



An open letter from gynaecologists, obstetricians and healthcare professionals

Lead signatories:

Dr Karen Joash, Consultant in Obstetrics and Gynaecology

Dr Leila Frodsham, Consultant Gynaecologist

And the undersigned gynaecologists, obstetricians and healthcare professionals

We are writing to you as Gynaecologists, Obstetricians and Health Care professionals who are extremely concerned about the lack of specific regulation for period products.

As those working on the front line of women's and female health, we are positioned to see firsthand effects on health, especially reproductive health, from exposure to toxic chemicals.

At a recent event in the [House of Lords](#) calling for the regulation of all period products, [Dr. Karen Joash](#)* said of the lack of regulation: *"It's a public health crisis, not just a reproductive crisis, with these toxic chemicals affecting every single system in a woman's body."*

And [Dr Leila Frodsham](#) ** reflects: *"I direct patients to using cotton/bamboo or reusable period/continence gel/SAP free products to aid recovery from certain gynaecological conditions such as vulvodynia, recurrent candida, vulvitis, sexual pain disorders, genital syndrome of menopause and vulval dermatoses, as they are better for microbiome and skin of the vulva and vagina, with the reminder that well-regulated, high-quality options are always the safest choice. Women often have resolution of many symptoms with this simple change."*

We as health care professionals echo public concern which is unequivocally clear. Every woman, girl and person who menstruates deserves safe, sustainable, affordable and accessible period products.

Innovation not matching regulation

In the UK women, girls and those who menstruate use on average 11,000 period products over their lifetime. Currently these are mostly single use disposable products, but there is a growing market in the use of organic single use disposables (SUDs) and reusable period products.

Yet, despite the big market shift and huge innovation around period products, with the advent of period underwear and menstrual discs, these most intimate of products are still regulated under the [General Product Safety Regulations \(GPSR\)](#).

There is no direct mention of period products in the GPSR, where they are regulated alongside consumer items like candles. The GPSR places the onus on producers to ensure the safety of consumer products, including period products, meaning there is no independent testing and little transparency about what is in these products. If consumers do have worries about safety of period products, they are directed to the [Citizens Advice Bureau](#) who have no knowledge of the issue.

Substances found in period products

This lack of specific regulation and transparency from the industry has led to [testing](#) by independent sources such as consumer organisations, non governmental organisations (NGOs) and scientists who found:

- Levels of the pesticide [glyphosate in tampons](#) at 40 times the legal limit allowed in drinking water.
- Heavy metals like [Lead, Mercury and Arsenic](#) in tampons.
- PFAS (forever chemicals) [found in period pants](#), and at lower levels in pads, tampons and panty liners.
- [Biocidal silver](#), used as an antimicrobial, found in period pants.

Although many of the chemicals and heavy metal residues found were present in small amounts, repeated tests have found similar contaminants and these are products women, girls and those who menstruate use regularly or daily when it comes to items like panty liners. And in a part of the body, the vagina, [which is thought](#) to be 10-80% more absorbent than the skin on the rest of the body.

The residues found can arise from intentional or unintentional sources. For example, pesticides applied to cotton crops used to make period products, crop or material contamination from polluted air, soil and water, by products of the plastic and materials processing used and intentionally added substances like anti-microbials and fragrances.

Chemicals found which are identified as Endocrine Disrupting Chemicals (EDCs) which, as The Lancet has noted, [no safe level can be determined](#), are particularly linked to gynaecological and reproductive diseases such as [endometriosis](#), [uterine fibroids](#) and [adenomyosis](#).

Superabsorbent polymer (SAP) granules, sometimes called gel, is used to absorb liquid in many SUD's. Largely made from [petrochemicals](#), it can impact the environment but also cause irritation around the delicate skin of the vagina.

Lack of transparency and regulation mean our cosmetics are better regulated than our period products. For example, if similar levels of fragrance used in period products were found in cosmetics, it would require regulation and labelling. Yet no such dictate is required for period products.

