



CHURCH & DWIGHT Co., INC.

500 Charles Ewing Boulevard, Ewing, NJ 08628

November 24, 2020

Via Email

Mr. Joe Calavita
Manager, Consumer Products Implementation Division
California Air Resources Board
Sacramento, CA 95812 -0806
icalavit@arb.ca.gov

Subject: CARB Workshop 11/10/2020

Dear Mr. Calavita,

Church and Dwight (C & D), a leading Consumer Packaged Goods Company, appreciates the opportunity to comment on the CARB Workshop for the Amendments to the VOC Consumer Products Rule presented by webinar on 11/10/2020.

Name change & VOC limits

C & D has continually worked with the CARB Staff on this rule development since the beginning in 2019. C & D supports the proposed name change by the staff for No Rinse Shampoo to be renamed Dry Shampoo. The VOC limit of 55% on 1/1/2023 and future effective limit 50% on 1/1/2029 are also supported by C & D.

Definition

C & D appreciates the work by the staff for the definition of Dry Shampoo. C & D believes that the purpose of the Dry Shampoo is to remove oil from the hair. In addition the removal of the oil from the hair refreshes the hair making the hair fuller in body and volume. Thus, the definition or the record for this rule amendments should reflect that Dry Shampoo adds body and volume to the hair. C & D would be willing to work with the staff on wording for the Dry Shampoo definition.

IPE for Compressed Gas

C & D has not had sufficient time to review the proposed provision for the Innovative Product Exemption (IPE) for Compressed Gas for use in Hair Spray, Dry Shampoo and Personal Fragrance Products. Thus, we will not be commenting at this time.

Summary

C & D commends the CARB staff for their availability to work with us on this very important issue. We look forward to reviewing the final proposal. Thank you for your continued work on this issue. C & D supports the VOC limits proposed by the staff and request inclusion of "fuller hair and volume" to the Dry Shampoo.

Thank you for this opportunity to comment. If you have any questions or comments please do not hesitate to contact our VOC consultant, Doug Raymond at 440-339-4539 or at diraymond@me.com.

Sincerely,

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

Jeffrey Shaul

Director, Global Regulatory Affairs

Church & Dwight Co., Inc.

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