

CFP 2020 Survey	Response
Manufacturer/ No manufacturing	Ma
Formulated Products/Articles/Both	Fo
Products/Packaging/Both	PP
Management Strategy	
Question M1	
1. Does your company have a chemicals policy that addresses products?	
a. Yes	X
b. No	
2. Our company's chemicals policy for products: (Follow up to question 1) Choose all that apply.	
a. Addresses the reduction of chemicals of high concern in our products	X
b. Includes an explicit preference for safer alternatives in our products	X
c. Is publicly disclosed	X
3. Does your company have a chemicals policy that addresses packaging?	
a. Yes	X
b. No	
4. Our company's chemicals policy for packaging: (Follow up to question 3) Choose all that apply.	
a. Addresses the reduction of chemicals of high concern in our packaging	X
b. Includes an explicit preference for safer alternatives in our packaging	X
c. Is publicly disclosed	X
5. Does your company have a chemicals policy that addresses manufacturing?	
a. Yes	X
b. No	
6. Our company's chemicals policy for manufacturing: (Follow up to question 5) Choose all that apply.	
a. Addresses the reduction of chemicals of high concern in our manufacturing	X
b. Includes an explicit preference for safer alternatives in our manufacturing	X
c. Is publicly disclosed	X
7. Does your company have a chemicals policy that addresses its supply chain?	
a. Yes	X
b. No	
8. Our company's chemicals policy for its supply chain: (Follow up to question 7) Choose all that apply.	
Addresses the reduction of chemicals of high concern in our supply chain	X
Includes an explicit preference for safer alternatives in our supply chain	X
Is publicly disclosed	X
9. Does your company have a chemicals policy that addresses its facilities?	
a. Yes	X
b. No	
10. Our company's chemicals policy for its facilities: (Follow up to question 9) Choose all that apply.	
a. Addresses the reduction of chemicals of high concern in our facility	X
b. Includes an explicit preference for safer alternatives in our facilities	X
c. Is publicly disclosed	X
Question M2	
1. Is reducing the use of chemicals of high concern and advancing safer alternatives beyond regulatory requirements integrated into your company's business strategy? (4 points)	
a. Our company has integrated strategies listed in question 2, below, into our business strategy.	X
b. Our company has not integrated strategies listed in question 2, below, into our business strategy.	
2. We have integrated the following into our company's business strategy: (Follow up to question 1) Choose all that apply.	
a. We screen for chemicals of high concern in product and/or packaging design and/or procurement.	X
b. We have a list of safer chemicals or safer materials that are preferred in product and/or packaging design and/or procurement.	X
c. We avoid the use of chemicals of high concern in our manufacturing processes.	X
d. Our company highlights the use of safer chemicals and materials in its product marketing.	X

CFP 2020 Survey	Response
Question M3	
1. Does your company advocate externally for the use of safer chemicals?	
a. Our company advocates externally to promote the actions listed in question 2, below.	X
b. Our company does not advocate externally to promote the actions listed in question 2, below.	
2. Our company engages in external initiatives that clearly promote the: (Follow up to question 1)	
Choose all that apply.	
a. prioritization of chemicals for reduction based on their inherent hazards	X
b. development and adoption of safer alternatives, including green chemistry solutions	X
c. public disclosure of chemicals of high concern or other chemical ingredients in products	X
Question M4	
1. Does your company have in place means of accountability to ensure implementation of your chemicals policy?	
For an explanation and examples, see Survey Guidance, Question M4, at https://www.chemicalfootprint.org/assess/survey-guidance .	
a. Our company has means of accountability listed in question 2, below, to ensure implementation of our chemicals policy.	X
b. Our company does not have means of accountability listed in question 2, below, to ensure implementation of our chemicals policy	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
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 chemicals of high concern.	X
d. has Board level engagement in the implementation of our chemicals policy	X
Chemical Inventory	
Question I1	
1. What is the scope of chemicals of concern you restrict in your products and manufacturing processes?	
a. Our company has developed a list of chemicals of concern.	X
b. Our company has not developed a list of chemicals of concern.	
2. Our company: (Follow up to question 1)	
Choose one option for "a - d," and/or "e" and/or "f" if applicable.	
a. Uses a restricted substances list (RSL) or lists for products 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 for products 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 for products that reflects the strictest regulation in all locations worldwide.	
d. Uses a single RSL for products 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.	X
e. Our company has developed an manufacturing restricted substances list (MRSL) for manufacturing process chemicals.	X
f. Uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not require suppliers to eliminate these chemicals in products, parts, or components.	X
Question I2	
1. What actions does your company take to ensure that its requirements regarding chemicals of concern are current and implemented effectively? (Respond only if you selected option a for question I1.2.)	
a. Our company takes actions listed in question 2, below, to ensure that its requirements are current and implemented effectively.	X
b. Our company does not take actions listed in question 2, below, to ensure that requirements regarding our list of chemicals of high concern are current and implemented effectively.	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
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. publicly discloses our RSL/MRSL/other requirements.	X

