



January 27, 2021

Mr. Joe Calvatia  
Manager, Consumer Products Implementation Division  
California Air Resources Board  
Sacramento, CA 95812-0806

Via electronic submission to [jcalavit@arb.ca.gov](mailto:jcalavit@arb.ca.gov)

Subject: GWP reduction IPE

Shield Packaging is an aerosol filler in the state of California. Shield has worked closely with CARB on Consumer Product VOC Rule Developments. Shield supports the attached GWP reduction IPE being proposed by the National Aerosol Association.

Throughout the years Shield has hosted the CARB staff into our manufacturing facility in an effort to fully explain the issues with aerosols. The NAA proposal provides the use of the Concept of Reactivity. Reactivity is sound science and should be used whenever possible in reducing VOC emissions. Reactivity provides much needed flexibility to the Consumer Product Manufacturers.

Thank you for considering our comments. Any questions feel free to contact our consultant Doug Raymond at 440-339-4539 or by email to [djraymond@me.com](mailto:djraymond@me.com)

Sincerely,

A handwritten signature in black ink on a light yellow background. The signature is cursive and appears to read 'Roger Vanderlaan'.

Roger Vanderlaan  
VP, General Manager