



# WOMEN'S VOICES FOR THE EARTH

OUR HEALTH. OUR FUTURE. TOXIC FREE.

January 25, 2018

Ron Lombardi  
President & CEO  
Prestige Brands Holdings, Inc.  
660 White Plains Road  
Tarrytown, NY 10591

Dear Mr. Lombardi:

On behalf of the undersigned reproductive justice, public health, and environmental organizations, we are writing to urge you to disclose all ingredients in Summer's Eve feminine care products and eliminate the presence of chemicals linked to cancer and other serious health concerns.

Summer's Eve is the leading brand in feminine care products regulated as cosmetics with approximately \$125 million in sales<sup>1</sup>. And feminine care products are manufactured and marketed exclusively to women. These products are specifically intended for use on vaginal and vulvar tissue, which constitute a highly permeable route of chemical exposure. This makes exposure to harmful chemicals in Summer's Eve and other feminine products a vital women's health issue.

Women who use feminine care products have the right to know which chemicals they are being exposed to. Feminine wipes, douches, and powders are designed to have direct contact with absorptive and sensitive vulvar and vaginal tissue. We believe chemicals linked to cancer and reproductive harm do not belong in products regardless of amount.

Women of color are disproportionately impacted by the harmful and unwanted chemicals in feminine wipes. Data compiled by the National Health and Nutrition Examination Survey (NHANES) indicate that Black and Latina women use wipes, douches, washes, and sprays at higher rates than white women.<sup>2</sup> Companies that continue to market feminine products more aggressively to women of color put their health at heightened risk of toxic exposures and adverse long-term health impacts.

Our 2015 store survey of ingredients in feminine care products showed that Summer's Eve products contain more chemicals of concern than other brands, including<sup>3</sup>:

- **Octoxynol-9:** A potent contraceptive drug that effectively kills sperm. However, feminine care products containing octoxynol-9 are not considered contraceptives, nor are they required to have any caution labeling to their potential effect on a woman's fertility. Women who use these products containing octoxynol-9 may be unaware that exposure to this ingredient may impact their ability to get pregnant.
- **Methylparaben and propylparaben:** Found in Summer's Eve cleansing cloths, these preservative chemicals have been shown to cause irritation of vaginal mucous membranes. Exposure to parabens is associated with genital rashes. Studies have also linked parabens to fertility problems and endocrine disruption.
- **2-bromo-2-nitropropane-1,3-diol:** A preservative used in several Summer's Eve wipes, including one product labeled 'Simply Sensitive.' 2-Bromo-2-Nitropropane-1,3-Diol releases formaldehyde, a human carcinogen. Exposure to formaldehyde can cause allergic reactions for those who are sensitized to it.
- **Ext. Violet 2, Red 33, and FD&C Yellow #5:** Colorants found in Summer's Eve feminine washes for which the FDA has issued use restrictions.<sup>4</sup> Ext. Violet #2 and Red 33 are not to be used in products that come in contact with mucous membranes, and Yellow #5 requires a specific safety warning regarding allergic reactions in products used vaginally. Though labeled "for external use," Summer's Eve washes are expected to be for both internal and external use, as product labels claim that "it's pH-balanced to work with your body's natural chemistry." Women understand that maintaining a healthy pH in the vagina helps promote good vaginal health. The marketing language on Summer's Eve washes implies and promotes that these products will provide that vaginal (i.e. internal) benefit, whereas there is no scientific rationale or shared understanding of any health benefit from pH balance of external vulvar tissue.
- **Neutresse®:** A trademarked odor-control technology used in many Summer's Eve products. It is the only feminine wipes brand that has such technology, and like fragrance, the ingredients in Neutresse® are withheld from consumers. Potential health impacts are simply unknown.
- **Fragrance:** Used in all Summer's Eve feminine products, but labels offer no fragrance ingredient information. Instead brand website only lists 'Clinically Tested Safe Scents' as one of the benefits to using their wipes products. This is vague marketing language that fails to provide women the ingredient information they need to make their own purchasing choices. Fragrance can be made up of potentially hundreds of different ingredients, many of which are linked to serious health problems from skin irritation to hormone disruption and breast cancer.