CFP 2020 Survey	Response
Question I3	
1. What chemical information does your company, either directly or through a respected third-party, collect from suppliers?	
a. Our company collects chemical ingredient information from suppliers.	X
b. Our company does not collect chemical ingredient information from suppliers.	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
a. Our company requires suppliers to confirm that they comply with our RSL.	X
b. Our company 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. Our company 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.	
d. Our company requests that suppliers to provide full chemical ingredient information.	X
e. Our company requires suppliers to provide full chemical ingredient information.	X
Question I4	
1. For what percentage of formulated products sold by your company do you collect full chemical ingredient information? (Respond only if you selected options d or e for question I3.2.)	
Enter percent below.	
	100%
Question I5	
1. What capabilities does your company have for managing data on chemical ingredients in its products and packaging?	
a. Our company has capabilities for managing data on chemical ingredients in products and/or packaging listed in question 2, below.	X
b. Our company does not have capabilities for managing data on chemical ingredients in products or packaging listed in question 2, below.	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
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 and/or packaging	X
c. a data system (either internal or third party) that links our inventory of chemicals in products and/or packaging to chemical hazard information	X
d. a data system for generating reports on chemical/material ingredient declarations to customers	X
Question I6	
1. How does your company ensure conformance with your chemicals requirements?	
a. Our company ensures conformance with chemicals requirements through methods listed in question 2, below.	X
b. Our company does not ensure conformance with chemicals requirements through methods listed in question 2, below.	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
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
Footprint Measurement	
Question F1	
1. Has your company set goals for reducing chemicals of high concern in the products you sell and measured progress toward these goals?	
a. Yes	X
b. No	
2. Our company: (Follow up to question 1)	
Choose all that apply.	
a. has set goal(s) for reducing chemicals of high concern by count or mass	X
b. has set a goal to reduce its chemical footprint (See definition of "chemical footprint" in instructions.)	X
c. publicly discloses the goal(s), at minimum, including percentage reduction and time period	
d. publicly discloses specific chemicals of high concern included in the goal(s)	
e. publicly reports annually on progress towards meeting goals	
f. has no chemicals of high concern in our products or packaging and publicly discloses this information (See definition of "chemicals of high concern" in instructions.)	

