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OPI PRODUCTS INC.

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Alexandra Gorman
Director of Science and Research
Women's Voices for the Earth
P.O. Box 8743
Missoula, Montana 59807

Dear Ms. Gorman:

I am pleased to report on our efforts to re-formulate our existing nail care products. Our goal continues to be to deliver to consumers exciting, innovative, high performance products that meet and exceed global safety standards.

As we have for the last two decades, we constantly search for ways to do more and to do it better. We are pleased that recent technological advances have enabled us to improve our formulas and to harmonize our product offerings so that we now have single global formulas for our nail care products, rather than different offerings in different markets.

Progress on Re-Formulation

I will address each of the three ingredients in which you have expressed an interest: DBP (dibutyl phthalate), a plasticizer used to make nail care products more flexible; toluene a solvent used to make nail care products flow more evenly; and formaldehyde, an ingredient used in hardeners to strengthen the nail.

Regarding DBP, beginning in Spring 2006, OPI eliminated DBP from all nail polishes, treatments, and hardeners it manufactures.¹

Insofar as toluene, commencing in January 2007 with our latest Australia Collection, OPI eliminated toluene from all the nail polishes it manufactures. Toluene-free formulas have also been approved for all our treatment and hardener products. Some of these new formulas are already being manufactured and the others will be on the market in the next few months.

With regard to formaldehyde, OPI's polishes and treatments have never contained, and do not now contain, formaldehyde as an ingredient. Some of OPI's hardeners do contain formaldehyde. To provide consumers with a choice, especially for those who may have allergic reactions, other OPI hardeners are formulated without formaldehyde.² At the same time, we continue to search for efficacious alternatives to formaldehyde in hardeners. Hardeners are very specialized, niche products designed specifically to alleviate the symptoms of dry, sensitive, brittle, or peeling nails.

¹ OPI actually began eliminating DBP from nail care products in the EU in 2005 and went global with the new formula in 2006 after additional tests were completed.

² Nail Envy Sensitive and Peeling, Start To Finish (Formaldehyde-Free), and Natural Nail Strengthener.

Industry Safety Record

Before closing, I want to emphasize that we, and other scientists and regulators, continue to believe that the products that we, and others, have sold for decades are safe. As you know, much of the concern about the above ingredients emanates from potential exposures in industrial, factory settings where the exposures are much, much higher than in finished nail care products. I will reference in my comments findings of authorities in the EU and in California, two of the most restrictive venues. Let me comment on each of the ingredients separately.

Insofar as DBP, while DBP was swept up in an automatic ban of over 1200 ingredients embodied in legislation adopted by the EU in 2003, the EU's own official scientific body charged with reviewing cosmetic ingredient safety found, even after adoption of the legislation, that DBP, **as used in nail polish products**, is safe.³ This EU scientific finding is consistent with the finding of other governments, including our own federal FDA.

Regarding toluene, the official EU agency dealing with such matters found, as recently as October 2006, that toluene, **as used in nail polish products**, is safe.⁴ Again, this finding is consistent with findings by other scientific and regulatory bodies.

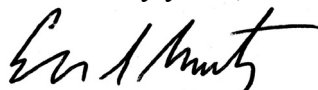
The level of formaldehyde in nail hardener products is well below the level set by the FDA. The maximum level for OPI hardeners, for example, is more than four times below the FDA limit. Further, not surprisingly, in an extensive, multi-year study, conducted under the auspices of the California authorities, the government agencies found that the levels of formaldehyde in nail salons were **no higher** than levels commonly found in offices and other workplaces where **no** nail care products, **whatsoever**, were present.⁵

Nevertheless, rather than getting mired in the question of whether the old formulas were safe, I'm sure you will agree it is more important to focus on the future, which looks bright.

Conclusion

We appreciate your interest and thank you for providing us the opportunity to report on our progress. We have no higher mission than to provide safe, effective products to our customers. I would also ask that you share this letter with your colleagues that are part of the Campaign for Safe Cosmetics coalition so that they too can be briefed on our progress.

Sincerely yours,



Eric Schwartz
Chief Operating Officer

³ http://ecb.jrc.it/DOCUMENTS/Existing-Chemicals/RISK_ASSESSMENT/SUMMARY/dibutylphthalatesum003.pdf

⁴ http://ec.europa.eu/health/ph_risk/committees/04_sccp/docs/sccp_o_076.pdf

⁵ This same study also found that toluene levels in nail salons were less than 1 ppm. The federal OSHA standard is 200 ppm.