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Looking Ahead to the 120th Congress: Advancing Industry Priorities

What's happening: Following the 2026 midterm election, PCPC congratulated newly elected and returning members of the 120th Congress and reaffirmed our commitment to working with policymakers on both sides of the aisle to advance the industry's priorities.

Why it matters: As a new Congress prepares to convene, PCPC is focused on strengthening policymakers' understanding of the industry's essential role in supporting American jobs, economic growth, innovation, and consumer well-being.

Bottom line: PCPC stands ready to continue serving as a trusted partner in advancing sound, science-based policies that protect consumers, foster innovation, strengthen American competitiveness, and ensure our industry can continue to grow, invest, and create opportunity in communities across the country.

Watch on demand: For additional insights into the election results and implications for our industry, watch PCPC's Post-Election Recap: What the Results Mean for Our Industry webinar. *(Member login is required.)*

Learn More

Household Hazardous Waste EPR: An Emerging Issue for Personal Care Products

Why it matters: Household hazardous waste (HHW) extended producer responsibility (EPR) policies are emerging as an important issue for cosmetics and personal care companies. Unlike traditional packaging EPR programs, these requirements may also apply to products remaining in discarded containers, raising new questions about product coverage, reporting, fees, and disposal.

What's happening: Vermont is advancing implementation of its statewide HHW EPR program following the release of its final program plan on Oct. 29. The plan identifies several personal care product categories that may be covered, including:

- **Flammable products:** Perfumes, colognes, hand sanitizers, nail polish and removers, hair styling products, and aerosol products such as hairspray and deodorants that meet hazardous waste ignitability criteria.
- **Corrosive products:** Certain hair products containing ammonia or other chemicals that meet hazardous waste corrosivity criteria.

Coming up: On Nov. 19, from 2:00-3:00 p.m. ET, the Vermont Department of Environmental Conservation will host a virtual meeting addressing updated covered-product guidance, personal care product exemptions, and revised product-registration requirements. PCPC encourages interested members to participate and submit questions in advance.

Looking ahead: HHW producer-responsibility policies are also gaining attention in other jurisdictions, including Los Angeles County. These developments underscore the importance of consistent, workable approaches that leverage existing collection infrastructure and reflect how personal care products enter the waste stream.

Our advocacy: PCPC is engaging members to identify implementation challenges, including product reporting, data requirements, and end-of-life management. Member input will help inform PCPC's advocacy for practical, consistent policies that avoid unnecessary regulatory complexity.

Bottom line: HHW EPR will remain an important PCPC priority heading into 2027. Members should assess potential implications for their product portfolios and share operational insights and policy recommendations to help inform PCPC's engagement.

Get involved: PCPC's Packaging Task Force monitors packaging and HHW EPR developments, recycled-content requirements, recyclability and labeling policies, and related litigation. Members with regulatory, legal, packaging, sustainability, or EPR responsibilities are encouraged to participate.

Get Involved

Oregon Toxic Free Cosmetics Act: Comments Due Nov. 23; Law Takes Effect Jan. 1

What's happening: The Oregon Health Authority (OHA) is in the final stage of implementing the state's Toxic Free Cosmetics Act, which was enacted in 2023 and takes effect Jan. 1, 2027.

Why it matters: The law establishes two significant requirements for the cosmetics industry. First, it prohibits a list of chemicals and chemical classes from use in

cosmetics. The list generally mirrors the requirements of Washington state's Toxic-Free Cosmetics Act, but Oregon's law does not include Washington's controversial change to the federal limit for trace levels of lead.

Dig deeper: The law also directed OHA to create a list of chemicals of concern used in cosmetics. Manufacturers selling products containing listed chemicals will be required to post a notice on their websites.

- Under OHA's proposed rule, octinoxate and D4 would be included on the list. The notice requirement would apply when octinoxate and D4 are intentionally added to cosmetics at 5 parts per million and 10 parts per million, respectively, or when either is present as a trace contaminant at 100 parts per million.

