as well, including flavor and fragrance constituents, and work with your suppliers to do so. Regulatory developments, like the <u>Cosmetic</u> <u>Flavor and Fragrance Right to</u> <u>Know Act of 2020 in California</u>,

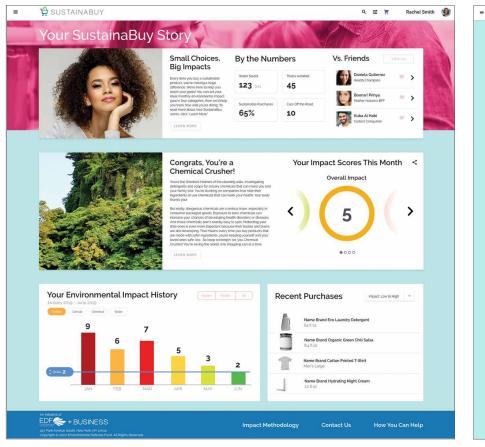
which goes into effect in 2022, will help to enforce this type of ingredient disclosure.

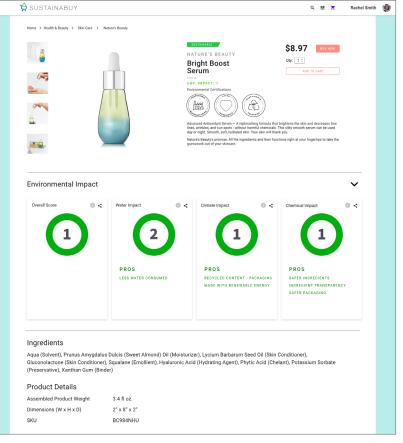
 Make it easy and intuitive for your customers to <u>find</u> clean products. Investing in opportunities to prominently showcase safer products, both in-store and online — can help attract the growing sustainability-driven consumer segment, making it good for your brand and your bottom line.



SustainaBuy

EDF created a first-of-its-kind interactive e-commerce prototype called <u>SustainaBuy</u> that companies can use as a model for creating safer, more sustainable online marketplaces. The prototype demonstrates how retailers can seamlessly integrate sustainability and chemicals data to help customers better understand the impact of purchasing decisions.









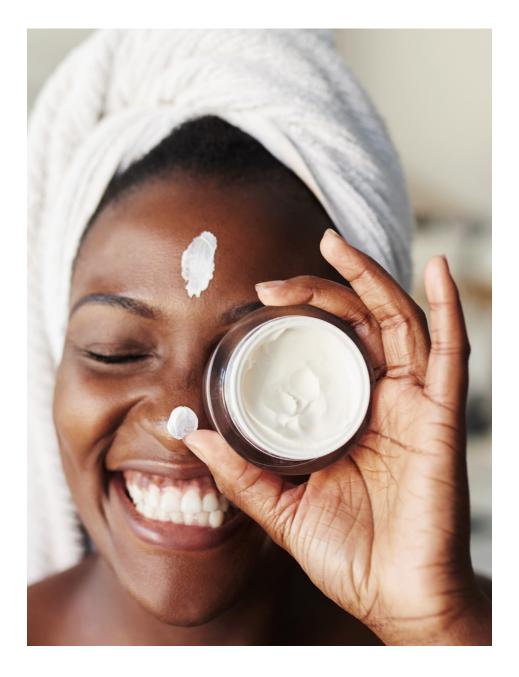
In today's beauty market, demonstrating the value of a credible clean portfolio is important for building your bottom line, cultivating customer loyalty and meeting investor demands. Nothing works better than data.



6 Demonstrate the financial and reputational value of a clean product portfolio to key stakeholders.



- Go beyond a one-time publication of your goals or criteria. Share your progress and updates often with investors and consumers.
- Show investors and the competition that the greater percentage of clean products in your assortment, the better it is for attracting customers and generating sales.
- Make it easy for stakeholders to see a direct connection between your clean beauty program and your organization's overall sustainability strategy. For example, maybe your sponsorship of safer chemistry innovation efforts directly led to the creation of new clean products on your website. This would be a praiseworthy result.



Forward-thinking companies have an opportunity to drive a safer, sustainable marketplace by championing a credible clean beauty program.

Chemical stewardship is a continuous journey. As the science evolves, and safer alternatives become more widely available, so too must the level of corporate ambition.

EDF's Clean Beauty Roadmap for Retailers





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