

August 5, 2020

To Members of Congress:

We, the undersigned organizations, support the Menstrual Product Right to Know Act (H.R. 2268). Introduced by Congresswoman Grace Meng, H.R. 2268 requires manufacturers of menstrual products such as pads, tampons, cups, and underwear, to disclose ingredients used in these products. Provisions from H.R. 2268 were also included in the Environmental Justice for All Act, recently introduced in the Senate by Senators Cory Booker (D-NJ), Kamala Harris (D-CA), and Tammy Duckworth (D-IL).

Menstrual products are regulated by the FDA as medical devices and come into contact with some of the most sensitive and absorbent tissues on a body. Tampons and pads are used by 70-85% of people who menstruate and other products such as menstrual underwear and menstrual cups are becoming increasingly popular.

Despite the widespread use of menstrual products, the FDA does not require the disclosure of ingredients, and the language/design of menstrual product labels are not required to get pre-market approval from the FDA. Under federal law (Title 21/Chapter I/Subchapter H) there are certain labeling requirements for tampons but it's limited to warnings around toxic shock syndrome and absorbency information.

Ingredients used in these products may pose a risk to menstruators' health. For example, some manufacturers add fragrance to pads and tampons. The fragrance ingredients that make up a scent could be any number of 4,000 ingredients listed on the International Fragrance Association's Transparency List. It's worth noting that over 1,300 of the ingredients on the list are flagged as toxic or potentially toxic by scientists.¹

Fragrance allergens have also been found in menstrual products including linalyl acetate, acetyl cedrane, and tetramethyl acetyloctahydronaphthalenes. Linalyl acetate and acetyl cedrane can be found in Always pads, and tetramethyl acetyloctahydronaphthalenes can be found in Tampax tampons according to voluntary public disclosures by Procter and Gamble. The largest authoritative list of fragrance allergens is the list of 82 allergens developed by the European Union Scientific Committee on Consumer Safety—any one of which could be found in menstrual products.²

In addition, preservatives including methylisothiazilinone (MI) and methylchloroisothiazilinone (MCI) have also been associated with menstrual products, most commonly included in

¹ <https://www.womensvoices.org/greenscreen-for-safer-chemicals-list-translator-scores-for-fragrance-chemicals/>

² SCCS (Scientific Committee on Consumer Safety), opinion on fragrance allergens in cosmetic products, 26-27 June 2012. Available at: https://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_102.pdf

adhesives of menstrual pads. These allergens are common causes of anogenital dermatitis, an ailment that has been specifically linked to menstrual pad use.³

Acrylates and methacrylates are also commonly included in menstrual pads. The disclosure of specific acrylates and methacrylates used in pads is lacking, but there are several published case studies of patients with diagnosed contact dermatitis from exposure to acrylates from the use of menstrual products and incontinence pads.⁴

People who menstruate have a right to know about the presence of these ingredients.

Ingredient listings are required for food, cosmetics, and over the counter drugs enabling the public to avoid ingredients they are concerned about, or that may cause allergic reactions like rashes, itchiness or burning.

It's a disservice to people who menstruate that products inserted into the vagina and that come into contact with sensitive vulvar tissue are not required to meet anywhere close to the same standard as other consumer products.

We urge Congress to pass this very important piece of legislation and want to extend our sincere gratitude to Congresswoman Grace Meng for being a champion of this issue and for menstrual equity.

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³ Foley CC, White S, Merry S, et al. Understanding the role of cutaneous allergy testing in anogenital dermatoses: a retrospective evaluation of contact sensitization in anogenital dermatoses. *Int J Dermatoll.* 2019;58(7):806-810. doi:10.1111/ijd.14360

⁴ Sauder MB, Pratt MD. Acrylate Systemic Contact Dermatitis. *Dermatitis.* 2015;26(5):235-238. doi:10.1097/DER.000000000000136. Available at: <https://pubmed.ncbi.nlm.nih.gov/26367207/>

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