



LONG BEACH ALLIANCE FOR CLEAN ENERGY





March 17, 2025

The Honorable Assemblyman Damon Connolly, Chair  
Assembly Environmental Safety and Toxic Materials Committee  
1020 N Street, Room 171  
Sacramento, CA 95814

**RE: Support for AB 916 (Lee), the Safer Soap Act**

Dear Chairman Connolly,

On behalf of our millions of members and supporters, the undersigned organizations write today to enthusiastically support AB 916 (Lee), the Safer Soap Act. With our collective expertise in environmental health, children’s health, medicine and healthcare, environmental justice, and consumer safety, we urge the California legislature to take this critical step in protecting the public from hand soap and body wash ingredients that have known human health risks and environmental harm and no evidence of benefit.

**Background and Context**

In 2016 the U.S. Food and Drug Administration (FDA) issued a final rule banning 19 antimicrobials from consumer antiseptic washes, concluding they were neither safe nor effective. The agency said there was no data to “demonstrate that there is any additional benefit from the use of these active ingredients in consumer antiseptic wash products compared to non-antibacterial soap and water.”<sup>1</sup> However, at the request of manufacturers, the FDA deferred rulemaking for one year on the three other antimicrobials used in antibacterial soaps: benzalkonium chloride (BZK), benzethonium chloride (BZT), and chloroxylenol (PCMX).<sup>2</sup>

The FDA has extended this deferral several more times and has still not reached a decision nearly nine years later. Meanwhile, the evidence of the health hazards linked to these

<sup>1</sup> FDA. (2016). FDA issues final rule on safety and effectiveness of antibacterial soaps. <https://www.fda.gov/news-events/press-announcements/fda-issues-final-rule-safety-and-effectiveness-antibacterial-soaps>

<sup>2</sup> FDA. (2016). Consumer hand and body wash antiseptics granted deferral letters. <https://www.fda.gov/drugs/information-drug-class/antiseptic-fda-letters>

ingredients (including their possible contribution to antimicrobial resistance) has only gotten stronger. The FDA itself has put out public communications discouraging consumers from using antibacterial hand soap due to these concerns (and lack of demonstrated benefit) as recently as December of 2024.<sup>3</sup> However, in a letter from February of 2025, the agency said it is “continuing to work with industry to obtain the data necessary to evaluate the safety and effectiveness” of these three remaining antimicrobials.<sup>4</sup> This suggests the FDA will continue to avoid taking formal action for the foreseeable future. It’s time for California to take the lead.

### **Antibacterial Soap Ingredients are Linked to Health Harm and Antimicrobial Resistance**

As the FDA fails to take action, consumers continue to buy soaps with these ingredients (advertised as “antibacterial”) thinking they are taking an extra step to protect themselves and their children from viruses and bacteria. In reality, these active ingredients are associated with a wide variety of health harms and can contribute to the rise of antimicrobial resistance.

- Quaternary ammonium compounds like BZK and BZT have been linked to reproductive effects like reduced fertility, respiratory conditions like asthma, and skin problems like dermatitis.<sup>5</sup> New research also links these chemicals to neurological harms.<sup>6</sup>
- PCMX is an organohalogen compound and a potential hormone disruptor.<sup>7</sup> Most well-studied organohalogens have been found to be harmful to people, ecosystems, and especially to children.<sup>8</sup>
- Studies suggest that exposure of bacteria to these chemicals can result in an increase in antimicrobial resistance, both to the chemicals themselves and clinically relevant antibiotics.<sup>9</sup> For example, a substantial body of evidence points to quaternary ammonium compounds as exacerbating resistance in pathogens of concern like *Pseudomonas aeruginosa*.<sup>10</sup> In the United States alone, there are more than 2.8 million antimicrobial-resistant infections each year that result in tens of thousands of deaths.<sup>11</sup>
- The use of antimicrobial chemicals comes with environmental harm. When people use products containing QACs, they enter and remain in water, soil, and sediment, and eventually make their way into the water supply network and food chain. The chemicals then re-enter into the body, and accumulate. Disinfectant pollutants continuously enter the environmental system, and because wastewater treatment plants are not designed to treat QAC contaminants, they are released into the environment as micro-pollutants.<sup>12</sup>

### **Antibacterial Soap Has No Benefit Over Regular Soap**

Both the FDA and Centers for Disease Control and Prevention (CDC) say that soaps with these chemicals are no more effective in preventing disease than non-antibacterial soap and water,

