Date of Hearing: May 14, 2020

ASSEMBLY COMMITTEE ON ENVIRONMENTAL SAFETY AND TOXIC MATERIALS
Bill Quirk, Chair
AB 1989 (Cristina Garcia) – As Introduced January 27, 2020

SUBJECT: Menstrual Products Right to Know Act of 2020.

SUMMARY: Requires a packaged menstrual products to conspicuously disclose all ingredients in the product. Specifically, **this bill**:

1) Establishes the Menstrual Products Right to Know Act of 2020 (Act).

2) Defines "confidential business information"(CBI) as an intentionally added ingredient or combination of ingredients for which a claim has been approved by the federal Environmental Protection Agency for inclusion on the Toxic Substances Control Act Confidential Inventory or for which the manufacturer or its supplier claim protection under the Uniform Trade Secrets Act.

3) Provides that CBI does not apply to any ingredient that is included on a designated list.

4) Defines "designated list" as any of the 22 authoritative lists identified in the Act, including any subsequent revisions to those lists when adopted by the authoritative body.

5) Defines "fragrance ingredient" as an intentionally added substance or complex mixture of aroma chemicals, natural essential oils, and other functional ingredients present in a menstrual product for which the sole purpose is to impart an odor or scent, or to counteract odor, and that is any of the following: present in a menstrual product at a concentration at or above 0.01 percent (100 parts per million), unless the substance is CBI; included on a designated list; and, is a fragrance allergen included in Annex III to European Union (EU) Cosmetics Regulation No. 1223/2009, as required to be labeled pursuant to EU Detergents Regulation No. 648/2004 or subsequent updates to those regulations when present in the menstrual product in a concentration at or above 0.01 percent.

6) Requires a manufacturer to determine the total concentration of each fragrance ingredient in the menstrual product by calculating the total amount of the fragrance ingredient as a percentage of the total weight of the menstrual product.

7) Defines "ingredient" as a fragrance ingredient or other intentionally added substance present in the menstrual product, unless the intentionally added substance is CBI.

8) Defines "intentionally added" as a substance that the manufacturer has intentionally added to the menstrual product.

9) Defines "manufacturer" as either of the following: a person or entity that manufactures the menstrual product and whose name appears on the product label; or, a person or entity for whom the product is manufactured or distributed, as identified on the product label pursuant to the federal Fair Packaging and Labeling Act.

10) Defines "menstrual product" as a product used to collect menstruation and vaginal discharge, including, but not limited to, tampons, pads, sponges, menstruation underwear, disks, and menstrual cups, whether disposable or reusable.

11) Requires a package or box containing menstrual products that was manufactured for sale or distribution in this state on or after January 1, 2023, to have printed on the label a plain and conspicuous list of all ingredients in the product.

12) Requires the ingredients to be listed in order of predominance by weight in the menstrual product, except that ingredients present at a weight below one percent may be listed in any order following the other ingredients. Requires ingredients to be identified using a standardized nomenclature, including, but not limited to, the International Nomenclature of Cosmetic Ingredients (INCI), the Household Commercial Products Association's Consumer Product Ingredient Dictionary (HCPA Dictionary), or common chemical name. Authorizes, if a standardized nomenclature does not otherwise exist for an ingredient, a name established by the Center for Baby and Adult Hygiene Products (BAHP) to be used by all menstrual product manufacturers.

13) Provides that the requirements in this bill does not prohibit a manufacturer from using technologies, including, but not limited to, digital link, to communicate the information required by this section.

14) Requires a manufacturer, when it is required to change the label on a menstrual product because of a change in a designated list or a change to an ingredient designated as a fragrance ingredient, to make the change within 18-months of the designated list or regulation being adopted by the relevant authoritative body, unless a later effective date is imposed pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986 (Chapter 6.6) or Annex III to EU Cosmetics Regulation No. 1223/2009, as required to be labeled pursuant to EU Detergents Regulation No. 648/2004.

15) States that the requirements in this bill apply in addition to other labeling requirements established in law.

EXISTING LAW:

1) Requires, pursuant to the federal Food, Drug & Cosmetic Act (FD&C Act), the label of a medical device in package form to specify conspicuously the name and place of business of the manufacturer, packer, or distributor. (21 Code of Federal Regulations Part 801)

2) Requires, pursuant to the Safe Cosmetics Act, a manufacturer of a cosmetic subject to regulation by the federal Food and Drug Administration (FDA) to submit to the California Department of Public Health (CDPH) a list of its cosmetic products sold in California that contain any ingredient that is a chemical identified as causing cancer or reproductive toxicity. (Health and Safety Code (HSC) § 111792)

3) Requires, pursuant to the Cleaning Products Right to Know Act, manufacturers of cleaning products to disclose specified chemical ingredients on a product label and on the manufacturer's website. (HSC § 108950)

4) Codifies the Uniform Trade Secrets Act to prohibit the misappropriation of trade secrets and provide certain remedies. (Civil Code § 3426, et seq.)

