



MENSTRUAL HEALTH & TRADE Increasing Trade and Transparency for Market Development

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BRIEFING NOTE

Menstrual Health & Trade: Increasing Trade and Transparency for Market Development

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Executive Summary

The imperative for strengthening trade data for Reproductive Health (RH) commodities -

A menstruating population of 1.72 billion women and girls live across low and middle income countries (LMICs)¹, yet an estimated 613 million rely on materials such as old cloth or toilet paper to manage their menstruation².

The challenge of access - Single use menstrual pads are widely available across LMICs, yet their cost makes them unaffordable to many. In the past decade reusable menstrual product innovations have grown as a new category in high income countries. These products are up to 15x more affordable, but they are not available for purchase in LMIC markets. Regulatory barriers, a lack of funding and investment, and limited understanding of the market have contributed to this gap in access.

The issue - To respond adequately to this need it is essential to understand what products are available in a country and how big the access gap is. For menstrual products and family planning it requires governments, donors and NGOs to conduct large scale and costly population and industry studies. This results in infrequent data that is limited in accuracy. Ultimately, it limits the ability to provide access to essential products in the places that need it most.

The solution - Trade data can make a difference. All products that move across borders are registered by national customs authorities through a system called the Harmonized Systems (HS) Codes. This data is captured in <u>UN Comtrade</u> - a public, open access database. However, the current HS codes for menstrual products have limited use because multiple products are grouped together into a single code, including diapers and wipes, rendering the data unusable.

The opportunity - There is an opportunity to change this. The <u>World Customs Organisation</u> (WCO) is about to start its revision process for HS Codes. A modification in the system would bring global data transparency to an essential product for half the world's population. It would also allow the alignment of global ISO standards for menstrual products, currently under development, facilitating certification, enforcement and custom procedures.

Our Ask - SHF is working with the global <u>The Reproductive Health Supplies Coalition</u> (RHSC) and the <u>International Trade Center</u> (ITC) to request a revision of the HS codes classification. With the support of Canada and Barbados, and co-sponsorship from a variety of member states to the WTO, we are proposing to discuss the opportunity for a revision within the committee on market access (CMA).



Briefing Note: Menstrual Health & Trade Data

¹UN Population Data on female population of reproductive age in LMICs in 2025.

² RHSC LEAP 2024.

1. About HS Codes

Among industry classification systems, Harmonized System (HS) Codes are commonly used throughout the export process for goods. This is a standardized numerical method of classifying traded products, used by customs authorities around the world. It is used to identify products when assessing duties and taxes, for identifying the correct category of product quality standards and certification and for gathering trade statistics. The HS is administered by the World Customs Organization (WCO) and is updated every five years. It serves as the foundation for the import and export classification systems used by countries across the world. More information about HS codes is available here.

The HS code classification is standardized globally up to the first six digits. The code can be broken down into three sets of two digits.

- 1. HS-2 -identifies the chapter the goods are classified in, e.g., 09 = Coffee, Tea, Maté and Spices.
- 2. HS-4 identifies groupings within that chapter, e.g., 09.02 = Tea.
- 3. HS-6 allow for detail within groupings, e.g., 09.02.10 = Green tea

Up to the HS-6 digit level, all countries classify products in the same way (a few exceptions exist where some countries apply old versions of the HS). Countries are allowed to add longer codes to the first six digits for further classification.

In the case of menstrual products, several HS codes apply:

- For **single-use menstrual products**: menstrual pads, tampons and liners, these are grouped into:
 - Chapter (HS-2) 96 Miscellaneous manufactured articles.
 - Heading (HS-4) 9619 Sanitary towels (Pads) and tampons, napkins and napkin liners for babies and similar articles, of any material
 - Code (HS-6) 961900 Sanitary towels (Pads) and tampons, napkins and napkin liners for babies and similar articles, of any material
- For reusable menstrual products no specific HS codes exist. These products are most often allocated to other groups, most notably:
 - [ADD HS codes] Textiles, for cloth based products including reusable menstrual pads, panty liners and period underwear.
 - [ADD HS codes] Silicone based products, for menstrual cups and discs.

Due to this grouping, the data gathered on these products is practically useless. Meanwhile HS-6 has over 90 free slots that would allow for better disaggregation and coding of these goods.

2. The Use of HS Codes for Trade & Market Data

Since WCO data is public, it can be used as a data source for understanding the flow of products around the world. This data is aggregated and freely available on <u>UN Comtrade</u> and could contribute to mapping the supply chain from raw materials to finished product, identify manufacturing hubs, identify supply chain vulnerabilities, unveil dependencies between countries and regions, provide insights into the total market size and overall use of different products in a country, and, importantly, help quantify the access gap to these products for women and girls. This is especially useful for countries with a limited national industry for these specific good, as is the case in many LMICs, and would provide insights into RH commodity use at national level in the most fragile countries in the world



By modifying these codes, public data becomes available that is granular to the country level and updated every year. This will enable public and private stakeholders to quantify the gap in access to these essential products and target their interventions to support women and girls across low and middle income countries. In addition, it will support efforts by market development and trade organisations to better understand market dynamics, trade flows and supply chain vulnerabilities, contributing to improved availability of quality supplies and strengthening local markets.

