



**Women's Voices for the Earth**  
**Response to call for inputs for a report on Gender & Toxics**  
**by the United Nations Special Rapporteur on Toxics and Human Rights**

**March 2024**

Thank you for this opportunity to provide input related to the intersection between gender and harms associated with exposures to toxic chemicals. Since 1995, [Women's Voices for the Earth](#) (WVE) has uplifted the connections between gender, health, class, race, and the environment. Our groundbreaking science, research and campaigns focus on the industries that most heavily market and sell to women.

We believe that this forthcoming report has the potential to uplift the human rights concerns implicated by the disproportionate exposures to toxic chemicals and harms experienced by women, LGBTQIA+ people, communities of color and others who have been historically marginalized by both the environmental health movement and protective government policies.

In this submission, we highlight four issues at the intersection of human rights related to gender equity and those that provide for a safe and healthy environment. We then offer recommendations for the forthcoming report.

## **Issues at the intersection of gender and toxics**

- 1) Governments' failure to address toxic chemicals in menstrual products interferes with the right to health of women, girls and other people who menstruate. Stigma around menstruation contributes to the lack of action to protect people who menstruate from toxic chemicals in period products.

The right to menstruate with dignity includes access to menstrual care products when needed for students, people who are incarcerated, people who are experiencing homelessness, and anyone who otherwise could be denied the right to menstruation products because of their life circumstances. The right to menstruate with dignity includes the right to know what ingredients are used in menstrual products and the right to products that do not contain harmful chemicals.

Barriers to basic, safe menstrual care impact millions of people in the U.S. alone. State actors have a responsibility to end the culture of stigma around menstruation that has prevented not only decision-makers, but also healthcare providers, educators and individuals from ensuring that menstrual health is a priority.

Period products are used on and in highly sensitive and absorptive parts of our bodies, which makes it important to understand and address the potential chemical exposures associated with their use. Until recently, information about ingredients, components or additives used in period products was largely unavailable from manufacturers. Chemical testing by WVE and others found toxic volatile organic compounds, phthalates (reproductive toxins), and other chemicals of concern in these products.

Thanks to a New York law that went into effect in 2021, numerous additives to period products have been disclosed for the first time, indicating that chemical exposure from period products is much more complicated than previously assumed. There are newly disclosed ingredients in period products which can cause skin irritation and allergic reactions, which may contain toxic contaminants that can cause cancer, and which release microplastic particles into the environment.

In recent years, the use of nanosilver as an antibacterial agent in period products has greatly increased. Nanosilver refers to microscopic particles of silver that are commonly incorporated into “antibacterial” athletic clothing in an effort to reduce odor. Nanosilver has been incorporated into certain period care products, including absorbent menstrual underwear and some menstrual pads. The purpose, according to manufacturers, is to decrease the growth of harmful and/or odor-producing bacteria (reinforcing the stigma that menstruation creates an offensive odor).

Unfortunately, there are several adverse health and environmental concerns associated with nanosilver use. Nanosilver may be especially inappropriate to use around sensitive vaginal and vulvar tissue, although the impact of antimicrobials in period products has never been studied directly. A healthy vaginal microbiome contains a delicate balance of numerous and diverse beneficial bacteria. A disruption of the microbial balance can lead to overgrowth of harmful bacteria resulting in bacterial vaginosis, increased risk of sexually transmitted diseases, increased risk of pregnancy complications and other similar conditions.

Governments have largely failed to support research on the impacts of toxics on the unique route of exposure through vaginal tissue. This type of exposure is not comparable to other dermal exposures, as it has significantly different unique characteristics such as mucous membranes, as well as direct potential harm to the reproductive system. As a result it remains unknown the extent to which chemical exposure from menstrual and intimate care products may be harming reproductive health.

## 2) Stigma also contributes to the lack of protections concerning toxic chemicals in other intimate care products marketed to women.

Until recently, WVE used the words “feminine hygiene” or “feminine care” when describing period and other personal care products like wipes, washes, douches and sprays. But we know that using the term “feminine” pushes some people out of the conversation. There are people who use these products who do not identify as women. Transgender and gender nonconforming people also have a right to health and equality. Their needs and experiences must also be considered when addressing toxic chemicals in intimate care products.

