

Beauty + Justice Podcast

EP 8: + A Conversation on Clean Beauty with Heather McKenney of The Honest Company

LISSAH JOHNSON

You're listening to the Beauty + Justice Podcast where we talk with folks from a variety of fields about what it will take to create a more clean and equitable future beauty for everyone. These conversations are led by Dr. Tamarra James-Todd, a trailblazer at Harvard TH Chan School of Public Health and head of the Environmental Reproductive Justice Lab. And I'm your host, Lissah Johnson, a PhD candidate at Harvard Chan.

Hey listeners, welcome to another episode of Beauty + Justice. In the last episode, we started our two-part dive into the role of businesses in beauty justice, specifically how strategic partnerships with companies within the beauty industry supply chain can have a ripple effect in cleaning up the entire industry, especially for products marketed to women of color. In this episode, we're actually going to get to talk with a clean beauty brand that's making waves in the industry.

HEATHER MCKENNEY

So Honest has an extensive banned and restricted substances list, and we call it our "No" list and it really outlines the ingredients that we have chosen not to use given a high inherent hazard.

LISSAH JOHNSON

That was Heather McKenney, the Head of Toxicology and Product Safety at The Honest Company, a beauty brand with a mission to inspire everyone to love living consciously while making clean, sustainable, well-designed products that work. While we're not endorsing any company or product with our interviews, we do want to highlight examples of companies that are working towards developing safer products for all consumers. In this conversation, Dr. Tamarra James-Todd and Heather talk about the Honest Company's model for product formulation, how beauty companies can handle uncertainty regarding the effects of chemicals, and what it will take to have a clean chemical standard for all beauty manufacturers. And now, here's Tamarra to get the conversation started.

TAMARRA JAMES-TODD

Heather, it is wonderful to have you join us today, could you please introduce yourself for our listeners?

HEATHER MCKENNEY

Hi Dr. James-Todd, my name is Heather McKenney. I am the Associate Director of Toxicology and Product Safety at The Honest Company. Thank you for this exciting chance to chat today about making safer products, I know that you and I share so many of the same core values on this subject. So, I'm really excited to be here today.

TAMARRA JAMES-TODD

I'm so really excited to have you here and I'm also, so you know, I think we have some overlaps, maybe in our journey of like how we came to doing work in this space of looking at safer products and really trying to improve the world around us through focusing in on this, you know, tell us a bit about your story—how did you kind of, you know, become interested doing this and how did you end up finding out learning about and landing at the Honest Company?

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HEATHER MCKENNEY

Sure, yeah, well I grew up in Massachusetts myself, in a town called Marblehead. So, for those who don't know anything about Marblehead, it is an incredibly wealthy town on the North Shore. But I actually grew up in state-assisted housing in the town and I lost my dad at a very young age to preventative heart disease and I think growing up exposed to both great affluence and need, as well as seeing the burden of exposure and disease on these, the lower SES community, although I didn't know it at the time really started to shape my core values that I bring into my work every day. So right after undergrad I attended the Boston University School of Public Health, where I opted for the MPH program. So through my time at BU, I was always retrofitting my projects to focus on personal care product safety, even when the project kind of lent itself more to maybe like an environmental media project, I was always finding way to do it. And also through all of that I landed some really great opportunities for research. So, when I graduated, one of my common searches in those post grad months was [honest.com/careers](https://www.honest.com/careers) because I'd had my eye on The Honest Company as a company that was really doing the work to make that product change towards safer products. And one day, Research Toxicologist was posted and the job posting truly read like it was written for me. And I applied and I think I had the job offer within 5 days and I packed up my car to drive from Boston to LA, I'd never been to California, and I've been with the company for five years now.

TAMARRA JAMES-TODD

That is really, I mean, it's really amazing, particularly when you like put together the different pieces of your Interest and it converging with kind of the, you know, kind of life experience, you and I share a lot not only BU School of Public Health, amazing, amazing opportunities there. But also, just how the impact, I too lost my father at an early age and I think for me, and it and I don't know, maybe it sounds like for you too, like it kind of put a lens towards thinking about health kind of early on and the importance of you know what are the things that we can do to improve and make the world a healthier place. For me, I dedicate a lot of my work and my science to him, so no, thank you for sharing that. Out of curiosity and kind of related question is can you tell us a bit more about the changes you've seen kind of across attitudes and beliefs around awareness of product safety, particularly for, you know, children and infants, you know have you seen this in the last, you know, 5-10 years? Do you feel like consumers are becoming more aware? And if so, how?

