

November 10, 2008

To: Donald Knauss, CEO, The Clorox Company
Alan G Lafley, CEO, Procter & Gamble
Bart Becht, CEO, Reckitt-Benckiser
H. Fisk Johnson, Ph.D., Chairman/CEO, SC Johnson & Son, Inc.
Bruce Fabrizio, CEO, Sunshine Makers, Inc./Simple Green
Chris Cathcart, President, Consumer Specialty Products Association
Ernie Rosenberg, President, Soap and Detergent Association

Dear Industry Leader,

We, the following undersigned groups, representing consumer, environmental, health, and justice organizations, are writing to request that manufacturers of cleaning products uphold their commitment to protect public health by labeling household cleaning products with a listing of ingredients that are used in the product, on the product label and on the manufacturer's website.

Our request

- Manufacturers should list all ingredients (including unintentionally added ingredients and fragrances) on the product label AND on a publicly accessible manufacturer website.
- On the website, manufacturers should list product ingredients using the actual chemical name, the CAS number, and a functional descriptor in parentheses. (i.e. 2-butoxyethanol, 111-76-2 (solvent)). On the labels, they should list the actual chemical name and a functional descriptor.
- Manufacturers should list the ingredients in English and Spanish.

Background

- **Evidence suggests that some cleaning products contain chemicals which may pose health risks.** A 2007 report from Women's Voices for the Earth, [Household Hazards](#), exposes the link between certain chemicals in cleaning products and asthma and reproductive harm. A 2007 report by the Natural Resources Defense Council (NRDC), [Clearing the Air](#) reveals phthalates found in air fresheners which have been linked to birth defects and reproductive problems.
- **Consumers are increasingly interested in product ingredient information.** A survey of Washington state residents conducted for the Washington Department of Ecology found that up to 85% of respondents supported requiring manufacturers to label all their products with complete ingredient lists saying that it was very or extremely important for the government to require manufacturers to label all of their products in this way.ⁱ
- **Consumers need ingredient information to protect their health.** Many consumers have individual sensitivities to chemicals - from allergies, to medical conditions, to precautionary health concerns. Individuals affected by conditions such as asthma or allergies often look to avoid substances that may trigger or exacerbate their symptoms. Similarly, women who are pregnant, or trying to get pregnant, take extra precautions to avoid exposures that may impact the development of their child. Individuals with

chemical sensitivities or various other diseases are also concerned about controlling their exposures to certain substances. Equally, if a person has a reaction to a product, they can immediately identify possible trigger chemicals by checking the label of the product in their hands.

- **Providing information to consumers at the point of purchase (i.e. on the label) AND on a website is critical.** Disclosing ingredient information on the product label AND on the internet is necessary to ensure accessibility for all consumers. Certain demographic groups have considerably less access to the internet. According to a 2007 Pew Center survey, age, ethnicity and education level all affect internet access. For example, only 56% of Latinos, 32% of persons without high school diplomas and 27% of those over the age of 71 go online. All of these groups however, are regular users of cleaning products.ⁱⁱ In addition, the label is easily accessible by the customer when comparison shopping in the grocery store whereas the manufacturer's website is not.
- **Full ingredient labeling is current standard practice in the food and cosmetic industries.** Consumers are already accustomed to reading labels on a variety of products, such as foods or cosmetics. While consumers might not immediately know what the ingredients are, they have a right to access and interpret information about product ingredients and manufacturers have an obligation to provide that information.
- **Providing a list of ingredients does not reveal the formula for the product.** Simply identifying the list of ingredients, without any information about how those ingredients are combined, does not reveal the formula.
- **The European Union requires disclosure of ingredients on a website.** Companies are already required to post ingredients on a website for detergent products they sell to the European market. In addition, companies are required to list allergenic ingredients in fragrance directly on the product label so that consumers afflicted with allergies can avoid them.
- **Functional ingredient labeling can be useful to customers, but it is not sufficient without full ingredient labeling.** Ingredients in cleaning products often have long complicated scientific names. It would be useful to some consumers to include explanatory language (such as "plant-based surfactant") for some ingredients. However, this explanatory language alone, without the name of the actual chemical ingredient is not sufficient for consumers interested in avoiding specific chemicals for health or other reasons.

Once again, the undersigned groups strongly urge individual companies and industry trade groups to adopt labeling policies that address the concerns and criteria described herein. Policies that fail to address these criteria will not adequately address a consumer's right to know. Furthermore, we encourage the manufacturers of household cleaning products to begin removing potentially hazardous ingredients from your products and replacing them with safer alternatives.

Sincerely,

Women's Voices for the Earth
Dori Gilels, Executive Director
Missoula, MT

Alaska Community Action on Toxics
Pamela Miller, Executive Director
Anchorage, AK

American Association on Intellectual and Developmental Disabilities (AAIDD)
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Association of Reproductive Health Professionals
Wayne Shields, President & CEO
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BREATHE California
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Breast Cancer Action
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Breast Cancer Fund
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Center for Health, Environment and Justice
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Center for Science in the Public Interest
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Earth Day Network
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Healthy Children's Organizing Project

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Science and Environmental Health Network
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Silent Spring Institute
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WE ACT for Environmental Justice
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Worksafe, Inc.
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Women is the First Environment Collaborative
Katsi Cook
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ⁱ Pamela M. M. Jull, PhD, Aaron Ignac, MS, Lucas Snider, Ryan Siu, Rachel Williams, & Christy Shelton, Cascadia Consulting Group, Inc. Department of Ecology Reducing Toxic Threats statewide Household Survey, April 2007.

ⁱⁱ Fox, S, Livingston G. Latinos Online, Hispanics With Lower Levels of Education and English Proficiency Remain Largely Disconnected from the Internet. Pew Hispanic Center and Pew Internet Project, March 14, 2007