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**CONSUMER PROTECTION DIVISION**  
**HEALTH EDUCATION AND ADVOCACY UNIT**

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February 27, 2026

To: The Honorable Heather Bagnell, Chair  
Health Committee

From: Irnise F. Williams, Deputy Director, Health Education and Advocacy Unit

Re: House Bill 1357 - Consumer Protection - Menstrual Hygiene Products - Labeling Requirements - **SUPPORT WITH AMENDMENTS**

The Office of the Attorney General's Health Education and Advocacy Unit (HEAU) supports HB1357 with amendments. This bill advances transparency and consumer protection by requiring manufacturers of menstrual hygiene products sold in Maryland—including pads, tampons, and menstrual cups—to display a prominent list of all intentionally added ingredients, in order of predominance, directly on each product's packaging.

Menstrual hygiene products are widely used and come into direct contact with highly absorptive mucosal tissue, creating potential exposure to chemicals such as PFAS, heavy metals, and other endocrine-disrupting compounds. Recent studies have detected measurable concentrations of 16 metals in 30 tampon samples from 14 brands, with each metal identified in at least one tampon sample — including toxic metals such as lead, for which no level of exposure is considered safe.<sup>1</sup>

While research continues to be studied on exposure pathways and health risks, findings have prompted other states to act and spurred renewed FDA consideration. In November 2025, the FDA issued draft guidance, [Menstrual Products-Performance Testing and Labeling Recommendations](#),

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<sup>1</sup> See, don, Vivian Do, Olgica Balac, et al, Khue Nguyen, Beizhan Yan, Marianthi-Anna Kioumourtzoglou, Kathrin Schilling, *Tampons as a source of exposure to metal(loid)s*, Environment International, Volume 190, 2024,108849, ISSN 0160-4120, <https://doi.org/10.1016/j.envint.2024.108849>.

on performance testing and labeling for menstrual products, signaling a shift toward greater understanding of safety concerns, contaminant exposure, and transparency.

Currently, these products are under-regulated compared to other health-related items, leaving consumers without critical information to make informed personal choices. Ingredient transparency helps individuals identify allergens, chemicals, or harmful byproducts that could impact their health. This bill ensures consumers know what their menstrual products contain, empowering them to make safer choices and reducing potential health risks.

Violations of this statute would constitute an unfair, abusive, or deceptive trade practice under the Consumer Protection Act (CPA), granting the Attorney General enforcement authority.

We urge a favorable report suggest the following amendments for HB1357.

### **Proposed Amendments**

To strengthen the bill and ensure clarity, we recommend:

1. Amending the definition of “menstrual hygiene products” to specifically include period underwear, which is widely used and similarly contacts absorptive tissue.

#### Rationale

Period underwear is specifically designed to absorb menstrual blood in the same way as pads, tampons, and menstrual cups. Because it directly contacts absorptive mucosal tissue and manages menstrual flow, its functional use is indistinguishable from products already classified as menstrual hygiene products.

Period underwear is widely used across age groups, including adolescents, because it is reusable, cost-effective, and offers an alternative for individuals who cannot or do not wish to use internal menstrual products.

As drafted, these products would be covered; however, because they are not explicitly listed, their omission could create avoidable debate about their inclusion.

2. Add a Harmonization Clause

Because the FDA is considering labeling updates for certain menstrual products, we suggest adding a harmonization clause to avoid any conflict with future binding federal ingredient labeling requirements.

cc: Delegate Anne R. Kaiser  
Delegate Tiffany T. Alston  
Delegate Michele Guyton  
Delegate Dana Jones  
Delegate Aaron M. Kaufman  
Delegate Lesley J. Lopez  
Delegate Gary Simmons  
Delegate Greg Wims