FISCAL EFFECT: Unknown.

COMMENTS:

Need for the bill: According to the author, "AB 1989 will protect people's health by requiring the disclosure of all ingredients in menstrual products including tampons, pads, cups, disks, sponges, and menstrual underwear. It is imperative that consumers have a right to know what is in the products they will be using for over 40 years of their life, in order to protect their health. My goal with this legislation is to increase the awareness of the toxic chemicals currently in our menstrual products. It was troubling at best to learn that products people rely on contain Phthalates, Bisphenols, Parabens, and [per- and polyfluoroalkyl substances], which all have been found to be harmful to human health. Periods are not a luxury and people should have the knowledge to make safer choices."

What are menstrual products? The products covered under this bill are those designed for women for when they are in menstruation. Menstrual products include, but are not limited to, tampons, sanitary napkins (pads), underwear liners, menstrual cups, and period underwear, which are intended to absorb or capture menstrual blood during a woman's menstrual cycle.

Menstrual products are used during menstrual periods on a monthly basis throughout the entire reproductive period in a woman's life. A single woman can use as many as 17,000 tampons or pads in her lifetime. These products come in direct contact with reproductive organs including vulvar skin and vaginal mucosa. The skin surrounding the genital area is thin and more permeable than skin covering the rest of the body.

Federal oversight of menstrual products: The FDA has broad authority to regulate medical devices for safety and effectiveness. Device classification depends on the *intended use* of the device and also upon *indications for use*. Menstrual products are considered medical devices because they are intended to affect the function of the body.

Menstrual products are not FDA approved; rather, they are registered and given clearance for marketing. Federal registration subjects these products to FDA oversight and consumer compliance tracking.

Unscented pads and scented/deodorized menstrual pads using materials that have been studied and previously cleared by the FDA are Class I medical devices; new studies are not required as long as the product is not materially different from what has previously been approved. The new product is simply registered and allowed to be marketed.

Scented pads using new materials and any device inserted vaginally (such as tampons and menstrual cups) are Class II medical devices. All tampon applications submitted to the FDA for approval must include a list of ingredients and a description of the manufacturing process. If the materials are similar to what is already approved, new studies are not required; only proof that the product is similar to what has already been approved is required. Menstrual cups have an expedited process and can go straight to market without approval from the FDA, but the product still has to be registered.

The FDA has developed a guidance document, *Menstrual Tampons and Pads: Information for Premarket Notification Submissions (510(k) - Guidance for Industry*, to assist industry in preparing premarket notification submissions (510(k)) for menstrual tampons and pads that are subject to 510(k) requirements for medical devices.

The FDA specifically states that tampons must be "free of 2,3,7,8- tetrachlorodibenzo-p-dioxin (TCDD)/2,3,7,8-tetrachlorofuran dioxin (TCDF) and any pesticide and herbicide residues" and that manufacturers must "describe any assurances that chemical residues are not present or, if residues are present, the level present and the method used to assess it." For any materials bleached during processing, the FDA recommends manufacturers identify the bleaching process used, e.g., Elemental Chlorine-Free (ECF) or Totally Chlorine-Free (TCF).

The FDA further recommends that for all component materials, including additives, present in a tampon, applicator, or pad, the manufacturer provide to the FDA for premarket approval:

- Detailed chemical identity and quantity (in µg per tampon or pad) for all components, and any additives or finishing (e.g., anti-wicking) agents;
- Chemical identity of each component of any fragrance or deodorants; and,
- References to any Device Master Files for component materials, whenever possible.

However, as mentioned, not all menstrual products are subject to premarket safety approvals. Generally, the FDA believes a material has an established safety profile if it has a history of safe use for similar intended uses and is physically and chemically well-characterized.

State oversight of feminine menstrual products: Menstrual products also meet the definition of medical device under the Sherman Food, Drug, and Cosmetic Act (Sherman Act). As such, CDPH has governance under the Sherman Act over feminine menstrual products as medical devices.

