

The Fine Line: A Case Study Analysis of Meaningful Public Participation



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Agenda

- Background
- Thesis Research
- Results and Discussion
- Further Avenues of Research

Background

Summer 2024, Graduate Research Assistant for the Cosmetics Toolkit project and also used the CT and related work (Toxic Free Cosmetics Act) to center this thesis.

The Hazardous Waste and Toxics Reduction unit at Ecology led the Cosmetics Toolkit (CT) project.



Image Credit: Canva

Lead In Cosmetics

► [MMWR Morb Mortal Wkly Rep](#). 2013 Nov 22;62(46):917–919.

Childhood Lead Exposure Associated with the Use of Kajal, an Eye Cosmetic from Afghanistan — Albuquerque, New Mexico, 2013

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Lead is a toxic metal that damages blood cells, the kidneys, the cardiovascular system the developing nervous system. The risk for lead exposure causing subsequent cognitive neurobehavioral deficits is especially high among toddlers because of their hand-to-mouth activities and their higher absorption of ingested lead compared with adults ([1](#)). In January 2013, the New Mexico Department of Health (NMDOH) received a report from an Albuquerque clinic of a refugee child aged 20 months (patient 1) with an elevated blood lead level (BLL) of 27.0 µg/dL (CDC reference value = 5.0 µg/dL). Medical staff informed NMDOH that the child and family used kajal, a traditional eye cosmetic brought from Afghanistan, their country of origin. Further investigation revealed that patient 1's brother, aged 4 months (patient 2), also had an elevated BLL of 33.5 µg/dL. Laboratory analysis

Image Credit: NPR, NIH, US FDA

Kohl: a lead-hazardous eye makeup from the Third World to the First World

[C Parry](#)¹, [J Eaton](#)

Affiliations + expand

PMID: 1954922 PMCID: [PMC1567936](#) DOI: [10.1289/ehp.94-1567936](#)

Abstract

Kohl is a widely used traditional cosmetic. It is mainly worn around the eyes in Asia, Africa, and the Middle East. It may be a pervasive source of lead poisoning in those areas and among individuals from those areas who have immigrated to developed nations. Samples of kohl were purchased in Morocco, Mauritania, Great Britain, and the United States. Some of these samples originated from Pakistan, India, and Saudi Arabia. Kohl is widely believed to consist of antimony, but analysis consistently revealed only trace amounts of antimony. Nine of the twenty-two samples tested contained less than 0.6% lead; however, seven samples had lead levels in excess of 50%. The remainder ranged from 3.31 to 37.3%. Third-world-manufactured kohls were purchased in the United States and Britain, suggesting that this hazard is no longer confined to the third world. Those kohls that contained lead were sold in violation of laws on lead in cosmetics in both of these nations. Third-world physicians and health care workers appear to be unaware of possible lead

used items. Physicians in developed nations with patients from Africa need to factor in the possibility of past or present lead exposure if the patient is kohl.

Kohl, Kajal, Al-Kahal, Surma, Tiro, Tozali, or Kwalli: By Any Name, Beware of Lead Poisoning

Many people may be unaware of the lead poisoning risk, in adults and children, from an avoidable source: traditional eye cosmetics containing kohl, kajal, al-kahal, surma, tiro, tozali, or kwalli.

The following information is intended to answer questions people may ask about these products and their dangers:

What are these products made of?

Kohl, kajal, al-Kahal, surma, tiro, tozali, and kwalli often contain high levels of lead. For example, lead, usually in the form of lead sulfide, sometimes accounts for more than half the weight of kohl products. Kohl products may also contain a variety of other materials, such as aluminum, antimony, carbon, iron, and zinc compounds, as well as camphor and menthol.[\[1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14\]](#) A tiro product linked to lead poisoning in an infant was found to consist of 82.6% lead.[\[15\]](#)

What are the effects of lead poisoning?

The risks associated with exposure to lead are especially serious for children. Among the effects associated with high levels of lead exposure are anemia, kidney problems, and

Public Participation

Citizen (public) participation is the redistribution of power to include members of the public who are excluded from the political and economic processes to be deliberately included in decision-making. This allows for marginalized groups to benefit from an affluent society (Arnstein, 1969).

