DAVID Y. IGE GOVERNOR OF HAWAI



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TESTIMONY ONLY

Testimony COMMENTING on SB2778 RELATING TO PRODUCTS CONTAINING SUN PROTECTION FACTOR INGREDIENTS

SENATOR MIKE GABBARD, CHAIR
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT
Hearing Date: 2/5/2020 Room Number: 224

- 1 **Fiscal Implications:** This measure may impact the priorities identified in the Governor's
- 2 Executive Budget Request for the Department of Health's (Department) appropriations and
- 3 personnel priorities.

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- 4 **Department Testimony:** SB2778 seeks to amend HRS 328 and HRS 342D to require that
- 5 sunscreens sold or distributed in Hawaii only contain active ingredients classified by the United
- 6 States Food and Drug Administration (FDA) as Category 1: Generally Recognized as Safe and
- 7 Effective. The Department has the following comments.
 - The Department recognizes the benefits of the 2018 legislation prohibiting the sale of oxybenzone and octinoxate containing sunscreen products and shares the concerns about the potential impacts of some sunscreen chemicals on coral reefs and human health. It is heartening to see the dramatic increase in availability, variety and consumer acceptance of local and national brand oxybenzone and octinoxate-free options and mineral sunscreen products that have entered the marketplace in the past two years. Use of these products meets standards for public health protection and offers the public a concrete choice to help protect Hawaii's coral reefs and marine environment when enjoying our beaches.
 - However, the risk of skin cancer from sun exposure remains a hazard for the people of Hawaii and visitors and it is imperative that the public health consequences of additional prohibition on sunscreen ingredients are considered.

Currently, the only FDA Category 1 active ingredients in sunscreens are zinc oxide and titanium dioxide, both of which are mineral sunscreens. Of the remaining fourteen approved ingredients, twelve are classified as Category 3 – *insufficient evidence to determine if they are safe and effective* and two are Category 2 – *Not safe or effective*.

Restricting the sale and distribution of sunscreens to only two approved active ingredients has the potential to increase the risk of skin cancer to Hawaii residents and visitors. This is particularly pertinent to certain individuals who have skin sensitivity or allergy to mineral sunscreens. While the language describing Category 3 - *insufficient evidence to determine if they are safe and effective* may sound alarming, it reflects lack of data, not evidence that they are harmful. In fact, many commonly used over-the-counter products rely on Category 3 medications, such as aspirin, some antacids, dandruff shampoos and cough medicines among many others. The Department is not aware of any states or jurisdictions that have passed legislation using FDA Category 3 status as justification for banning or restricting medications or personal care products.

The Department supports FDA efforts to evaluate the safety and effectiveness of overthe-counter medications including sunscreens and encourages further study of these chemicals. At this time, the risk of greatly restricting available sunscreen options in Hawaii outweighs the potential benefits.

Offered Amendments: None

Thank you for the opportunity to testify on this measure.

Submitted on: 1/28/2020 12:30:45 PM Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Alexandra Kahn	Testifying for Surfrider Oahu	Support	No

Comments:

Aloha Chair Gabbard,

Hawaii made an impactful statement when we banned the sale and distribution of sunscreens containing oxybenzone and octinoxate, and since then other island communities around the world have followed our lead. However, these are just two of the multiple harmful chemicals the average sunscreen contains. It's unfortunate that the harmful effects of sunscreens was discovered so late and that we have had decades of unknowingly poisoning our marine life, but now that we know better, we must do better.

These chemicals affect coral, which is already being negatively impacted from rising sea temperatures, other ocean pollutants, and rising earth temperatures. Effects on these corals include bleaching, damaging the DNA, deforming young corals, and even killing coral. These corals are particularly important to the Hawaiian Islands because they protect us from storms, are a habitat for the seafood we catch, and provide the waves and snorkeling/diving experiences that drive much of our tourism industry and overall economy.

Other aspects of marine life harmed by these chemicals include impairing the growth and photosynthesis of green algae- one of the primary ways to produce more oxygen to combat the dangerous levels of CO2 in the atmosphere, recently made MUCH worse by the surge of fires in Australia and other places; inducing defects on young mussels, damaging the immune and reproductive system of sea urchins, decreasing fertility and reproduction in fish, causing female characteristics in male fish, and an accumulation of the chemicals in the tissues of dolphins which can be transferred to their young.

We must do everything that we can to mitigate the impact on our reefs and that includes stricter sunscreen laws. Passing a law like this would be setting a precedent for communities around the world. It would wake up consumers to the harmful effects of sunscreen on humans and the environment and could truly shake the sunscreen and cosmetic industry- in the best way possible. We should not be putting any dangerous chemicals on or in our bodies, or in the water and air. It just doesnt make sense when there are alternatives.

Surfrider was so happy to support the original ban of oxybenzone and octinoxate chemicals in sunscreen and will work with the legislators and community to further restrict the harmful chemicals in sunscreens to help protect our marine life.

Mahalo for all you do for the environment.

Alexandra Kahn, Policy Coordinator

Surfrider Oahu

<u>SB-2778</u> Submitted on: 1/28/2020 3:41:41 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Cathy Goeggel	Testifying for Animal Rights Hawai'i	Support	Yes

Comments:

This is so important for our precious ocean- so many tourists visit Hawai'i and each visitor should be using sun screen- please pass this bill - it has the potential to lessen the effect of tourism on our environment.



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Executive Officers

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TO:

Committee on Agriculture and Environment Senator Mike Gabbard, Chair Senator Russell E. Ruderman, Vice Chair

FROM: HAWAII FOOD INDUSTRY ASSOCIATION

Lauren Zirbel, Executive Director

DATE: February 5, 2020

TIME: 1:30pm

PLACE: Conference Room 224

RE: SB2778 Relating to Products Containing Sun Protection Factor Ingredients

Position: Opposed

The Hawaii Food Industry Association is comprised of two hundred member companies representing retailers, suppliers, producers, and distributors of food and beverage related products in the State of Hawaii.

HFIA is opposed to this measure, which disadvantages local retailers and benefits mainland and online retailers. This bill dramatically limits the number of desirable sunscreen products available for sale by local businesses. Internet sales of these same products will likely continue as it is very difficult to enforce this law for items sold online.

This ban would impact a number of products that are used to prevent skin cancer, we believe that a higher standard of review is necessary before banning products that many Hawaii residents rely on to prevent cancer.