HEATHER MCKENNEY

Yeah, I think that most people have noticed shifting opinions throughout their lifetime on product safety because as consumers ourselves, we respond and often emotionally to the research and news about product safety. So, you know, unfortunately, researchers are typically unable to secure funds to study chemicals or products until you know, we're widely exposed as a community. So, every time a new research article pops out about XYZ chemical had being a, I don't know, potential carcinogen, odds are we've used that product ourselves and it might even be in our house. So, I think we've all kind of felt the tides changing as we have access to more data. As somebody born in the early 90s in my childhood, I watched adults essentially navigate emerging news related to safer food products more than cosmetics, so watch my community move from strict brand loyalty to one to two parents not letting their kids have cupcakes for birthdays because of food dyes. That was a big one, that poor, the poor kid in the class he was like, sorry, my mom says I can't have one. But also, you know, their mom might have been right so, I think about that a lot, you know BPA in baby bottles and then, you know, growth hormones in dairy and

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then the move for all products to be natural vegan, organic, GMO. But but I do think the average consumer is becoming more aware in the cosmetic space as well because like I said, we have constant access to data information and opinion now. So, I think that for many the root cause of this at home, research and concern can be attributed, at least in part, to an acquired lack of trust that the authoritative bodies and consumer product industries are working to protect them. I remember when I was a kid, these light up water yoyos on like a Jelly string were all the rage. I had a very different mindset then, because I remember the rumor going around school being that they were toxic, right? The water inside the yoyos were toxic to kids and little Heather, her response was they couldn't sell them to kids if it was toxic. And I just think about that all the time of, like how far the pendulum has swung in my own journey, right, of learning about consumer product safety.

TAMARRA JAMES-TODD

I just wanted to just highlight that statement because I don't, I think there's so many people that still are there, that little Heather said, you know, they wouldn't sell it to kids if it wasn't toxic, you know, if it was toxic, you know, and that's powerful, I resonated with that.

HEATHER MCKENNEY

But you would ask specifically about baby products, you know, we have these pivotal life events that trigger consumers to reevaluate their buying habits, you know, pregnancy and the birth of a child being two of the strongest. Well, I think this change in purchasing behavior has been true for decades, or perhaps longer the topics of conversation are changing daily, and they should be based on the data available and the facts surrounding the conversation. So right now, a year ago, the conversations that the people may have been having with themselves and their doctors and their communities might have been about hey, how do I feel about disinfecting my home with bleach if I have a child at home, and that was because we had so many uncertainties with COVID, we didn't know how it was transmitted, does it live on surfaces and that was a really important conversation to be having even for an individual who might not normally choose to be disinfecting with bleach, but now, that conversation isn't as pertinent. So that same consumer might have kind of changed and started researching safer or the difference between natural and synthetic ingredients in their shampoo for their baby. So, it's just, it's interesting to track how these things can change so quickly but I think about a lot of the time, that was that this research is also happening on the Internet, and I think that the consumer can find absolutely whatever they want to find online to either change their opinion or reinforce their opinion, and it might change from day-to-day. So, if I want to hear that the natural ingredient is safer, I can find that, if tomorrow I want to find that this synthetic ingredient is safer, I can find that. So, I think we're at a critical point in consumer product safety where perfection also might be getting in the way of progress. Extreme views on both sides of the conversations want a definitive this or that answer, where the reality is a little bit more complex than that. So, my hope is that more brands and prudential groups can start to elucidate some of these complex issues and importantly, bring the consumers along on the journey to see the massive progress that we've made and sometimes that can get lost in the day-to-day messaging.

TAMARRA JAMES-TODD

I really appreciate the statement, you know, perfection getting in the way of progress. And also this idea that you know it's constantly changing and the way that we seek information has changed so drastically in the last you know, couple of decades that, you know, in any given day depending on what

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my search is I could get a completely different answer and I and I think not only does that maybe make it hard for the consumer to kind of decide what's safe for me, but it I would think that that's probably hard for companies to decide, you know, what do we, you know, give you know, what do we, you know, supply the consumers with and so just sort of, you know, out of curiosity, have you seen changes in how retailers go about carrying different products, particularly the ability to carry safer products in their stores, have there been real changes around that because again this is a really complex web of you know what the consumers' needs are, what the kind of our health and our science say, but then also what we can bring to market.

