



Reusable & toxic-free menstrual products

Making women's lives better
while fighting plastic pollution

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#break**free**fromplastic

Executive Summary

Half the world's population needs menstrual products in order to have a decent life. Despite this, the Commission's *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment* ("single-use plastics") fails to seize the opportunity to reduce plastic pollution while also lowering menstrual poverty and exposure to hazardous chemicals.

Ensuring that reusable and toxic-free menstrual items are made available across the EU should be made a priority on this *Proposal for a Directive*. For that reason, Zero Waste Europe and HEJSupport believe that articles 1, 6, 7 and 10 of the legislative proposal need to be amended so that MEPs:

- Fight menstrual poverty by ensuring the widespread availability of reusable and safe menstrual products, in particular in large retailers and pharmacies across the EU, and that this is accompanied by awareness-raising measures on alternatives to single-use menstrual products.
- Reduce hazardous substances in menstrual products, preventing women from being exposed to well-known toxic substances linked to certain types cancer and other diseases.

This is an opportunity for MEPs to champion women's issues ahead of the elections. With an average of a 16% gender pay gap across the EU¹, ensuring that women have access to cheap and toxic-free reusable alternatives will show how seriously MEPs take women's well-being.



¹ https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics#Gender_pay_gap_levels_vary_significantly_across_EU

Which changes need to be introduced?

Article 1 (on the objective of the Directive), Article 6 (on product requirements), Article 7 (on marking requirements) and Article 10 (on awareness-raising measures) of the current Proposal offer an excellent opportunity to fight all of the above points.

Article 1 should be amended in order to ensure that:

- The objective of the Directive includes transitioning to a non-toxic circular economy;
- The Directive aims at a reduction in the consumption of single-use plastics, with sustainable business models, and non-toxic products and materials, thus also contributing to the efficient functioning of the internal market.

Article 6 should be complemented in order to ensure that:

- The product requirements for all products referred to in the Directive prevent the use of hazardous chemicals in their composition.

Article 7 should be amended so that:

- All of the product information listed in Article 7 is provided to consumers (not allowing manufacturers to pick their preferred one);
- A new point is added on the provision of information on the availability of existing alternatives;
- A new point is added on the product's inclusion of components meeting the properties of Article 57 of Regulation 1907/2006 or which have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).

Finally, Article 10 should be complemented so that:

- Measures are implemented to inform consumers of the impact of plastic and its chemical composition on human health;
- Reusable menstrual products are made widely available in each Member State, in particular in large retailers and pharmacies; and awareness-raising measures on alternatives to single-use menstrual products are carried out, including through school programmes.

Plastic is the main ingredient in the average menstrual product

During her lifetime, a woman will have the period for up to 3,000 days, or the equivalent of 8.2 years². During that time, a woman will use on average 12,000 pads, the equivalent of 150 kilograms per woman, or enough to fill two minibuses³. It has been calculated that on average, each menstrual item is 90% plastic⁴. To put it another way, one conventional pack of menstrual pads contains the equivalent of four plastics bags in plastic⁵.

² <https://www.thecupeffect.org/why-we-exist/>

³ <https://www.thecupeffect.org/why-we-exist/>

⁴ http://www.natracare.com/?utm_source=twitter&utm_medium=biolink&utm_campaign=social

⁵ <http://www.natracare.com/>



The set of materials that make up a menstrual product does not have to be disclosed by law, because they are considered medical devices. However, those companies that have made this information available report that plastic is the main component.

Procter and Gamble is one of the few companies that displays the materials in their single-use menstrual items. Table 1 shows that polyethylene⁶ is the most used plastic (polyolefins⁷ being part of its family, which also includes LDPE, LLDPE, HDLE and PP), with other materials also used such as adhesives and fragrances.