<sup>3</sup> FDA. (2024). Skip the antibacterial soap; use plain soap and water. <https://www.fda.gov/consumers/consumer-updates/skip-antibacterial-soap-use-plain-soap-and-water>

<sup>4</sup> FDA. (2025). Response to inquiry from the Green Science Policy Institute and Earthjustice. <https://greensciencepolicy.org/docs/General/response-to-inquiry-from-green-science-policy-institute-02-13-2025.pdf>

<sup>5</sup> Arnold, W. A., Blum, A., Branyan, J., et al. (2023). Quaternary ammonium compounds: a chemical class of emerging concern. *Environmental Science & Technology*, 57(20), 7645–7665. <https://doi.org/10.1021/acs.est.2c08244>

<sup>6</sup> Cohn, E. F., Clayton, B. L. L., Madhavan, M., et al. (2024). Pervasive environmental chemicals impair oligodendrocyte development. *Nature Neuroscience*, 27(5), 836–845. <https://doi.org/10.1038/s41593-024-01599-2>

<sup>7</sup> The Endocrine Disruption Exchange. (n.d.). TEDX List of Potential Endocrine Disruptors: 4-chloro-3,5-dimethylphenol. <https://endocrinedisruption.org/popup-chemical-details?chemid=256>

<sup>8</sup> Kodavanti, P.R.S., & Loganathan, B.G. (2017). Organohalogen Pollutants and Human Health. *International Encyclopedia of Public Health*, 359-366. <https://www.sciencedirect.com/science/article/abs/pii/B9780128036785003180?via%3Dihub>

<sup>9</sup> Arnold, W. A., Blum, A., Branyan, J., et al. (2023). Quaternary ammonium compounds: a chemical class of emerging concern. *Environmental Science & Technology*, 57(20), 7645–7665. <https://doi.org/10.1021/acs.est.2c08244>

<sup>10</sup> Chen, B., Han, J., Dai, H., & Jia, P. (2021). Biocide-tolerance and antibiotic-resistance in community environments and risk of direct transfers to humans: Unintended consequences of community-wide surface disinfecting during COVID-19?. *Environmental pollution*, 283, 117074. <https://doi.org/10.1016/j.envpol.2021.117074>

<sup>11</sup> CDC. (2019). Antibiotic resistance threats in the United States. <https://www.cdc.gov/antimicrobial-resistance/media/pdfs/2019-ar-threats-report-508.pdf>

<sup>12</sup> Hladik ML, Gross MS, Black GP, Kolpin DW, Masoner JR, Phillips PJ, Bradley PM, Smalling KL. Temporal concentrations of Quaternary ammonium compounds in wastewater treatment effluents during the COVID-19 pandemic, 2020-2021. *Chemosphere*. 2024 Nov;368:143753. <https://pubmed.ncbi.nlm.nih.gov/39547295/>

and discourage their use due to serious public health and environmental concerns discussed above.

- According to the FDA, “currently there isn’t sufficient evidence to show that over-the-counter (OTC) antibacterial soaps are better at preventing illness than washing with plain soap and water.” “What should consumers do? Wash your hands with plain soap and water,” the agency advises.<sup>13</sup>
- “Using these products might give people a false sense of security,” said an FDA representative in the same consumer update.
- According to the CDC, “[t]o date, studies have shown that there is no added health benefit for consumers (this does not include professionals in the healthcare setting) using soaps containing antibacterial ingredients compared with using plain soap.”<sup>14</sup>

We urge you to vote to sign AB 916 into law to protect Californians from washing their hands and bodies with harmful ingredients that have no health or safety benefits. This common-sense legislation will safeguard public and ecosystem health and align with our state's leadership in consumer safety.

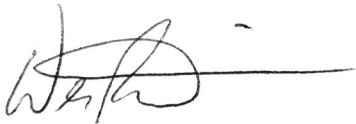
Sincerely,



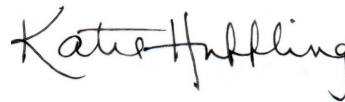
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<sup>13</sup> FDA. (2024). Skip the antibacterial soap; use plain soap and water. <https://www.fda.gov/consumers/consumer-updates/skip-antibacterial-soap-use-plain-soap-and-water>

<sup>14</sup> CDC. (2024). Handwashing Facts. <https://www.cdc.gov/clean-hands/data-research/facts-stats/index.html>

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## Members

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