The FDA's proposed rules regarding the GRASE status of sunscreen ingredients is not a ban. Per FDA Commissioner Scott Gottlieb, M.D. "The proposal we've put forward would improve quality, safety and efficacy of the sunscreens Americans use every day. We will continue to

work with industry, consumers and public health stakeholders to ensure that we're striking the right balance."1

The FDA's press release on the proposed rule also quotes Janet Woodcock, M.D., director of the FDA's Center for Drug Evaluation and Research as saying, "It is important that, as this rulemaking effort moves forward and the FDA gathers additional scientific information, given the recognized public health benefits of sunscreen use, consumers continue to use sunscreen in conjunction with other sun-protection measures."

We understand that there are some mineral sunscreens available that contain only the mineral ingredients currently classified as GRASE however, the classification for these ingredients could also change with better testing. Consumer Reports has noted, "Mineral sunscreen have consistently underperformed in CR's testing, not always testing at the claimed SPF label on the package and failing to provide adequate protection from either UVA or UVB rays. None of the 18 sunscreens in our current ratings that contain only titanium dioxide, zinc oxide, or both scored high enough to receive a recommended designation from CR."²

If this measure is passed before the FDA has a chance to gather information and update GRASE status of sunscreen ingredients it can send a confusing and potentially dangerous message to consumers about these products.

There are also still questions about which ingredients are safest for the environment. In April 2019 Civil Beat reported, "The new research introduces the possibility that titanium dioxide sunscreen is not as safe for ocean life and human health as previously thought." Researcher Craig Downs, who was a leading proponent of the oxybenzone ban, is now stating that only expensive sunscreen is acceptable.

The head of science for the Great Barrier Reef Marine Park Authority is not supporting calls to ban people from using potentially damaging sunscreens on the Reef. Amid calls for a crackdown on the products in Queensland, the acting Chief Scientist for the Great Barrier Reef Marine Park Authority (GBRMPA) said currently, the health benefits are outweighing any reef risks. "There's ample evidence oxybenzone plays a role in human health, so protecting us from DNA damage and the risks of skin cancer," Dr James Kerry told the ABC. "The science behind the impact of the products on corals is not well established at all. The only studies that have established any link to damage to corals have been done in a lab and they haven't replicated the conditions on the reef. They've been done these in confined spaces, in tanks, and if you treat coral that way it tends to get stressed. When we look for concentration of these chemicals out on the reef we're finding very, very low concentrations." Dr Kerry said people who are concerned about the health of the reef would be far better off reducing their

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FDA News Release, FDA Advances New Proposed Regulation to Make Sure That Sunscreens Are Safe and Effective https://www.fda.gov/news-events/press-announcements/fda-advances-new-proposed-regulation-make-sure-sunscreens-are-safe-and-effective

² https://www.consumerreports.org/sunscreens/what-you-need-to-know-about-sunscreen-ingredients/

³ https://www.civilbeat.org/2019/08/some-reef-safe-sunscreens-may-not-be-safe-after-all/

⁴ https://www.civilbeat.org/2019/08/some-reef-safe-sunscreens-may-not-be-safe-after-all/

carbon footprint. "This issue of sunscreen is a distraction from what we really need to focus on the reef, which is climate change," he said.

Hawaii has high rates of skin cancer and we don't believe there is enough evidence to warrant additional bans on functional products.

Thank you for the opportunity to testify.

Submitted on: 2/2/2020 3:47:24 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Lisa Bishop	Testifying for Friends of Hanauma Bay	Support	Yes

Comments:

From: Friends of Hanauma Bay

To: Senate Committee on Agriculture and Environment

Senator Mike Gabbard, Chair

Senator Russell Ruderman, Vice Chair

Re: SB2778 Relating To Products Containing Sun Protection Factor Ingredients

Hearing: Wednesday, February 5, 2020 1:30 pm Conference Room 224

Position: STRONGLY SUPPORT, and recommending an amendment to change the implementation date to 1 January 2021 to coincide with Act 104, Session Laws of Hawaii 2018.

Aloha Chair Gabbard, Vice Chair Ruderman, and Committee Members,

Mahalo for the opportunity to testify. Friends of Hanauma Bay strongly supports this important bill.

Sun Protection Factor (SPF) ingredients are drugs regulated by the FDA and comprise a \$10B a year industry in the United States.

For many years, the FDA has allowed 16 sunscreen monograph active ingredients to be sold over the counter:

- (a) the mineral sunscreens zinc oxide and titanium dioxide; and
- (b) the chemical sunscreens aminobenzoic acid (PABA), trolamine salicylate, cinoxate, dioxybenzone, ensulizole, homosalate, meradimate, octinoxate, octisalate, octocrylene, padimate O, sulisobenzone, oxybenzone, and avobenzone.

However, chemical sunscreens are endocrine disruptors. Numerous independent scientific studies continue to demonstrate significant linkages between them and serious

human health issues including breast cancer, endometriosis, reduced sperm viability and other reproductive disorders, Hirschsprung's deformity in newborns, developmental disorders, learning problems, and immune system dysfunction.

Further, these chemicals can adversely affect all living things with endocrine receptors. Numerous studies over the last 20 years have documented similar toxic effects on corals, fish, and other marine life, leading to the enactment of Act 104, Session Laws of Hawaii 2018.

These linkages to public health problems are so serious that for the first time in its history, the FDA re-opened the sunscreen monograph for updates. In 2019, the FDA announced that its final draft on the updated sunscreen monograph states the following:

- 1. The mineral sunscreens (zinc oxide and titanium dioxide) are Generally Recognized as Safe and Effective (GRASE) for human use.
- 2. The chemical sunscreens aminobenzoic acid (PABA) and trolamine salicylate are NOT GRASE.
- 3. There is not sufficient data on the remaining 12 chemical sunscreens for the FDA to determine they are safe for human use.

In the interest of promoting the health of Hawaii's residents, Hawaii"s near shore marine environment, and the health of over 10 million visitors that visit our State, SB2778 supports the FDA's findings and proposes that only sunscreens the FDA determines are safe and effective for human use are sold in Hawaii starting in 2023.

Manufacturers are responsible for providing the FDA with scientific data supporting the safety and efficacy of their products. After 40 years, chemical sunscreen companies have failed to do so.

Why should we continue to allow their sale in our State?

Friends of Hanauma Bay strongly supports SB2778, and recommends advancing the effective date to January 2021 to coincide with Act 104, Session Laws of Hawaii 2018.

