



WeavingVoices

FOR HEALTH & JUSTICE

September 16, 2026

VIA ELECTRONIC SUBMISSION to Resolutioncomments@health.nyc.gov

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:

Weaving Voices for Health & Justice (Weave) writes to the New York City Department of Health and Mental Hygiene (“DOHMH”) in full support of the proposed rules implementing Local Law 136 of 2025 (“Local Law 136”) regarding restricted substances in menstrual and intimate care products.

Weave is a national nonprofit organization working to eliminate harmful chemical exposures and advance policies that protect health, particularly for communities disproportionately impacted by environmental and consumer product exposures. Our work combines scientific research, consumer education, corporate accountability, and policy advocacy to advance safer products and greater transparency.

For over a decade, Weave has worked on issues related to menstrual and intimate care product safety, including ingredient transparency, chemicals of concern, and the unique considerations associated with products used on and around vaginal and vulvar tissues. Our work has included publishing [What’s in Your Period Product?](#) a 2022 report examining ingredient disclosure and chemicals of concern in menstrual products; and [Chem Fatale](#) a 2013 report examining chemicals of concern in intimate care products. We have supported both New York state and federal legislation to strengthen menstrual product safety and transparency; and serve as a leading advocacy voice in efforts to strengthen Food and Drug Administration (FDA) guidance on menstrual product testing, labeling, and ingredient transparency.

Toxic chemicals simply do not belong in menstrual and intimate care products which are applied to some to the most sensitive and absorptive skin on our bodies. Local Law 136 makes this clear and will protect public health from these potentially harmful exposures.

We feel especially strongly that “fragrance” must continue to be included in the list of restricted substances in Local Law 136. We have publicly advocated for the removal of fragrance from these product types since 2013, and have largely achieved success in the menstrual product market where currently there is an exceptionally small number of fragranced products still for sale. Our store surveys (in both NY and other states) in recent years frequently find no scented menstrual products at all, and we are unaware of any public consumer backlash or concerns that have arisen from this change. There is no demonstrated demand for fragranced menstrual products, but considerable health benefits from their removal from the market.

We find there are still intimate care products marketed with fragrance as an ingredient – and remain very concerned about the health impacts of this chemical exposure to vaginal and vulvar tissue. The term “fragrance” represents a wide variety of undisclosed fragrance chemicals, which includes known carcinogens, reproductive toxicants and allergens. While more research on vaginal and vulvar exposure to fragrance is needed, the [American College of Obstetrics and Gynecologists](#) specifically recommends against the use of scented menstrual and intimate care products, due to the potential adverse impacts on vulvar health.

Fragrance chemicals are also entirely unnecessary additions to these products. While fragrance is often added to these products for “odor-control,” there is a lack of any scientific research to support these claims. There are no existing protocols for measuring vaginal odor, and no scientific studies demonstrating that scented intimate care products have any impact on perceived odor. Fragrance is merely an unfortunate marketing gimmick, which preys on product users’ confidence and self-esteem by promoting an unsubstantiated myth of vaginal odor to sell products.

Local Law 136 is an important law which will protect menstrual and intimate care product users from toxic exposures which can affect their health. Weave strongly supports the New York City Department of Health and Mental Hygiene’s proposed rules for implementing Local Law 136.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexandra Scranton". The signature is fluid and cursive, with the first name "Alexandra" written in a larger, more prominent script than the last name "Scranton".

Alexandra Scranton
Director of Science and Research
Weaving Voices for Health & Justice