



WOMEN'S VOICES FOR THE EARTH

OUR HEALTH. OUR FUTURE. TOXIC FREE.

An Open Letter to the Makers of Summer's Eve

Ron Lombardi
President & CEO
Prestige Consumer Healthcare, Inc.
660 White Plains Road
Tarrytown, NY 10591

October 22, 2019

Dear Mr. Lombardi:

On behalf of the undersigned scientists, researchers and academics we are writing to urge you to disclose all ingredients (including fragrances) in Summer's Eve intimate care products, eliminate the presence of chemicals linked to cancer, fertility effects and other serious health concerns and conduct research to better understand potential health harms from the use of intimate care products.

Summer's Eve is the leading brand in intimate care products. These products are specifically intended for use on vaginal and vulvar tissue, which constitute a highly permeable route of chemical exposure. Furthermore, a considerable body of research has associated use of douches and other vaginal cleansers with greater risk of bacterial vaginosis and vulvovaginal candidiasis.^{1,2,3,4} Yet, there is very little research examining the potential for chemicals in douches and vaginal cleansers to disrupt the vaginal microbiome, possibly leading to greater risk of infection.⁵ In addition, douching has been linked to increased body burden of harmful chemicals, such as phthalates.⁶ This makes exposure to harmful chemicals in Summer's Eve and other intimate products a vital public health issue.

Chemicals of concern in Summer's Eve Products

Our 2018 store survey of ingredients in intimate care products showed that Summer's Eve products still contain chemicals of concern, including:

Octoxynol-9: (*Present in Summer's Eve Douche and Body Powder*) A potent contraceptive drug that effectively kills sperm. However, intimate care products containing octoxynol-9 are not considered contraceptives, nor are they required to have any caution labeling to their potential effect on a woman's fertility. Women who use vaginal products containing

octoxynol-9 may be unaware that exposure to this ingredient may impact their ability to get pregnant. Octoxynol-9 is also chemically similar to nonoxynol-9. Use of vaginally applied products containing nonoxynol-9 is known to both cause vaginal irritation⁷, and significantly increase risks of HIV transmission.⁸ Octoxynol-9 is simply not an appropriate ingredient for an intimate care product.

Fragrance & Ingredient Transparency

Fragrance can be made up of hundreds of different ingredients, many of which are linked to serious health problems, from skin irritation to hormone disruption and breast cancer.⁹ Summer's Eve brand does not currently disclose the specific fragrance ingredients used in each product, making it impossible for users of these products to avoid fragrance chemicals of concern. For example, there is a variety of allergens very commonly found in fragrance and exposure in sensitized individuals could lead to considerable discomfort. Your customers with allergies deserve the information necessary to avoid the fragrance allergens of particular concern to them.

Undisclosed fragrance chemicals are of special concern in feminine care products given research findings linking vaginal douching with higher levels of a certain phthalate (DEP), a known fragrance ingredient, in the body. Phthalates, in general, are chemicals of concern for women's health because they are endocrine disruptors and are linked to harmful health effects including reproductive and developmental harm as well as chronic disease risks in adults.¹⁰

Users of intimate care products have the right to know which chemicals they are being exposed to. Personal wipes, douches and powders are designed to have direct contact with sensitive vulvar and vaginal tissue that readily absorbs chemicals. We believe chemicals linked to cancer and reproductive harm do not belong in these products, even at very low concentrations. Major manufacturers of personal care products such as Procter & Gamble and Unilever have recently committed to disclosing individual fragrance ingredients on every product. Similarly, as you may know, any cosmetic products sold in the European Union must disclose the presence of fragrance allergens on the label. Numerous international manufacturers are also providing the same information for their U.S. customers. Disclosing fragrance ingredients is both feasible and the right thing to do for customers.

Needed Research

Lastly, as the makers of the leading brand in intimate care products, Summer's Eve has a responsibility to its customers to investigate and better understand the links between use of intimate care products and adverse health outcomes such as bacterial vaginosis and vulvovaginal candidiasis. These conditions are very common, and cause considerable morbidity globally.^{11,12} Your products may be contributing significantly to these adverse

conditions. You have both the moral and legal responsibility to produce safe and harmless products for your customers. Further investigations into the prevalence of these conditions among users of your products are needed with greater attention to any modifications that could be made to improve product safety.

For these reasons, we urge Prestige Consumer Healthcare to:

- Disclose all ingredients, including fragrance ingredients, in all of your intimate care products, and highlight fragrance allergens in those products.
- Eliminate the presence of ingredients and contaminants linked to cancer and other serious health problems from all of your intimate care products.
- Develop and disclose a chemical safety policy for Summer's Eve products to address the use of known and emerging chemicals of concern.
- Conduct research to better understand potential health harms from the use of intimate care products to ensure safer products.

We understand that at Prestige Consumer Healthcare you focus on products "*to better improve the lives of our customers and their world.*" Indeed, it is your mission to "*preserve consumer trust by continuing to provide products stewarded with their needs in mind.*" We appreciate these laudable goals and encourage you to apply them to improve the safety of Summer's Eve products.

We would be happy to discuss the concerns raised in this letter with you further. Please contact Jamie McConnell, Director of Programs and Policy at (406) 543-3747 or jamiem@womensvoices.org at your earliest convenience to set up a time for a call or meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexandra Scranton". The signature is fluid and cursive, written on a light-colored background.

Alexandra Scranton
Director of Science and Research
Women's Voices for the Earth

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