U.S. Food and Drug Administration (FDA) Proposed Rule: Sunscreen Drug Products for Over-the-Counter Human Use

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DRAFT LETTER

I urge the FDA to remove oxybenzone and octinoxate from its current list of 16 marketed active ingredients and use the best available science when considering "generally recognized as safe and effective" (GRASE) ingredients.

The growing body of data and literature about oxybenzone and octinoxate demonstrates that these are extremely harmful chemicals that undermine human health and pose a direct threat to the marine environment.

Both oxybenzone and octinoxate are highly toxic to marine life, especially coral reefs. Recent scientific research has shown that these ingredients leave coral vulnerable to coral bleaching and that varying oxybenzone and octinoxate concentrations, even at low exposure levels, can cause significant coral deformation and mortality.

These chemicals are harmful environmental pollutants that put life and ecosystems at risk. They are endocrine disruptors known to be highly toxic to many wildlife species including fish, corals, and even people. It is well documented that both ingredients have produced adverse developmental effects in both humans and wildlife.

Furthermore, these ingredients that are used in personal care products like sunscreen pollute the marine environment and reduce the resiliency and capacity of these ecosystems to survive on their own and prevent the natural recovery of degraded environments and wildlife.

I urge the FDA to update the regulatory requirements by removing oxybenzone and octinoxate from its current list of active ingredients to ensure safe and effective sun care protections to consumers while safeguarding corals and marine life.