Toxic-Free Cosmetics Act (TFCA)



Formaldehyde in cosmetics rulemaking and public comment

[Public comment is open](#) from Feb. 6, 2025 at 12 a.m. until April 11, 2025 at 11:59 p.m. to submit comments for the [formaldehyde in cosmetics rulemaking \(Chapter 173-339 WAC\)](#). Learn more about the formal draft rule and other rulemaking documents available for review and comment.

We are also hosting public hearings:

- [Online public hearing - March 31](#) at 10 a.m. via Zoom. [Register in advance](#).
- [Online public hearing - April 1](#) at 5:30 p.m. via Zoom. [Register in advance](#).



Lead in cosmetics policy and rulemaking

We issued an [interim policy on lead in cosmetics](#), effective Jan 1, 2025, for manufacturers unable to achieve lead concentrations below 1 part per million (ppm). Manufacturers must [fill out our online form](#) to meet the lowest lead levels possible.

Read [questions about the](#)

Image Credit:
WA
Department
of Ecology



Department of Ecology
Committees, Boards, and Workgroups

[Portal ID #1962]

Overview View our committees

Safer Products for Washington

Stakeholder webpage

The Departments of Ecology and Health will use this site to share information and draft documents as we implement Chapter [70A.350](#) Revised Code of Washington (formerly Chapter 70.365 RCW). Our implementation program for the law is called [Safer Products for Washington](#).

Subscribe to the [Safer Products for Washington email list](#) to receive updates and invitations for public comment. Contact us at [SaferProductsWA@ecy.wa.gov](#).

- Comuníquese con nosotros a [hwtrpubs@ecy.wa.gov](#) si usted necesita ayuda con servicios de interpretación o materiales traducidos a otro idioma.
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Arnstein's Ladder of Citizen (Public) Participation