CDPH has responsibility to ensure that menstrual product manufacturers are licensed and inspected by CDPH; that the products are packaged, labeled, and advertised pursuant to the Sherman Act; and, that the products are not adulterated, misbranded, or falsely advertised.

CDPH has not taken any enforcement action or seen any violations related to menstrual products under the Sherman Act.

Current labeling requirements: Under the FDA regulations for medical devices, menstrual product components do not have to be disclosed on the package, but they are listed with the FDA under 501(k) submissions (premarket). The regulations define component as "any raw material, substance, piece, part, software, firmware, labeling, or assembly which is intended to be included as part of the finished, packaged, and labeled device." (21 CFR 820.3(c)) In contrast, the FDA defines "accessory" as a separate, finished device intended to "support, supplement, and/or augment the performance" of at least one parent device. For example, a tampon is considered a component, and the applicator would be considered an accessory. Accessory ingredients also do not have to be listed on the product package.

Specific labeling requirements require pad and tampon packages to have user instructions and manufacturer information. Unique to tampons, labels are required to include information on tampon size and absorbency; tampon insertion; how a tampon should be worn and wear-time;

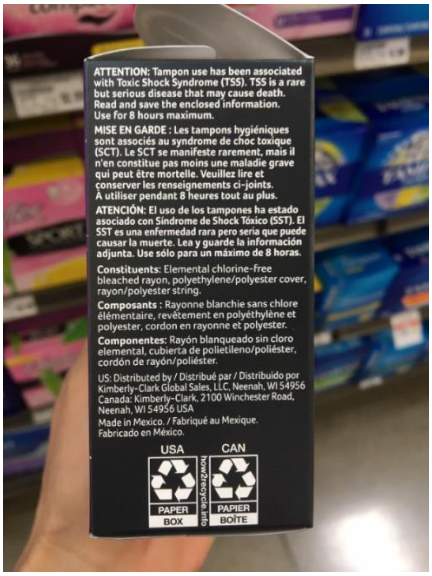
and, tampon removal and disposal. Tampons are required to be labeled with information about Toxic Shock Syndrome. (21 CFR 801.430(a))

Menstrual products ingredients: Menstrual products can be made from a variety of materials. Generally, tampons are blends of cotton and rayon, along with synthetic fibers, but each manufacturer's products are different and considered proprietary. Pads are usually a combination of cotton, absorbent materials, polymers, and adhesives. Menstrual cups are often made of medical-grade silicone. Exact ingredients are unknown because laws and regulations do not require ingredient labeling, and many manufacturers, due to proprietary information or other reasons, do not elect to print ingredients on the package.

Some examples:

Tampax PURE tampon package has an ingredient statement, but does not elucidate what constitutes "fiber finishes."

Seventh Generation provides a more robust ingredient list, yet also declines to fully list the ingredient makeup of the menstrual pad.



Kotex regular unscented tampons lists the ingredients as "elemental chlorine-free bleached rayon, polyethylene/polyester cover, rayon/polyester string."

Other products list nothing by way of ingredient information. Always Ultra Thin pads, for example, does not include any ingredient statement.

Because menstrual products are regulated by the FDA as medical devices, there are no requirements for the disclosure of ingredients. This contributes to the inconsistency in labels amongst products available on the market today.

Labeling requirements proposed under this bill: By establishing labeling requirements for menstrual products, AB 1989 would create uniformity amongst ingredient labeling for all covered products.

California has established precedents for consumer product disclosure, and AB 1989 would require the disclosure of menstrual product ingredients based on those existing laws for other consumer products.

The Cleaning Products Right to Know Act (SB 258 (Lara, Chapter 830, Statutes of 2017) requires a manufacturer of a cleaning product to disclose on the product label and on the product's internet website information related to chemicals contained in the product. The law requires any chemical to be disclosed if it is included on any of the 22 authoritative lists of chemicals that exhibit hazardous traits and/or an environmental or toxicological endpoint, as identified by the United States Environmental Protection Agency, the state of California, the European Union, Canada, the International Agency on Cancer Research, the federal Agency for Toxic Substances and Disease Registry, among others. These are the same authoritative lists included in AB 1989.

Generally speaking, disclosure of ingredients in consumer products provides consumers greater information to make more informed choices. Other disclosure laws have compelled manufacturers to make changes in how products are manufactured. The Safe Drinking Water and Toxic Enforcement Act of 1986, known as Proposition 65, provides a good example. According to the Office of the Attorney General, Proposition 65 has motivated some businesses to eliminate or reduce listed, or likely to be listed, toxic chemicals in numerous consumer products, such as ceramic tableware, jewelry, potato chips, and vitamin supplements. Thus,

Proposition 65 has prompted reformulation of products to be safer to avoid the warning label prescribed under the law.

