



CONSUMER
HEALTHCARE
PRODUCTS
ASSOCIATION

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March 23, 2026

The Honorable Senator Pamela Beidle
Chair, Senate Finance Committee
3 East Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401

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

Dear Chair Beidle,

On behalf of the Consumer Healthcare Products Association¹ (CHPA), we appreciate the opportunity to provide comments on HB 1357, which would establish ingredient labeling requirements for menstrual products. We also extend our gratitude to Delegate Kaiser for her collaboration and thoughtful engagement on this issue in the House of Delegates.

CHPA member companies are dedicated to producing menstrual hygiene products that meet the highest standards of safety, efficacy, and quality, while ensuring that consumers have access to clear, accurate information about the products they use. We share the sponsors' commitment to greater transparency and to strengthening consumer confidence.

We are pleased to express our support for HB 1357, contingent on the adoption of certain amendments. In its current form, select definitions and enforcement provisions are not fully consistent with analogous laws in other states, which could create unnecessary compliance burdens for manufacturers operating across multiple jurisdictions. To resolve these concerns, we respectfully propose the following clarifying amendments:

Clarify Ingredient Definition

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

Page 2 Lines 15-17 – add (back):

**9 (2) (3) “INGREDIENT” MEANS ANY INTENTIONALLY ADDED SUBSTANCE
10 IN A MENSTRUAL HYGIENE PRODUCT THAT SERVES A TECHNICAL OR FUNCTIONAL
PURPOSE IN THE FINISHED PRODUCT.**

Replace Enforcement with a Civil Penalty Structure

We recommend substituting the current enforcement language with a clear civil penalty framework to provide regulatory certainty and support consistent compliance:

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



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Page 2, strike lines 5-9 and insert:

~~1 Unfair, abusive, or deceptive trade practices include any:~~
~~2 (14) Violation of a provision of:~~
~~3 (xlvii) Title 14, Subtitle 50 of this article; [or]~~
~~4 (xlviii) Section 13-411.1(c)(2) of the Transportation Article; or~~
~~5 (XLIX) SECTION 14-1330 OF THIS ARTICLE; OR~~
SUBTITLE 51. MENSTRUAL HYGIENE PRODUCTS.
~~6 14-1330. 14-5101.~~

Conclusion

CHPA supports policies that advance transparency while maintaining consistent and practical regulatory frameworks. With the amendments described above, HB 1357 would better align with comparable state laws and provide a workable compliance pathway for manufacturers.

We appreciate Delegate Kaiser’s partnership and the Committee’s consideration, and we look forward to continued engagement.

Respectfully submitted,

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