

HB1357 Kaiser Testimony - Senate.pdf

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Position: FAV

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Vice Chair
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THE MARYLAND HOUSE OF DELEGATES
ANNAPOLIS, MARYLAND 21401

Testimony in Support of HB 1357: Consumer Protection - Menstrual Hygiene Products - Labeling Requirements
March 25, 2026

Madam Chair Beidle and distinguished members of the Finance Committee, it is my pleasure to come before you and offer testimony in favor of **House Bill 1357: Consumer Protection - Menstrual Hygiene Products - Labeling Requirements**. This bill is a consumer protection measure to require ingredient transparency for menstrual products sold in Maryland.

Menstrual products are used by millions of Marylanders for decades of their lives, often in prolonged contact with highly absorbent body tissue. Yet unlike food or cosmetics, menstrual products are not required under federal law to list their ingredients on packaging. Consumers are routinely purchasing and using these products without knowing what they contain.

This lack of transparency is concerning considering emerging research showing the presence of per- and polyfluoroalkyl substances (PFAS), dioxins, volatile organic compounds, and even pesticide residues in certain menstrual products. In one study, the University of Notre Dame found evidence of intentionally added PFAS in approximately 30% of tested reusable menstrual products. PFAS exposure has been associated with cancer, hormone disruption, immune system effects, and reproductive harm. While research on these risks continues, recent lawsuits from individuals who suffered serious health problems from menstrual products highlight the urgent need for transparency.

Recognizing both the health risks and the need for consumer transparency, several states, including New York, California, New Jersey, and Nevada, have successfully enacted laws requiring menstrual product ingredient disclosure without disrupting product availability. The Maryland bill mimics those states and mandates that manufacturers list all ingredients on product packaging in order of predominance, like food labeling, ensuring this information is readily accessible to consumers rather than hidden online.

The amendment I have prepared further clarifies definitions, ensures the ingredient list is consumer-facing, and establishes a civil enforcement mechanism consistent with other states.

As science evolves, consumers deserve transparency and accountability. **HB 1357** does not ban products or dictate how they must be made. It simply ensures that ingredient information is available so individuals can make informed choices for themselves and their families.

This bill passed the House with a vote of 132-1. I urge a favorable report on **HB 1357**.

Cross-over HB 1357 Consumer Protection - Menstrual

Uploaded by: Catherine OMalley

Position: FAV

BILL NO: House Bill 1357
TITLE: Consumer Protection – Menstrual Hygiene Products – Labeling Requirements
COMMITTEE: Finance
HEARING DATE: March 25, 2026
POSITION: **SUPPORT**

The Women's Law Center of Maryland is dedicated to ensuring the physical safety, economic security, and bodily autonomy of women throughout the State. Through direct legal services, policy advocacy, and education, we work closely with survivors of domestic violence and sexual assault, as well as with the nonprofit organizations that serve them. Our work is grounded in the principle that women must have access to accurate information and the ability to make informed decisions about their own bodies.

The Women's Law Center of Maryland supports HB1357. This bill requires manufacturers of menstrual hygiene products sold in Maryland to include a list of ingredients on each package, displayed prominently and in order of predominance. The bill further provides that a violation constitutes an unfair, abusive, or deceptive trade practice under the Maryland Consumer Protection Act, subject to its civil and criminal penalties.

Access to clear and transparent ingredient information is essential to bodily autonomy and consumer protection. Menstrual hygiene products are used internally or in prolonged contact with the body, yet consumers often have no way of knowing what chemicals or materials they contain. HB1357 ensures that women and girls in Maryland can make healthy and informed choices about the products they use. Women have the right to know exactly what ingredients are in products that directly affect their health.

For these reasons, the Women's Law Center of Maryland respectfully urges the Committee to issue a favorable report on HB1357.

The Women's Law Center of Maryland is a non-profit legal services organization whose mission is to ensure the physical safety, economic security, and bodily autonomy of women in Maryland. Our mission is advanced through direct legal services, information and referral hotlines, and statewide advocacy.

BAHP - MD HB 1357 - Amendments Testimony - Senate

Uploaded by: Andrew Hackman

Position: FWA



March 23, 2026

The Honorable Senator Pamela Beidle
Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401

Re: Support with Amendments – HB 1357 (Kaiser) Menstrual Product Labeling

Dear Chairwoman Beidle and Members of the Senate Finance Committee,

The Center for Baby and Adult Hygiene Products (BAHP) represents manufacturers of absorbent hygiene products in North America such as menstrual products, disposable diapers, and incontinence garments and pads and companies that supply materials for those essential everyday products. Our members represent over 85% of the market for absorbent personal hygiene products in North America.

Thank you for the opportunity to submit testimony in support with amendments on HB 1357 – *Menstrual Hygiene Products - Labeling Requirements*. We have appreciated working with Delegate Kaiser on legislation that is consistent with other states for the labeling of menstrual products. Per our discussions with Delegate Kaiser and previous drafts/amendments of the bill, we are requesting that following additional technical changes be made to the bill, prior to passage:

Page 2 – Line 5-9:

~~Unfair, abusive, or deceptive trade practices include any-~~

~~(14) Violation of a provision of:~~

~~-(xlvii) Title 14, Subtitle 50 of this article; [or]~~

~~-(xlviii) Section 13-411.1(c)(2) of the Transportation Article; or~~

~~-(XLIX) SECTION 14-1330 OF THIS ARTICLE; OR~~

SUBTITLE 51. MENSTRUAL HYGIENE PRODUCTS.

14-1330. 14-5101.

Page 2 Lines 15-17:

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

Thank you for your time and consideration of our input on this legislation. We would also like to

thank all the hard work of Delegate Kaiser and her staff on this legislation. Should you have any questions, please contact us at info@bahp.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Stewart", followed by a long horizontal line extending to the right.