Respectfully, Lisa Bishop

President

Friends of Hanauma Bay

<u>SB-2778</u> Submitted on: 2/3/2020 12:45:45 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Will Cattell	Testifying for H2Ohana	Support	No

Comments:

We must act now, with stricter regulatio,. If we are going to save our are reefs. We must continue lead the way and saving our ocean life.



Activities & Attractions Association of Hawaii PO Box 598, Makawao, Hawaii 96768 (808)871-7947 Main (808)877-3104 Fax

Testimony to the

COMMITTEE ON AGRICULTURE AND ENVIRONMENT

Senator Mike Gabbard, Chair Senator Russell E. Ruderman, Vice Chair

SUPPORT SB2778

Wednesday, February 5, 2020, 1:30 P.M. Conference Room 224

Aloha Chair Senator Gabbard and Vice-Chair Senator Ruderman along with members the committee,

Mahalo for this opportunity to testify, my name is Toni Marie Davis. For the last 23 years, it has been my honor to serve the Activity & Attraction industry of Hawaii through my position as the Executive Director of A3H (Activities & Attractions Association of Hawaii). A3H represents nearly 150 businesses statewide. Our members range in size from very large (over 300 employees) to very small (1-2 employees) aggregated well over 1500 employees/Hawaii residents. A3H's purpose is to support the sustainability of Hawaii businesses, the environment, and our communities.

While reviewing Bills for the 2020 session, our board of directors, which consists of CEOs and Owners from Atlantis Adventures, Blue Dolphin Charters, Fair Wind Cruise, Hawaiian Paddle Sports, Polynesian Cultural Center, Schuman Aviation, Smith's Luau and Fern Grotto Tours, and Warren & Annabelle's Magic Show unanimously approved support of SB2778.

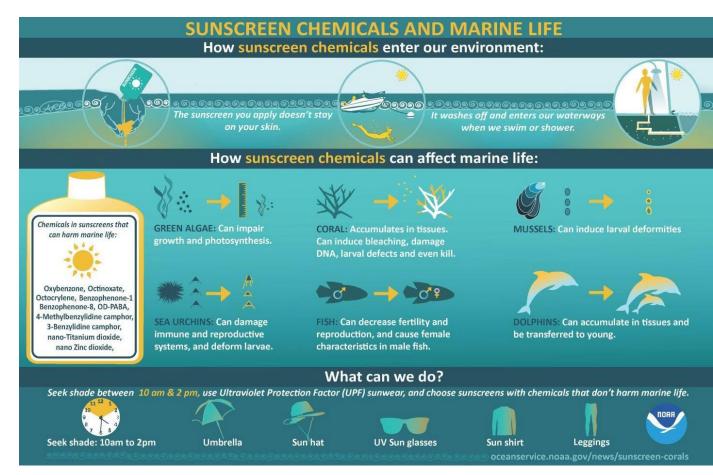
According to ReefsatRisk.org, Hawaii has lost 40% of our corals reefs already, it is happening, and we need to be more aware and stop ignoring that what we do affects our environment. There is a great video on the impacts of sunscreen that I would encourage you all to watch: https://www.youtube.com/watch?v=aGP9loQ0dqs.

Please also reviewed documents from The National Oceanic and Atmospheric Administration who have recognized this existential threat to our coral reefs. (See the image on back), (https://oceanservice.noaa.gov/news/sunscreen-corals.html)

Sincerely,
Toni
Toni Marie Davis
Executive Director



Activities & Attractions Association of Hawaii PO Box 598, Makawao, Hawaii 96768 (808)871-7947 Main (808)877-3104 Fax





February 4, 2020

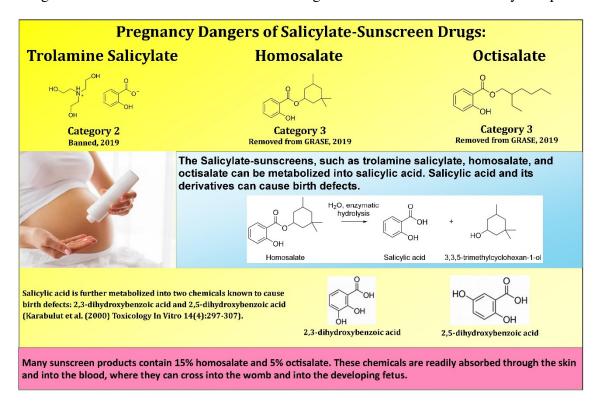
SUPPORTING SB 2778 - Sale of only GRASE, category 1, Sunscreens in Hawaii

Thank you for sponsoring and supporting this critical legislation that will protect Hawaii's natural resources and the public health.

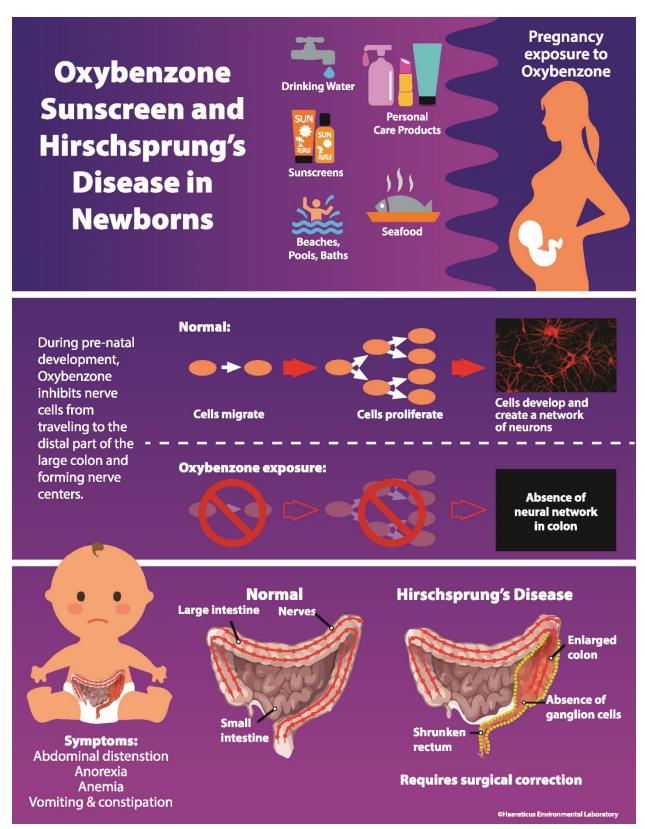
In 1992, the U.S. National Toxicology Program first demonstrated that rats exposed to relevant concentration to oxybenzone caused endocrine disruption, resulting in reduction in epididymal sperm density in males, and increase in the length of the estrous cycle in females. In 1997, scientists Gulati and Mounce demonstrated that oxybenzone exposure in mice caused changes in liver, kidney, and prostate weights, reduction in immune function, and significantly increased uterine weight in juveniles. All of these symptoms are consistent with the pathological signs associated with estrogenic-axis endocrine disruption. Since these studies, more than 100 scientific studies have demonstrated that oxybenzone and other non-GRASE sunscreen drugs induce a wide range of toxicities.

