



December 31, 2024

Via Electronic Mail

Safer Products for Washington

Department of Ecology

Submitted electronically: SaferProductsWA@ecy.wa.gov

Re: Identification of Priority Chemicals Report to the Legislature: Cycle 2 Implementation Phase 2

Dear Ms. Morley,

The Personal Care Products Council (PCPC) appreciates the opportunity to submit the following comments to the Washington Department of Ecology (Ecology) on *Identification of Priority Chemicals Report to the Legislature: Cycle 2 Implementation Phase 2* and the *Draft Technical Supporting Documentation for Priority Products (Cycle 2 Implementation Phase 2)*. Founded in 1894, the Personal Care Products Council (PCPC) is the leading national trade association representing the cosmetics and personal care products industry. PCPC is dedicated to promoting product safety, quality, and innovation, serving as a unifying voice that champions science-based standards and responsible practices to support health, well-being, and economic growth. PCPC's global members are some of the beloved and trusted brands in beauty and personal care today, providing millions of consumers with the diverse products they rely on every day – from sunscreens, toothpaste and shampoo to moisturizer, makeup, and fragrance.

We therefore have a strong interest in the scope and applicability of this report as it applies to cosmetics and cyclic volatile methylsiloxanes (cVMS) and any subsequent actions. PCPC maintains that the use of these ingredients in cosmetic products has been determined to be safe for human health and the environment.

Regulatory Assessments

PCPC is concerned that most of the support to identify these siloxanes as priority chemicals are based on the European Union's hazard-based approach for assessing substances. This approach does not consider overall risk as it does not consider exposures of the ingredients to humans and the environment. Environmental assessments conducted by [Australia](#) and [Environment and Climate Change Canada/Health Canada](#) have determined that, "The direct risks to aquatic life from exposure to these chemicals at expected surface water concentrations are not likely to be significant (National Industrial chemicals Notification and Assessment Scheme (NICNAS)," and is reflected by having no use restrictions for these siloxanes in Canada.

Scope

Ecology should note that there is limited indication that cyclotrisiloxane (D3) is being used as a cosmetic ingredient in products marketed in the United States and has been deleted as an entry in the *International Cosmetic Ingredient Dictionary and Handbook (Dictionary)* ([Johnson et al.](#),

[2011](#)). We therefore recommend its removal from consideration as a priority substance and limit the scope to cyclotetrasiloxane (D4), cyclopentasiloxane (D5) and cyclohexasiloxane (D6).

Sensitive Populations

Additionally, the Cosmetic Ingredient Review (CIR) Panel concluded that these ingredients are safe as cosmetic ingredients, including baby products, in the practices of use and concentration as described in the safety assessment (Johnson et al., 2011). This conclusion should be considered by Ecology when evaluating siloxanes' potential effects on sensitive populations.

Conclusion

We appreciate the opportunity to provide Washington Department of Ecology with comments on the draft documents. We hope to see our comments addressed and look forward to additional opportunities to participate in this rulemaking process.

Sincerely,

Kathleen Stanton

Kathleen Stanton
Senior Director, Science & Regulatory Affairs
Personal Care Products Council