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January 26, 2026

The Honorable Susan Donovan
Chair, House Health and Human Services Committee
Rhode Island House of Representatives
82 Smith Street
Providence, RI 02903

RE: Opposition to H 7192 (Lombardi) – Requiring that all cosmetics manufactured, sold, delivered, or held for offering to be sold contain a label that completely and accurately lists all of their component ingredients

Dear Chair Donovan:

On behalf of the Consumer Healthcare Products Association (CHPA), the Washington, D.C. based national trade organization representing the leading manufacturers of over-the-counter (OTC) medicines, dietary supplements, and OTC medical devices, I'm writing to express opposition to H 7192. This legislation requires "that all cosmetics manufactured, sold, delivered, or held for offering to be sold contain a label that completely and accurately lists all of their component ingredients."

As currently drafted, the bill requires products regulated as cosmetics, including drugs that are also regulated as cosmetics, to list all component ingredients on the label. The Food and Drug Administration (FDA) has sole authority over product labels per 21 CFR 201.66.1 FDA labeling requirements for OTCs include, but are not limited to, listing the active ingredients, inactive ingredients, the product's purpose, any specific warnings about use, expiration date, and dosage instructions. Adding the additional requirement of listing of all ingredients on the product's label would conflict with FDA regulations and would be confusing to consumers.

To ensure this bill does not conflict with existing federal law, CHPA proposes to amend paragraph 18 of the bill (p. 3 lines 13-14) as follows:

(18) The manufacturing, sale, or delivery, or holding or offering for sale of any cosmetic if its label does not contain a complete and accurate listing of each and every component ingredients contained in that cosmetic. This provision does not pertain to a product that is regulated as both a cosmetic and nonprescription drug.

OTC medicines are the trusted first line of treatment for millions of consumers – including thousands of Rhode Island residents. Consumers have grown to rely on OTC product labels for critical information about the contents of the product, and directions of use. Deviating from the existing labeling format not only conflict with federal law but could cause confusion for consumers.

Thank you for your careful consideration of our concerns. Please feel free to contact me directly with any questions or comments on our position.

Respectfully submitted,

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Cc: House Committee on Health & Human Services
The Honorable Representative John Lombardi