Table 1: List of components of Procter and Gamble's Always sanitary pads⁸

Pad components	Infinity	Radiant	Ultra	Maxi	Pure and Clean
Top Sheet A soft fabric that is designed to pull fluid away from skin	Polyolefins, like those commonly used in clothing; with petrolatum and zinc oxide, (ingredients found in skin lotions) on Infinity and Radiant.				Polyethylene - Synthetic fibers similar to those used in garments clothing
Absorbent Core A layer that acquires and stores fluid, locking it away	Absorbent foam (Flex Foam)		Absorbent wood cellulose (the absorbent material used in pads since 1920s) with absorbent gel, rayon, or polyester		Absorbent wood cellulose and super absorbent gel pearls to keep fluid inside
Back Sheet A soft moisture proof layer to keep the fluid inside	Polyolefins, like those commonly used in clothing (printed on Radiant)				Polypropylene and polyethylene – Synthetic layer moisture proof to keep fluid inside
Adhesives	An FDA approved food additive adhesive similar to craft glue sticks				Glue to ensure the layers in the pad keep together and pad adheres to panty
Fragrance Provides a fresh scent	Fragrance ingredients. Only on versions labelled as scented				Not present
Wrapper Protects the adhesives before the pad is used	Printed polyolefin like that used in clothing, and paper (Maxi only)				Printed polyethylene – film to keep pad protected and convenient to carry
Wing paper Protects the wings adhesive before the pad is used	Printed paper				Paper to protect wing adhesive before pad is used

⁶ According to Plastics Europe, one of the most common types of thermoplastic is polyethylene, which can be reheated, reshaped and frozen repeatedly, hence it is part of the thermoplastics family.

⁷ Plastics Europe describes Polyolefins as the family of polyethylene and polypropylene thermoplastics, produced mainly from oil and natural gas by a process of polymerisation of ethylene and propylene, respectively.

⁸ <https://always.com/en-us/about-us/what-ingredients-are-in-always-pads>

Menstrual poverty

Where statistics are available, as many as two in ten women cannot afford single-use menstrual items⁹ in the EU, preventing girls and women from attending school or work. Most importantly, when girls cannot afford sanitary products and miss school during their periods (usually around five days a month), it has a serious impact on their education and long-term prospects. The impact of menstrual poverty is felt strongly amongst women and girls in the world's poorest communities, which are constantly excluded from participating fully in society because of their period.

The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500¹⁰ to 7,500¹¹ euros in some EU countries, compared to less than 100 euros when using the reusable alternatives¹².

Over a lifetime, it has been calculated that using reusables represents 6% of the costs of disposable menstrual products¹³. With an average gender pay gap of 16% across the EU¹⁴, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital, especially since the middle class in Europe has significantly shrunk since 2008 and lower-income classes have been growing ever since¹⁵.

Toxics in menstrual items

Single-use plastic menstrual items contain a wide range of chemicals, many linked to negative health impacts for the user. Hence, using this opportunity to reduce women's exposure to toxics is paramount.

Conventional sanitary pads are made of up to 90% crude-oil plastic and can contain chemicals like BPA, phthalates and petrochemical additives, which are known to be endocrine-disrupting substances and are linked to various diseases, such as heart diseases, infertility and cancer. Even traces of dioxin and glyphosate can be found in menstrual products.¹⁶ A recent test found carbon disulfide in tampons made of rayon, which has been associated with an increased risk of early menopause and menstrual disorders.¹⁷

Plastic pollution

Menstrual products are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common¹⁸. Sanitary

⁹ <https://www.theguardian.com/society/2018/feb/05/period-poverty-scotland-poll-shows-women-go-to-desperate-lengths>

¹⁰ <https://www.mooncup.co.uk/why-mooncup/why-should-i-use-a-menstrual-cup/>

¹¹ https://www.huffingtonpost.co.uk/2015/09/03/women-spend-thousands-on-periods-tampon-tax_n_8082526.html Own calculation: 13 pounds per month, 14.5 euros per month (conversion rate in August 2018), 174 euros per year, assuming a woman has the period from the age of 12 to 55 (43 years) it is a total of 7,482 euros.

