

Public Comment from Credo Beauty on the Formaldehyde-Releasing Agents Rule
Washington Department of Ecology

Credo Beauty appreciates the opportunity to comment on the proposed restriction of formaldehyde-releasing preservatives under the Toxic-Free Cosmetics Act.

These chemicals are present in a wide range of products, and their potential health risks are of concern, especially for individuals in environments like salons and vulnerable communities. We strongly support efforts to reduce harmful exposures for all, particularly vulnerable communities. This aligns with our commitment to prioritizing public health, which is why we appreciate the Department's recognition of these risks and its clear intention to ban formaldehyde-releasing agents as part of broader chemical safety measures.

However, it is critical that this transition be approached with industry feedback, data, and thoughtfulness. We must ensure that alternatives are not only available but also affordable, effective, and safe. Without viable alternatives to banned ingredients, there is a risk that consumer safety could be compromised in the pursuit of toxicity reduction. Effectiveness, in this context, means maintaining the product's stability, shelf life, and microbial protection, all of which are key to short- and long-term consumer safety.

Additionally, we encourage a broader evaluation of products that may not have intentionally added formaldehyde but could release it under specific use conditions. This will help avoid overlooking scenarios where formaldehyde could still present a risk without being deliberately included in the formulation.

While intentionally added formaldehyde releasers should be addressed, we urge clear guidance and flexibility in addressing products' preservation needs. Preservatives are essential to preventing microbial contamination, which protects consumers from serious health risks like infections or product spoilage. We must balance the need for safer ingredients with the preservation of product safety. Reducing preservatives without ensuring proper alternatives could have unintended consequences, such as products becoming less microbially safe, potentially leading to product recalls or compromised consumer trust.

We commend the hazard assessments and the identification of alternatives conducted so far. We encourage ongoing collaboration with industry stakeholders to ensure that safe, effective, and accessible preservative systems remain available. We strongly support our industry moving towards stricter chemical safety measures; however, we must ensure we are maintaining the integrity of the products is vital to both consumer health and trust in the market.

We appreciate the opportunity to engage in this process and look forward to continued collaboration to ensure that we protect public health while maintaining high standards for product safety.

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