CFP 2020 Survey	Response
Question F2	
1. How does your company measure its baseline chemical footprint for the most recent year for which you have data?	
a. Our company has calculated its chemical footprint.	X
b. Our company is unable to calculate its chemical footprint at this time.	
2. Our company: (Follow up to question 1)	
Choose one. Provide a narrative summary of how you calculate your company's chemical footprint.	
a. Has calculated its chemical footprint by mass using the CFP CoHC Reference List	X
b. Has calculated its chemical footprint by count using the CFP CoHC Reference Lst	
c. Has calculated its chemical footprint by mass using the EU SVHC Reference List	
d. Has calculated its chemical footprint by count using the EU SVHV Reference List	
e. Has no intentionally added chemicals of high concern, using the CFP CoHC Reference List	
3. Our company's chemical footprint in kilograms is: (Required response if you selected options a or c for question 2.)	
Enter footprint in kilograms below.	
	2002.28128
4. Our company's chemical footprint by count is: (Required response if you selected options b or d for question 2.)	
Enter footprint by number of chemicals of high concern in your product portfolio below.	
	2
Question F3	
1. Over the most recent year for which you have data, how much have intentionally added chemicals of high concern in your products and/or packaging changed?	
a. Our company has calculated the change in intentionally added chemicals of high concern.	X
b. Our company is unable to answer this question at this time.	
2. Our company: (Follow up to question 1)	
Choose one.	
a. has calculated the change in its chemical footprint by mass, using the CFP CoHC Reference List (See instructions for definition of "chemical footprint")	
b. has calculated the change in its chemical footprint by count, using the CFP CoHC Reference List	
c. has calculated the change in its chemical footprint by mass, using the EU SVHC Reference List	
d. has calculated the change in its chemical footprint by count, using the EU SVHC Reference List	
e. is unable to calculate its baseline chemical footprint for beginning of reporting period. However, it is able to calculate the change in the number and/or mass of intentionally added chemicals of high concern over the reporting period.	X
f. had no products containing intentionally added chemicals of high concern, using the CFP CoHC Reference List, for the reporting period.	
3. Our company's change in chemical footprint in kilograms is: (Required response if you selected options a or c for question 2.) (Optional)	
Enter your change in chemical footprint in kilograms below.	
4. Our company's change in chemical footprint by count is: (Required response if you selected options b or d for question 2.) (Optional)	
Enter your change in chemical footprint by number of chemicals below.	
5. Our company's change in the number and/or mass of intentionally added chemicals of high concern is: (Respond only if you selected option e for question 2.) (Optional)	
Enter your change in chemicals of high concern by number and/or kilograms below.	
	737.16
Question F4	
1. How does your company assess the hazards of chemicals in its products and/or packaging, and for what percent of your products has your company assessed these hazards?	
a. Our company assesses the hazards of chemicals in our products and/or packaging.	X
b. Our company does not does not currently assess the hazards of chemicals in its products and/or packaging beyond regulatory requirements.	
2. Our company: (Follow up to question 1)	
Choose one or both options.	
a. uses a system or tool (internal or third party) to evaluate chemical hazards. Identify the system or tool in attached documentation.	X
b. asks suppliers to provide their evaluations of chemical hazards in the products they sell to us.	
3. Our company has assessed hazard for the following percent of our products and/or packaging: (Required response if you selected options a and/or b for question 2.) (Optional)	
Indicate what percent of products and/or packaging are screened for hazard.	
	100%

Beautycounter
Publicly available CFP 2020 Survey Responses
Web links and public documents



CFP 2020 Survey	Response
Question F5	
1. How does your company encourage the use of safer alternatives to chemicals of high concern?	
a. Our company encourages the use of safer alternatives to chemicals of high concern using methods listed in question 2, below.	X
b. Our company does not encourage the use of safer alternatives to chemicals of high concern using methods listed in question 2, below.	
2. Our company: (Follow up to question 1) Choose all that apply.	
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 and/or packaging 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 and/or packaging, consistent with our company's criteria for a safer alternative, and/or	X
f. publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices.	
g. If neither your company's products nor packaging contain chemicals of high concern, using the CFP CoHC Reference List, please describe in documentation how it ensures that the safest chemicals available are used.	
Public Disclosure and Verification	
Question D1	
1. What information does your company disclose about the chemical ingredients in its formulated products?	
a. We publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	X
b. We do not publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	
2. For formulated products, our company publicly discloses: (Follow up to question 1) Choose all that apply.	
a. the identity of chemicals beyond legal requirements at the SKU level	X
b. all intentionally added chemicals including fragrances, flavors, and preservatives in products at the SKU level	X
3. Our company publicly discloses the identity of chemicals beyond legal requirements at the SKU level for the following percent of our formulated product portfolio: (Required response if you selected option a for question 2.) Enter percent below.	
	100%
4. Our company publicly discloses all intentionally added chemicals including fragrances, flavors, and preservatives at the SKU level for the following percent of our formulated product portfolio: (Required response if you selected option b for question 2.) Enter percent below.	
	100%
Question D2	
1. Does your company agree to publicly disclose its responses to the CFP Survey?	
a. Yes	X
b. No	
Question D3	
1. Does your company agree to publicly disclose its score on the CFP website?	
a. Yes	X
b. No	
Question D4	
1. Have any of your company's responses to the questions in the Survey been verified by an independent third party?	
a. Yes	X
b. No	
2. Our company's response options have been verified by an independent third party for: (Follow up to question 1) Choose one.	
a. one of our response options	
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	X
TOTAL	96