While this bill is not asserting that menstrual products are unsafe, if any product contains an ingredient present on one of the designated lists, a manufacturer can disclose that ingredient(s) or elect to remanufacture a product without that ingredient.

Intentionally-added ingredients: There is debate amongst stakeholders over how the term "intentionally added" should be defined. As proposed, it would be defined as a substance that the manufacturer has intentionally added to the menstrual product. Under the Cleaning Products Right to Know Act, it is defined as "a chemical that a manufacturer has intentionally added to a designated product and that has a functional or technical effect in the designated product, including, but not limited to, the components of intentionally added fragrance ingredients and colorants and intentional breakdown products of an added chemical that also have a functional or technical effect in the designated product." The key difference between the two is the verbiage "and that has a functional or technical effect."

The Fragrance Creators Association (FCA) has requested that these definitions of ingredient in AB 1989 be amended to more closely mirror those in the Cleaning Products Right to Know Act, for consistency.

The FCA argues that definition in the Cleaning Products Right to Know Act more effectively furthers the intent of the statute by providing clear guidance on what manufacturers are required to disclose. They explain, "Absent clarity on this point, manufacturers could exploit the vague language and disclose only the bare minimum. Menstrual products are "assembled products," meaning manufacturers purchase multiple raw materials and effectively "assemble" the product by putting the layers together. As a result, the current language could have the effect of requiring that manufacturers only disclose the elements that they are assembling as a final step – for example, on a tampon, this would be the Cotton or Rayon Absorbent Core, Cover, Cord/String, and Fragrance, if applicable. Manufacturers wishing to go further to comply with the "spirit of the law" would alternatively be forced to draw their own arbitrary and inconsistent lines on where to stop the disclosure along their supply chain. In contrast, adding "functional or technical benefit" expands the materials included in the scope of disclosure, while providing manufacturers clear and actionable guidance on how far to go with their disclosures. Again, using the tampon example, this would require manufacturers to additionally disclose materials present in the finished products, such as fiber finishes, adhesives, colorants, pacifiers, and any other ingredients with a technical benefit in the product."

Therefore, the Committee may wish to consider the merits of aligning AB 1989 more closely with the Cleaning Products Right to Know Act as follows as it relates to the definition of "intentionally added" to provide consistency with other disclosure laws and provide clarity as to how manufacturers should comply.

> Sec. 111822 (e) "Intentionally added" means a substance that ~~the manufacturer has intentionally added to~~ *serves a technical or functional purpose in the finished* menstrual product.

Protection of trade secrets: Under the Sherman Act, CDPH is authorized to require that the label on each package of a food, drug, device, or cosmetic bear the common or usual name of the

article (product), and in case the article consists of two or more ingredients, the common or usual name of each ingredient listed in order of decreasing predominance by weight. This provision does not require that any trade secret be divulged.

While this provision provides protections for proprietary information, it does not extend to any other provisions of the Sherman Act; therefore, it would not apply to the provisions of AB 1989 that would be added to the Sherman Act. Provided that, AB 1989 includes language to protect CBI from being disclosed, which would include an intentionally added ingredient or combination of ingredients for which a claim has been approved by the U.S. Environmental Protection Agency (US EPA) for inclusion on the Toxic Substances Control Act Confidential Inventory or for which the manufacturer or its supplier claim protection under the Uniform Trade Secrets Act. AB 1989 explicitly precludes any ingredient included on one of the 22 designated lists from that CBI protection.

Concerns with requiring disclosure for menstrual products commensurate with other product disclosure laws: AB 1989 is drafted to closely resemble other disclosure laws for cleaning products, cosmetics, and fragrances, and that is intentional – to follow the precedent set by the California Legislature that has been negotiated, analyzed, implemented, and eligible to be litigated.

Breast Cancer Prevention Partners (BCPP), which sponsored the Cleaning Products Right to Know Act, does not view that law as an appropriate "one size fits all" solution for all product categories. BCPP states that because many menstrual products are used internally, such as tampons, the absorption of chemicals from those products serves as a direct route to the bloodstream. Furthermore, although AB 1989 does not allow for CBI protections for ingredients on certain designated lists of chemicals of concern, BCPP is concerned there may be many chemicals present in menstrual products that are not on designated lists yet may still present a risk to women's health and should be disclosed.

