



April 11, 2025

Stacey Callaway
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Proposed Cosmetic Products Restrictions Rule (Chapter 173-339 WAC); Restrictions on Intentionally Added Formaldehyde and Formaldehyde Releasers

Dear Ms. Callaway,

The Center for Environmental Health (CEH) strongly supports the Washington Department of Ecology's draft rule to ban intentionally added formaldehyde and formaldehyde releasers in cosmetics pursuant to Washington State's Toxic-Free Cosmetics Act (Ch. 70A.560 RCW).

CEH is a national non-profit organization headquartered in Oakland, California, dedicated to protecting the public from environmental and public health hazards, including harmful chemicals in air, food, water, and everyday products. CEH envisions a world where everyone lives, works, learns, and plays in a healthy environment.

Formaldehyde has been classified as a Group One human carcinogen by the International Agency for Research on Cancer.¹ Despite its widespread presence in beauty products, many consumers remain unaware of formaldehyde's dangers. In addition to causing cancer, formaldehyde in beauty products can cause allergies and asthma, skin burns, serious eye damage,

¹ IARC, *IARC Classifies Formaldehyde as Carcinogenic to Humans*. Lyon, France: International Agency for Research on Cancer (2004); Protano, Buomprisco, Cammalleri, Pocino, Marotta, Simonazzi, Cardoni, Petyx, Iavicoli, Vitali, *The Carcinogenic Effects of Formaldehyde Occupational Exposure: A Systematic Review*, Cancers (Basel) (Dec. 29, 2021), <<https://pmc.ncbi.nlm.nih.gov/articles/PMC8749969/#:~:text=The%20International%20Agency%20for%20Research,all%20published%20before%20that%20year>>, [as of Apr. 10, 2025].

and hormonal harm. This is particularly concerning for cosmetologists, their clients, and other people who use these cosmetics frequently. Numerous hair and beauty products advertised to Black women contain formaldehyde, “which has been linked to increased risks of hormone-related cancers, including uterine and breast cancer.”² Studies show that these products disproportionately affect Black women, who already experience higher rates of aggressive breast cancer before age 45 as compared to White women,³ and who have the highest likelihood of receiving uterine cancer diagnoses compared to other racial and ethnic groups.⁴

Now, Washington State is leading the way with a strong rule to ban all intentionally added formaldehyde and formaldehyde releasers in cosmetics. This sets a powerful national precedent—pushing safer products for everyone, no matter where you live or shop. Please finalize the rule and ensure strong enforcement to protect public health and the environment.

Respectfully,



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² Jasmine Smith, Medically Reviewed by Dr. Bayo Curry-Winchell, BlackDoctor.org, *Cancer-Causing Hair Products? Why Black Women Are at the Highest Risk!* (Mar. 25, 2025), <<https://blackdoctor.org/cancer-causing-hair-products/>>, [as of Apr. 10, 2025].

³ Yedjou, Sims, MMiele, Noubissi, Lowe, Fonseca, Alo, Payton, Tchounwou, National Institute of Health, National Library of Medicine, *Health and Racial Disparity in Breast Cancer*, Adv. Ex. Med. Biol. 2019, 1152:31-49, <https://pmc.ncbi.nlm.nih.gov/articles/PMC6941147/>, [as of Apr. 10, 2025].

⁴ Beth Howard, New York-Presbyterian, Health Matters, *Uterine Cancer and its Impact on Black Women* (Sept. 27, 2023), <<https://healthmatters.nyp.org/uterine-cancer-and-its-impact-on-black-women/>>, [as of Apr. 10, 2025]; [Beauty Products and Potential Cancer Risk Among Women of African Descent - NCI](#); Kaley Beins, MPH; Alexa Friedman, Ph.D.; Hong Lin; Kristian Edwards, DRPH, Environmental Working Group, *Higher Hazards Persist in Personal Care Products Marketed to Black Women, Report Reveals* (Feb. 11, 2025), <<https://www.ewg.org/research/higher-hazards-persist-personal-care-products-marketed-black-women-report-reveals>>, [as of Apr. 10, 2025].