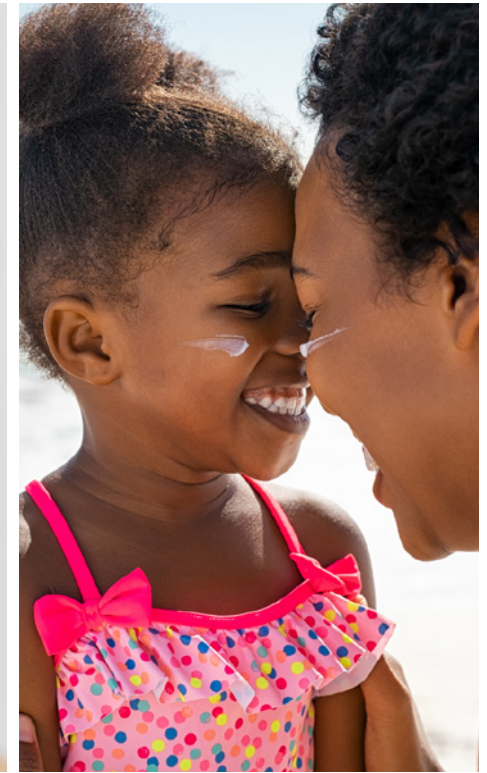


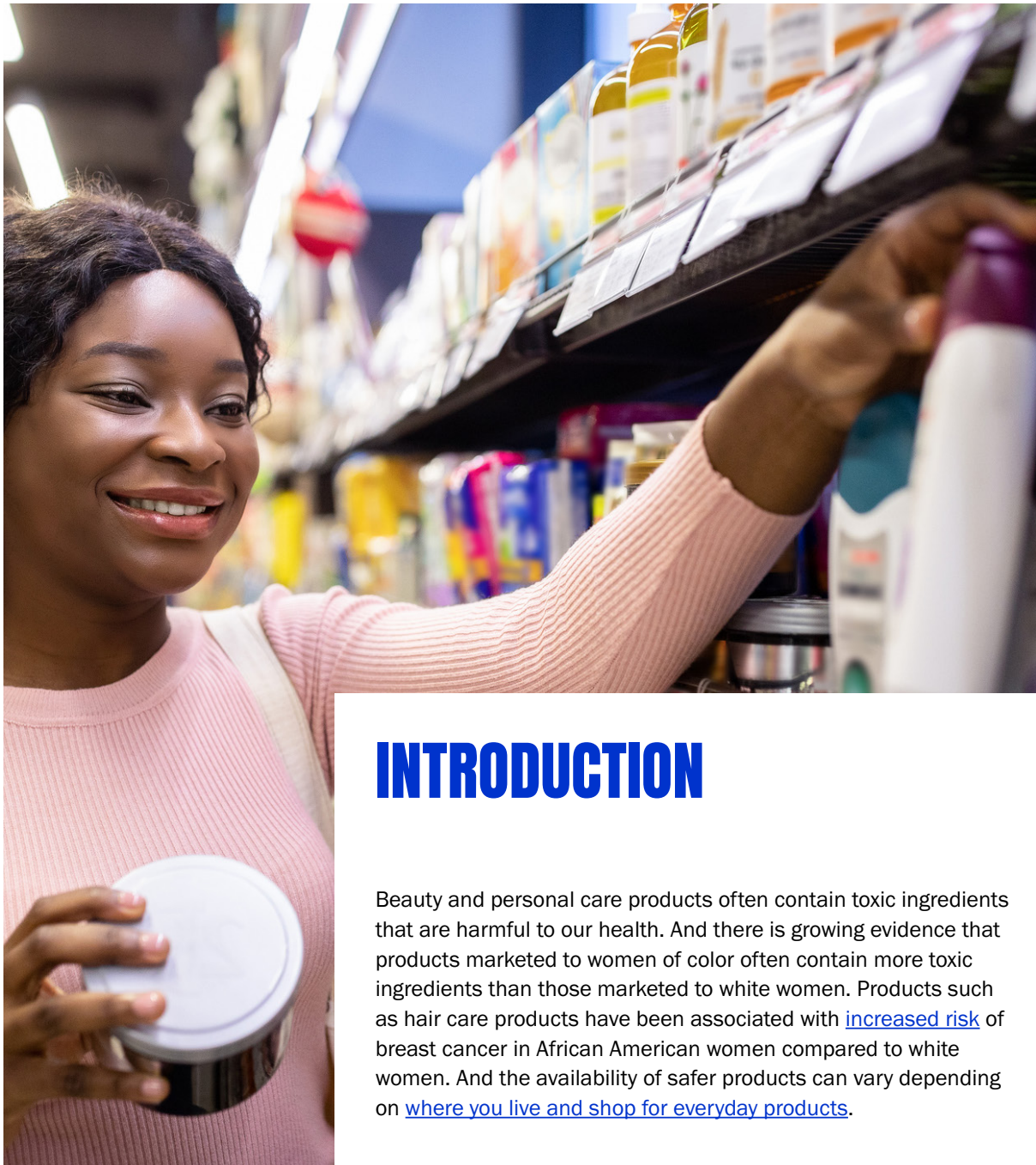
CLEAN BEAUTY JUSTICE RETAILER ROADMAP



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INTRODUCTION


Beauty and personal care products often contain toxic ingredients that are harmful to our health. And there is growing evidence that products marketed to women of color often contain more toxic ingredients than those marketed to white women. Products such as hair care products have been associated with [increased risk](#) of breast cancer in African American women compared to white women. And the availability of safer products can vary depending on [where you live and shop for everyday products](#).