Women's Voices for the Earth (WVE) shares that concern. WVE states, "There are numerous allergens that are not currently on any authoritative lists. A few examples of these fragrance allergens are linalyl acetate, acetyl cedrane, and tetramethyl acetyloctahydronaphthalenes. Linalyl acetate and acetyl cedrane can be found in Always pads, and tetramethyl acetyloctahydronaphthalenes can be found in Tampax tampons according to voluntary public disclosures by Procter & Gamble. These allergens would not currently be required to be disclosed by AB 1989."

While AB 1989 does require a manufacturer to monitor the designated lists for changes and update its product labels within a specific timeframe, the Committee may wish to consider including the following amendment to explicitly allow manufacturers to disclose CBI using an ingredient's common name.

> Sec. 111822.2. (b) The ingredients shall be listed in order of predominance by weight in the menstrual product, except that ingredients present at a weight below one percent may be listed in any order following the other ingredients. Ingredients shall be identified using a standardized nomenclature, including, but not limited to, the International Nomenclature of Cosmetic Ingredients (INCI), the Household Commercial Products Association's Consumer Product Ingredient Dictionary (HCPA Dictionary), or common chemical name. If a standardized nomenclature does not otherwise exist for an ingredient, a name established by the Center for Baby and Adult Hygiene Products (BAHP) shall be used by all menstrual

product manufacturers. *A manufacturer may identify any ingredient that is confidential business information by its common name to protect its confidential identity.*

In addition, the author may wish to consider working with stakeholders to consider how to address these concerns about known chemicals of concern that are not currently listed on the designated lists

As far as the threshold for ingredient disclosure, Black Women for Wellness advocates that fragrance disclosure in menstrual products should be disclosed when there is less than 100 parts per million (ppm) in a product, which would be a deviation from other ingredient disclosure laws that require fragrance disclosure at or in exceedance of 100 ppm. The author may wish to consider working with stakeholders that share the concern about disclosure thresholds to determine whether 100ppm is the appropriate floor for requiring disclosure.

Clarifying responsibility: Environmental Working Group notes that, "the bill places the disclosure and labeling responsibility solely on the manufacturer, and not on the retailer or distributor. As a result, only manufacturers – many of whom are out of state or overseas -- would be held responsible for carrying out the law, and retailers could continue to sell noncompliant products."

The Cleaning Products Right to Know Act, the intended model for AB 1989, holds retailers responsible for ensuring that the labeling standard is upheld. Health and Safety Code section 108958, which was added to statute by SB 258, states, "A designated product shall not be sold in the state unless the designated product and the manufacturer of the designated product comply with this chapter." For purposes of consistency with existing California law, the Committee may wish to include the same language in AB 1989.

New York State menstrual product disclosure law: In October 2019, New York enacted a law (S.2387-B/A.164-B) requiring menstrual product packages or boxes sold in New York State to contain a plain and conspicuous printed list of all the ingredients in the products. This law makes New York the first state in the nation to require ingredient labels on menstrual products. Under the law, product manufacturers will have 18-months to develop new packaging or labels with the ingredients, effecting the disclosure requirements in April 2021.

Opposition, including CALPIRG, National Women's Health Network, Center for Environmental Health, The Diva Cup, and others, argue that AB 1989 should be modeled after the New York law, and requiring anything less than that law undercuts the precedent New York set.

A copy of New York's law would not paste neatly into California law: First, the 5th amendment of the U.S. Constitution provides the guarantee of due process for all persons, which requires the government to respect all rights, guarantees, and protections afforded by the U.S. Constitution and all applicable statutes before the government can deprive any person of life, liberty, or property.

Philip Morris, Inc. v. Reilly, 312 F.3d 24 (2002) concerned one attempt, by the state of Massachusetts, to regulate tobacco products by requiring tobacco companies to submit to Massachusetts the ingredient lists for all cigarettes, snuffs, and chewing tobaccos sold in the state. For each brand, the manufacturer is required to list, by relative amount, all ingredients besides tobacco, water, or reconstituted tobacco sheet. (Massachusetts General Laws ch. 94, § 307B (2002). A group of tobacco companies treat these ingredient lists as trade secrets and

either do not disclose brand-specific information at all or do not disclose it without some guarantee of confidentiality. The courts ruled that the Massachusetts statute, which allows the public disclosure of these ingredient lists whenever such disclosure, "could reduce risks to public health," created an unconstitutional taking, and the Massachusetts statute violated the tobacco companies' due process rights by effecting a taking of their property without first providing a meaningful opportunity to be heard.