Our advocacy: PCPC opposes the inclusion of octinoxate and D4 on OHA's list. PCPC is also concerned that the proposed notice language is inflammatory and that the criteria and sources OHA could use to add chemicals to the list in the future are overly broad, insufficiently scientific, and not based on risk.

- PCPC has remained engaged throughout the rulemaking process and will submit comments on the proposed rule. The association is advocating for science- and risk-based requirements that are clear and workable and provide manufacturers with sufficient certainty and time to comply.

Bottom line: Public comments are due Nov. 23, and the law takes effect Jan. 1, 2027. PCPC will continue advocating for a practical implementation framework and will keep members informed as OHA finalizes the rule.

Share Your Input

PCPC Seeks Member Input on Potential Spain-Related Shipping Restrictions

Why it matters: A Federal Maritime Commission (FMC) proceeding involving Spain could result in restrictions affecting Spanish cosmetics and inputs entering the U.S., with potential impacts extending to other companies using the same vessels.

What's happening: PCPC is preparing to file public comments for the Dec. 14 deadline and engaging the FMC and other U.S. government stakeholders while coordinating with industry partners in Spain.

Bottom line: Members with Spanish products, ingredients, sourcing, or other potential shipping impacts should contact Katherine Bedard, Director, International Trade and Regulatory Affairs, so PCPC can incorporate company-specific impacts into its advocacy.

Share Your Input

Section 338 Tariffs on Canada: Product Coverage Expands

Why it matters: The widening Section 338 action is increasing the number of cosmetics, personal care products, and inputs caught in the U.S.-Canada tariff dispute, with implications for highly integrated North American supply chains.

What's happening: The U.S. product list expanded on Oct. 30 to cover additional shampoos, soaps, and packaging inputs. Approximately $709 million in U.S. sector imports from Canada are now covered by 50% tariffs, nearly one-third of sector imports from Canada.

Our advocacy: In comments to the U.S. International Trade Commission, PCPC also urged a targeted approach to the Section 338 process that protects essential manufacturing inputs, accounts for retaliation against U.S. exports, and provides exclusions where tariffs could harm U.S. manufacturing and competitiveness.

Bottom line: PCPC continues to assess member exposure and advocate with U.S. and Canadian partners for tariff relief and approaches that protect integrated North American supply chains.

CBP Customs Reforms and Supply Chain Disclosure

Why it matters: New U.S. Customs and Border Protection (CBP) requirements could affect how cosmetics and personal care product companies import goods and increase the supply chain information companies may need to provide.

What's happening: Beginning Jan. 5, 2027, new rules will establish criteria for qualifying as a U.S. Importer of Record, under which certain U.S.-organized companies will be treated as foreign importers. Foreign importers generally will need to use Customs Trade Partnership Against Terrorism (CTPAT)-validated brokers. CBP is also considering expanded disclosures covering suppliers, raw materials, production, and foreign customs filings.

Bottom line: PCPC continues to keep members informed to protect confidential business information, avoid unnecessary burdens, and minimize disruption to legitimate trade and U.S. manufacturing. Please ensure your Customs Team reaches out to Jonathan Hicks, Senior Director, International Trade and Regulatory Affairs, with any questions.

Share Your Input

PCPC Advances Regulatory Cooperation with China, Secures U.S. Commerce Engagement

Why it matters: PCPC is advancing efforts to address long-standing regulatory barriers affecting U.S. cosmetics exports to China, with direct U.S. government engagement supporting that work.

What's happening: PCPC briefed Chinese regulators on the Modernization of Cosmetics Regulation Act (MoCRA) and advocated for recognition of independent International Organization for Standardization (ISO) Good Manufacturing Practices (GMP) 22716 certification as an alternative to the U.S. Food and Drug Administration (FDA)-issued GMP certification. PCPC is also advancing cooperation on the International Nomenclature of Cosmetic Ingredients (INCI), including Chinese translations and greater participation in the international naming process.

Bottom line: The U.S. Department of Commerce has agreed to raise the GMP certification barrier and other cosmetics market access issues with Chinese officials, while PCPC will continue working with Chinese regulators and China Association of Fragrance, Flavour, and Cosmetic Industries (CAFFCI) on INCI alignment. PCPC's goal is to translate this engagement into greater market access and stronger regulatory alignment.