Notable health disparities for women of color, including fibroids and breast cancer, have links to disparities in chemical exposure.

 African Americans were found to have **1.8 times** the level of diethyl phthalate in their bodies compared to white Americans. Diethyl phthalate is a common fragrance ingredient that can interfere with our hormone system.

 Early childhood exposure to endocrine disrupting chemicals through hair products is associated with early onset menarche, a risk factor for breast cancer.

 Some of the most toxic products, including hair straighteners and skin lighteners, are also symbols of an industry that has historically promoted eurocentric beauty norms.

 **84%** of chemicals detected in a set of hair products marketed to Black women were not listed on the label, making it hard for customers to make informed decisions.



In late 2022, Congress passed the [Modernization of Cosmetics Regulation Act](#), the first major update to the Food, Drug and Cosmetics Act in 84 years. [Recent efforts](#) to prioritize beauty justice within federal oversight of cosmetic safety have yet to succeed.

The clean beauty movement, which has continued to grow in recent years, has largely been marketed to white women even though women of color are bearing the brunt of toxic exposure in beauty products.

Ending this toxic reality requires brands and retailers to put racial equity front and center in their clean beauty efforts. By centering equity in chemical policies, companies and beauty retailers can ensure that safer products are available, accessible and affordable for all customers, regardless of race or income. Companies can ensure [beauty justice](#).

The following steps – focused on addressing environmental racism in beauty and personal care products – guide companies to develop and implement their chemical policies with equity at the forefront. These are framed in accordance with EDF's [Five Pillars](#) of Safer Chemicals Leadership and build on EDF's [Clean Beauty Roadmap](#) for Retailers.

How can retailers champion the creation of safer products for people of color?

- 1 Make an institutional commitment:** Create a chemical policy that includes a specific, time-bound goal to incorporate equity that ensures safer products across your product portfolio.
- 2 Increase supply chain transparency:** Require ingredient disclosure from your suppliers and enhance your data management systems to be able to track product and ingredient hotspots.
- 3 Inform consumers:** Disclose ingredient and product information to your customers to support informed decision-making and build trust.
- 4 Incorporate safer product design:** Create clear and credible criteria for prioritizing chemical safety in products that are marketed to people of color.
- 5 Make a public commitment:** Make your commitment public to encourage other companies to drive a safer and more equitable marketplace.



**Ending this toxic reality
requires brands and retailers
to put racial equity front
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beauty efforts.**



1

MAKE AN INSTITUTIONAL COMMITMENT:

An institutional commitment creates a foundation for addressing chemicals in your products by creating alignment within your organization around goals. One of the strongest tools to create this alignment is a written corporate chemical policy.

Addressing equity in beauty and personal care products requires embedding commitments within this policy to communicate to your organization that beauty justice is a priority. A strong commitment also sends a message to your suppliers (and competitors) that they should take action as well.

-
- Create a chemical policy that includes a specific, time-bound goal to address beauty justice in your products and reduce your [chemical footprint](#) in a manner that ensures safer products are available to all consumers, especially people of color. If you're early in your journey, set a goal to determine your baseline chemical footprint for products marketed to people of color.
 - Prioritize ingredient transparency so your customers can make informed purchasing decisions.
 - Consumers also shouldn't be priced out of safer products, but too often, these products are offered at premium prices. Commit to offering safer products at every price point.
 - Ensure that your policy doesn't put the onus only on brands owned by people of color to offer safer products. These brands are often already underfunded and [under-represented](#) on store shelves. Uplift brands owned by people of color that are already offering safer options and support other brands in making the switch.
 - [Accelerator programs](#) that support small brands, particularly those founded by people of color, are a great option to provide the funding, resources and expertise to help these brands in making the switch.



2

INCREASE SUPPLY CHAIN TRANSPARENCY:

Understanding what's in your products through supply chain transparency is essential for informed decision-making.

- Require full ingredient disclosure from your suppliers, including for ingredients like “fragrance” and “flavor.” At a minimum, work with a third-party data management company that can screen all ingredients in products against your policy commitments, even if generic ingredient names are used.
- Enhance your data management systems to be able to tackle chemicals of concern and address hotspots, like specific product categories that are [known to be a challenge](#) when it comes to beauty justice. Identify if any changes or updates are needed to ensure that you can measure and act on the beauty justice goals you set in your chemical policy.





