

Chemical Footprint Project 2019 Survey Responses
Beautycounter



For weblinks and associated texts see Disclosure Leader Profiles at
www.chemicalfootprint.org/results/disclosure-leaders

Survey Question	Response
Management Strategy	
M1. Does your company have a chemicals policy that aims to avoid chemicals of high concern (CoHCs) and includes a stated preference for the use of safer alternatives? Check all that apply. Our company has:	
a. has a policy that addresses the reduction of CoHCs in our products.	x
a preference for safer alternatives in our products.	x
a policy that addresses the reduction of CoHCs in our manufacturing.	x
a preference for safer alternatives in our manufacturing.	x
a policy that addresses the reduction of CoHCs in our facilities.	x
a preference for safer alternatives in our facilities.	x
a policy that addresses the reduction of CoHCs in our supply chains.	x
a preference for safer alternatives in our supply chains.	x
a policy that addresses the reduction of CoHCs in our packaging	
a preference for safer alternatives in our packaging.	x
c. does not have manufacturing operations.	
d. has no established policy at this time.	
M2. Is reducing the use of CoHCs and advancing safer alternatives beyond regulatory requirements integrated into your company's business strategy? Check all that apply.	
a. We screen for CoHCs in product design and/or procurement.	x
b. We have a list of safer chemicals or safer materials that are preferred in product design and/or procurement.	x
c. We avoid the use of CoHCs in our manufacturing processes.	x
d. We do not manufacture products.	x
e. Our company highlights the use of safer chemicals and materials in its product marketing.	x
f. None of the above.	
M3. How does your company advocate externally for the use of safer chemicals? Check all that apply. Our company engages in external initiatives that clearly promote the:	
a. prioritization of chemicals for reduction based on their inherent hazards.	x
b. the reduction in the use of CoHCs.	x
c. development and adoption of safer alternatives, including green chemistry solutions.	x
d. public disclosure of CoHCs or other chemical ingredients in products.	x
e. none of the above.	
M4. What means of accountability does your company have in place to ensure implementation of your chemicals policy? Check all that apply. Our company:	
a. delineates chemicals management responsibilities in job descriptions and individual annual performance metrics.	x
b. assigns member(s) of senior management responsibility for meeting chemical policy goals and objectives.	x
c. has financial incentives for senior management to meet corporate sustainability goals. These goals include reducing the use of some or all CoHCs.	x
d. has Board level engagement in the implementation of our chemicals policy.	x
e. none of the above.	

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Chemical Inventory	
I1. What is the scope of chemicals of concern you restrict in your products and manufacturing processes? Our company:	
a. uses our RSL(s) to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.	
b. uses a single RSL that reflects the strictest regulation in all of the countries or markets in which the brand operates and sells products (e.g., regulations that apply to manufacturing, marketing, and sales locations).	
c. uses a single RSL that reflects the strictest regulation in all locations worldwide.	
d. uses a single RSL that includes voluntary limits or bans of chemicals beyond what is covered in the most restrictive global regulations, or it includes chemicals that may not be subject to regulation but which the registrant has voluntarily chosen to limit or ban from its products.	x
e. has developed an MRSL.	
f. uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not <i>require</i> suppliers to eliminate these chemicals in products, parts, or components.	
g. uses none of the above.	
I2. What actions does your company take to ensure that its requirements (as selected in I1) are current and implemented effectively? Check all that apply. Our company:	
a. delineates compliance requirements in contracts with suppliers.	x
b. trains suppliers about how to comply with our requirements.	x
c. updates our RSL/MRSL/ other requirements at minimum on an annual basis.	x
d. engages external stakeholders such as non-governmental organizations (NGOs), business customers, and consumers in the development of our RSL/MRSL/ other requirements.	x
e. publicly discloses our RSL/MRSL/other requirements.	
f. uses none of the above.	
I3. What chemical information does your company, either directly or through a respected third-party, collect from suppliers? Our company:	
a. requires suppliers to confirm that they comply with our RSL.	x
b. requires suppliers to confirm that they comply with our RSL and to provide information on chemicals on our Watch List, which includes 1 – 50 chemicals.	
c. requires suppliers to confirm that they comply with our RSL and to provide information on chemicals on our Watch List, which includes more than 50 chemicals.	x
d. requests that suppliers to provide full chemical ingredient information.	x
e. requires suppliers to provide full chemical ingredient information.	x
f. does none of the above.	
I4. For what percentage of products sold by your company do you collect full chemical ingredient information?	
a. <i>formulated products</i> : For what percentage of formulated products sold by your company is full chemical ingredient information collected? _____ percent	100%
b. <i>articles</i> : For what percentage of articles sold by your company is full chemical ingredient information collected? _____ percent	
I5. What capabilities does your company have for managing data on chemical ingredients in its products? In your documentation, please include a description of your data system. Check all that apply. Our company has:	
a. an internal named point(s) of contact or outside contractor who communicates with suppliers concerning our chemical information requirements.	x
b. a data system (either internal or third party) to manage an inventory of chemicals in products.	x
c. a data system (either internal or third party) that links our inventory of chemicals in products to chemical hazard information.	x
d. a data system for generating reports on chemical/material ingredient declarations to customers.	x
e. none of the above.	

