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## PFAS Regulations Enter the Beauty Industry Spotlight

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The 2025 PFAS bans in the cosmetic industry require companies to take immediate action to adapt to new regulations, or risk exposure to compliance challenges and legal liabilities. With the recent PFAS regulatory changes, beauty brands should consider how to develop and market their products to stay competitive and compliant. Compliance requires continuous adaptation to the law, managing media and consumer relationships, and carefully navigating environmental responsibility.

An increased number of states are enacting stringent restrictions on the use of PFAS in certain products or, in some instances, outright bans. For instance, some regulations require companies to disclose the specific amounts of PFAS in their products. These regulatory changes are far from being limited to cosmetics; they also impact textiles, packaging, electronics, and other industries.

Specifically in the cosmetic industry, the following states have enacted a ban on the use of PFAS in cosmetic products:

**California:** Incorporated a ban on PFAS in cosmetics under the PFAS-Free Cosmetics Act (AB 2771) and Toxic-Free Cosmetics Act (AB 2762).

**Washington:** Incorporated a ban on PFAS in cosmetics under the Toxic-Free Cosmetics Act (HB 1047).

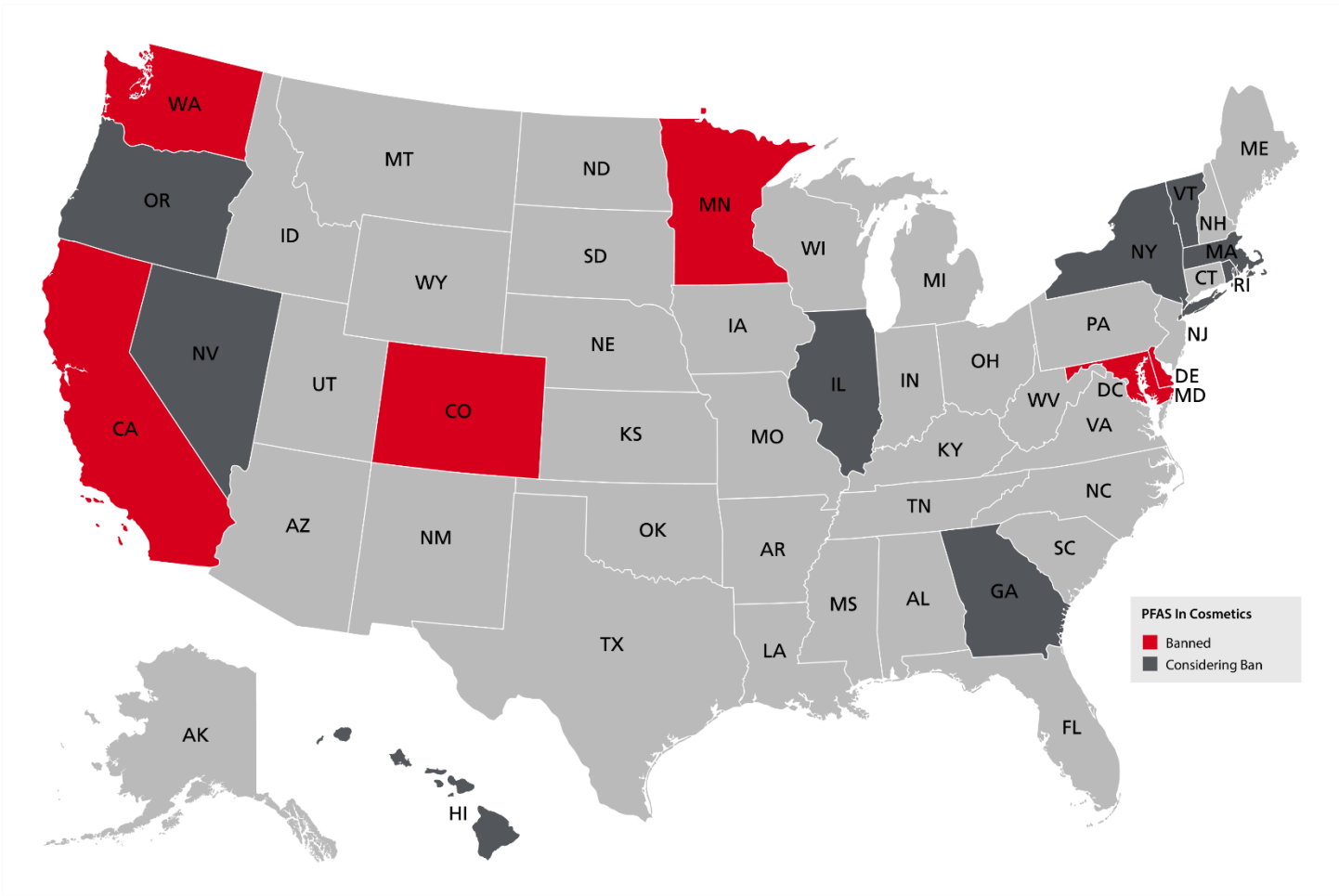
**Colorado:** Incorporated a ban on PFAS in cosmetics under the Perfluoroalkyl and Polyfluoroalkyl Chemicals Protection Act (HB 22-1345).

**Minnesota:** Incorporated a ban on PFAS in cosmetics under the Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Protection Act (also called Amara's Law).

**Maryland:** Incorporated a ban on PFAS in cosmetics under the PFAS in Cosmetics Prohibition Act (HB 643).

Other states considering bans on PFAS in cosmetics and other personal care products include the following, but not limited to: **Georgia, Hawaii, Illinois, Massachusetts, New York, Nevada, Oregon, Rhode Island, and Vermont.**

# Client **Alert**



Given the multibillion-dollar cosmetics market in the United States, with an enormous consumer base, the implementations of the bans are expected to garner ongoing media attention. The rapid state-level regulatory changes and growing media attention will require a response from the beauty industry. Companies must adapt to these developments to ensure compliance and maintain consumer trust.

For example, we expect an increase in litigation asserting that companies marketing “green” products are misrepresenting their environmental sustainability. Claims are already on the rise alleging that environmentally conscious companies are not adhering to sustainable practices due to the use of PFAS. In the current regulatory landscape, products that claim environmental consciousness will face heightened scrutiny for potential PFAS components.

## Client **Alert**

Cosmetics companies will be best poised to weather these changes by implementing a robust practice of ongoing regulatory and compliance audits, careful management of media and consumer relationships, and a strategy for navigating the legal landscape surrounding PFAS.

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