¹² Menstrual cups cost about 30 euros per pair; the expected lifetime of each is 10 years. <https://www.thecupeffect.org/why-we-exist/>

¹³ Blacklaws, K; Parke, H (2017) Period of adjustment: the case for reusable feminine hygiene products

<http://www.isonomia.co.uk/?p=4912>

¹⁴ https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics#Gender_pay_gap_levels_vary_significantly_across_EU

¹⁵ <https://www.eurofound.europa.eu/publications/blog/europes-shrinking-middle-class>

¹⁶ <https://www.60millions-mag.com/2016/03/01/test-de-tampons-et-protections-feminines-10206>

¹⁷ Test carried out by Women's Voices for the Earth, 2018; <https://www.womensvoices.org/feminine-care-products/whats-in-your-tampon/>

¹⁸ European Commission, 2018, *Impact Assessment, Reducing Marine Litter: Action on Single Use Plastics and Fishing Gear*, page 11

http://ec.europa.eu/environment/circular-economy/pdf/single-use_plastics_impact_assessment.pdf



towels usually end up in the aquatic environment after being flushed down the toilet, eventually reaching rivers and seas.

Such items do have a significant negative impact on the marine environment: they can be ingested by marine animals; release chemicals in the water, including microplastics; contribute to the transport of invasive species (also known as rafting) and microbial contamination; and have a negative economic impact on both tourism and fisheries.

Table 2: Assessment of the impacts of menstrual items by the European Commission¹⁹

	Sanitary applications
Entanglement of marine wildlife	+
Ingestion by marine animal	++
Pollution of marine waters (chemicals release, microplastics)	++
Transport of invasive species (rafting)	+++
Microbial contamination	+++
Economic impacts on tourism	+++
Economic impacts on fisheries	++
Potential human health impacts	+

Help the EU meet Sustainable Development Goals 4, 5 and 12

Supporting the legislation changes highlighted above will boost the EU's efforts to meet the Sustainable Development Goals (SDGs). Fighting menstrual poverty will help towards gender equality (Goal 5), since girls and women will be empowered and will be able to have an independent life. It also helps with Goal 4, on quality education, since menstrual poverty has a significant negative impact on girls' access to education. Reusable toxic-free menstrual items contribute to SDG 12, since it entails reducing the use of single-use plastic products containing toxic substances.

Conclusion

Changes to the single-use plastic Proposal for a Directive, specifically in Articles 1, 6, 7 and 10, will be a game changer when it comes to contributing positively to both the environment and women. This is a unique opportunity to show how the European Parliament cares about women's well-being and is willing to take the necessary steps to enhance their lives, while also improving the state of the environment for all.

¹⁹ European Commission, 2018, *Impact Assessment, Reducing Marine Litter: Action on Single Use Plastics and Fishing Gear*, page 20
http://ec.europa.eu/environment/circular-economy/pdf/single-use_plastics_impact_assessment.pdf



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About Zero Waste Europe

Zero Waste Europe is the European network of communities, local leaders, businesses, experts, and change agents working towards the same vision: phasing out waste from our society.

We empower communities to redesign their relationship with resources, to adopt smarter lifestyles and sustainable consumption patterns and think circular.

About HEJSupport

HEJSupport aims to achieve a healthy environment and environmental justice for affected people. It provides long-term technical, policy and awareness-raising support for active communities deprived of justice to enable them to make their problems heard and to strive for solutions. HEJSupport works at the policy level to achieve a healthy environment and environmental justice globally.

Towards a future free from plastic pollution

Zero Waste Europe and HEJSupport are part of #BreakFreeFromPlastic, the global movement envisioning a future free from plastic pollution. Since its launch in September 2016, nearly 1,300 organizations from across the world have joined the movement to demand massive reductions in single-use plastics and to push for lasting solutions to the plastic pollution crisis.

Zero Waste Europe is also a founding member of Rethink Plastic, the alliance of Break Free From Plastic members working with European policy-makers to design and deliver policy solutions to end plastic pollution.

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