

CHURCH & DWIGHT CO., INC.

Corporate Headquarters:
Princeton South Corporate Center
500 Charles Ewing Boulevard
Ewing, New Jersey 08628
Main Phone: (609) 806-1200

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Joe Calavita
Manager, Consumer Products Implementation Section
California Air Resources Board, AQPSD
P.O. Box 2815
Sacramento, CA 95812

Subject: Reactivity for future VOC limits

Church & Dwight Co., Inc., a leading Consumer Packaged Goods Company requests that the California Air Resources Board (CARB), allow Maximum Incremental Reactivity (MIR) limits to meet the intent of the California State Implementation Plan (SIP) for the current products in this rule making.

Church & Dwight Co. has worked closely with CARB to develop a technologically and commercially feasible limit for 2023 California State Implementation Plan commitment for the dry shampoo category. This limit was the result of a significant level of research and consumer validation. As we move towards the 2031 SIP commitment, Church & Dwight Co. anticipates the elimination or reduction of usage of certain compounds that would be options for VOC reduction.

The Science of Reactivity is sound. The reduction of the MIR for a product always leads to a reduction in ozone production, whereas mass-based regulations do not always reduce ozone production. Reactivity provides the manufacturer/marketer flexibility in reformulation of their products that allows for the development of effective products while obtaining ozone reduction.

Church & Dwight believes that a Reactivity compliance option should be available for the 2031 SIP commitment. In April of 2019, Church & Dwight requested equivalent VOC values for Dry Shampoo. In late February 2020, CARB staff agreed to provide Reactivity equivalent VOC values for the product category. This provided hope that Reactivity limits might be considered. Then on March 10, 2020, in response to a question, the staff stated that no Reactivity limits would be proposed. This was the first announcement of this position on MIR. This announcement was first made nearly 10 months into the rule making.

Industry supplied three years of data including reactivity data to CARB staff. This information was supplied in good faith with the thought that CARB would use this data to provide a more productive rule making. Industry should be allowed flexibility in the development of products that meet the requirements and the intent of the regulation. CARB is in possession of all the Industry's Reactivity data to regulate our products. This data should be given back to the Industry. If a Reactivity limit can be used to achieve an equivalent VOC reduction and provide Industry with flexibility it represents a positive outcome for the Agency and for Industry.

Church & Dwight urges CARB to work with Industry to provide Reactivity as a compliance option.



Thank you for your time and consideration to this request. If you need any additional information, please do not hesitate to contact our VOC consultant Doug Raymond at 440-339-4539 or at djraymond@me.com.

Sincerely,



Jeffrey Shaul
Director, Global Regulatory Affairs

Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond