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I6. How does your company ensure conformance with your chemicals requirements? Check all that apply. Our company:	
a. has an audit program to verify supplier submitted data.	x
b. requires suppliers to test parts in third party approved labs and provide results.	x
c. trains suppliers on how to comply with reporting requirements.	x
d. routinely tests parts, components, or products to assure conformance with reporting requirements.	x
e. has none of the above.	
Footprint Measurement	
F1. Has your company set goals for reducing CoHCs in the products you sell and measured progress toward these goals? Check all that apply in "a - d" or answer only "e" or "f". Our company:	
a. has set goal(s) for reducing CoHCs by count or mass.	x
b. publicly discloses the goal(s).	
c. publicly discloses specific CoHC(s) included in the goal(s).	
d. publicly reports annually on progress towards meeting goals, OR	
e. has no CoHCs in our products and publicly discloses this information, OR	
f. has none of the above.	
F2. How does your company measure its baseline chemical footprint for the most recent year for which you have data? Choose either response option "a," options "a" and "b" or option "c" or option "d". Our company:	
a. had intentionally added CoHCs/SVHCs in its products = ____ CoHCs/SVHCs by count and/or	
b. had intentionally added CoHCs in its products = ____ CoHCs/SVHCs by mass (kg), or	x
c. had no intentionally added CoHCs in its products or	
d. is unable to answer this question at this time.	
Enter the count of intentionally added CoHCs/SVHCs	
Enter the mass (kg) of intentionally added CoHCs	1880.16
Please indicate which reference list you are using:	CFP CoHC 2018 List
F3. Over the most recent year for which you have data, how much have intentionally added CoHCs in your products changed?	
a. Our company's difference in the number of intentionally added CoHCs/SVHCs in products: (total number of COHCs/SVHCs at beginning of reporting period minus total number of CoHCs/SVHCs at end of reporting period) ____ CoHCs/SVHCs by count.	6.0
b. Our company's difference in the mass of intentionally added CoHCs in products: (total mass of COHCs/SVHCs at beginning of reporting period minus total mass of CoHCs/SVHCs at end of reporting period) ____ CoHCs/SVHCs by mass (kg).	
c. Our company is unable to calculate baseline chemical footprint for beginning of reporting period. However, the number and/or mass of intentionally added CoHCs changed by the following amount over the reporting period ____.	
d. Our company's products did not contain intentionally added CoHCs for the reporting period.	
e. Our company is unable to answer this question at this time.	
Please indicate which reference list you are using:	CFP CoHC 2018 List
F4. How does your company assess the hazards of chemicals in its products and for what percent of your products has your company assessed these hazards?	
a. Our company uses a system or tool (internal or third party) to evaluate chemical hazards. Identify the system or tool: _____.	x
b. Our company asks suppliers to provide their evaluations of chemical hazards in the products they sell to us.	x
c. For what percentage of products has your company assessed these hazards, using methods in a and/or b? _____.	
d. Our company does not currently assess the hazards of chemicals in its products beyond regulatory requirements.	