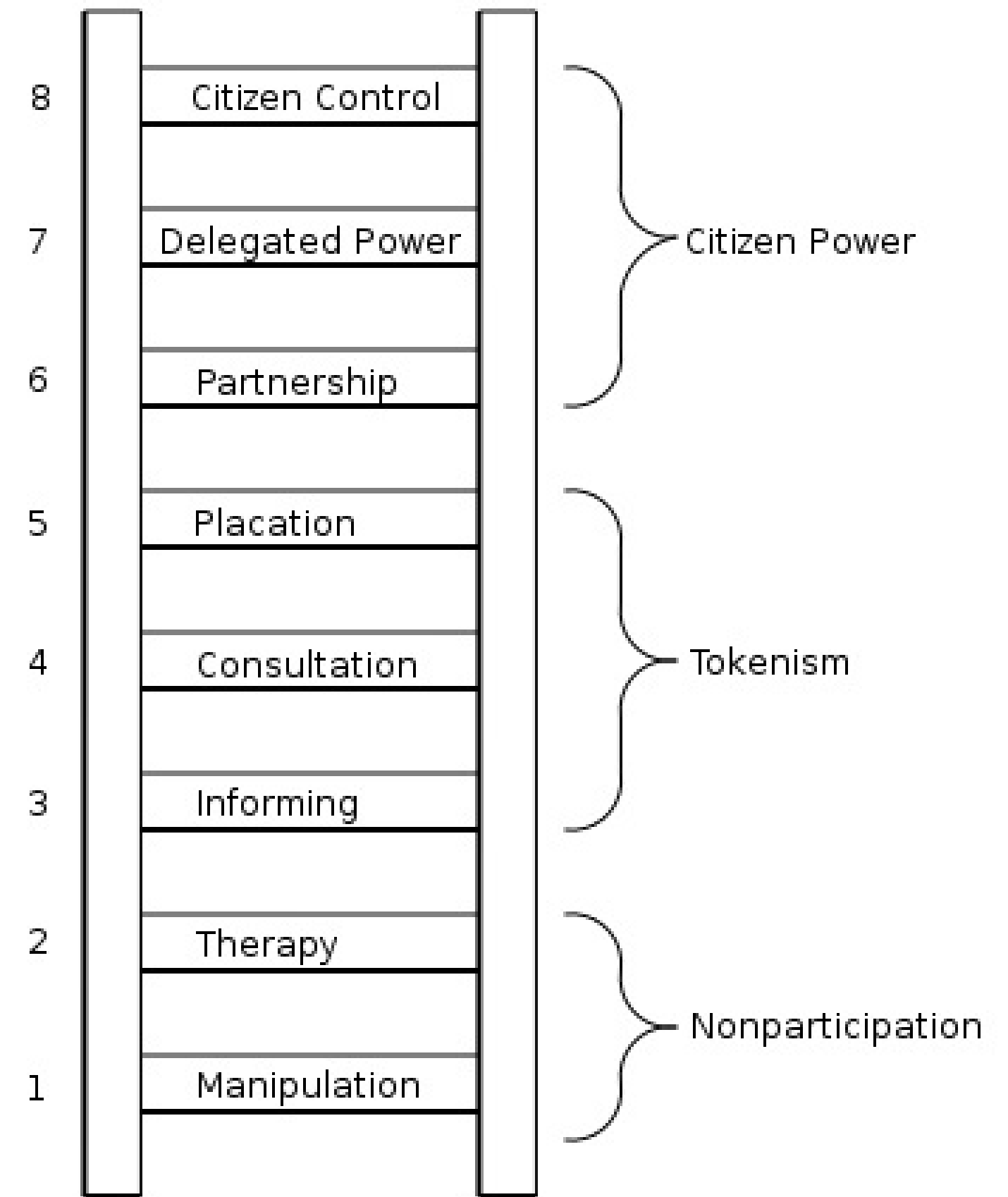


Image Credit: DuLithgow

Research Questions

- **In what ways does the Washington State Department of Ecology support meaningful public participation in its work around heavy metals?**
- **In what ways can the Washington State Department of Ecology achieve meaningful public participation in its work focused on heavy metals despite institutional barriers?**
- **What are possible solutions to public participation barriers?**

Data Collection

- Semi-structured interviews (qualitative data collection method).
- 7 interviews total with Ecology and CBO employees working on lead exposure mitigation efforts
- Participant observation (qualitative data collection method).
- 9 total events (Cosmetics Toolkit Steering Committee Meetings, TFCA rulemaking meetings, Cosmetics Toolkit Focus Groups)

Results and Discussion



Relationships

I think that that Ecology looked to IRC, to be the cultural experts on this population, and trusted our expertise, just on Afghan culture just on what Afghans would and wouldn't respond to well, and really, didn't dictate to us how to do things, or what to say.... (CBO Interviewee)

Relationships

For the toolkit project, the existing relationship that IRC has, and the connections that Manzanita house and Mahima project, those are all so important. I really don't think we would have gotten the turnout or the response that we did get if it had just been, you know, Ecology trying to set this up on our own... (Ecology Interviewee)

Relationships

I can target these couple of people and this couple people and this couple people, because I know that they represent kind of different factions within the Afghan community. I know the difference between these ethnic groups. I know the difference between people who speak these different languages and why their perspectives might be different on this topic (CBO Interviewee).

Trust

With the government, there's nothing (no religion), and most of them they have worked with the US military embassy. They have that trust built..... (CBO Interviewee)

They (the community) have high respect for the US government. That's how they came, and trust and the state is always neutral here. (CBO Interviewee)

Barriers to Public Participation



Contracts

Time consuming, Capacity, Compensation for lived experience,

Elevated funding amounts, Contracting the same group.