Supporting web links, where available

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?

Beautycounter Chemicals Policy: Blueprint for Clean

<https://www.beautycounter.com/safety>

Since our first product launch in 2013, we've been creating the gold standard for safety in the personal-care industry. How? First, we omit 1,800+ questionable ingredients in our formulations that are currently used in the industry—we call this [The Never List™](#). Instead, we use an ever-evolving toolbox of clean, more sustainable ingredients that have been screened by our safety and sustainability experts to create innovative formulas that deliver results—safely.

Beautycounter RSL: The Never List

<https://www.beautycounter.com/the-never-list>

At Beautycounter, we've committed to a health and safety standard that goes well beyond what is legally required in the United States. The Never List™ is made up of more than 1,800 questionable or harmful chemicals that we never use as ingredients in our products. This includes the over 1,400 chemicals banned or restricted in personal care products by the European Union, plus additional chemicals screened by Beautycounter and found to be of concern.

While all of our ingredients are sourced with a higher standard of safety and quality in mind, it is well recognized — and accepted by regulatory authorities around the world — that incidental, trace levels of a chemical may inadvertently be introduced in a cosmetic product due to the complexities of the supply chain and manufacturing process. At Beautycounter, we work incredibly hard to minimize — but unfortunately, can't eliminate — the potential that a product may contain trace levels of a chemical from The Never List™.

Beautycounter Packaging Chemicals Policy

<https://www.beautycounter.com/packaging>

For decades, there's been growing research around the health impacts of packaging, especially plastic. Studies have shown there can be serious health risks tied to packaging products in certain potentially harmful materials. So, much like our ingredient [Never List™](#), there are certain materials we prohibit or restrict in our packaging. BPA or plastics that contain phthalates (like vinyls) are a few of them, as they are known to leach into the products and contaminate formulas when heated.

Beautycounter Ingredient Selection Process

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

1. Ban Intentionally – The Never List™ is made up of approximately 1,800 harmful or questionable ingredients we prohibit from our product formulations, including the nearly 1,400 ingredients banned in the European Union.
2. Screen Rigorously – Using the best available sources, we screen every potential ingredient for information on specific hazards like cancer, developmental toxicity, hormone disruption, and infertility.

3. Learn Constantly – There are major data gaps on most cosmetics ingredients, so we review emerging data regularly and even commission our own studies.
4. Source Responsibly – 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.
5. Share Transparently – 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).

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

Beautycounter ingredient RSL is publicly called **The Never List**

<https://www.beautycounter.com/the-never-list>

Introduction to the Never List

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D1. What information does your company disclose about the chemical ingredients in its products?

Beautycounter Ingredients Glossary

<https://www.beautycounter.com/ingredient-glossary/>

Scientists shouldn't be the only ones able to decipher the label on a cosmetics bottle. Our Ingredient Glossary is a comprehensive collection of every single ingredient used in our products—all of which are carefully chosen and assessed for safety through our groundbreaking [Ingredient Selection Process](#).

Specific ingredients in each Beautycounter product are listed at beautycounter.com.