Share Your Input

PCPC Files National Trade Estimate Comments

Why it matters: The National Trade Estimate (NTE) is the U.S. government's annual report identifying significant foreign barriers to U.S. exports and helps guide the U.S. Trade Representative (USTR), the Department of Commerce, and other agencies as they set trade priorities and engage foreign governments.

What's happening: PCPC filed comments on the 2027 NTE, highlighting barriers affecting cosmetics and personal care products, including China's GMP certification requirements for the animal-testing exemption and ingredient or product registration, as well as labeling requirements in foreign markets.

Bottom line: PCPC urges U.S. agencies to prioritize these barriers in engagements with foreign governments to expand market access and strengthen U.S. export competitiveness.

IFRA Joint Advisory Group Meeting Highlights Emerging Fragrance Priorities

What's happening: PCPC participated in last week's International Fragrance Association Joint Advisory Group meeting held in New York City. The meeting brought together stakeholders from the fragrance industry to discuss key priorities and advocacy.

Why it matters: The meeting reinforced PCPC's leading role in advancing science-based advocacy and strengthening global industry collaboration on emerging regulatory challenges. Through its engagement with IFRA and allied trade associations, PCPC is helping elevate member priorities, share advocacy successes, and strengthen coordination on issues that could affect the fragrance and personal care industries.

Issue to watch: Alpha-pinene is expected to be listed on California's Proposition 65 through the California Office of Environmental Health Hazard Assessment's authoritative bodies mechanism. Because alpha-pinene is widely present as both a directly added fragrance ingredient and a constituent of natural materials, the potential impact on fragrance and fragranced products could be significant.

- Stakeholders are evaluating the appropriate scientific and regulatory strategy and coordinating across the fragrance and fragranced-products sectors. California Air Resources Board activities were also identified as a key priority.

Bottom line: PCPC is working to ensure member companies have a strong voice in shaping the scientific, regulatory, and policy discussions affecting the global fragrance industry. Through continued engagement with IFRA and industry partners, PCPC is helping identify emerging challenges early, advance coordinated advocacy strategies, and promote science-based policies that support innovation and regulatory certainty.

Cosmetics and Personal Care Product Industry's Support Drives Look Good Feel Better's Impact

Why it matters: The cosmetics and personal care product industry's continued support of Look Good Feel Better helps people undergoing cancer treatment regain confidence through free workshops and resources addressing treatment-related appearance changes.

What's happening: The 2026 BeautyCares DreamBall, held Oct. 7 in New York City, brought together industry leaders and cancer survivors and raised nearly $1 million to support Look Good Feel Better's mission. The evening honored David Greenberg, Chair, Board of Directors, PCPC; Chairman, L'Oréal USA; Mark Marshall of NBCUniversal; Vinima Shekhar of Walmart U.S.; and survivor advocate Jeslyn Gorman.

- During Breast Cancer Awareness Month, Look Good Feel Better also expanded access to its services with support from the Steven & Alexandra Cohen Foundation, providing free Makeup Confidence Kits to participants in its virtual skin care and makeup workshops.

Bottom line: These initiatives demonstrate the power of industry collaboration to help more people undergoing cancer treatment access the tools, education, and support they deserve. Members can help extend that impact by sharing Look Good Feel Better's free resources and workshops.

Learn More

Member Benefit Spotlight

Need a CFS Before Year-End? Start Your Certificate of Free Sale Application

What's happening: If your company has products shipping overseas before the end of 2026 or early in 2027, November is the time to submit your Certificate of Free Sale (CFS) application.

Why it matters: Standard CFS processing takes 3-5 weeks, so submitting early can help avoid delays and keep your international shipments on track.

Bottom line: Submit by Nov. 23 for standard processing or Dec. 1 for full legalization. PCPC will process requests through Dec. 22 and resume processing Jan. 4.