3

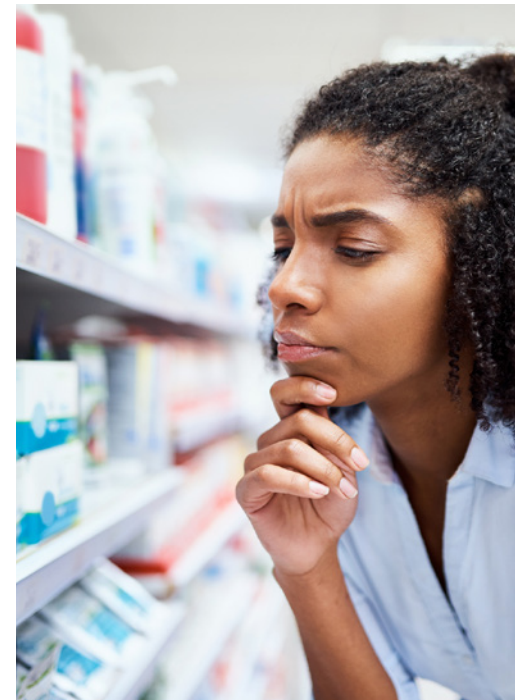
INFORM CONSUMERS

Prioritizing ingredient transparency for consumers is critical because the lack of transparency has allowed toxic disparities in products to persist for decades. Sharing ingredient information fosters accountability, creates consumer trust and builds brand loyalty. It enables customers to make informed decisions regarding their product purchases.

- Ensure ingredient information is available and understandable no matter if customers are shopping in store or online. Product packaging can limit the amount of ingredient information you can share – but providing websites and QR codes creates opportunities to share additional information to help shoppers understand what's in their products.



Most consumers in the U.S. - **83%** - are interested in having [access to more information about their products](#) than what's available on the physical label.



INCORPORATE SAFER PRODUCT DESIGN

Safer product design ensures that retailers have clear, credible criteria for prioritizing chemical safety in products. Removing chemicals of concern from products through the use of “banned lists” is the first step. Actively championing the use of safer ingredients helps avoid toxic substitutions.

Understand your chemical footprint

- Develop a list of chemicals of concern, prioritizing chemicals of concern to which people of color are disproportionately exposed. Evaluate your products for the presence of these ingredients. Consider using BCPP’s Red List of top toxic chemicals found in Black beauty products.
- Develop methodology to baseline and track your beauty justice chemical footprint.
- Track product hotspots that are known to be sources of disproportionate exposures to harmful ingredients, such as products marketed to children and teenage girls, and specific product categories, such as skin care products, hair care products, make-up and fragrances.
- Retailers should track brands that have high market share with women

of color, including but not limited to multicultural brands whose company missions are focused on products for women of color.

- Leverage this understanding to set specific improvement targets for new and existing products – and set accelerated improvement targets for products with chemicals of concern.

Breast Cancer Prevention Partners (BCPP’s) Campaign for Safe Cosmetics [Non-Toxic Black Beauty Project](#) developed a [Red List](#) of chemicals of concern in cosmetic products to address health outcomes of particular importance for Black women. They also evaluated nearly 8,000 Black beauty and personal care products to identify the most frequently used chemicals of concern in these products.

Establish a methodology for eliminating toxic chemicals and selecting safer alternatives.

- Prioritize ingredients that avoid the hazard endpoints most concerning for beauty justice (e.g. endocrine disruption, reproductive toxicity).
- Define your criteria for “safer.”
- Where safer alternatives don’t yet exist, work with allies and peers to rapidly advance the innovation or adoption of safer alternatives.
- Build in incentives, like clean shops, to accelerate supplier action and ensure that these shops carry options for all of your customers.
- Leverage rigorous and transparent certification programs from reputable third-parties, such as [Cradle to Cradle](#) or [EWG Verified](#).

Track progress against the goals set in your chemical policy including your beauty justice goals

- Use your progress data to course-correct and evaluate if attention is needed for any particular products, product categories or ingredients.



5

MAKE A PUBLIC COMMITMENT

Demonstrating your commitment to beauty justice and the value of addressing equity in your products is essential to shifting the market to ensure that all customers have access to safer products. Such a commitment can also create consumer trust and brand loyalty.

- Demonstrate the positive impact your chemical policy is having by publicly reporting how the product assortment — particularly products marketed toward people of color — is getting safer every year.
- Highlight which toxic chemicals have been reduced and eliminated from specific products and promote the availability of safer products in store and online. This will inspire other companies, including your suppliers, to take action too.





Forward-thinking companies have an opportunity to drive a safer, more equitable marketplace by championing beauty justice. Proactive chemicals management is a continuous journey. As the science evolves, and safer alternatives become more widely available, so too must the level of corporate ambition.

CLEAN BEAUTY JUSTICE RETAILER ROADMAP



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