

April 8, 2025

Stacey Callaway  
Department of Ecology  
Hazardous Waste & Toxics Reduction Program  
300 Desmond Drive SE  
Lacey, WA 98503

Dear Ms. Callaway,

Thank you for the opportunity to provide input during the Formaldehyde in Cosmetics Formal Public Comment Period. Washington Conservation Action Education Fund (WCA) is a 501(c)(3) organization founded in 1967 as Washington Environmental Council. Our mission is to develop, advocate for, and defend policies that ensure environmental progress and justice by centering and amplifying the voices of the most impacted communities. We are committed to eliminating health disparities that communities of color face due to disproportionate exposure to toxic chemicals.

WCA strongly supports the Department of Ecology's draft rule to ban all formaldehyde releasers in cosmetics. This rule is a critical step towards making the products that we use on our skin, in our hair, and wash down the drain safer. As you know, formaldehyde exposure has been linked to certain cancers, can irritate eyes and skin, increase the risk of asthma, and harm brain function.

Products that are marketed towards people of color and particularly Black women, such as chemical hair relaxers, often contain formaldehyde or formaldehyde releasers. An estimated 89 percent of Black women have used chemical hair relaxers, starting as early as childhood, putting them at increased risk for adverse health outcomes.

We commend Ecology for proposing to restrictions. Specifically, we support:

1. The ban of the listed 28 formaldehyde releasers that will take effect on January 1, 2027;
2. The definition of intentionally added, which will ensure ALL formaldehyde releasers added to the final product, during the manufacturing of the product, or that are an ingredient in the final product will be covered; and,
3. The strong enforcement provisions that clearly state there will be an assumption that formaldehyde or a restricted formaldehyde releaser, or both were intentionally added if formaldehyde is found during sampling.



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Please finalize this draft rule that bans ALL formaldehyde releasers and ensures strong enforcement.

Thank you,

Katie Byrnes  
Toxics & Stormwater Policy Senior Manager  
Washington Conservation Action Education Fund