

The Campaign for Safe Cosmetics

www.SafeCosmetics.org



May 26, 2009

Campaign Steering Committee

William C. Weldon
Chief Executive Officer
Johnson & Johnson Companies
One Johnson & Johnson Plaza
New Brunswick, New Jersey 08933

Alliance for a Healthy Tomorrow

Dear Mr. Weldon:

Breast Cancer Fund

We are health care professionals, nursing associations, parents and environmental health and justice organizations writing to express concerns about personal care products made by Johnson & Johnson. We are pleased that your company has stated its commitment to environmental responsibility and healthy communities,¹ and with this in mind, we hope that you will take seriously the concerns that some Johnson & Johnson products contain hazardous chemicals. We respectfully request that you take action to remove these chemicals and switch to safer alternatives within the time frame outlined below.

Clean Water Action

Commonweal

Environmental Working Group

Our concerns stem in part from a report issued by the Campaign for Safe Cosmetics on March 12, 2009. *No More Toxic Tub: Getting Contaminants Out of Children's Bath and Personal Care Products* documents laboratory tests that found formaldehyde and 1,4-dioxane in Johnson's Baby Shampoo and other Johnson & Johnson products². Both chemicals are known to cause cancer in animals and are listed as probable human carcinogens by the Environmental Protection Agency. Please see the addendum for a list of specific concerns about the chemicals and manufacturing processes used in Johnson & Johnson personal care products.

Friends of The Earth

Massachusetts Breast Cancer Coalition

Women's Voices for the Earth

Other companies are making similar products by using ingredients that do not have contamination concerns. In addition, it appears that Johnson & Johnson is making products with alternatives to formaldehyde releasing ingredients in Japan³ where formaldehyde is prohibited in cosmetics.⁴ Therefore, any amount of these hazardous substances in products intended for infants and children is clearly unnecessary.

Given your company's position as a manufacturer of trusted brands of baby products that are advertised as "the number one choice of hospitals," we feel confident that you see the value of ensuring that your products used by infants and children are of the highest quality, made with the safest and purest ingredients. In the absence of adequate safety guidelines from FDA, we hope that you will take action consistent with your corporate reputation and go beyond regulatory compliance, rising to the highest level of safety set by other companies and the international community.

We urge Johnson & Johnson to address these concerns by creating company policies that ensure your products use the safest ingredients possible, based on the most recent science and based on a precautionary approach⁵. We believe that, by doing so, you will protect public health, reduce pollution in our environment, and ensure your position as the global market leader in baby shampoos and body-care products.

Today's consumers are demanding products that do not contain hazardous ingredients, and information on chemical hazards is more readily available than ever before. To respond to consumer demand and remain competitive, forward-thinking companies are voluntarily adopting precautionary chemical policies. For example, in the beginning of 2009, SC Johnson committed to provide ingredient information for all of its air freshening and home cleaning products, as well as to phase out the use of phthalates in all its products. Also in March 2009, Sunoco began to restrict sales of BPA, an estrogenic chemical used in baby bottles and food containers that poses health threats particularly to fetuses, babies and children. Sunoco will now require customers to guarantee that its BPA will not be used in food and water containers for children under three.

While Johnson & Johnson has responded with statements like "all our products meet or exceed the regulatory requirements in every country where they are sold," an increasing number of companies are acknowledging that such positions no longer adequately address consumer concerns and the mounting evidence of health impacts from low dose exposures to toxic chemicals. These companies, including many in the cosmetics and personal care products sector, are moving beyond regulatory compliance to phase out chemicals of concern in their products.

Johnson & Johnson can and should be a leader on these issues. To that end, we respectfully ask that Johnson & Johnson commit to taking the following actions by the end of August 2009:

- Ensure that all products are safe for children and others who are vulnerable
- Reformulate personal care products to ensure that they are free of 1,4-dioxane
- Reformulate products to avoid the use of Quaternium-15 and other formaldehyde-releasing preservatives and switch to safer preservatives
- Phase all phthalates out of your products, including any that might be fragrance components

We would also strongly encourage you to adopt longer-term goals consistent with policies of the Campaign for Safe Cosmetics, and with great importance to your customers, including longer-term goals such as:

- Disclosure of all chemicals and components in fragrance in Johnson products
- Becoming a signatory to the Compact for Safe Cosmetics or developing a publicly available "Johnson & Johnson Safe Chemicals Policy" that addresses the core components of this pledge for safety and transparency signed by more than 1,000 cosmetics companies from Burt's Bees and Tom's of Maine to the Body Shop (please see the attached addendum for the full text of the

Compact for Safe Cosmetics)

We will contact you within 10 business days to schedule a meeting with health care professionals, scientists and representatives of the Campaign for Safe Cosmetics to discuss the concerns laid out in our letter, and possible solutions, at a mutually convenient time and location. We genuinely look forward to working with you to protect the health of our communities and the environment.