If AB 1989 required disclosure of all menstrual product ingredients without respect to trade secrets, as the New York law requires, California could be found in violation of the Takings Clause of the U.S. Constitution. The author included the CBI protections in the bill to prevent liability of constitutional violation.

Second, New York's disclosure requirements are arguably vague. The law requires each package of menstrual products to list all intentionally added ingredients. It leaves it up to each manufacturer's interpretation as to the specificity of disclosure. Some manufacturers may interpret the law not to cover unintentionally added ingredients; others may not disclose trace amounts of intentionally added ingredients; some may only disclose ingredients at amounts determined by themselves; and, others may have different interpretations altogether. Furthermore, the law is silent on fragrance disclosure, which is not required to be disclosed under federal law. The federal Food, Drug, and Cosmetic Act exempts chemicals used as fragrances or flavoring from being identified as ingredients on the labels of cosmetic products (21 CFR 701.3(a)), so it is unclear whether "all ingredients" is inclusive of fragrances, or whether federal law would usurp fragrance disclosure.

While there is room in this bill for the author to work with the stakeholders who have raised concerns about the level of disclosure and CBI protections, California's precedent for ingredient disclosure is more precise and offers greater clarification for the covered entities doing business in this state. By establishing parameters for disclosure via the designated lists, California's current laws create clear, finite direction on what needs to be disclosed.

Ambiguity in any law can lead to confusion, and confusion leads to potentially diminished compliance. Given the population size of California and the size of the state's economy, laws need to be clear to ensure enforceable compliance, which benefits the consumer, and that is the intent of AB 1989.

Technical amendment: The Committee may wish to consider deleting the reference to the EU's Detergent's Regulation as follows as it is not relevant to the consumer product category covered by this bill.

> Sec. 111822 (c)(1)(C) A fragrance allergen included in Annex III to European Union Cosmetics Regulation (EU) No. 1223/2009, ~~as required to be labeled pursuant to European Union Detergents Regulation (EU) No. 648/2004~~ or subsequent updates to those regulations when present in the menstrual product in a concentration at or above 0.01 percent (100 parts per million).

Arguments in support: California Health Coalition Advocacy states, "[Feminine care] products intended for use on or in an incredibly absorbent part of a woman's body are marketed and sold with little to no data assuring the ingredients they contain are safe. Ingredients are determined "safe," operating under the premise that they are used on ordinary skin just like other cosmetic

products. That means chemicals of concern, such as carcinogens, reproductive toxins, endocrine disruptors, and allergens are being on, or even in, the extremely permeable mucus membranes of the vaginal area. … Women have a right to know about these ingredients."

Arguments in opposition: CALPIRG, et al, state, "Independent testing of menstrual products has detected harmful chemicals including styrene, toluene, chloromethane, dioxins, furans, parabens, phthalates, and toluene, PFAS, among others. This is especially concerning considering menstrual products may be inserted into the body or placed on or around absorbent vaginal tissue … Unlike cleaning products, there is so much that we do not know about the manufacture, ingredients and potential health impacts of menstrual products … The chemical exposure routes from menstrual products are unique as these products are inserted into the body or touch highly absorbent vaginal and vulvar tissue. Allowing some ingredients to be hidden as CBI will hamper the progress of needed research, and will not give menstruators, advocates, or researchers a full picture of the ingredients used in these products."

Double referral: This bill was double referred to the Assembly Environmental Safety & Toxic Materials Committee and the Assembly Health Committee; however, due to the COVID-19 pandemic and state-wide shelter in place orders that have truncated the Legislative calendar for considering legislation, this bill will only be heard by this Committee.

REGISTERED SUPPORT / OPPOSITION:

Support

A Voice for Choice Advocacy
California Health Coalition Advocacy
City of West Hollywood
Educate. Advocate.
Empower Family California

Opposition

ACT for Women and Girls
American Chemistry Council
Breast Cancer Action
California Chamber of Commerce
California Healthy Nail Salon Collaborative
California Latinas for Reproductive Justice
California Manufacturers & Technology Association
CALPIRG, California Public Interest Research Group
Center for Baby and Adult Hygiene Products
Consumer Health Products Association
Consumers Brands Association
Diva Cup
Femtruth
Fragrance Creators Association
Healthy Babies Bright Futures
Informed Green Solutions
Lola
National Center for Health Research

National Women's Health Network
Natracare
Period Equity
Sierra Club
Sustain Natural
The Center for Environmental Health
Turning Green
Women's Voices for the Earth

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