



A FAMILY COMPANY

Global Government Relations
1667 K Street, NW
Suite 650
Washington, DC 20006

May 19, 2015

The Honorable Jimmy Gomez, Chairman
Assembly Committee on Appropriations
State Capitol, Room 2114
Sacramento, CA 95814

SUBJECT: AB 708 (Jones-Sawyer) Consumer Product Ingredient Disclosure: Oppose

Dear Assembly Member Gomez:

I am writing on behalf of S. C. Johnson & Son, Inc. (SC Johnson) to express our opposition to AB 708 (Jones-Sawyer), which would mandate ingredient disclosure for certain categories of consumer products sold in California. As an industry leader in the effort to inform consumers about the ingredients used in consumer products, we believe AB 708 in its current form – however well-intentioned it may be – imposes unnecessary new burdens on consumer product manufacturers, ignores the current industry trend in product ingredient disclosure, and falls short of establishing a mechanism to provide meaningful ingredient information to consumers.

SC Johnson is a family company dedicated to innovative, high-quality products, excellence in the workplace and a long-term commitment to the environment and the communities in which it operates. Based in the U.S., the company is one of the world's leading manufacturers of household cleaning products and products for home storage, air care, pest control and shoe care. It markets such well-known brands as GLADE®, KIWI®, OFF!®, PLEDGE®, RAID®, SCRUBBING BUBBLES®, SHOUT®, WINDEX® and ZIPLOC® in the U.S. and beyond, with brands marketed outside the U.S. including AUTAN®, TANA®, BAMA®, BAYGON®, BRISE®, KABIKILLER®, KLEAR®, MR MUSCLE®, and RIDSECT®. The 129-year-old company generates \$9 billion in sales, employs approximately 13,000 people globally and sells products in virtually every country around the world. Please visit www.scjohnson.com for additional information on our company.

Since 2009, SC Johnson has developed and implemented a comprehensive ingredient communication program that goes beyond any current regulatory standard and is designed to provide useful and readily-accessible information to consumers and their families about the ingredients in the products they use in their homes. SC Johnson's North American ingredient communication website, www.whatsinsidescjohnson.com, is part of a broad ingredient communication program that includes putting product ingredients online, making them available through a toll-free consumer hotline number, and adding International Nomenclature of Cosmetic Ingredients (INCI) terms to product labels.

This ingredient communication plan builds on a household products industry right-to-know initiative that was announced in late 2008. SC Johnson committed to going beyond the industry model and regulatory requirements with our own ingredient communication program, which includes:

- Disclosing all ingredients, including dyes, preservatives and fragrance ingredients.
- Focusing on ingredient names that are meaningful to consumers primarily by using the personal care industry's INCI names, as well as those in the Consumer Specialty Products Association's Consumer Product Ingredients Dictionary.
- Not just listing, but defining ingredients, and including an explanation of their purpose in the product – to help families make more informed purchasing decisions.
- Providing information about U.S. products in English and Spanish.
- Providing information about Canadian products in English and French.

And, we continue to enhance and build upon the program:

- In 2012, SC Johnson announced the launch of its Exclusive Fragrance Palette, which provides a comprehensive list of fragrance ingredients that may be used in the company's products in the U.S. and Canada, and is accessible through the ingredient disclosure website.
- In 2013, we added pest control and other U.S. EPA-registered products to the website.
- In October 2014, we announced plans to begin disclosing product-specific fragrance ingredient information on www.whatsinsidescjohnson.com, starting with U.S. and Canada air care products – including sprays, candles, oils and gels – in the spring of 2015, and then expanding into other product categories, including home cleaning.

By contrast, AB 708 is highly prescriptive and provides manufacturers with virtually no flexibility to design and implement an ingredient communication program that provides consumers with meaningful ingredient information. Of our many concerns, we wish to highlight a few in particular:

Mode of disclosure: Manufacturers should have the option of communicating ingredient information via the company website, rather than on product labels. Manufacturers like SC Johnson frequently adjust their formulations – a fact that not only reflects supply chain realities, but also the drive to continuously improve ingredient selection. A mandatory requirement to disclose even a portion of product ingredients on product labels would necessitate costly re-labeling – and potential marketing delays – every time a formula is changed. Updating information via the company's website would make ingredient information publicly available much more quickly.

Ingredient nomenclature: Our company made the informed decision to focus on ingredient names that are truly meaningful to consumers, using the personal care industry's International Nomenclature of Cosmetic Ingredients (INCI) names and those in the Consumer Specialty Products Association's (CSPA) Consumer Product Ingredients Dictionary. Our research indicates that use of Chemical Abstract Service (CAS) number does little to inform consumers, and we would recommend that the bill be modified to remove that requirement.

Ingredient definition: As currently written, the bill’s definition of “ingredient” is overly broad. We believe a better approach would be to limit disclosure only to intentionally added substances and exclude incidental substances that have no technical or functional effect in the formulation or are present at insignificant levels.

We strongly believe in communicating openly about our company’s products, so that consumers in California and around the country can use SC Johnson products with the utmost confidence. We also believe our ingredient disclosure program, which we continue to enhance with additional consumer research and feedback, makes information about product ingredients both easy to find and to understand. Unfortunately, AB 708 proposes a relatively inflexible, “one-size-fits all” approach that not only will jeopardize our company’s ingredient disclosure program, but will do little to effectively communicate meaningful ingredient information to consumers.

For these reasons, we urge your “no” vote on AB 708 when it comes before the Appropriations Committee this week. SC Johnson is committed to transparency and we welcome the opportunity to work with the author and your members to develop a more balanced and flexible legislative approach to ingredient disclosure.

Thank you for your consideration. Please do not hesitate to contact me with any questions at (202) 331-1186 or cppearce@scj.com.

Sincerely,

A handwritten signature in black ink, reading "Christopher P. Pearce". The signature is fluid and cursive, with a long horizontal stroke at the end.

Christopher P. Pearce
Director, Government Relations

cc: Assembly Appropriations Committee Members
Assembly Member Jones-Sawyer