In February of 2019, the U.S. Food and Drug Administration recognized that there was insufficient data in both the safety and effectiveness of 12 of the 16 over-the-counter sunscreen drugs. Two of the 16 sunscreen drugs were regulated as not safe, PABA and a type of salicylic acid.

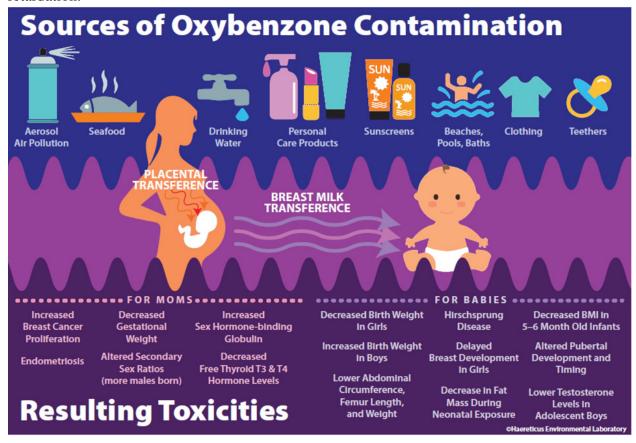
We argue that all the salicylic acid UV drugs (octisalate and homosalate) pose a potential threat in inducing birth defects or miscarriages in pregnant women, based on the fact that all that of the UV drugs are metabolized into documented teratogens – chemicals that are embryonic poisons.



With the passing of Hawaii Act 104 in 2018, most of you are familiar with the dangers of oxybenzone to pregnancy. Oxybenzone has been shown to induce a causative mechanism that gives rise to birth defect called Hirschsprung's disease. Women who are exposed to oxybenzone are especially at risk, because of the timing of the exposure with interference with development and migration of nerve clusters in the lower colon.



There are more than 30 other scientific papers on oxybenzone alone that associated exposure to oxybenzone with pregnancy complications, birth defects, and neonatal and child developmental retardation.



All of the category 2 drugs have yet to be sufficiently demonstrated to be safe, or even effective in protecting our skin from the complete harmful effects of UV light from the sun.

We hear a lot of claims that "sunscreen" protects against skin cancer. Unfortunately, skin cancer rates have only increased despite increased sunscreen usage. It could easily and consistently argue, from the epidemiology studies to date that the use of certain sunscreens is providing a false sense of safety and effectiveness, and that the use of sunscreen.

In a 2005 scientific paper by a team of researchers, they stated in their conclusion that, "As such, sunscreens might promote instead of protect against melanoma." (Chiang et al., 2005 Sunscreen ingredients inhibit inducible nitric oxide synthase: a possible biochemical explanation for the sunscreen melanoma controversy. Melanoma Research 15:3-6)

This study was a foundation stone for a work published by the International Agency for Research on Cancer that, "Advertising for sunscreens and labeling of sunscreen bottles should inform consumers of the carcinogenic hazards associated with sunscreen abuse."

In 2011, Dutch and French scientists published a study that "Epidemiological evidence that UVA radiation is involved in the genesis of cutaneous melanoma." And that "...sunscreens may partly explain why melanoma incidence increases in most light-skinned populations without

concomitant increase in mortality." Autier et al. 2011. E Epidemiological evidence that UVA radiation is involved in the genesis of cutaneous melanoma. Current Opinions in Oncology 23.

It was pointed out to me that a number of product-protection firms have been slandering me and my colleagues scientific research in this Hawaii Legislative season. This is an old game that these firms have played, reminiscent of the tobacco wars, the leaded-gas wars, the asbestos wars, the DDT wars, and the opioid wars. They also go on to say that the only science that has merit was generated by a researcher that they have wholly funded and promoted. By all means, listen carefully to their propaganda, but please also consider this article:

https://www.salon.com/2020/02/the-art-of-scientific-deception-how-corporations-use-mercenary-science-to-evade-regulation/?ct=t(RSS_EMAIL_CAMPAIGN)

Respectfully submitted,

Craig A. Downs, Ph.D.

Executive Director

Submitted on: 2/4/2020 2:57:14 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Tatyana Cerullo	Testifying for Kokua Sun Care LLC (Hawaii company)	Support	No

Comments:

Dear Senators:

I am testifying to assure you that there are many alternatives to chemical sunscreens on the market that use only zinc oxide and/ or titanium dioxide. I am the owner of a Hawaii-based company, a registered Hawaii limited liability company, called KÅ• kua Sun Care that is selling 3 oz, 1oz tubes, and sample packets of a Hawaiian Natural Zinc Sunscreen 50 SPF/80 minute water resistance. See www.kokuasuncare.com. The active ingredient is 25% non nano zinc oxide, and we are using 7 Hawaii-grown antioxidant ingredients supporting local farms. It was formulated and is manufactured to meet all over-the-counter drug regulations in a FDA-inspected drug licensed facility, FDA-tested, labeled in accordance with FDA regulations, and labels are registered with the FDA. Our products are widely available via Amazon Prime, our website, Whole Foods Markets, Down to Earth stores, Island Naturals, Mana Foods, and many shops and hotels around the islands, and the list continues to expand daily.

We strongly support SB2778 to ban additional chemical sunscreens (those not included in FDA category I) due to the established widely accepted scientific data that these chemicals are harmful to our coral reef ecosystem and human health. Zinc oxide protects human skin from more of the UV spectrum than any of the chemical sunscreens that actual invite more damage to the skin. There is NO basis to claim there should not be a more extensive ban because no alternative sunscreens exist. There is concrete evidence from my company and many others that effective quality sunscreens that would be compliant with this law do exist and are widely available.

Mahalo for your consideration.

Tatyana Cerullo

Co-owner, KÅ• kua Sun Care

Honolulu, Hawaii



COMMITTEE ON AGRICULTURE AND ENVIRONMENT In Support of SB2778 - Sale of only GRASE I Sunscreens in Hawaii

Feb 5, 2020 Wednesday 1:30PM Room 224 State Capitol

Dear Senator Mike Gabbard, Chair, Senator Russell E. Ruderman, Vice Chair and Committee Members,

My name is Mendy Dant, and I am Exec. Vice President of Fair Wind Cruises and Kona Sunrise Charters in Keauhou Kona, Hawaii. We have been taking visitors and residents alike snorkeling to Kealakekua Bay since 1971. Over the years as tourism has grown, we have seen a negative effect on our coral reef's health. Since we have had a couple of very warm summers, we have seen further decline.