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F5. How does your company encourage the use of safer alternatives to CoHCs? Check all that apply in "a - f" or answer only "g" or "h". Our company:	
a. has developed a definition for a safer alternative that is consistent with the CFP definition, and we include such criteria in our business processes.	x
b. communicates about and asks suppliers to use our company's criteria for a safer alternative.	x
c. rewards suppliers that use safer alternatives.	x
d. has integrated our company's criteria for a safer alternative into our product development process (e.g., through our design and safety processes).	x
e. has established a goal and is tracking progress to improve the profile of chemicals across our products, consistent with our company's criteria for a safer alternative.	x
f. publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices.	
g. does not have products that contain CoHCs (please describe in documentation how it ensures that the safest chemicals available are used).	
h. does none of the above	
Disclosure and Verification	
D1. What information does your company disclose about the chemical ingredients in its products? Enter the percentages for all that apply.	
D1.a. For formulated products, our company publicly discloses:	
Chemical identity beyond legal requirements for ____ percentage of sales at the SKU level.	
All intentionally added chemicals including fragrances, flavors, and preservatives in products for ____ percentage of sales at the SKU level.	x
We do not publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	x
i. (for products) Percentage of sales at the SKU level for which chemical identity beyond legal requirements is disclosed.	
ii. (for products) Percentage of sales at the SKU level for which chemical identity of all intentionally added chemicals including fragrances, flavors, and preservatives in products is disclosed.	100%
D1.b. For articles, our company publicly discloses:	
Generic material content for 95% by mass of chemicals in products for ____ percentage of sales or spend at the SKU level.	
Chemical identity for 95% by mass of chemicals in products for ____ percentage of sales or spend (e.g., Health Product Declaration).	
We do not publicly disclose information about chemicals in our articles beyond legal requirements.	
i. (for articles) Percent of sales or spend at the SKU level for which, at a minimum, chemicals on the EU's Candidate List of SVHCs in products are disclosed.	
ii. (for articles) Percentage of sales or spend at the SKU level for which chemical identity for 95% by mass of chemicals in products is disclosed	
D2. Does your company agree to publicly disclose its responses to the CFP Survey?	
Yes.	x
No.	
D3. Does your company agree to publicly disclose its score on the CFP website?	
Yes.	x
No.	
D4. Have any of your company's responses to the Survey questions been verified by an independent third party? Check only one. Our company's response options have been verified by a an independent third party for:	
a. none to one of our response options.	x
b. two to four of our response options.	
c. at least eight of our response options.	
d. at least twelve of our response options.	
e. all response options except D2, D3, and D4.	
Score	87.5



Beautycounter
Publicly available CFP 2019 Survey Responses
Web links and public documents

M1. Does your company have a chemicals policy that aims to avoid chemicals of high concern (CoHCs) and includes a stated preference for the use of safer alternatives?

Response options	Response options selected	If publicly available, provide web link:
a. Our company has:		
- has a policy that addresses the reduction of CoHcs in our products .	X	https://www.beautycounter.com/transparency
- a preference for safer alternatives in our products .	X	
- a policy that addresses the reduction of CoHcs in our manufacturing .	X	https://www.beautycounter.com/transparency
- a preference for safer alternatives in our manufacturing .	X	
- a policy that addresses the reduction of CoHcs in our facilities .	X	https://www.beautycounter.com/transparency
- a preference for safer alternatives in our facilities .	X	
- a policy that addresses the reduction of CoHcs in our supply chains .	X	https://www.beautycounter.com/transparency
- a preference for safer alternatives in our supply chains .	X	
- a policy that addresses the reduction of CoHcs in our packaging .		https://www.beautycounter.com/transparency
- a preference for safer alternatives in our packaging .	X	
b. no manufacturing operations.		
c. no established policy at this time.		

Chemicals policy: <https://www.beautycounter.com/transparency>

Our Ingredient Selection Process

The Never List™ is made up of approximately 1,500 harmful or questionable ingredients we prohibit from our product formulations, including the nearly 1,400 ingredients banned in the European Union.

Using the best available sources, we screen every potential ingredient for information on specific hazards like cancer, developmental toxicity, hormone disruption, and infertility.