The purpose of intimate care products is to clean, moisturize, absorb discharge or otherwise treat the sensitive skin and tissues of the vaginal area. Consumers are told they are necessary for personal hygiene, a “fresher feeling,” or “greater confidence,” and the companies marketing these products imply that this improved cleanliness will promote good health and increase sex appeal (again, reinforcing the myth and stigma around vaginal odor). WVE found that chemicals of concern such as carcinogens, reproductive toxins, endocrine disruptors, and allergens are being used on, or even in, the extremely permeable mucus membranes of the vaginal area.

The practice of douching is associated with higher levels of phthalates in women's bodies. The more prevalent use of vaginal douching products by Black women can be traced to both marketing practices and myths related to odor and Black women's bodies. The greater rate of douching can partially explain why Black women have higher phthalate levels in their bodies than women of other races and ethnicities.<sup>1</sup>

## 3) Toxic chemicals found in cleaning supplies disproportionately impact women's health and violate their right to the protection of health and safety in the home and workplace.

Since 2007, WVE has compiled research on chemicals in cleaning products and their impacts on women's health. Although gender roles have changed over time, studies show that women in the U.S. still do more than 70% of the housework in the average home, meaning that their exposure to potentially dangerous chemicals in cleaning products is more frequent and exponentially higher than men. Women (and girls) who spend more of their time at home may also have higher exposure to these chemicals. Studies show that women are two to three times more likely to suffer from fragrance-induced skin allergies than men as a result of greater exposure to fragrance chemicals from products such as cleaning products.

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<sup>1</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.

During the pandemic, the cleaning products industry aggressively promoted the use of strong chemicals (like bleach) for protection from Covid-19. As a consequence, we have seen a drastic increase in the use of disinfectants that contain harmful chemicals. Household cleaners (also known as domestic workers) are most at risk. These workers - frequently immigrants and overwhelmingly women - earn poverty-level wages, commonly face violations of labor laws and human rights, and are regularly exposed to toxic chemical compounds from the cleaning products they use.<sup>2</sup>

Several of the toxic chemicals identified in WVE's *Beyond the Label* report pose specific risks during pregnancy. Fragrances used in cleaning products contain some of the most problematic chemicals, including those linked to reproductive harm, aquatic toxicity, allergens and hormone disruption. For example:

- Fragrance chemical Lilial, often listed as butylphenyl methylpropional, is classified by the European Union (EU) as a reproductive toxin and banned from products in the EU. It is still used widely in the United States in cleaning products, including laundry products, air fresheners, multipurpose cleaners, glass cleaners, and carpet deodorizers.
- Fragrance chemical HICC is banned from cosmetic products in the EU because it is a potent skin allergen. HICC is also still found in numerous cleaning products in the United States including laundry products and air fresheners.

Cleaning products marketed to people of color, particularly the Latinx community, commonly contain chemicals of concern, such as reproductive toxicants and skin allergens.

Exposure to toxic chemicals from cleaning products adds to the harm many people of color, Indigenous people, immigrants and low-income families disproportionately face from industrial pollutants, climate change, and lack of adequate healthcare. Governing regulations and the cleaning product industry need to prioritize these existing conditions when designing safer products and must be accountable for the role cumulative impacts from exposure to cleaning products and other environmental toxins has on individuals and communities.

#### 4) Toxic chemicals in salon products disproportionately impact women's health, especially women of color and salon workers.

Professional hair and nail salon workers are exposed to chemical ingredients in the products they use every day, accumulating significantly more exposure than the average user of cosmetic products. Salon workers are predominately women, people of color, often immigrants, who are often low-income – meaning the exposure to toxic chemicals in the salon workplace compounds the myriad other health threats they already face related directly to gender, race,

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<sup>2</sup>The Toll of Household Cleaning Work: Economic and Health Precarity of Immigrant Latinx Cleaners in New York, a report by the Safe and Just Cleaners Study, March 2021 available at [www.safeandjustcleaners.org](http://www.safeandjustcleaners.org)

economic status, access to quality healthcare, and more. As a result, studies show that salon workers suffer from significantly higher rates of disease and chronic health conditions such as asthma, skin conditions, pregnancy complications and some types of cancer compared to other occupations.