Regulation not placation

While regulators and scientists debate about absorption rates and safe levels of toxic chemicals in period products, women, girls and those who menstruate are paying the price with their health. Surely there can be no debate about the safety of heavy metals like lead found in products coming into direct contact with one of the most absorbent and hormone-sensitive parts of the body.

Women's Health Strategy

This comes at a fortuitous time with the upcoming review by the Department of Health of the Women's Health Strategy. While we welcome the Government's decision to renew the Strategy and appreciate the commitment already shown to improving women's health outcomes, we call on the government to seriously address menstruation and women's, and females' reproductive health through eliminating these exposures.

Addressing toxic exposures in period products would reinforce the Strategy's goals on economic participation, chronic conditions, menstrual health, and equity for those most affected by gynaecological and hormonal disorders.

This is why Wen is also calling for a [Menstrual Health, Dignity and Sustainability Act](#) which would address all aspects of menstrual health and dignity.

At a time when [women's health](#) is in decline in the UK, the cost to health is immeasurable but also we need to consider the social and economic costs. Women's health is also inseparable from their ability to participate in the workforce.

Evidence continues to show the scale of the impact. Gynaecological conditions [cost](#) the UK an estimated £11 billion a year in absenteeism. And for those marginalised and racialised women and their communities, the impacts are far worse.

Public concern

Wen's and PAN UK's [petition](#) calling for regulation of period products has now surpassed 80,000 signatures. We delivered the petition to 10 Downing Street and Defra on 5 November.

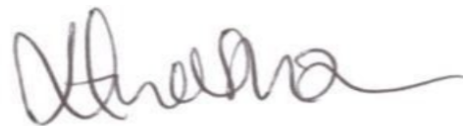
To conclude, we, the undersigned, call on the UK government and all departments responsible for the regulation of period products, and those reviewing the Women's Health Strategy, to be world leaders in relation to women's and female health by becoming the first country to specifically regulate period products.

As health care professionals we are galvanized behind the principle of putting people's health first. We believe women, girls and those who menstruate have a fundamental right to safe, sustainable and properly regulated period products.

Signed:



Dr. Karen Joash, Consultant in Obstetrics and Gynaecology at Imperial College Healthcare NHS Trust, Queen Charlotte's and Chelsea Hospital



Dr. Leila Frodsham, Consultant Gynaecologist, Guy's and St Thomas

And the undersigned gynaecologists, obstetricians and healthcare professionals:

Additional signatories will be added as clinicians confirm their support.

*Dr. Karen Joash is a Consultant in Obstetrics and Gynaecology at Imperial College Healthcare NHS Trust, Queen Charlotte's and Chelsea Hospital site, and holds multiple roles shaping maternal and reproductive health globally. As the Scientific Advisor to Global Maternal Health and chair of the research review committee at Tommys. Charity, she spearheads initiatives to improve awareness of environmental effects on health, particularly during pregnancy and infancy. Additionally, she serves as the Head of Postgraduate Training for Obstetrics and Gynaecology & Community Sexual and Reproductive Healthcare in London; overseeing an impressive 26 hospitals. She wrote the foreword for the landmark Black Child Clean Air Report which highlighted the extent of outdoor and indoor air pollution which affects us all regardless of background or race.

** Dr. Leila Frodsham became a consultant in obstetrics and gynaecology in 2009. From 2013 to 2016, she was a consultant in both Kent and at Guy's and St Thomas' NHS Foundation Trust. She currently works as a Consultant Gynaecologist and leads the Psychosexual service at Guy's and St Thomas. She is also a foundation training programme director at the Trust, and a clinical academic at King's College London where she co leads Women's Health Block and the Transition to F1 module. In lockdown she established (with peers) a doctor's menopause café which educates and offers pastoral care to doctors. The café has over 7000 members. She is also a spokesperson for the Royal College of Obstetricians and Gynaecologists (RCOG).