There are major data gaps on most cosmetics ingredients, so we review emerging data regularly and even commission our own studies.

We choose the best organic, natural, sustainable, and synthetic ingredients that meet our standards. Over 80% of the ingredients in our products are natural or plant-derived. We do not test on animals.

Every formula ingredient, including known components of fragrances, flavors, and intentionally added preservatives, are listed on our product labels or on [Beautycounter.com](https://www.beautycounter.com).

11. What is the scope of chemicals of concern you restrict in your products and manufacturing processes?

Response options	Response options selected
a. Uses our RSL(s) to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.	
b. Uses a single RSL that reflects the strictest regulation in all of the countries or markets in which the brand operates and sells products (e.g., regulations that apply to manufacturing, marketing, and sales locations).	
c. Uses a single RSL that reflects the strictest regulation in all locations worldwide.	
d. Uses a single RSL that includes voluntary limits or bans of chemicals beyond what is covered in the most restrictive global regulations, or it includes chemicals that may not be subject to regulation but which the registrant has voluntarily chosen to limit or ban from its products.	X
e. Our company has developed an MRSL	
f. Uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not <i>require</i> suppliers to eliminate these chemicals in products, parts, or components.	
g. None of the above	

12. What actions does your company take to ensure that its requirements are current and implemented effectively?

Response options	Response options selected
a. delineates compliance requirements in contracts with suppliers	X
b. trains suppliers about how to comply with our requirements	X
c. updates our RSL/MRSL/ other requirements at minimum on an annual basis	X
d. engages external stakeholders such as non-governmental organizations (NGOs), business customers, and consumers in the development of our RSL/MRSL/ other requirements	X
e. publicly discloses our RSL/MRSL/other requirements Provide web link:	
f. None of the above	

F1. Has your company set goals for reducing CoHCs in the products you sell and measured progress toward these goals?

Response options	Response options selected
a. has set goal(s) for reducing CoHCs by count or mass	X
b. publicly discloses the goal(s) (at minimum includes percentage reduction and time period)	
c. publicly discloses specific CoHC(s) included in the goal(s)	
d. publicly reports annually on progress towards meeting goals, OR	
e. has no CoHCs in our products and publicly discloses this information, OR	
f. none of the above	
For options "b," "c," "d," and/or "e," provide web link(s):	

F5. How does your company encourage the use of safer alternatives to CoHCs?

Response options	Response options selected
a. has developed a definition for a safer alternative that is consistent with the CFP definition, and we include such criteria in our business processes	X
b. communicates about and asks suppliers to use our company's criteria for a safer alternative	X
c. rewards suppliers that use safer alternatives	X
d. has integrated our company's criteria for a safer alternative into our product development process (e.g., through our design and safety processes)	X
e. has established a goal and is tracking progress to improve the profile of chemicals across our products, consistent with our company's criteria for a safer alternative	X
f. publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices. Provide web link:	
g. If your company's products do not contain CoHCs, please describe in documentation how it ensures that the safest chemicals available are used.	
h. none of the above	

D1. What information does your company disclose about the chemical ingredients in its products?
 Enter the percentages for all that apply.

D1a. For formulated products, our company publicly discloses:

Response options	Response options selected
i. Chemical identity beyond legal requirements for ____ percentage of sales at the SKU level	
ii. All intentionally added chemicals including fragrances, flavors, and preservatives in products for __100%__ percentage of sales at the SKU level	X
iii. We do not publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	

Ingredients disclosed by product at beautycounter.com.

D1b. For articles, our company publicly discloses:

Response options	Response options selected
i. Generic material content for 95% by mass of chemicals in products for ____ percentage of sales or spend at the SKU level	n/a
ii. Chemical identity for 95% by mass of chemicals in products for ____ percentage of sales or spend (e.g., Health Product Declaration)	n/a
iii. We do not publicly disclose information about chemicals in our articles beyond legal requirements.	n/a
Provide web link(s) to online ingredient disclosure:	

D2. Does your company agree to publicly disclose its responses to the CFP Survey? Yes

D3. Does your company agree to publicly disclose its score on the CFP website? Yes

Total Score: 88