

March 13, 2017

Alexandra Scranton, MS  
Director of Science and Research  
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Dear Alexandra:

I wanted to follow up with you about the contacts you have made to SC Johnson regarding the presence of galaxolide in some of our fragrances. First, I want to reiterate what we've explained previously about our process and why we feel it is beyond the norm for responsibility and rigor.

#### **About Our Standards**

As has been our practice for decades, we constantly review scientific information that might affect our ingredient choices. When there is sufficient scientific evidence to warrant a reformulation, we consider it. We won't change to an alternative without good science behind it, however. What's new is not necessarily always better. It takes time and study to evaluate new options, and we respect that process.

We also respect and support scientific governing bodies. There are thousands of scientists working for governments around the world – people with families of their own who care just as we do about health, safety and the future. When these experts determine an ingredient can be used, we respect their guidance. We will not discount the science or vilify an ingredient that has been thoroughly assessed.

With our principle-based approach and high standards, SC Johnson has delivered a long track record of taking action when needed, even when it has negative business implications. We've demonstrated this again and again, as early eliminators of troubling chemicals, and through our nearly 10-year, multi-million-dollar investment in ingredient disclosure.

We do not measure ourselves against internet rumors, unsubstantiated articles, or companies that may greenwash to boost their marketing. Rather, we use science as our guide.

### **The Science Says Galaxolide Can be Used Safely**

As we've discussed previously, the European Chemicals Agency (ECHA) and the United States Environmental Protection Agency (EPA) do not consider galaxolide to be a PBT. A review of this science is attached as a reference.

Given their certainty, while we see business benefits of transitioning away from galaxolide, we have chosen to wait while alternatives are tested – to make sure any changes we make are grounded in science. In fact, new data have come to light in recent years that give us the comfort to move toward alternatives that meet our high standards. Given that, we started transitioning to alternatives last year, and plan to continue that process over time.

However, I want to reiterate that we began that process because we now feel we have even better alternatives for our customers and the planet. In fact, we have significant concerns about the misconceptions that Women's Voices for the Earth has continued to perpetuate in your campaign against the science on galaxolide.

### **Our Concerns with Your Conclusions**

Over the past decade, we have repeatedly discussed our ingredient research and progress on ingredient transparency with Women's Voices for the Earth. We have shared information, responded to inquiries and, along with fragrance house partners, met with you in-person in Montana. To be frank, it is unfortunate that you knowingly distort and sensationalize the science for self-serving purposes rather than working to serve the public's benefit. We choose the latter – here are some of our concerns with your science:

- Your conclusions based on the GreenScreen study seem unfounded. That study assessed whether galaxolide has hazard properties, which it does. But so do water and table salt. The important next step is to determine risk – can the hazard be effectively managed. Table salt can be a hazard, but one can minimize the risk by using it responsibly. The same is true of galaxolide, as evidenced by ECHA and EPA's assessments.
- You have also talked about the "ubiquity" of galaxolide, which is a bit misleading. Ubiquity speaks to the pervasiveness of a substance, not to its persistence or whether it becomes unsafe due to accumulation. The ECHA and EPA studies confirmed that when measured over time, galaxolide levels remain unchanged in sediment and household dust. It does not accumulate and remains at levels that have been shown to be safe for human health and the environment.
- Additionally, you have mischaracterized SC Johnson as one of the "top six" users of this ingredient in the U.S. This is incorrect. The EPA report you referenced, the Chemical Data Reporting tool (CDR), does not report use of galaxolide. It reports *new sources* of it whether in products manufactured in or imported to the U.S. There are many companies that use galaxolide, some at significantly greater levels than SC Johnson, which do not appear on the CDR list because they are not considered *new sources*.

- But here's what's even more notable: Women's Voices for the Earth's singular focus on galaxolide overlooks many bigger and more concerning health issues affecting the Great Lakes, just one of which is mercury, a top ten chemical of public health concern. Thousands of pounds of mercury are pumped into the air annually from coal-fired power plants around the Great Lakes, and a great deal ultimately makes its way in the water. As you know, the potential neurological and other impacts from mercury are extremely significant and alarming. Plus, persistent methylmercury is consumed by fish and accumulates in the aquatic food chain, putting all species that eat fish at risk. Given this, we cannot understand why you would focus so much energy on galaxolide – a chemical authorities say is not a risk – rather than the undisputed harm that mercury could be causing for generations to come. This is something we care deeply about, and in fact SC Johnson has invested more than \$1.3 million in water stewardship efforts from educational programs to shoreline protection.

#### **Integrity in Ingredient Choices**

At the end of the day, for us, ingredient selection is about integrity. It's about the integrity of the science – ensuring that robust research has been done and accepting the fact-based conclusions that research delivers. And it's about the integrity of the process – taking the time to get scientific input on decisions, holding true to research findings, and taking measured steps rather than jumping on the latest trend that the data doesn't back up.

I hope this helps explain our position on galaxolide – and any ingredient, for that matter. We know ingredients are a topic for which your team has great passion, and we respect that. We ask that you respect us, too.

While Women's Voices for the Earth prefers to gloss over our leadership, the reality is that SC Johnson has been bringing integrity, science and responsibility to ingredient choices for decades. And, no matter how much you hope to change us...we will continue working to make the best science-based decisions we can for the families who use our products.