FDA PFAS Cosmetics Report Flags One Chemical for Potential Safety Concern

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January 12, 2026

On December 29, 2025, the US Food and Drug Administration (FDA) published its Report on the Use of PFAS in Cosmetic Products and Associated Risks (Report). The Report, as required under the Modernization of Cosmetics Regulation Act of 2022 (MoCRA), summarizes the FDA's assessment of the use of intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS) in cosmetic products and scientific evidence regarding their safety, including associated health risks. Due to their unique characteristics, including water and oil repellency, smooth texture, and film formation, PFAS can be found in a litany of cosmetic products such as eyeshadows, lipsticks, cleansers, nail polish, and hair conditioners.

The report identified approximately 51 different types of PFAS that were intentionally added as ingredients in over 1,700 cosmetic products sold in the United States, which represent 0.41% of total registered products as of August 2024. These products, which primarily consist of eyeshadows, leave-on face and neck products, eyeliners, face powders, and foundations, encompass 56% of PFAS-containing cosmetic products. Of the 51 identified PFAS variants, polytetrafluoroethylene was primarily used; it was detected in nearly 500 different products and accounted for 28.1% of all PFAS-containing cosmetic products. Other common variants identified in the FDA's Report include perfluorononyl dimethicone (13.3%), trifluoroacetyl tripeptide-2 (9.4%), tetradecyl aminobutyroylvalylaminobutyric urea trifluoroacetate (8.9%), perfluorohexylethyl triethoxysilane (7.1%), methyl perfluorobutyl ether (6.5%), and methyl perfluoroisobutyl ether (6.2%).

Although 51 PFAS variants were identified in the FDA's Report, it primarily focused on 25 types of PFAS, as these account for over 96% of PFAS used in cosmetic products sold in the United States. For each of these 25 PFAS, the Report evaluated toxicological data, including systemic effects such as acute toxicology, genotoxicity, carcinogenicity, repeated dose toxicity, developmental and reproductive toxicity, and neurotoxicity as well as port-of-entry effects through the skin, eyes, and respiratory tract. As part of its risk assessment, the FDA calculated margin-of-exposure values, the ratio between toxicological reference points—e.g., no observed adverse effect level and estimated human exposure level—to assess potential human health concerns.

Notably, the Report concludes that five types of PFAS pose low safety concerns in cosmetic products under intended use conditions, with only one—perfluorohexylethyl triethoxysilane—considered a potential safety concern when used in body lotion at the highest use level, i.e., the concentration of an ingredient in a final product. Note the FDA's Report did not address PFAS that may be present in final products via contamination.

That said, the FDA states its assessment is subject to several uncertainties, including limited data regarding use level, lack of dermal and oral absorption data and mechanistic information, as well as the absence of dermal toxicity data. Critically, MoCRA does not require companies to report ingredient concentrations when submitting product listing information, as concentration levels are typically considered proprietary and unavailable to the public. Therefore, the Report was unable to assess the safety of 19 of the 25 most common types of PFAS.

Currently, there are no US federal regulations that specifically address the use of PFAS in cosmetic products. This contrasts with New Zealand, which already has regulations in place to phase out the use of all PFAS in cosmetic products, starting in 2027. Similarly, Germany, Denmark, the Netherlands, Norway, and Sweden have proposed comparable regulations.

Despite the absence of federal regulations, at least 11 states—California, Colorado, Connecticut, Maine, Minnesota, New Hampshire, New Mexico, Oregon, Rhode Island, Vermont, and Washington—have banned the use of PFAS in cosmetic and other products, while at least ten—Georgia, Hawaii, Illinois, Massachusetts, New Jersey, New York, North Carolina, Ohio, Pennsylvania, and Tennessee—have proposed legislation to ban or limit it. Therefore, it is imperative for manufacturers, sellers, distributors, and others within the cosmetics industry to continually monitor and remain aware of evolving PFAS regulatory and scientific developments.

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