3. Increasing Transparency to Drive Impact for Women's Health

Together with the <u>The Reproductive Health Supplies Coalition</u> (RHSC) and ITC, SHF is preparing a draft request for revision of the HS codes for both menstrual products.

This request is submitted on behalf of the major global stakeholders working on increasing access to reproductive health commodities in LMICS. RHSC functions as the global coalition that brings together these stakeholders. Its members include:

- Bilateral- and multilateral- funders, e.g. GIZ/BMZ and FCDO
- philanthropic foundations BMGF, CIFF, Packard Foundation
- Governments across LMICs
- UN organizations e.g. SHF and UNFPA
- NGOs e.g. PATH and PSI
- Private sector, including distributors and manufacturers

The RHSC has two initiatives to increase supply chain and market visibility which would make this trade data and analyses available to the public:

- the Landscape & Projection of Reproductive Health Supply Needs (LEAP)
- the Global FP Visibility and Analytics Network (VAN)

The timeline

Proposals for the <u>next revision of the HS nomenclature</u> will start in 2025 and run up to 2030. The revisions will take effect in 2033. A <u>detailed guide on the process for HS code revisions</u> is available on the website of WCO. The summarized timeline would be as follows:

- Prior to developing a draft proposal, the initiating organization would like to work with trade
 missions in Geneva, through the Committee on Market Access, to inform countries of this
 process and extend an invitation to contribute to the development of the proposal
- Q1 2026 Share a draft proposal of the revision with the CMA.
- Q2 2026 Submit a proposal for revision to the WCO.
- (2026-2030) The final document will go to the HSC committee to vote.
- (2030) The WCO Council will vote on the entire package of all HS code revisions. If any one country objects it loses the vote, which usually doesn't happen.
- 2030 Once the objection period has passed, the package passes. Then countries have 2 years to get it into force.
- 2033 Adoption.



4. The Imperative for a Revision of HS Codes for Menstrual Products

613 million women and girls <u>across Low and Middle Income Countries (LMICs)</u> do not have access to quality affordable menstrual products. This affects the rate and quality of participation in education, work and social life. This can have long term consequences for the individual - impacting educational performance or reducing earnings - and for countries in the areas of health, economic and educational outcomes. More information is available <u>here</u>.

Single use (disposable) menstrual pads are widely available, yet their price point makes them inaccessible for many. While more recent innovations in menstrual products (e.g. menstrual cups, reusable pads or period underwear) have the potential to significantly reduce the cost of menstruation, these products are not available across markets in LMICs. Regulatory barriers, a lack of funding and limited understanding of the market have contributed to this gap in access for over a third of the menstruating population in LMCIs. A major obstacle to identifying market barriers and developing effective models for product access at the last mile is the lack of market data and transparency.

As of 2023, the International Standards Organization (ISO) has started the process of developing global menstrual product standards under Technical Committee (TC) 338. HS codes play an important role for customs officials to correctly identify a shipment of goods and ensure these goods meet the corresponding quality specifications. Revision of the HS-codes for menstrual products would allow for alignment with the upcoming global ISO standards and facilitate the ease and effectiveness of quality inspection against these standards. This process will become even more important as long-term health and safety safeguards will be included in the new ISO standards, which are expected to become binding requirements to be enforced through regulatory and customs bodies.

Dedicated HS codes will ensure the identification, classification and tracking of certified menstrual products, to ensure quality, safety and ultimately public health across trade and emergency response systems. Without clear codes, menstrual products can face import delays, misclassification as non-essential goods, and incur unnecessary tariffs and non-tariff barriers—disrupting supply chains. This not only compromises the health, dignity, and safety of menstruators—particularly in vulnerable or displaced populations—but also undermines the ability of industries to forecast demand, ensure compliance, and scale manufacturing and distribution.

All this combined, the revision of the HS codes for menstrual products would radically increase transparency of product use, make the access gap visible, facilitate trade and quality control, and help identify non-tariff barriers and challenges in making these products available across LMICs.

5. An Initial Glance at HS Code Data

Maisha meds - a data and consultancy firm specialized in reproductive health commodity data in Africa, conducted a quick analysis on behalf of RHSC of data related to HS961900 (menstrual products) for Sub-Saharan Africa. The outcomes from this analysis found that:

- The total market size for menstrual products across LMICs is \$28 bn. Total value over 4 years of import is currently at \$2.87bn.
- Annual value has fallen slightly from 2019-2022. It is unclear why this might be, possible
 explanations include competing interest in the raw materials during COVID and an overall



- decrease of demand during this period. Assuming rising demand, the value of goods imported could be lower due to falling prices or increasing local manufacturing.
- China accounts for 43% of value this isn't great news as although it is possible to get export data from China it is slow, expensive, and the data is often a little out of date.
- South Africa is the number 2 for exports, may be re-exportation (risk of double counting here).
- Only country with significant exports to the region where data is easily available is Turkey thus export data is unlikely to be good for building a case for the groupings.
- Import data for Kenya, Uganda, Namibia, Ghana is likely the best source to try to understand the breakdown of the types of products shipped. Expert understanding of the space is the other obvious determinant.

With a revision of the HS codes, specific trends, use patterns, access gaps and supply chain interdependencies could be provided at the product category and product type level.

6. Contact and Additional Information

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