We understand the harmful chemicals in the popular sunscreens have caused many of our corals to become sterile. Now, that the FDA has declared its concerns about the effects of chemical sunscreens on human health, removing the chemicals from sunscreen should be supported by everyone concerned with the health of every living thing that has an endocrine system. That is every mammal and corals too because they are animals.

Sun Protection Factor ingredients are drugs regulated by the FDA. The FDA is extremely concerned about their safety and efficacy for human use because chemical sunscreen manufacturers have still not provided the data the FDA requires in order to determine if their products are safe. Therefore, for the first time in its 40-year history, the FDA has re-opened one of its monographs for updating - the monograph on sunscreens.

The mineral sunscreen prevents sunburns when used as directed, that is why FDA has given it their GRASE stamp of approval. There are many locally made, safe mineral sunscreens available for us to buy and use. Please make this the only choice safe! Do away with chemicals that are harmful to both humans, cetaceans, fish and coral.

I've heard arguments that without these chemical sunscreens on the marketplace customers will stop buying sunscreen. With education people soon understand the health benefits and are already using mineral only sunscreens. Johnson & Johnson owns Neutrogena and they market a number of all mineral sunscreen products, Sheer Zinc, Neutrogena Naturals, Sensitive Skin and Pure & Free baby sunscreen, to name four that are 100% zinc and or mixed with titanium dioxide, all mineral. On the label it states it is #1 Dermatologist recommended sun care, and it gives superior sun protection against UVA & UVB rays to prevent sunburns, now if this did not protect from the sun as well as their chemical sunscreens they would be open to a lawsuit. So, their argument that people will get skin cancer if they only use mineral sunscreen is not true based on their own marketing.

Please support this bill SB2778 and protect the public from these harmful and dangerous chemicals.

Sincerely,

Mendy Dant Exec. Vice President Fair Wind Cruises Kona Sunrise Charters Inc 78-6775 Makenawai St Kailua Kona, Hi 96740

78-6775 MAKENAWAI ST., BOX A KAILUA-KONA, HAWAII 96740 TELE: 808-322-2644

FAX: 808-322-2913

<u>SB-2778</u> Submitted on: 2/4/2020 2:03:16 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Inga Gibson	Testifying for For the Fishes	Support	Yes

Submitted on: 2/4/2020 3:11:16 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
ileana ing	Testifying for surfrider foundation	Support	No

Comments:

Aloha,

Thank you for taking the time to read my testimony. It is very important to me that my voice is heard, especially when environmental issues like this are in the conversation. As humans, we need sun protection. The sun is very powerful and can cause damage to our skin as well as cause diseases like cancer. HOWEVER, as a human on this earth, part of the almost 8billion population, I CARE about what I am putting on myself and how it affects the environment, because of this, it has made buying sunscreen more expensive, and honestly, something Idont end up buying because of its harmful chemicals that most cheap sunscreens sell. I want to be able to go to the store and protect myself from the sun and JUST that, i dont want to protect MYSELF at the cost of coral lives and marine lives at stake, I see that as very selfish and a failure at us humans. We arent better than other animals or our aquatic environment, theyre better than us because THEY can live there and we CANT. so I will always vow to protect, advocate, educate, for the oceans and environment and I try to do ALL that i can to reduce my footprint. I know this bill will help protect our corals, the hawaiian islands have such beautiful coral that is exponentially dying out. As a person who free dives several times a week, even with my regular people eyes I can see the death in our reefs and that breaks my heart. We must be doing all that we can to help protect our oceans and changing the chemicals in our sunscreens will do that, each change matters!!!!! I strongly support



February 5, 2020

Senator Mike Gabbard, Chair Senator Russell E. Ruderman, Vice Chair Committee on Agriculture and Environment State Capitol 415 South Beretania Street Honolulu, HI 96813

Chair Gabbard and Vice Chair Ruderman:

As a coalition of health, wellness and business organizations we respectfully request that you oppose SB 2778.

SB 2778 would require that as of January 1, 2023, only sunscreen products that contain active ingredients classified by the U.S. Food and Drug Administration (FDA) as "Category 1," generally recognized as safe and effective, be sold in the state, which would ban the vast majority of sunscreen products available to Hawaii residents and visitors.

Sunscreens are regulated by the FDA as Over-The-Counter (OTC) drugs and FDA has sole authority to approve sunscreen ingredients for use in the United States. Manufacturers must formulate products using only these ingredients. Individual sunscreen active ingredients are reviewed by FDA and only those that are included in FDA's monograph may be used in sunscreen products marketed in the U.S.

SB 2778 would impose an outright ban on sunscreen products that contain any one of 12 out of 15 approved sunscreen ingredients currently recognized as safe and effective. This bill would create a serious public health issue by banning the sale of critical sunscreen protection for millions of consumers and tourists in Hawaii. Policy decisions that will likely adversely impact public health should not be made ahead of a scientific consensus on this issue.

As noted in the legislation, FDA is in the process of a comprehensive rulemaking seeking additional data on 12 sunscreen ingredients to affirm their status as Category 1. This process, however, will take time, likely beyond 2023. In the interim, FDA has repeatedly and consistently stressed that consumers should continue to use all available sunscreen on the market to protect against the dangers of skin cancer. FDA, Centers for Disease Control and Prevention (CDC), U.S. Surgeon General, American Academy of Dermatology (AAD), Skin Cancer Foundation and health care professionals worldwide emphasize that using sunscreens is a critical part of a safe sun regimen.

According to The Skin Cancer Foundation, skin cancer is the most common form of cancer, with one-in-five people in the U.S. expected to be diagnosed within their lifetime. Ninety percent of non-melanoma skin cancers are associated with exposure to ultraviolet (UV) radiation from the sun. Sunscreens are proven to prevent the harmful effects of solar radiation, and we are concerned that restricting the use of vital sunscreen ingredients could lead to higher skin cancer rates in the U.S.

We understand that the decline of coral reefs is an urgent issue requiring policymakers to take pressing action. However, we urge you to direct your attention to proven causes of coral reef decline, which should be addressed. This proposed ingredient ban ignores the real causes of coral decline according to scientists from around the world, the foremost being climate change. Coral reefs are impacted by an increasing array of hazards – primarily from effects of pollution (acidification and runoff), global climate change and unsustainable fishing practices.

