



March 31, 2026

Chair David Bennett and Vice-Chair Robert Phillips
Rhode Island House Committee on Environment and Natural Resources
State House
82 Smith Street
Providence, RI 02903-1105

**RE: LETTER OF OIPPOSITION TO HB 7737, AN ACT RELATING TO HEALTH AND SAFETY --
CONSUMER PFAS BAN ACT OF 2024**

Chair Bennett and Vice-Chair Phillips,

On behalf of the members of the Personal Care Products Council (PCPC)¹, I am writing to express our opposition to HB 7737. The bill aims to amend previously passed legislation that prohibits the use of intentionally added per- and polyfluoroalkyl (PFAS) substances in certain products. PCPC appreciates the intent of the bill but the legislation doesn't address our concerns with the initial legislation and has the potential to create confusion for manufacturers.

PCPC is the leading national trade association representing cosmetics and personal care products companies and serving as the voice on scientific, regulatory, legislative and international issues for the global cosmetics industry. PCPC and its member companies have a long history of going above and beyond what is required by law and working on public policy with various stakeholders at all levels of government. In Rhode Island, the industry employs more than 11,220 residents and contributes more than \$519 million to the state's GDP.

The Rhode Island legislature passed SB 2152 in 2024 which prohibited intentionally added per- and polyfluoroalkyl (PFAS) substances in cosmetics and other consumer products. The legislation is set to go into effect on January 1, 2027 and our member companies are set to comply with the law. If the legislature passes additional restrictions on these products, prior to the previous requirements being implemented manufacturers might not be able to comply.

¹ Founded in 1894, the Personal Care Products Council (PCPC) is the voice and advocate for 600 member companies representing the \$529.3 billion global cosmetics and personal care products industry. PCPC's members represent approximately 90% of the U.S. beauty industry and are some of the most beloved and trusted brands in beauty and personal care today. As the manufacturers, distributors and suppliers of a diverse range of products millions of consumers rely on every day – from sunscreens, toothpaste and shampoo to moisturizer, makeup and fragrance – PCPC's member companies are global leaders committed to product safety, quality and innovation.

Specific Concerns with HB 7737

- **PCPC requests technical amendments to help clarify the language for consistency with other states and federal law.** Definitions are critical in state legislation and uniformity throughout the states is vital to manufacturers' interpretation of and compliance with the law. PCPC has also requested language to align with California law regarding technically unavoidable traces.
 - **PCPC requests the definition of intentionally added PFAS.**

"Intentionally added PFAS" means either of the following: (1) PFAS chemicals that a manufacturer has intentionally added to a product and that have a functional or technical effect on the product. (2) PFAS chemicals that are intentional breakdown products of an added chemical.
 - **PCPC requests an amendment for "unavoidable trace quantities" consistent with California law.**

"If a cosmetic product made through manufacturing processes intended to comply with this chapter contains a technically unavoidable trace quantity of an ingredient listed in subdivision (a) and that trace quantity stems from impurities of natural or synthetic ingredients, the manufacturing process, storage, or migration from packaging, that trace quantity shall not cause the cosmetic product to be in violation of this section."

PCPC urges the committee to oppose HB 7737 and consider the amendments outlined above.

Sincerely,



Katie Bernard Wright
VP, State Government Affairs
Personal Care Products Council

Cc: House Committee on Environment and Natural Resources committee members