Sincerely,

Lisa Archer
National Coordinator
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Encl: Addendum

Addendum: Statement of concerns about the chemicals and manufacturing processes used in Johnson & Johnson products

Quaternium-15: Peer reviewed research indicates this preservative, used in Johnson's Baby Shampoo and other products produced by your company, is a skin and immune system toxicant, and has had broad systemic effects in animals at low doses.⁶ Quaternium-15 also releases formaldehyde into products over time. Formaldehyde was found in two samples of Johnson's Baby Shampoo at levels of 200 and 210 parts per million which may induce skin reactions in sensitive individuals.⁷ Formaldehyde is a carcinogen and a skin sensitizer.⁸

D&C Orange #4: This orange dye used in Johnson's Baby Shampoo is not approved by FDA for use in products intended for use around the mouth, lips, eyes, or on damaged skin. Johnson & Johnson's "no more tears" tagline brings home what all parents know: bath products often end up in children's eyes and mouths. Johnson & Johnson should be sure to use ingredients that don't violate FDA recommendations and that are safe for short and long term use.

Ethylene oxide in chemical processing and 1,4-dioxane contamination: The ethoxylation process -- used to process chemicals such as the PEG-80 sorbitan laurate and PEG 150-distearate in Johnson's Baby Shampoo -- involves the use of ethylene oxide, a highly toxic chemical and known carcinogen⁹. Even if the finished product contains no ethylene oxide, the use of this chemical is a concern for the workers who create, handle, or use it in the processing of ingredients used in your products. This chemical process often leads to 1,4-dioxane contamination, as found in your products in February 2007 (<http://safecosmetics.org/article.php?id=64>) and March 2009 lab tests.

According to the Environmental Protection Agency (EPA), 1,4-dioxane is a probable carcinogen.¹⁰ The federal Consumer Product Safety Commission states that "the presence of 1,4-dioxane, even as a trace contaminant, is cause for concern."¹¹ In a recent Web MD article, Dr. Wilma Bergfeld, chair of the Cosmetics Ingredients Review Panel, said that "Dioxane should not be in any baby care or children's cosmetic, period, because it is possible to take it out."¹²

Lack of full disclosure about the ingredients in your products: The contaminants 1,4 dioxane and formaldehyde were not listed on product labels, yet these chemicals were present in some products made by your company. Consumers are left to wonder what other hidden contaminants are in children's bath products. In addition, the chemical components of the "fragrance" used in your products are also not disclosed. We are concerned that fragrances in your products may contain phthalates and other chemicals of concern. Without full disclosure of what personal care products contain, parents cannot make fully informed decisions to protect their children from unwanted, risky exposures.

Lack of information about safety: There are currently no legal requirements for the cosmetics industry to assess cosmetic ingredients or products for safety. More than 80% of chemicals in cosmetics have never been assessed for safety by the Cosmetics Ingredients Review, the industry's safety panel, or the FDA.¹³

Cumulative Exposure: While one-time uses of contaminated bath products highlighted in the Campaign for Safe Cosmetics report may not cause harm, these products are used repeatedly and in combination with other products that can also contain hazardous chemicals. The same baby can be

exposed to formaldehyde and 1,4-dioxane from baby shampoo, bubble bath and body wash in a single bath as well as from other sources. For example, formaldehyde is also found in kitchen cabinets, furniture, new clothes and other sources. These exposures add up. It is especially important that products intended specifically for infants and children do not add to these toxic exposures.

Children are more vulnerable to toxic chemicals: According to the National Academy of Sciences, several factors contribute to children's exceptional vulnerability to the harmful effects of chemicals.¹⁴ In its recently updated cancer risk guidelines, the Environmental Protection Agency cites a review of 23 studies of early life exposures to cancer-causing chemicals and concludes that babies are 10 to 65 times more vulnerable to those chemicals than adults.¹⁵ However, the government does not impose special regulations on personal care products marketed for babies and children.

These specific concerns are in line with larger goals shared by health care associations and other non-profit organizations that are working to protect public health by reducing exposure to hazardous substances in our environment, in consumer products, in hospitals and in our bodies.