Published studies claiming to show adverse impacts of sunscreens on coral (e.g. Downs et al. 2016) are unreliable and should therefore not be used when making important policy decisions.¹ Measured sunscreen levels in U.S. coastal waters where coral live are extremely low (parts per trillion levels have been detected) - equivalent to adding a few drops of sunscreen to the Rosebowl Stadium filled with seawater (Mitchelmore et al., 2019).²

This bill would ban the vast majority of affordable and effective sunscreen products ahead of both valid environmental and health data and studies. We respectfully ask that you oppose SB 2778.

¹ Downs C.A., Kramarsky-Winter E., Segal R., Fauth J.E., Knutson S., Bronstein O., Ciner F.R., Jeger R., Lichtenfeld Y., Woodley C.M., Pennington P., Cadenas K., Kushmaro A. and Loya, Y. 2016. Toxicopathological effects of the sunscreen UV filter, Oxybenzone (benzophenone-3), on coral planulae and cultured primary cells and its environmental contamination in Hawaii and the U.S. Virgin Islands. Archives of Environmental Contamination and Toxicology 70 (2), 265-288.

² Mitchelmore, C.L., He, K., Gonsior, M., Hain, E., Heyes, A., Clark, C., Younger, R., Schmitt-Kopplin, P., Feerick, A., Conwat, A. and L. Blaney. 2019. Occurrence and distribution of UV filters in coastal surface water, sediment and coral tissue from Hawaii. Science of the Total Environment 670, 398-410.

Submitted on: 2/4/2020 10:51:03 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Alexandra Kahn	Testifying for Surfrider Oahu	Support	No

Comments:

Aloha Chair Gabbard,

Hawaii made an impactful statement when we banned the sale and distribution of sunscreens containing oxybenzone and octinoxate, and since then other island communities around the world have followed our lead. However, these are just two of the multiple harmful chemicals the average sunscreen contains. It's unfortunate that the harmful effects of sunscreens was discovered so late and that we have had decades of unknowingly poisoning our marine life, but now that we know better, we must do better.

These chemicals affect coral, which is already being negatively impacted from rising sea temperatures, other ocean pollutants, and rising earth temperatures. Effects on these corals include bleaching, damaging the DNA, deforming young corals, and even killing coral. These corals are particularly important to the Hawaiian Islands because they protect us from storms, are a habitat for the seafood we catch, and provide the waves and snorkeling/diving experiences that drive much of our tourism industry and overall economy.

Other aspects of marine life harmed by these chemicals include impairing the growth and photosynthesis of green algae- one of the primary ways to produce more oxygen to combat the dangerous levels of CO2 in the atmosphere, recently made MUCH worse by the surge of fires in Australia and other places; inducing defects on young mussels, damaging the immune and reproductive system of sea urchins, decreasing fertility and reproduction in fish, causing female characteristics in male fish, and an accumulation of the chemicals in the tissues of dolphins which can be transferred to their young.

We must do everything that we can to mitigate the impact on our reefs and that includes stricter sunscreen laws. Passing a law like this would be setting a precedent for communities around the world. It would wake up consumers to the harmful effects of sunscreen on humans and the environment and could truly shake the sunscreen and cosmetic industry- in the best way possible. We should not be putting any dangerous chemicals on or in our bodies, or in the water and air. It just doesnt make sense when there are alternatives.

Surfrider was so happy to support the original ban of oxybenzone and octinoxate chemicals in sunscreen and will work with the legislators and community to further restrict the harmful chemicals in sunscreens to help protect our marine life.

Mahalo for all you do for the environment.

Alexandra Kahn, Policy Coordinator for Surfrider Oahu

<u>SB-2778</u> Submitted on: 1/27/2020 8:15:57 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Benton Kealii Pang, Ph.D.	Individual	Support	No

<u>SB-2778</u> Submitted on: 1/30/2020 3:33:02 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Megan Blazak	Individual	Support	No

<u>SB-2778</u> Submitted on: 1/30/2020 7:32:08 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Te'sha Martines- Melim	Individual	Support	No

<u>SB-2778</u> Submitted on: 2/1/2020 10:43:04 AM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Jeff Chasin	Individual	Support	No

Comments:

Hawaii should continue to be at the forefront of protecting its natural environment, and be seen as a leader in the fight against climate change. This is a small, but vital step.

<u>SB-2778</u> Submitted on: 2/2/2020 10:43:23 AM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Ralph Bishop	Individual	Support	No

Comments:

As the science becomes irrefultable we need to step up the pace of keeping this toxicity from our oceans and our reefs. Pass this legislation now.

Submitted on: 2/2/2020 5:33:17 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Allana Marie Nicolas	Individual	Support	No

Comments:

My favorite place Hamauma Bay has been suffering a depletion of marine life due to coral reef bleaching. This bleaching is caused by not only Oxybenzone and Octinoxate but also because of the other chemicals in sunscreens that locals and tourists alike use.

It is even stated by dermatologists that these chemicals don't fully protect from UVA&UVB rays. However the formulations they aren't harmful, like titanium dioxide and zinc oxide protect from both spectrums and are not harmful to the environment.

Banning these chemicals from Hawaii would protect our precious and rare marine ecosystem so that we can maintain the beautiful 'aina that we love so much.

<u>SB-2778</u>

Submitted on: 2/2/2020 8:36:23 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Cynthia Punihaole Kennedy	Individual	Support	No

Comments:

Aloha Honorable Sen. Gabbard and Sen. Ruderman

I am writing in support of SB 2778. The FDA is extremely concerned about chemical sunscreen ingredients on the FDA GRASE Category III - Insufficient data for use in sunscreens - because manufacturers have still not provided the data the FDA requires in order to determine if their products are safe. On January 21, 2020 a new FDA report was published https://www.webmd.com/skin-problems-and-treatments/news/20200121/fda-skin-absorbs-dangerous-sunscreen-chemicals This report discusses the dangers of sunscreen chemicals to human health. Please support SB 2778.

Submitted on: 2/3/2020 8:26:11 AM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Brittany Biggs	Individual	Support	No

Comments:

Removing the ability to purchase these toxic sunscreens will be a step towards rebuilding our reefs. Hawaii is at the forefront of important ecological changes, and let's continue to set the example to other states and countries that saving the environment is critical.