In 2004, the US Environmental Protection Agency (EPA) published a guide for the nail salon community on how to protect themselves from potentially hazardous chemical exposures, focusing predominantly on wearing personal protective equipment and improving ventilation. The guide highlighted some of the potentially dangerous chemicals in nail products, such as methyl methacrylate (MMA). This chemical is often used in artificial nail products, even though it is prohibited from use in nail salons in California and other states. It can cause "irritation to eyes, skin, nose, mouth, and throat, sore throat, cough, shortness of breath, and skin rash." The Guide also listed toluene and dibutyl phthalate as problematic chemicals.

Nail salon workers have been found to have higher phthalate levels than the general population. Studies have shown a positive association between phthalate exposure levels and adverse reproductive outcomes such as preterm birth. Toluene is a reproductive toxicant and may have an effect on the nervous system. Although many salon product manufacturers have phased out toluene and dibutyl phthalate, it's unclear if the replacements are any safer.

Formaldehyde is a dangerous pollutant and carcinogen that can be severely irritating to the eyes, nose and throat. Repeated exposure may lead to cancer and long-term respiratory effects. In 2011, the US Occupational Safety and Health Administration (OSHA) issued a hazard alert warning against the use of hair straighteners containing high levels of formaldehyde due to complaints of "difficulty breathing, nose bleeds, and eye irritation" from hair stylists using Brazilian Blowout and similar brands. While many other countries around the world immediately removed these products from shelves, formaldehyde in these and other hair products continue to be sold in the United States, with health impacts that disproportionately affect Black women.

WVE's investigation found hazardous chemicals in professional salon products that harm lungs, cause allergic skin reactions and are linked to reproductive harm and cancer. Despite decades of warnings about these chemicals from public health officials, and known harm to salon workers, very little innovation toward safer chemistry is evident in the professional salon product industry. The few harmful ingredients that have been removed from products have been replaced with regrettable substitutes. Manufacturers frequently provide product "safety instructions" that make it near impossible to use products in a way that avoids harm. Despite new laws requiring ingredient disclosure, some salon products are still sold without ingredient listings on the label.

## Other concerns related to gender and toxics

In addition to the specific concerns outlined above, it's important to note that women's bodies are simply more vulnerable to the hazards posed by toxic chemicals due to relative body size, body fat, and other differences. Whether in consumer products, in the home, in the workplace or

released into the community, our reliance on hazardous chemicals disproportionately threatens the health and well-being of women and girls.

## WVE's Recommendations

We recommend that the upcoming report on gender and toxics include:

- 1) There is a clear connection between gender and exposure to toxics. The lack of protective action by governments violates the rights of women, girls, and other people who menstruate to health, non-discrimination and gender equity. Failure to address toxic chemicals in predominantly female work environments constitutes a gender-based violation of the right to a safe and healthy workplace.
- 2) All people have a right to know whether the products they use in or on their bodies and in their workplaces contain toxics. Governments should require disclosure of all ingredients intentionally added to period products and other intimate care products, cosmetics, cleaning products, and salon products.
- 3) Governments should adopt the precautionary principle when considering the approval of new chemicals for use in the marketplace, requiring producers to prove that the product is safe for people and the environment. Special caution should be taken before approving products for use in sensitive bodily areas and in enclosed environments.
- 4) Governments should exercise greater vigilance in banning potentially harmful ingredients, especially those that are not necessary to the efficacy of the product, such as potentially harmful fragrance ingredients.
- 5) Manufacturers should create and implement improved ingredient safety screens to rule out ingredients which may pose unnecessary health risks. Specifically, companies should institute policies to eliminate the use of carcinogens, mutagens, reproductive toxins and endocrine disruptors from intimate care products.
- 6) Governments should fund research into the short- and long-term gender-specific health impacts of exposure to toxics in intimate care products, cleaning products, cosmetics, and salon products. More research is needed from the scientific community to better understand the potential effects of chemical exposure on vaginal and vulvar tissue. Health disparities for intimate care products users based on race, age, and socio-economics should also be examined.
- 7) Governments must enforce stronger worker protection laws to ensure the safety and health of people who clean as a regular part of their job duties, of salon workers, and other low-wage workers routinely exposed to toxics. At minimum, workers in these industries must have the same protections as other workers, including the right to health and safety training, protective equipment, and legal protections against retaliation.

- 8) As governments enact additional protections for workers and consumers, multinational corporations must not shift the production, marketing and sale of toxic products to states with fewer protections. The international community and member states should put into place structures for monitoring and enforcement of human rights related to safe and healthy environments and workplaces for all peoples regardless of their location.