Start Your CFS Application

**CFS is exclusive to Active category members.*

📣 Announcements and Upcoming Events

Call for Experts: Environmental Safety Committee (ESC)

Why it matters: There is an increasing need to demonstrate the environmental safety of cosmetic and over-the-counter (OTC) drugs due to concerns of state, federal, and global regulators and legislators.

What's happening: To achieve this, the ESC evaluates the environmental exposure, hazard, and risk of cosmetic and OTC drug ingredients in both fresh and marine waters. Experts with knowledge of and expertise in these areas are invited to contribute to the ESC.

Criteria:

- **Commitment:** 4 virtual main committee meetings per year, 1 in person; participation in specialized sub-groups, with meeting participation as required.
- **Scope:** Pre- and post-meeting review of environmental safety materials; contribution to collaborative discussion; review of output for dissemination within PCPC's membership and externally.

Get involved: If you want to apply or have any questions about joining the ESC, please contact Iain Davies, Senior Environmental Scientist.

Call for Experts: International Nomenclature Committee (INC)

Why it matters: INCI is a systematic naming framework developed in 1973 by PCPC, which assigns each cosmetic ingredient a unique, internationally recognized name. INCI ensures that ingredient lists on product labels are clear, consistent, and understandable across languages and markets. Driven by rapid innovation in the cosmetics and personal care sector, the INCI Nomenclature program is expanding.

What's happening: We are seeking biochemistry and biotechnology subject matter experts to join INC and its INC Biotechnology Subcommittee. Given the surge in applications involving peptides and animal cell culture-derived ingredients, we are particularly interested in candidates with strong scientific backgrounds in these areas.

Criteria:

- **Commitment:** 5 hybrid meetings per year (in-person and virtual options available).
- **Scope:** Pre-meeting application reviews, collaborative discussions, and post-meeting monograph proofreading for several hundred applications annually.

Get involved: If you want to apply or have any questions about joining the INC or the INCI Nomenclature program, please contact Alex Peterson, Associate Director, INCI Program.

Help Shape PCPC's Global Advocacy Priorities

Why it matters: PCPC is transitioning to a new global committee structure designed to give members a stronger role in setting strategic priorities across trade, international regulatory policy, supply chains, and market access.

What's happening: The Global Strategies Committee (GSC) will replace the International Steering Committee (IX), with a greater focus on setting strategic direction and priorities. A new Trade Policy Committee will replace the Trade Policy Working Group as the primary forum for trade policy work. A Supply Chain Working Group will also be added. Regional committees will remain, and a cross-market collaboration mechanism will be created.

- The International Committee (IC) is open to all members, and new meetings for 2027 will be announced soon. Existing distribution lists will be maintained so that members can continue to receive relevant information even if they are not serving on a committee.

Bottom line: A recruitment email will be coming soon with details on the new structure and nomination process. **GSC nominations are due on Dec. 5**, and members should consider which senior leader within their company is best positioned to help shape PCPC's global strategic priorities. Committees that sit

under the new GSC, including those on trade policy and regional committees, will open recruitment in the coming weeks.

Get involved: If you are interested in learning more, please contact Heather Helm, Executive Vice President, Global Strategies.

Get Involved

December 3, 2026, at 1:00PM - 2:00PM ET: Packaging EPR: 2026 Year-End Update and 2027 Outlook Webinar

Join Circular Action Alliance for a review of key packaging extended producer responsibility (EPR) developments in 2026 and what companies should prepare for in 2027. This webinar will cover state implementation updates, program milestones, emerging requirements and deadlines, and practical guidance to help producers navigate evolving obligations.

Presented by Kendal Asuncion and Geoffrey Inch of Circular Action Alliance.

Register Today

Complimentary for PCPC members; $100 for nonmembers.

December 8, 2026, at 1:00 PM-2:00 PM. ET: PCPC Member Update: 2026 Year in Review Webinar

Join PCPC leadership for an exclusive year-end conversation highlighting PCPC's key achievements, milestones, and initiatives in 2026. The team will also share priorities and focus areas for 2027, offering a look at what's ahead for PCPC and the industry.

Register Today

Complimentary for PCPC members | Members only

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