SENATE THIRD READING
SB 754 (Durazo)
As Amended September 3, 2025
Majority vote

SUMMARY

Requires a manufacturer of disposable tampons or menstrual pads to maintain information regarding the concentrations of lead, arsenic, cadmium, and zinc in their products and to provide that information to the Department of Toxic Substances Control (DTSC) upon request.

Major Provisions

1) Requires a manufacturer of disposable tampons or pad products to, on or before December 31, 2026, maintain information regarding the concentrations of lead, arsenic, cadmium, and zinc in their products.

2) Authorizes DTSC to determine additional chemicals of concern in disposable tampons or pad products and publish on its internet website a list of those chemicals.

3) Authorizes DTSC to, require a manufacturer of disposable tampons or pad products to maintain information regarding the concentrations of additional chemicals of concern in their products.

4) Requires a manufacturer to, upon request from DTSC, provide any technical documentation, including test methods and analytical test results, to assess the concentrations of listed chemicals in their disposable tampon or pad products.

COMMENTS

Menstruation and menstrual products: Half of the world's population has experienced or will experience menstrual bleeding, a physiologic process that occurs, on average, every 24 – 38 days over four decades of a menstruating person's life. Menstrual products are essential to managing menstrual bleeding. From menarche (average age 12 years) until menopause (average age 52 years), the average menstruator in the United States (U.S.) will use approximately 11,000 menstrual products resulting in a total of about 1,800 days (about a solid five years) of exposure to those products over a lifetime. In the U.S., sales of tampons and menstrual pads, the most commonly used menstrual products, exceeded $2.8 billion in the year 2018 alone, with nearly 600 million units sold.

Exposure from menstrual product use: According to a 2022 article published in *Current Environmental Health Reports,* "It is biologically plausible that environmental contaminants in contact with vaginal and vulvar epithelium can be absorbed and pass into systemic circulation." The article describes that the vaginal epithelium is comprised of a mucosal membrane that is permeable to a range of compounds, and the vagina's numerous folds increase the absorbing surface area. Furthermore, the vagina is well-vascularized and chemicals absorbed by the vagina bypass first-pass metabolism by the liver, and, therefore, directly enter systemic circulation. Because of the efficiency of vaginal absorption and systemic drug transport through this process, vaginal medication is often administered to provide prolonged, continuous drug delivery throughout the body. The list of medications administered vaginally is growing, and includes vaginal rings for hormonal contraception and hormone therapy.

By the very nature of menstruation, menstrual products are used by people of reproductive age; therefore, environmental exposure through menstrual products could potentially impact unborn children, as well as the person using the menstrual product. Also, experts are especially concerned about the effects of exposure to chemicals during phases when the body is acutely vulnerable, such as when someone gets their first period or is pregnant or is in menopause transition. During these times, the body and brain undergo major shifts, making them extra sensitive to endocrine disrupters and other chemicals.

Contaminants in menstrual products: While menstruation and its importance in environmental health has long been overlooked in epidemiological research, several recent studies, including literature reviews, have found many environmental chemicals and metals in menstrual products. For example, the authors of the study, "Chemicals in menstrual products: A systematic review," published in September 2023, in *BJOG: An International Journal of Obstetrics & Gynaecology,* conducted a review of the literature to determine exposure to environmental chemicals in menstrual products, and found that, "Menstrual products contained measurable levels of a range of endocrine disrupting chemicals including phthalates, phenols and parabens. This reflects a potentially important route of exposure to chemicals that can impact women's reproductive health." In addition to the chemicals mentioned above, the 2022 *Current Environmental Health Reports* article reported that dioxins, fragrances, bisphenols, triclocarban, glyphosate, volatile organic compounds, and other environmental chemicals have been detected in menstrual products. Many of these chemicals have been associated with cancer, endocrine disruption, and reproductive effects.

Toxic, heavy metals have also been found in menstrual products. The study, "Tampons as a source of exposure to metal(loid)s," published in 2024 in *Environment International*, found measurable concentrations of all 16 metals assessed (arsenic, barium, calcium, cadmium, cobalt, chromium, copper, iron, manganese, mercury, nickel, lead, selenium, strontium, vanadium, and zinc) in tested tampons. The authors of this study concluded, "Tampon use is a potential source of metal exposure. We detected all 16 metals in at least one sampled tampon, including some toxic metals like lead that has no "safe" exposure level." Of particular concern is that the study's authors found lead in all the tested tampons. The authors note, "There is no safe exposure level to [lead]; any proportion of [lead] that may leach out of a tampon and reach systemic circulation might contribute to negative health outcomes… [Lead] is associated with numerous adverse neurological, renal, cardiovascular, hematological, immunological, reproductive, and developmental effects. Of particular note, even low-level exposure to [lead] can result in neurobehavioral impacts in adults and children, including decreased cognitive function such as impaired attention, memory, and learning ability." The heavy metals found in tampons in the study are carcinogens, and/ or are associated with adverse neurological, cardiovascular, respiratory, immunological, reproductive, or developmental health impacts.

This bill: This bill requires a manufacturer of disposable tampons or pad products to maintain information regarding the concentrations of the metals lead, arsenic, cadmium, and zinc in their disposable tampon or pad products and to provide that information to DTSC upon request. It also authorizes DTSC to publish any analytical test results received from manufacturers or obtained through its own testing, along with any departmental analysis of these results; and, to provide information regarding the potential health impacts associated with the presence of specific chemicals in disposable tampon or pad products by making the information available to the public in a searchable format on DTSC's internet website. This bill authorizes DTSC to also conduct its own tests to confirm the manufacturer's results, or to contract with third-party

laboratories for that testing, and then requires the manufacturer to pay for the costs of DTSC's testing before the testing is conducted.