<u>SB-2778</u> Submitted on: 2/3/2020 1:29:50 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Amy Cady	Individual	Support	No

<u>SB-2778</u> Submitted on: 2/3/2020 3:20:17 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Robin Kaye	Individual	Support	No

Submitted on: 2/3/2020 6:07:02 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing	
Andrea Quinn	Individual	Support	No	

Comments:

Dear Honorable Committee Members:

Please support SB2778 relating to sunscreens. Our marine life is our most valuable economic resource, and the reefs are already turning into virtual deserts due to fertilizer runoff, aquarium collecting and climate change. Sunscreens, many of which contribute to the destruction of our reefs, should be regulated.

Thank you for the opportunity to present my testimony.

Andrea Quinn

Kihei

Submitted on: 2/3/2020 9:42:22 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Stefani Specker-Cook	Individual	Support	No

Comments:

Aloha,

We must protect the health of the people and marine ecosystems. Sunscreen is destroying the Hawaiian coral reefs that supply us food, generate money for the economy, vital for Hawaiian culture, and provide us oxygen we need to breathe. It would be heartbreaking to see the reefs die due to products in current sunscreens. We have the alternatives and we can make a change.

Please support.

Mahalo nui loa.

Submitted on: 2/3/2020 7:25:47 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Toni Withington	Individual	Support	No

Comments:

The evidence is clear that some chemicals are very toxic to our fragile reefs. As a swimmer and diver and fisherman, I can see the reefs taking a serious die-off. Not all is atributable to the chemicals, but this is something we can do to help our reefs. Please support the bill.

Toni Withington

Hawi, Hawaii

<u>SB-2778</u>

Submitted on: 2/3/2020 10:50:30 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Kilian Niedermeier	Individual	Support	No

Comments:

There are various, sustainable alternatives to the substances in question and banning them would not harm anyone. Coral reefs are essential to the diversity of marine life as well as the trophical cascade. Would the reefs collapse, in time the whole ocean and the whole planet would collapse, and that can only have a negative effect on human civilization. Ban these sunscreen chemicals!

In Support of SB 2778 - Sale of only GRASE I Sunscreens in Hawaii

First, I would like to Mahalo Senators Gabbard, Riviere, Ruderman, Moriwaki, Nishihara for introducing SB 2778 which will add measures to further protect Hawaii's environment, constituents and the 10 million visitors that come to enjoy its natural beauty.

As you know, Hawaii's Act 104 (banning the sale of sunscreens containing oxybenzone or octinoxate) has caused the world to open its eyes to the environmental destruction that sunscreens have caused and continue to cause globally. Because of this, Palau, Aruba, Bonaire, the U.S. Virgin Islands, Marshall Islands, and the city of Key West have followed Hawaii's example and have introduced similar/identical bans.

Another impact of Hawaii's innovative planning/action has caused the Food & Drug Administration (FDA) to question the human safety of not just oxybenzone and octinoxate, but of all 16 sunscreens actives currently approved for use in the United States. This action has caused FDA to identify that only Zinc Oxide and Titanium Dioxide actives **are Generally Recognized as Safe and Effective** (GRASE - Category I) for human use. The remaining 14 chemicals have been reclassified as **not** being **GRASE** "because the public record does not currently contain sufficient data to support positive GRASE determinations". FDA has published their reasoning for this action in the Februaury 26, 2019 Federal Register:

"For example, the available literature includes studies indicating that oxybenzone is absorbed through the skin to a greater extent than previously understood and can lead to significant systemic exposure, as well as data showing the presence of oxybenzone in human breast milk, amniotic fluid, urine, and blood plasma. The significant systemic availability of oxybenzone, coupled with a lack of data evaluating the full extent of its absorption potential, is a concern, among other reasons, because of questions raised in the published literature regarding the potential for endocrine activity in connection with systemic oxybenzone exposure. Nearly all of these sunscreen active ingredients also have limited or no data characterizing their absorption." (FYI - by law, it is industry's responsibility to provide this data)

Because of industry's inability to provide adequate safety data to FDA and their apprehension to confirm FDA's concerns about "significant systemic exposure" the FDA conducted their own study on products currently being sold that contained 6 of the chemicals in question (Figure 1) ... FDA concluded that all posed a significant risk to human health because they absorb into our blood stream above the safety cut-off point of 0.5 ng/ml (horizontal line at 0.5 on each of the graphs below) **after one day** of application. Additionally, even when applications were **stopped after 4 days**, the level of sunscreens in the blood stayed above the 0.5 ng/ml level (oxybenzone never dropped below this line even 17 days after applications were stopped).

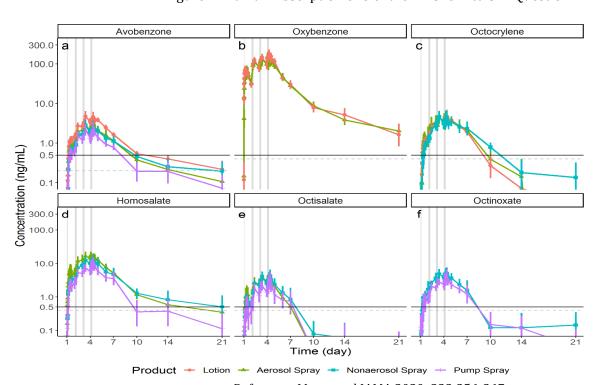


Figure 1: Human Absorption of 6 of the 12 Chemicals in Question:

Reference: Matta et al JAMA 2020; 323:256-267

The information obtained from this experiment, confirms FDA's concerns about the safety of these chemicals and justifies their request to industry to provide data that, among other things, demonstrates these chemicals will not cause cancer or reproductive effects to offspring based on absorption levels. Another point that justifies FDA's safety concerns is based on the results obtained from a recent 2-year carcinogenicity study that was conducted by the US National Toxicology Program (NTP) on oxybenzone. The summary data released by NTP states that at the **levels tested** oxybenzone produced:

- 1) Increased incidence of **thyroid** C-cell adenomas and uterine stromal polyps in female rats.
- 2) Occurrence of brain and spinal cord malignant meningiomas in male rats.
- 3) Increased incidences of non-neoplastic lesions of the uterus and **adrenal cortex** in female rats and of the **testis** and **pancreas** in male rats.
- 4) No evidence of carcinogenic activity in male or female mice.
- 5) Increased incidences of non-neoplastic lesions of the bone marrow, spleen, and kidney in female mice and of the bone marrow, spleen, kidney, and liver in male mice.

