

G2G Ventures, PBC

Comments on State of Washington Department of Ecology Proposed Rule on  
Formaldehyde in Cosmetics, Chapter 173-339A

Submitted: April 11, 2025

G2G Ventures, PBC dba Beautycounter (G2G Ventures) appreciates the opportunity to provide comments to the State of Washington Department of Ecology (WA DoE) on the proposed draft rule restricting the use of formaldehyde and formaldehyde-releasing chemicals (formaldehyde releasers) in cosmetics products (proposed rule). G2G Ventures supports the proposed rule and recommends that WA DoE act swiftly to finalize the rule.

We are a leading clean beauty manufacturer—innovating, developing, and selling cosmetics products across North America. Our varied portfolio of skin care and color cosmetics includes products ranging from skin creams, cleansers, and serums to lip glosses, eye shadows, and blushes. G2G Ventures proudly employs an extensive, rigorous ingredient selection process to formulate safe and effective products that exceed regulatory minimums while delivering on consumer demands and expectations. Our commitment to continuously innovate products using science-based, safer options means that we disallow the use of several conventional cosmetic ingredients with unfavorable safety profiles. As it pertains to the proposed rule, our formulators are prohibited from selecting formaldehyde or formaldehyde releasers to create our formulas.

Formaldehyde is a well-established human carcinogen, irritant, and associated with increased risk of asthma.<sup>1</sup> Formaldehyde and formaldehyde-releasers are not necessary to formulate cosmetics products, and as mandated Washington state's Toxic-Free Cosmetics Act (RCW 70A.560.020) and further directed in the proposed rule, should not be intentionally added to cosmetics products.

In finalizing the rule, G2G Ventures recommends that WA DoE explicitly indicate that formaldehyde releasers include “but are not limited” to the identified chemicals; institute a process by which the list of formaldehyde releasers may be expanded; and add greater clarity regarding section WAC 173-339-110(a)(ii). With respect to clarifying section WAC 173-339-110(a)(ii), we recommend WA DoE further define “in-state retailer” and “in possession of” including whether an “in-state retailers” is limited to retailers with a physical presence in Washington and whether “in possession of” extends to product held outside the state (e.g., distribution centers).

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<sup>1</sup> [https://iris.epa.gov/ChemicalLanding/&substance\\_nmbr=419](https://iris.epa.gov/ChemicalLanding/&substance_nmbr=419),  
<https://ntp.niehs.nih.gov/sites/default/files/ntp/roc/content/profiles/formaldehyde.pdf>