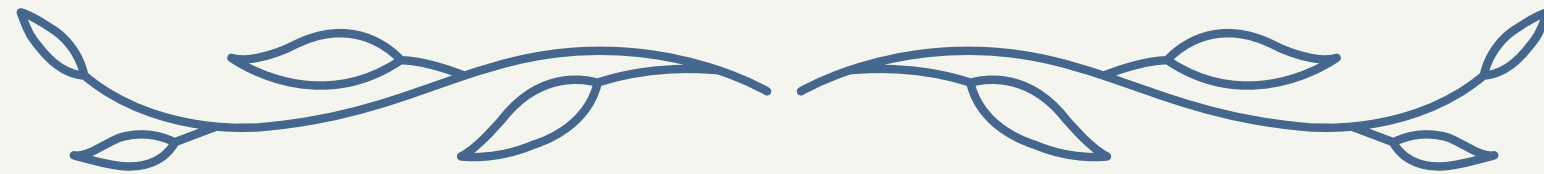
Contracts

I think this is the best contract I have ever worked with compared to my past. Kimi is such an awesome person, they are so prompt and responding and very organized and very flexible. So approachable, and I think this is the best one. I would love to do this kind of project more in the future if it is possible (CBO Interviewee).

Resources

Staffing capacity is a thing for the agency, for sure in this space, just because the kind of meaningful engagement that we seek, we understand, is very resource intensive (Ecology interviewee).

Implementing Public Participation Programming



Skilled facilitator

Culturally appropriate food

Willingness to be flexible accommodating (I.E time for prayer, adding an extra participant last minute).

Cultivating an environment of gratitude

Outcome of the Cosmetics Toolkit Project

Eyeliner Recipe

Ingredients

- $\frac{1}{2}$ teaspoon food grade activated charcoal
(or $\frac{1}{2}$ teaspoon unsweetened cocoa powder for brown-optional)
- $\frac{1}{4}$ teaspoon distilled water
- $\frac{1}{2}$ teaspoon jojoba or almond oil
(or skin-friendly oil of your choice)
- 2-3 drops vitamin E oil
- $\frac{1}{2}$ teaspoon beeswax *(small beads/pastilles work best)*
- 1 small glass container (1 oz)



Oil + Beeswax Recipe 2

(creamier, longer-lasting application, no water)

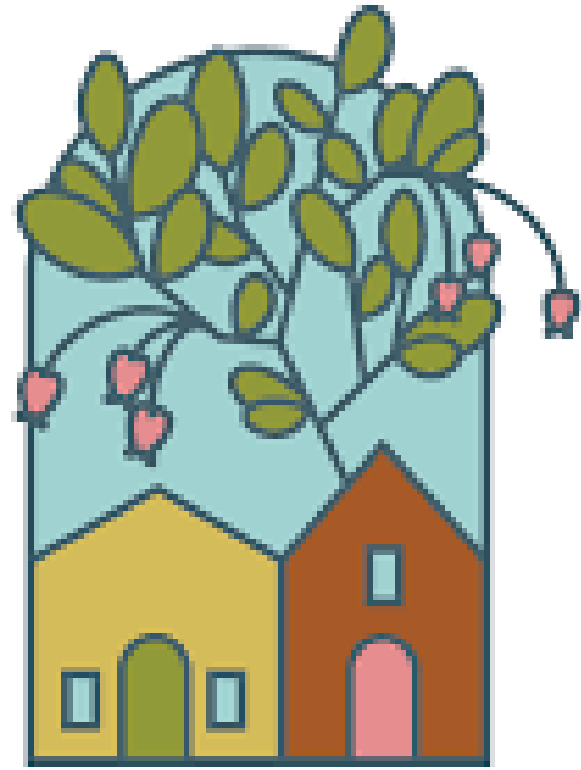
1. Mix activated charcoal (or cocoa powder) with jojoba or almond oil in small glass jar
2. Add 2-3 drops of Vitamin E oil and mix well.
3. Add beeswax to glass jar
4. Fill small sauce pan with water to about half the height of your glass jar. Heat gently on stovetop and stir until all wax has melted.
5. Remove from heat, let cool and test.
6. If mixture is too dry, add a few more drops of Vitamin E-oil, reheat, cool, and test again as necessary.

Further Avenues for Research

Further research to better understand if CT educational materials and alternative eyelineer could be translated to other communities/countries.

Further research to create a framework that is meant for state governments public participation efforts. This framework would keep in mind government constraints.

Further research could be conducted to look at other Washington state agencies and how they are going about implementing meaningful public participation.



Manzanita
House



Acknowledgements

Questions



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