HEATHER MCKENNEY

Yeah, definitely. And I think you hit the nail on the head that it, it doesn't just make it difficult for consumers, but for the brands who are making products because you have to make a game time decision and you might be missing the full data set and there is the entire value or supply chain like you mentioned, retailers also play an important role here. And what I have seen is that many major retailers now have their own internal clean or green designations that they're using both in store and on website, and typically they're these little badges that designate products that meet whatever the certification scheme is to allow a consumer to easily make a safer or more sustainable choice compared to the conventional options on the shelf. So, this change is something that most of us can't see right, you can walk down the aisles at Target and see that they have clean at Target, that they might be calling out a vegan product, but there are definitely changes that the consumer can't see that are happening as well. So many, many retailers have rolled out company wide, banned or restricted lists and they apply to all the brands they carry. So, while this is not a rule, I have generally noticed that smaller retailers and more purpose driven big bigger box retailers do frequently have an extensive restriction list and they actually require that brands attest to the fact that they're not intentionally adding any of those ingredients before they'll sell whatever the product is in question. But this contrasts with retailers that have rolled out shorter banned lists and maybe a guidance document that a company can use as a north star for formulating to potentially reduce some of these chemicals of potential concern in the next X number of years and while you can use that as a guidance for formulating, they're not prescriptive, it's not required that the brands who sell to do that and since the discrepancies in approach do tend to occur across price point lines, the next step I would like to see is retailers flipping these guidelines into an enforceable standard. Currently right, it might be harder for somebody who's in a lower SES area to locate and purchase safer products.

TAMARRA JAMES-TODD

Yeah, no, I mean, I think that you really hit the nail on the head as far as kind of there's, you know, brands that are really trying to do their best to make products that are safer. There's these challenges, there's these barriers in place that could make it hard for there to be kind of, you know, equitable distribution and access to safer products. And part of me, I often hear this conversation, oh it's about price, but one of the barriers is really around cost and I don't know that that's true. And I'm curious, you know what, what do you think the barriers might be for companies, you know, to produce safer products and for retailers to carry these safer products, you know, and, you know, do you or do you think their strategies that we could employ to kind of help get this, you know, out there spread more equitably, so on and so forth.

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HEATHER MCKENNEY

Yeah, I think that one of one of the biggest barriers is within the supply chain in supplier cost, right? If it's a bit of a chicken and egg situation where if a retailer wants to ban a low-cost preservative, for example, they're going to potentially knock off shelf those products that are the most affordable because that was the cheap option for the company to manufacture with. But the opposite side of that is if the brand making that product cannot secure a low cost, safer preservative because there is not enough volume for the suppliers to sell it at that discounted cost, then we're not able to achieve that, we're not able to achieve that price point right now. So, it's kind of a stalemate of do you just ban the thing and then wait for some amount of time where you don't fill that price point in the market? And or do you sit and wait and hope that the safer alternative comes along? But of course it's not sitting and waiting, there's things that we can do, but as the retailer they tend not to have as much of a say, but one of the cool things that I have been participating in is the Green Chemistry and Commerce Council, or GC3, through UMass Lowell, and they are connecting the value chain, so from the raw material suppliers, the brands and the retailers to come together and have these conversations on innovating in green chemistry. So, there are these opportunities, but they are still they are still pretty niche in that the larger companies aren't necessarily participating at scale yet. So would love to see these bigger companies who have a bigger splash, a lot more buying power, start participating in those innovative programs.

TAMARRA JAMES-TODD

What a phenomenal, you know, conference and just you know the highlighting the point that you raised here about the importance of really understanding the systems that are involved in being able to get safer products to consumers and recognizing the complexity that's involved and I really love this point that you raised and so you know out of curiosity right now, I think we're still in a moment in time where safer products are still an exception. They're the exception to the rule, they're not the norm. And I'm wondering, what do you see is needed to really make that transition, particularly in the personal care product space for safer products becoming the norm and not the exception?

HEATHER MCKENNEY

Well, I'm hopeful that we are well on our way to kind of start making safer products the norm, but of course there's work to be done. So right now, raw materials suppliers, brands and retailers are responsible for their own self-regulation to get themselves there. However, I personally think that refreshing certain federal guidelines or regulations could help propel the industry's ability to work within a framework of green or safer chemistry. So, the reality is that certain technologies with a human health or environmental concern are lower cost, and they are easier to formulate with. So, your average brand, you know the only quantifiable repercussion that they might be able to find is you know of to using these less desirable ingredients, that is, is perhaps the loss of sales that they have to an alternative or safer brand. You know, I think an important goal, though, of the federal program, not sure that would be a regulation, program, a guideline would be finding opportunities for the reduced cost of the green chemistries so that they are just more often selected. So, I'm definitely not a policy expert and this is probably that there's several hour-long conversation. But I will say I think it's successful program would standardize ingredient selection and finished good testing approach while controlling for disproportionate impacts on smaller companies because one of the concerns that I do hear most in the industry is that if a program for example has a financial repercussion it can unintentionally favor larger

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corporations that could simply just choose to pay a penalty, while a smaller company might not be able to compete with that.