Undisclosed fragrance chemicals are of special concern in feminine care products given research findings linking vaginal douching with higher levels of phthalates in the body.<sup>5</sup> Phthalates are chemicals of concern for women's health because they are endocrine disruptors and are linked to harmful health effects including reproductive and developmental harm as well as chronic disease risks in adults. They are also thought to be particularly harmful when a developing fetus is exposed in the womb. Specifically, women's higher exposures to DEP during pregnancy have been linked to adverse developmental outcomes in their children.<sup>6,7</sup> The 2015 study found a clear racial disparity, where Black women had phthalate levels 48% higher than those found in white women. A significant amount of this disparity could be accounted for by the fact that Black women were also much more likely to report that they douched regularly.

Major manufacturers of personal care products such as Procter & Gamble and Unilever have recently committed to disclosing individual fragrance ingredients on a product-specific basis.<sup>8,9</sup> Disclosing fragrance ingredients is both feasible, and understood as the right thing to do for customers.

For these reasons, we urge Prestige Brands to:

- Disclose all ingredients, including fragrance and Neutresse® ingredients, in all of your feminine care products, and highlight fragrance allergens in those products.
- Develop a policy to eliminate the presence of ingredients and contaminants linked to cancer, reproductive toxicity, endocrine disruption, and other serious health problems from all of your feminine care products. Additional product screening is necessary to ensure safety of use on mucous membranes.

We hope Prestige Brands prioritizes women's health by seeking to make products free of chemicals of concern. We look forward to hearing from you by February 6, 2018, so that we can arrange a time to discuss this further. Please contact Sarada Tangirala, Director of Corporate Accountability at [saradat@womensvoices.org](mailto:saradat@womensvoices.org) or call (406) 543-3747.

Sincerely,

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Executive Director  
Women's Voices for the Earth

Amber Garcia  
Field and Advocacy Manager  
Colorado Organization for Latina  
Opportunity and Reproductive Rights

Nourbese Flint  
Policy Director  
Black Women for Wellness

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Catherine Porter  
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Sierra Club

Pamela Miller  
Executive Director  
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Monica Simpson  
Executive Director  
SisterSong

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<sup>1</sup> [https://www.briefing.com/investor/analysis/story-stocks/prestige-brands-adds-summers-eve-manufacturer-to-portfolio-for-825-mln-in-cash-\(pbh\).htm](https://www.briefing.com/investor/analysis/story-stocks/prestige-brands-adds-summers-eve-manufacturer-to-portfolio-for-825-mln-in-cash-(pbh).htm)

<sup>2</sup> Zota, A (2012) Descriptive statistics on feminine hygiene use among U.S. reproductive-aged women, NHANES 2001-2004. Personal communication. 2012.

<sup>3</sup> 2015 survey conducted at Target (15555 E. 14<sup>th</sup> St. Suite 400, San Leandro, CA 94578), Walgreens (Oakland, CA), CVS (Oakland, CA), and Walmart (San Leandro, CA) on April 4 and 5, 2015.

<sup>4</sup> Feminine Washes with Colorants of Concern, <https://www.womensvoices.org/feminine-care-products/feminine-washes-with-colorants-of-concern/>

<sup>5</sup> Francesca Branch, Tracey J. Woodruff, Susanna D. Mitro and Ami R. Zota (2015) Vaginal douching and racial/ethnic disparities in phthalates exposures among reproductive-aged women: National Health and Nutrition Examination Survey 2001-2004. *Environmental Health. Vol.14. No. 57, July, 15 2015.*

<sup>6</sup> Swan SH, Main KM, Liu F, Stewart SL, Kruse RL, Calafat AM, et al. (2005) Decrease in anogenital distance among male infants with prenatal phthalate exposure. *Environmental Health Perspectives.* 2005;113(8):1056–61.

<sup>7</sup> Engel SM, Miodovnik A, Canfield RL, Zhu C, Silva MJ, Calafat AM, et al. (2010) Prenatal phthalate exposure is associated with childhood behavior and executive functioning. *Environmental Health Perspectives.* 2010;118(4):565–71

<sup>8</sup> “P&G Expands Transparency Commitment to Include Fragrance Ingredients across Product Portfolio” Procter and Gamble press release. August 30, 2017. Available at: <http://news.pg.com/press-release/pg-corporate-announcements/pg-expands-transparency-commitment-include-fragrance-ingred>

<sup>9</sup> “Unilever announces new ingredient transparency initiative for its home and personal care brands” Unilever press release, July 2, 2017. Available at: <https://www.unilever.com/news/press-releases/2017/Unilever-announces-new-ingredient-transparency-initiative-for-home-and-personal-care-brands.html>