These finding were based on oxybenzone being tested at 0.1%, 0.3% and 1% concentrations, which is **6 to 60 times lower** than the 6% level that is commonly used in sunscreen products.

So, how does the human absorption and animal carcinogenicity data presented above tie into the environmental concerns in coral and other aquatic life forms that Act 104 was based on?

- 1) FDA's long history determining that human safety is tied into the amount of chemical that is in the blood. For lack of a better term, this is "guilt by association", but something cannot produce an adverse event if it is not present.
- 2) The NTP data not only identifies the carcinogenic potential of oxybenzone, but demonstrates that it targets endocrine glands (thyroid, adrenal glands, testies, pancrease ... etc). The chemical is introduced into the system (rodents) and it produces specific adverse reactions (damage to endocrine glands) ... this is called "causation".

Therefore, one can summarize that exposure to oxybenzone is associated with specific adverse effects that impact living organisms or "association is related to causation". How can we extrapolate this concern to all living organisms; simple! The World Health Organization has stated that chemicals that impact endocrine glands (endocrine disruptors) are not specific to a certain species. In other words, chemicals with this potential do not care (differentiate) if you are a coral, fish, bird, democrat or republican ... the only prerequisite is that a endocrine receptor is there to impact!

Based on published safety data, it appears that the chemical sunscreens currently in question by FDA are more likely to cause cancer than to prevent it. **Please vote to support SB 2778** and continue to protect Hawaii's environment, citizens and visitors.

Most Respectfully,

Joe DiNardo (retired toxicologist with 44+ years experience and frequent Hawaii visitor)

Submitted on: 2/4/2020 4:40:53 AM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Sunshine Eckstrom	Individual	Support	No

Comments:

Please support SB2778. Hawaii did a great thing in 2018 by banning two sunscreen ingredients that are harmful to coral reefs. However, there are a number of other commonly used sunscreen ingredients that harm the reefs but are still not banned. SB2778 would address this and provide more complete protection for our reefs. This is another important step forward that will help restore the health of our imperiled ocean ecosystems.

<u>SB-2778</u> Submitted on: 2/4/2020 6:28:33 AM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Mackenna Cady	Individual	Support	No

Submitted on: 2/4/2020 1:55:20 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Kimberly Matucci	Individual	Support	No

Comments:

Aloha! Please SUPPORT SB2778 and help to save & preserve Hawaii's coral reefs! Coral reefs host an exponential amount of life, adding to Hawaii's unique biodiversity. Coral reefs are both ecologically & economically vital to Hawaii. Please allow Hawaii to be the role model for the rest of the world.

Mahalo,

Kimberly Matucci

808 640 7409

<u>SB-2778</u> Submitted on: 2/4/2020 4:52:04 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Barbara Grigsby	Individual	Support	No

Comments:

I support this bill

<u>SB-2778</u> Submitted on: 2/4/2020 9:49:37 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Simone Matucci	Individual	Support	No

Submitted on: 2/4/2020 11:08:58 PM

Testimony for AEN on 2/5/2020 1:30:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Shannon Murphy	Individual	Support	No

Comments:

Aloha, my name is Shannon Murphy and I am a 19-year-old attending the University of Hawaii at Manoa, studying Global Environmental Science. Being born and raised in the state of Hawaii has really opened my eyes to nature. My favorite hobby is snorkeling and free diving and I have always loved spending time examining the underwater world. Coral reefs have always caught my eye and in fact, my curiosity and desire to learn more about these animals has shaped my education pathway and career goals.

My involvement in environmental science has really awakened me to anthropogenic issues and human impact on the ocean. We have lost about 50% of our reefs in the last 30 years according to the National Oceanic and Atmospheric Administration. The magnitude of this issue is almost incomprehensible. Imagine losing majority of trees on the planet. Humans would not be able to survive. Coral reefs play the same role or even play a bigger role in the ocean. They take up less than 1% of the Earths surface yet, they are home to 25% of marine life. Coral reefs are crucial for coastal protection against waves and surf, fisheries, biomedical products, and are a key source for tourism here in Hawaii. Coral reefs are the foundation for our existence! It is our duty as residences of this planet to assure their health the best we can.

We understand there are many factors to consider when discussing coral bleaching. A coral contains a calcium carbonate structure with thousands of polyps on the surface layer of the skeleton. Inside the polyps tissue is a symbiont alga called zooxanthellae. These algal species photosynthesize and provide the coral with food. When a coral bleaches, the symbiont algae zooxanthellae leaves the calcium skeleton and all is left is the translucent tissue and the white skeleton. The corals cannot live without these algal species- it will eventually starve and won't be able to grow. The algae leave the tissues when they are stressed and this is used by ocean acidification, runoff pollution, and chemical sunscreens. It is harder to regulate ocean acidification and runoff since those are large scale issues but banning chemical sunscreens is an immediate fix.

Back in high school 2 years ago, I was able to host my own oxybenzone sunscreen swap. Community members came down to switch their chemical sunscreens for mineral-based sunscreens. I ended up collecting an entire wheelbarrow full of chemical sunscreens and this demonstrated that people on this island care about the environment and the health of the ocean. The solution is very simple, yet extremely powerful.

By using mineral-based zinc oxide or titanium dioxide sunscreens, we can easily eliminate these pollutants for coral reefs.

I know this bill SB2778, is possible because we have already banned oxybenzone and octinoxate sunscreens! This is just a further step into our efforts to saving the reefs.

I want to say thank you to the representatives who introduced this bill and to those reading this with an open mind. This is our time to save the reefs and improve the health of our islands for future generations to enjoy.

<u>SB-2778</u> Submitted on: 2/5/2020 10:29:30 AM

Testimony for AEN on 2/5/2020 1:30:00 PM



Submitted By	Organization	Testifier Position	Present at Hearing
Simone	Individual	Support	No

<u>SB-2778</u> Submitted on: 2/5/2020 11:45:37 AM

Testimony for AEN on 2/5/2020 1:30:00 PM



Submitted By	Organization	Testifier Position	Present at Hearing
Kelly Sundberg	Individual	Support	No

<u>SB-2778</u> Submitted on: 2/5/2020 12:36:33 PM

Testimony for AEN on 2/5/2020 1:30:00 PM



Submitted By	Organization	Position	Hearing
patty hermann	Individual	Support	No

<u>SB-2778</u> Submitted on: 2/5/2020 2:13:34 PM

Testimony for AEN on 2/5/2020 1:30:00 PM



Submitted By	Organization	Testifier Position	Present at Hearing
Melanie Eccard	Individual	Support	No