TAMARRA JAMES-TODD

That's a great point. It's particularly in a space where we're trying to be innovators, right? Like it's, yeah, that's a great point. You were going to say more, and I'm, I'm sorry.

HEATHER MCKENNEY

Yes, I I have, I have a realization that I think really elucidated a need for a standardized guideline and that was when I was comparing the certifying bodies that that I work for or work with and I really appreciate the work that they do, and they have same or very, very similar goals, right? But they end up having different opinions on what makes the product safer, so it's unrealistic to expect that safe products can be consistently produced in the face of inconsistent conclusions and information. But the truth is that without a standardized federal approach to safer products, either enforceable or not, I think it will be hard to achieve or even simply gauge success at scale and you know, without that, that benchmark, who's to say when we've crossed the finish line?

TAMARRA JAMES-TODD

You're raising, I think, a really great point and I do, you know, sometimes I hear the feedback, so my I'm neither a, you know, I'm also not a policy expert in any way. But one of the things that I sometimes hear is, you know, at the so maybe not the federal level, but at the state level, there's certain states that are really leading the charge. You're seated in one, you know, California's done, you know, an amazing job really leading the charge and trying to, you know, champion and advocate for consumer product safety. And so, I, I do wonder as a part of you know the point you raised here around you know just being able to kind of have a better handle on what is allowed into our consumer products and particularly personal care, you know, California's disclosure policies around, you know, labeling ingredients and things like this, which really does do a phenomenal job of helping consumers. But you know, just to highlight that I think even at the state or local levels it's helpful for folks who might be interested in like, well, how might things more closer to home impact and speaking of closer to closer to home I'm just out of curiosity what are some of the ingredients that The Honest Company kind of vouches to avoid and why is that?

HEATHER MCKENNEY

So Honest has an extensive banned and restricted substances list, and we call it our "No" List and it really outlines the ingredients that we have chosen not to use given a high inherent hazard, so these are ingredients that are essentially not worth the risk, so to speak, because that health endpoint that may be associated with the ingredient is either of high hazard, like a cancer risk or known endocrine disruption, or there's strong evidence of a growing problem like growing sensitization in populations over time, or simply that there are just too many data gaps, you know, in the case of significant data gaps or perhaps an unknown contamination profile of an ingredient we do opt for the precautionary principle and that's where the ingredient is assumed high risk unless we have data or until we have data to suggest otherwise. And this high-risk tier on the "No" list, includes ingredients like phthalates, parabens, formaldehyde donning ingredients, cyclic silicones, benzalkonium chloride and much, much more. But this living list evolves as new science emerges, and we do take a look at new primary research

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review articles and governmental or NGO guidance as it's published, something I've noticed since we are consistently innovating new products and therefore qualifying new active ingredients internally is it some of these fad ingredients that take the cosmetic market by storm, are really under researched with regard to safety, and they actually do typically end up on our "No" list. Which is a really tough marketing call to make, you know, for the company since we can't offer our answer to that new magic serum that all of our competitors are selling. But at the end of the day, it's the right decision for us and our consumers trust that we are confident in the ingredients we use so sticking to our framework of the Honest standard really helps keep us honest, pun intended. When there are those larger data gaps.

TAMARRA JAMES-TODD

So much of the need to create safer products sits at this kind of nexus of, you know, kind of the science of what we know and then the need to kind of, you know, move beyond and develop new techniques, new tools, but not just in the actual space of you know just thinking about the new products that might come to market, but like as we talked about earlier, kind of the overall systems that are at play. I'm just curious, you know what other types of you know, product safety issues is your team taking on, you know as far as kind of you know being the trailblazers, innovation leaders, you know that you are at the Honest Company.

HEATHER MCKENNEY

Well, in the US, the FDA doesn't have the authority to require manufacturers to participate in any pre-market approval of cosmetics or personal care products. And you know, everybody talks about how the FDA has only banned or cites bans for 11 ingredients or ingredient classes.

