

Alister F. Martin, MD, MPP
Commissioner
New York City Department of Health and Mental Hygiene
Gotham Center
42-09 28th Street
Long Island City, NY 11101-4132

Re: Proposed Rules Implementing Local Law 136 of 2025 (New Chapter 42 of Title 24 of the Rules of the City of New York) — Restricted Substances in Menstrual and Intimate Care Products

Dear Commissioner Martin,

I write to you today as a private citizen and resident of the Bronx, but with subject matter expertise as an environmental pediatrician who works in the Department of Environmental Medicine at Icahn School of Medicine at Mount Sinai Hospital. I am the chair of the Environmental Health and Climate Change Committee for New York State Chapter 3 of the American Academy of Pediatrics (C3 NYS AAP, which represents pediatricians from Staten Island, Manhattan, the Bronx, and lower Hudson valley counties) and coordinate environmental health and climate change policy for all NYS AAP chapters at the state level.

I write to you in support of the New York City Department of Health and Mental Hygiene (DOHMH)'s proposed rules implementing Local Law 136 of 2025 (Local Law 136) regarding restricted substances in menstrual and intimate care products, published in the City Record on August 14, 2026 and scheduled for public hearing on September 16, 2026.

These proposed rules to implement requirements around specific restricted substances, including fragrances, are important public health protections to establish. In my work, I frequently field questions from concerned parents and community members about odors that arise in homes or communities and how they can be connected to health. People frequently have both positive and negative associations with specific odors that do not always align with health protection or health harms. For example, carbon monoxide has no smell but can be deadly. Negative associations with certain odors, such as body odors, may be unpleasant but are not connected to health harms. Certain fragrances, added to personal care, menstrual and feminine hygiene products, as well as cleaning supplies, are often positively associated with “cleanliness”, hygiene, and health, but this is often not the case.

Fragrances in consumer products are largely within the category of volatile organic chemicals (commonly referred to as VOCs), which is a large and heterogeneous label that requires further scientific study to clearly demonstrate the full breadth of health harms. However, anecdotally and

supported by the medical literature, we know that many added fragrances that subjectively smell “good” to certain people are linked to headaches and can exacerbate chronic health conditions for vulnerable populations, including children. Added fragrances have been linked to irritant and allergic contact dermatitis, worsening eczema exacerbations, and as triggers for asthma exacerbations [1-4]. These health impacts can result from these chemicals coming in direct contact with the skin and mucous membranes, contact with fomites on scented fabrics or furniture, or contact with products used by other individuals, in addition to aerial exposure largely in poorly ventilated indoor environments.

While further research certainly needs to be completed to support the non-comprehensive review of medical literature references I have included, there is enough evidence to act. In addition, during conversations I have had in clinical settings with families impacted eczema or asthma as a pediatrician, parents are happy to learn about these linkages and seek new products that are more protective for their family’s health. Without sustained funding and effort to create health literacy programming for public education on the associations between odors, fragrances, and human health, I believe the next best step is to move forward with the public health protections established by Local Law 136.

Thank you for the opportunity to submit comments on this important public health matter. I am happy to answer any questions if contacted at the email address associated with this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles E. Moon III', with a stylized flourish at the end.

Charles E. Moon III, MD FAAP

References:

1. Alblooshi S. The impact of perfumes and cosmetic products on human health: a narrative review. *Front Toxicol.* 2025;7:1646075. Published 2025 Aug 29. doi:10.3389/ftox.2025.1646075
2. Steinemann A. Fragranced consumer products: exposures and effects from emissions. *Air Qual Atmos Health.* 2016;9(8):861-866. doi:10.1007/s11869-016-0442-z
3. Johansen JD. Fragrance contact allergy: a clinical review. *Am J Clin Dermatol.* 2003;4(11):789-798. doi:10.2165/00128071-200304110-00006
4. Cheng J, Zug KA. Fragrance allergic contact dermatitis. *Dermatitis.* 2014;25(5):232-245. doi:10.1097/DER.0000000000000067