Compact for Safe Cosmetics

1. All cosmetics and personal care products made by this company anywhere in the world meet or exceed the formulation standards and deadlines set by the European Union Directive 76/768/EEC to be free of chemicals that are known or strongly suspected of causing cancer, mutation or birth defects.
2. This Company will implement substitution plans that replace hazardous materials with safer alternatives within three years, by:
 - Conducting an inventory of potential chemicals of concern in our products (or byproducts) to determine their toxicity to living things, their persistence in the environment, their ability to increase in concentration in the food chain, their contamination of our bodies, or qualities they possess that pose hazards including carcinogens, endocrine disruptors, sensitizers, mutagens, reproductive toxins, developmental toxins and neurotoxins.
 - Developing an aggressive substitution plan and timeline to: move to safer materials, prioritizing for substitution those compounds internationally recognized as most toxic; provide for an ongoing review of safer materials and chemicals as effective, cost-competitive alternatives are available; and work with upstream suppliers to provide toxicity data on chemicals in products.
 - Publicly reporting on their progress in meeting these goals.

For more information on the Compact for Safe Cosmetics, please visit our website at:
www.safecosmetics.org/compact

¹ “Our purpose is to improve the health and well-being of families everywhere. To fulfill this goal, we must protect the environments in which we work and live. A healthy planet and a healthy community go hand in hand. We set high standards for our operating companies in the area of environmental responsibility — striving for performance that does not merely comply with regulations but reduces our environmental impacts.” Johnson & Johnson website: <http://www.jnj.com/connect/caring/environment-protection/> Accessed April 20, 2009.

² For product test results please refer to our letter to Johnson & Johnson informing your company of our product testing results and report release, dated March 11, 2009, or to the Toxic Tub report on our website: www.safeCosmetics.org/toxictub.

³ Johnson & Johnson Japan Website: http://translate.google.com/translate?js=n&prev=_t&hl=en&ie=UTF-8&u=http%3A%2F%2Fjohnsons.jp%2Fbaby%2Fproducts%2Fsoap1.html&sl=ja&tl=en&history_state0= accessed April 27, 2009.

⁴ Salvador, Amparo and Alberto Chisvert, editors. Analysis of Cosmetic Products. Elsevier. Amsterdam. 2007. p. 215. http://books.google.com/books?id=IYf8FDXID5oC&dq=Analysis+of+Cosmetic+Products&printsec=frontcover&source=bn&hl=en&ei=QP2mSfiY04mQtQOj3_3cDw&sa=X&oi=book_result&resnum=4&ct=result#PPA21,M1 accessed February 25, 2009.

⁵ Wingspread Consensus Statement on the Precautionary Principle: <http://www.sehn.org/wing.html> accessed April 20, 2009.

⁶ <http://www.cosmeticsdatabase.com/ingredient.php?ingred06=705478> accessed April 20, 2009.

⁷ Jordan WP Jr., Sherman WT, King SE. Threshold responses in formaldehyde-sensitive subjects. J Am Acad Dermatol. 1979; 1(1):44-8. Also confirmed by personal communication between Dr. Sharon Jacob and Stacy Malkan, February 26, 2009.

⁸ Sarantis H, et al. “No More Toxic Tub: Getting Contaminants Out of Children's Bath and Personal Care Products,” March 2009, Breast Cancer Fund and Commonweal.

⁹ Skin Deep Cosmetics Database. Environmental Working Group. <http://www.cosmeticsdatabase.com/ingredient.php?ingred06=726229> accessed April 20, 2009

¹⁰ U.S. Environmental Protection Agency. Technology Transfer Network Air Toxics Web Site. “1,4-Dioxane (1,4-Diethyleneoxide).” www.epa.gov/ttn/atw/hlthef/dioxane.html accessed December 20, 2008.

¹¹ U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program. “1,4-Dioxane, CAS No. 123- 91-1: Reasonably Anticipated to be a Human Carcinogen.” Eleventh Report on Carcinogens. December 2002. Available at: <http://ntp.niehs.nih.gov/ntp/roc/eleventh/profiles/s080diox.pdf>.

¹² Boyles, S, Reviewed by Chang, L MD. “Report: Toxins Common in Baby Products: Of the Baby Products Tested, 61% Contained Formaldehyde and 1,4-Dioxane”, WebMD Health News, March 12, 2009, <http://children.webmd.com/news/20090312/report-toxins-common-in-baby-products?page=2> accessed April 20, 2009.

¹³ Skin Deep Cosmetics Database. Environmental Working Group. “FDA Warns Industry to Follow Law on Untested Ingredients.” www.cosmeticsdatabase.com/research/FDA_Warning accessed February 15, 2009.

¹⁴ NAS (National Academy of Sciences). Pesticides in the Diets of Infants and Children. National Academy Press. Washington, DC. 1993.

¹⁵ U.S. Environmental Protection Agency. Supplemental guidance for assessing susceptibility from early-life exposures to carcinogens. EPA Risk Assessment Forum. EPA/630/R-03/003F. March 2005. [Final version of 2003 Draft]. 2005.