Eric Stewart
Executive Director

CHPA Comments on HB 1357 3.23.2026.pdf

Uploaded by: John McLuckie

Position: FWA



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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,

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

HB1357 Menstrual Products Labeling OPPOSE.Crossove

Uploaded by: Irnise Williams

Position: UNF

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Deputy Attorney General

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Deputy Attorney General



STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION
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General Counsel

CHRISTIAN E. BARRERA
Chief of Staff

IRNISE WILLIAMS
Deputy Unit Director

March 23, 2026

To: The Honorable Pamela Beidle
Chair, Finance Committee
Health Committee

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

Re: House Bill 1357 - Consumer Protection - Menstrual Hygiene Products - Labeling Requirements - **OPPOSE**

The Office of the Attorney General's Health Education and Advocacy Unit (HEAU) supported HB1357 with amendments in the House chamber because the bill, as introduced, advanced 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. Violations of the proposed statute would have constituted an unfair, abusive, or deceptive trade practice under the Consumer Protection Act (CPA), granting the Attorney General enforcement authority, which includes civil penalties not to exceed \$10,000 for each violation, with consideration of various factors in determining the amount of the penalty. Md. Code Ann., Com. Law § 13-410.

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.¹

¹ 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>.

While research continues to develop on exposure pathways and health risks, findings have prompted other states to act and spurred renewed FDA consideration. In October 2025, the FDA issued draft guidance, [Menstrual Products-Performance Testing and Labeling Recommendations](#), 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 would have ensured consumers know what their menstrual products contain, empowering them to make safer choices and reducing potential health risks.

We must withdraw our support and oppose the bill for several reasons, most notably because the amendments struck the provision subjecting manufacturers to the enforcement and penalty provisions contained in the CPA and substituted a provision limiting civil penalties to an amount not to exceed \$1,000. The amendment eviscerates the deterrent effect the CPA civil penalty provision provides and erodes the ability of the Consumer Protection Division (Division) to adequately protect consumers. The bill also provides that the Division must pay any penalties collected into the General Fund. The Division should be able to recover costs before any money goes to the General Fund to ensure it can recoup its enforcement costs.

These amendments, like the other changes made to the bill, were purportedly made to align implementation dates and definitional sections with other states acting to inform and protect consumers, but they failed to fully align with those other states leaving the bill overly deferential to manufacturers.

The definition of ingredient now means “any added substance in a menstrual product that serves a technical or functional purpose.” But that definition is unclear. In NY, where there has been a labeling law since 2019, a functional or technical effect is further defined to include, but not be limited to, “the components of intentionally added fragrance, flavoring and colorants, and the intentional breakdown products of an added element or compound that also has a functional or technical effect on the finished product.” [2026 Sess. Law of N.Y. Ch. 31 \(A. 9503\)\(effective December 19, 2026\)](#). It is also notable that NY’s recent update to the law bans restricted substances including lead, mercury and related compounds, formaldehyde, triclosan, toluene, talc, dibutyl phthalate, [di(2)exylhexyl] DI(2-ETHYLHEXYL) phthalate, 2-(4-TERTBUTYLBENZYL) PROPIONALDEHYDE (ALSO KNOWN AS butylphenyl methylpropional [and isobu- tyl-, isopropyl-, butyl-,]), ISOBUTYLPARABEN, ISOPROPYLPARABEN, BUTYL- PARABEN, propylparaben, and perfluoroalkyl and polyfluoroalkyl substances.

The bill also allows the manufacturer to hide the name of a proprietary ingredient by listing a common name “to protect confidentiality”. This approach does not give consumers the information they need. Nonbinding October 2025 FDA draft guidance states: “Ingredient information should be presented in a manner that is consistent and easy to access and understand. Ingredient trade names and chemical names may be the most informative way to communicate this

information, as trade names may be the most recognizable to the lay population, and the chemical name allows for a more thorough understanding of the specific chemicals present.” And, while other states allow for exemptions for “confidential business information”, there are significant limitations tied to the exemption.

For example, in California, which has had a labeling law since 2021, “Confidential business information” that is protected from disclosure means an intentionally added ingredient or combination of ingredients for which a claim has been approved by the EPA for inclusion on the Toxic Substances Control Act (TSCA) Confidential Inventory, or for which the manufacturer or its supplier claim protection under the Uniform Trade Secrets Act, but specifically excludes

(1) An intentionally added ingredient or combination of ingredients that is on a designated list, as defined in subdivision (b). ***There are 22 items in the designated list.***

(2) A fragrance allergen included on Annex III of the European Union (EU) Cosmetics Regulation No. 1223/2009 or subsequent updates to those regulations, when present in the product at a concentration at or above 0.001 percent (10 parts per million).

[Cal. Health & Safety Code § 111822](#)

It is also notable that effective January 1, 2025, California banned menstrual products that contain regulated PFAS. [Cal. Health & Safety Code § 25258.3](#)

For these reasons, the Office of the Attorney General must oppose HB1357 as amended. The bill significantly weakens enforcement authority by replacing CPA penalties with a capped \$1,000 civil penalty, undermining deterrence and limiting the Consumer Protection Division’s ability to safeguard the public. It also includes unclear ingredient definitions and overly broad confidentiality allowances that fall short of standards adopted in other states, leaving consumers without meaningful transparency. The bill does not provide the protections necessary to ensure that Marylanders can make informed, safe choices about menstrual products.

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
Chair, Heather Bagnall
Vice Chair, Bonnie Cullison
Delegate Pam Guzzone
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Delegate Thomas Hutchinson
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Delegate Ashanti Martinez

Delegate Samuel Rosenberg
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Delegate Jennifer White Holland
Delegate Teresa Woorman