

From: Joseph T. Yost <jyost@thehcpa.org>

Sent: Wednesday, November 27, 2019 12:21 PM

To: ARB Consumer Products <csmrprod@arb.ca.gov>

Cc: Ramalingam, Ravi@ARB <Ravi.Ramalingam@arb.ca.gov>; Calavita, Joseph@ARB <joe.calavita@arb.ca.gov>; Gomez, Jose@ARB <jose.gomez@arb.ca.gov>

Subject: Feedback on CARB Staff Initial Draft Regulatory Strategies - Consumer Products Regulation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Berghouse,

The Household & Commercial Products Association (HCPA) staff and our member company representatives are still conducting a thorough review of the CARB staff initial draft regulatory strategies that were presented and discussed during the public workshop held on November 7.

HCPA appreciates the opportunity to provide our member companies' preliminary feedback on the following issues contained in the CARB staff's initial draft regulatory strategies:

- We respectfully request that CARB staff withdraw the proposal to “sunset” the 2% fragrance exemption in 2027.
- We commit to working with CARB staff to further develop and refine the proposed definitions of “Manual Aerosol Air Freshener” and “Automatic Aerosol Air Freshener”
- We have serious concerns that it may not be possible for manufacturers to: (1) conduct the necessary research and development to reformulate crawling bug insecticide products; and (2) produce the updated efficacy and related data required by the U.S. Environmental Protection Agency and the California Department of Pesticide Regulation to support the new formulas in time comply with the initial draft proposed limit of 10% VOC by the target effective date.
 - HCPA requests a meeting with CARB staff in January 2020 to provide relevant and detailed information about commercially and technologically feasible reformulation options for crawling bug insecticide product category
- We respectfully urge CARB to withdraw the initial draft proposal to establish a lower VOC limit for the charcoal lighter material product category.
- We respectfully request that CARB staff conduct a technology assessment in 2027 to determine whether the second round of VOC limits comply with the statutory requirement that the regulation must be “commercially and technologically feasible,” and change the initial draft proposed effective date to 2028 (or later).
- We will work with CARB staff to revise the current definition for the “Institutional Product” or “Industrial and Institutional (I&I) Product” category to more clearly define which products are subject to the Consumer Products Regulation.

Please contact us if you have questions regarding any of the issues presented in HCPA member companies' preliminary feedback.

Respectfully,

Joseph T. Yost

Vice President, Strategic Alliances & Industry Relations
jyost@thehcpa.org | 202-833-7325

Steven D. Bennett, Ph.D.

Senior Vice President, Scientific Affairs
sbennett@thehcpa.org | 202-833-7330

Nicholas B. Georges

Senior Director, Scientific & International Affairs
ngeorges@thehcpa.org / 202-833-7304

Household & Commercial Products Association



1667 K Street NW, Suite 300 | Washington, DC 20006
202-872-8110 / www.theHCPA.org

CONFIDENTIALITY NOTICE: This e-mail message (including any attachments) contains information from the Household & Commercial Products Association (HCPA) and is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-21, and is intended only for the named recipient (or recipients) and HCPA member companies. This e-mail, including any attachments or hyperlinks within it, may contain information that is confidential or otherwise protected from disclosure. If you are not the intended recipient of this email, you are not entitled to use, disclose, distribute, copy, print, disseminate or rely on this email in any way. Even if you are the intended recipient or a HCPA member company, you may not distribute, disclose or otherwise disseminate this email or its attachments outside the membership of HCPA, without HCPA's prior written consent.

 Please consider the environment before printing this