



CONSUMER  
HEALTHCARE  
PRODUCTS  
ASSOCIATION

Taking healthcare personally.

February 27, 2026

The Honorable Delegate Heather Bagnall  
Chair, House Health Committee  
241 Taylor House Office Building  
6 Bladen Street  
Annapolis, MD 21401

**RE: HB 1357 - Consumer Protection - Menstrual Hygiene Products - Labeling Requirements**

Dear Chair Bagnall,

On behalf of the Consumer Healthcare Products Association<sup>1</sup> (CHPA), thank you for the opportunity to comment on HB 1357, legislation establishing ingredient labeling requirements for menstrual products. CHPA member companies are dedicated to manufacturing menstrual hygiene products that are safe, effective, and of the highest quality, while making sure that consumers can access clear and accurate information about those products. Like the sponsors of this legislation, we place great importance on transparency and maintaining the trust of consumers.

Nevertheless, we find ourselves obligated to respectfully oppose HB 1357 in its current form. As written, the bill establishes definitions, labeling requirements, and enforcement provisions that are inconsistent with comparable laws already enacted in other states. Such discrepancies would pose substantial compliance challenges for manufacturers who operate across multiple jurisdictions, with the potential to drive up costs, disrupt supply chains, and create confusion among consumers.

We understand that Delegate Kaiser is exploring amendments that would bring HB 1357 into alignment with menstrual product ingredient disclosure laws already passed in other states. Should the following amendments be adopted, CHPA would take a neutral position on the legislation.

**Clarify and Harmonize Key Definitions**

In order to promote consistency and establish practical compliance standards, we recommend the following revisions:

- **Ingredient:** *“Means any intentionally added substance in a menstrual hygiene product, unless such a substance or combination of substances is confidential business information, in which case the manufacturer may identify the ingredient by its common name to protect its confidential identity.”*
- **Intentionally added:** *“Means a substance that serves a technical or functional purpose in the finished menstrual hygiene product.”*

---

<sup>1</sup> Consumer Healthcare Products Association is the national trade association representing the manufacturers of nonprescription drugs, dietary supplements and over-the-counter medical devices



Taking healthcare personally.

- **Menstrual hygiene product:** *“Means a product whether disposable or reusable used for the purpose of absorbing or containing menstruation and vaginal discharge, including sanitary pads, tampons, and menstrual cups.”*

These revisions would align the bill with language adopted in other states, promoting uniformity and allowing manufacturers to comply more efficiently across jurisdictions.

### **Clarify Labeling Placement**

We recommend adding the term “consumer facing” to ensure clarity regarding labeling placement:

*“A manufacturer of menstrual hygiene products shall include a list of all ingredients listed in order of predominance and displayed prominently in conspicuous type on each consumer facing package of menstrual hygiene products sold in the State.”*

This clarification ensures that ingredient information is displayed on the outer packaging that consumers see at the point of purchase, while preventing unintended consequences for internal components or bulk packaging that consumers never see.

### **Modify the Implementation Timeline**

We recommend modifying the enactment timeline to:

*“No later than eighteen months after this section shall take effect.”*

An 18-month implementation period is necessary to accommodate packaging redesign, supply chain adjustments, inventory turnover, and coordination across national distribution systems. Shorter timelines would risk unnecessary product disruption.

### **Replace Enforcement with a Civil Penalty Structure**

We recommend substituting the current enforcement language with a straightforward civil penalty provision. A clearly defined civil penalty structure offers regulatory certainty, encourages compliance, and prevents disproportionate enforcement outcomes.

### **Conclusion**

To summarize, CHPA supports policies that advance transparency while preserving consistent and practical regulatory frameworks. In its current form, HB 1357 would impose compliance burdens that are out of step with similar laws in other states. With the amendments described above, however – which would bring the bill in line with comparable requirements adopted elsewhere – CHPA would take a neutral stance on the legislation.

We are grateful for the author's openness to considering these changes and look forward to continuing our engagement with the Committee.

Respectfully submitted,



Taking healthcare personally.

A handwritten signature in blue ink that reads 'Carlos I. Gutiérrez'.

Carlos I. Gutiérrez  
Vice President, State & Local Government Affairs  
Consumer Healthcare Products Association  
Washington, D.C. | 202.429.3521 | [cgutierrez@chpa.org](mailto:cgutierrez@chpa.org)

CC: Members of the House Health Committee