LISSAH JOHNSON

There is some exciting news in the space of federal cosmetic regulations. Recently, the modernization of Cosmetics Regulation Act of 2020, or MoCRA was passed and it's the first major update to cosmetic and personal care product regulations in the United States in over 80 years. The updates include several new provisions like record keeping and reporting of serious events to the Food and Drug Administration due to use of a product as well as requirement for labeling on the package regarding how to report such adverse events. The FDA will also have increased authority to recall products on the market if they are adulterated, meaning that they contain a substance that may be harmful to human health. And these are only a few of the updates required within MoCRA, and while this is a step in the right direction, additional work still needs to be done to better define what safety means when talking about personal care products and to increase transparency with regards to information for consumers.

HEATHER MCKENNEY

And that's typically contrasted with the policies in the EU and over 2000, high risk ingredients have been banned for use in cosmetics. And at Honest we more closely aligned to that philosophy in the EU when it comes to product safety. So, let's start with ingredient restrictions—a restriction list can be key for avoiding those high hazard ingredients that are simply not worth the risk. Our "No" list is a filter through which we remove those high-risk ingredients from our ingredient library, allowing us to formulate in this inherently lower risk situation right off the bat. So, it also allows us to incorporate those risks outside of human health. But the second process that we borrow from the EU is completing a toxicological risk assessment on finished goods and the work is done to effectively assess if the exposure poses a health

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risk and therefore remediation is needed. By doing so, you can conclude if the consumer's exposure is expected to be associated with adverse effects, well, you can also include those proper include proper adjustment factors to protect for your most vulnerable and susceptible users, such as babies or pregnant women. And I feel strongly that that level of confidence in product safety cannot be achieved by a restriction list alone which is the most common approach that I see in the safer product industry in the US. So, I do hope to see other companies start to adopt the two-pronged approach in an effort to address both high hazard ingredients and high-risk use scenarios.

TAMARRA JAMES-TODD

Well, I mean that's I mean very impressive because there's, you know, many, many out there are unaware that these processes exist (a) and (b) that they're actually being employed by some companies to look really due diligence to make sure that products are available that are safer for consumers. I want to just, you know, see if there's any other points you wanted to make sure to share with us before we, you know, have to part for the day.

HEATHER MCKENNEY

So, I think that one of the things that I'm most excited about and, and I think it makes me very hopeful for the future is I'm seeing a lot more democratization of data in the industry. And I and I really can't wait to see how that will affect product safety. So, the paradigm is shifting from a place of protecting development IP to sharing information within the industry to help achieve shared goals. And there are some platforms that exist that connect several manufacturers and they can come together to fill toxicological gaps or other safety gaps and these platforms and softwares are new to market within the five years have been at Honest, so it's kind of like watching the industry change before my eyes. Well, these platforms are voluntary right now. Who knows what their legacy will be, there are efforts being made right now at the federal level that would require suppliers to share information on all intentionally added ingredients, impurities, toxicological data to their downstream partners that use them in formulation. So that, for example, is the Cosmetic Supply Chain Transparency Act of 2021. That's currently in the House, so I do hope to see this collaborative process of identifying safer alternatives help to continue that inching towards a feasible national scale product safety guideline.

TAMARRA JAMES-TODD

I love that and what I really love is like a powerful take home message is that we really do all have a part in this, right? And so companies, retailers, consumers, we all have a way to help in making our products safer. And I really want to thank you for taking the time today, to meet with us and to really highlight the importance of, you know, the innovative work that some companies are doing and special thanks to The Honest Company for all the hard work and for you being willing to join us today.

HEATHER MCKENNEY

Yes, thank you. It was a pleasure to be here, always excited to talk about safer products.

LISSAH JOHNSON

An important part of this work is acknowledging and being able to talk openly about the limits and uncertainties in the data. However, in the case of personal care products, even in the face of uncertainty, there's still enough information about the potential health effects from ingredients of

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concern to act. By taking on a precautionary approach, we can protect more people, including the most vulnerable folks in the population by not including such ingredients with unknown health impacts in our products.

The beauty industry really is an important partner in pushing for beauty justice. With manufacturers, businesses and retailers involved there are many points along the supply chain where more just practices can be implemented and with beauty brands like The Honest Company being leaders and committing to prioritize consumer health in addition to product effectiveness as well as strategic business partnerships, helping beauty brands of all sizes get the information that they need to make better chemical choices—a more safe and equitable future of beauty for everyone, especially folks of color, is within sight. In the next few episodes, we'll be shifting our focus to the intersection between science and advocacy, starting with Dr. Dede Tete, Assistant Professor at Chapman University.

Thanks so much for joining us once again for another episode of Beauty + Justice. Help us get more folks listening to the podcast, make sure to tell a friend and leave a rating and review wherever you listen to podcasts, be well listeners and talk to you again soon.

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