According to the Author
"Tampons have existed for nearly 100 years, and pads for over 150. Disposable menstrual products are used by 9 million people in California, including 1 million children, in one of the most sensitive and permeable areas of the body. Yet research consistently finds new chemicals in them.

SB 754 requires manufacturers to disclose the concentrations of potentially harmful chemicals in their products to [DTSC]. This bill also allows the DTSC to publish these results along with their own analyses, providing researchers with valuable information about the concentrations of chemicals in these products. By ensuring access to information, SB 754 helps safeguard our public health and empowers consumers to make informed decisions about their personal health products."

Arguments in Support
The Los Angeles County Sanitation Districts writes in support of the bill, "Harmful chemicals and toxic heavy metals have been found in menstrual products, and while some of these substances are intentionally added, others result from contamination during manufacturing. Exposure to these chemicals is linked to serious potential health issues, including cancer and reproductive harm. Menstrual products are often flushed down the drain or sent to solid waste facilities when disposed of in the trash. In landfills, these products break down and can result in chemical-laden leachate (rainwater that filters through waste), which is collected for proper treatment at wastewater treatment facilities. SB 754 would require manufacturers to disclose the concentrations of potentially harmful chemicals in their products to DTSC, making the information available to the public. As passive receivers, the Sanitation Districts believe this would help safeguard public health by enhancing transparency, while also potentially reducing the presence of these chemicals entering waste streams and the environment."

The American College of Obstetricians and Gynecologists writes in support of this bill, "As OB-GYNs, we understand the risks of prolonged exposure to toxic substances, especially when used in sensitive areas of the body such as the vaginal canal. Despite widespread use of these products by millions of Californians, particularly adolescents and underserved populations, there remains a troubling gap in testing, regulation, and transparency. SB 754 helps close that gap by establishing a proactive, science-based framework for oversight and public awareness."

Arguments in Opposition
A coalition of opponents including the California Manufacturers & Technology Association (CMTA), the American Chemistry Council, and the Consumer Healthcare Products Association, write in an "opposed unless amended" position:

> "… [DTSC] is currently looking at menstrual products as part of their 2024-2026 Priority Product Work Plan via the Beauty, Personal Care, and Hygiene Products category. Additionally, in July 2024 a tampons study was released by researchers from Columbia University, University of California Berkeley and Michigan State University. In light of that study, the [United States Food and Drug Administration, or FDA] commissioned an independent contractor to undertake a thorough literature review to assess any possible links between tampon use and adverse health effects. In December 2024, FDA released its

findings and did not identify any safety concerns. The FDA continues to recommend FDA-cleared tampons as a safe option for menstrual protection…

…The bill does not specify how DTSC will determine which chemicals are considered "of concern," nor does it define the scientific standards or thresholds for these decisions… Additionally, recent amendments include two criteria under DTSC's consideration of adding chemicals for evaluation. There is lack of clarity which creates uncertainty and raises the risk of shifting to arbitrary compliance expectations…

The bill mandates that manufacturers must, upon request, provide any technical documentation— including test methods and results—and also allows DTSC to conduct its own testing or outsource it to third parties. Notably, manufacturers would be required to pay for the cost of testing upfront, regardless of whether previous internal testing already demonstrates compliance. This not only duplicates efforts but imposes unpredictable financial burdens, especially for small and mid-sized manufacturers…

This proposal, if signed would go into effect January 1, 2026, however manufacturers would need to comply just twelve months later by December 31, 2026, without knowing when DTSC would come out with their list of chemicals "of concern," leaving little to no time to be in compliance.

We request the following amendments:

1) Specify the use of relevant physiological testing methods on intact products that mimic consumer use of menstrual products (e.g. such as the [FDA's] Chemical Analysis for Biocompatibility Assessment of Medical Devices or ISO10993.)

2) Remove zinc from specified chemicals list and replace with another recognized heavy metal such as mercury.

3) Remove the language that manufacturers shall pay for DTSC's testing costs.

4) Remove the language about publication of testing results on DTSC's website."

FISCAL COMMENTS

According to the Assembly Appropriations Committee, enactment of this bill would result in ongoing cost pressure of an unknown but potentially significant amount, possibly in the hundreds of thousands of dollars, should DTSC choose to use some or all of the authorities granted to it by this bill.

VOTES

SENATE FLOOR: 39-0-1
YES: Allen, Alvarado-Gil, Archuleta, Arreguín, Ashby, Becker, Blakespear, Cabaldon, Caballero, Cervantes, Choi, Cortese, Dahle, Durazo, Gonzalez, Grayson, Grove, Hurtado, Jones, Laird, Limón, McGuire, McNerney, Menjivar, Niello, Ochoa Bogh, Padilla, Pérez, Richardson, Rubio, Seyarto, Smallwood-Cuevas, Stern, Strickland, Umberg, Valladares, Wahab, Weber Pierson, Wiener
ABS, ABST OR NV: Reyes

ASM ENVIRONMENTAL SAFETY AND TOXIC MATERIALS: 5-0-2
YES: Connolly, Bauer-Kahan, Lee, McKinnor, Papan
ABS, ABST OR NV: Ellis, Castillo

ASM APPROPRIATIONS: 11-0-4
YES: Wicks, Arambula, Calderon, Caloza, Elhawary, Fong, Mark González, Ahrens, Pacheco, Pellerin, Solache
ABS, ABST OR NV: Sanchez, Dixon, Ta, Tangipa

UPDATED

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