



Independent Cosmetic
Manufacturers And Distributors

December 3, 2019

California Air Resources Board
1001 I Street
Sacramento, CA 95814

To Whom It May Concern:

Founded in 1974, the Independent Cosmetic Manufacturers and Distributors (ICMAD) is a non-profit trade association representing the interests of small to medium size cosmetic companies. These Companies represent the innovation forefront for the industry and as such, changes in regulation can have significant business impact.

We frequently join in the stakeholder process for proposed changes to the Consumer Products Regulations as they can have large implications for small cosmetic companies. With regard to the current proposed regulations for No Rinse Dry Shampoo/Conditioner, we agree that considering this category an opportunity for VOC reduction is reasonable; however, we believe that starting the category at 50% VOC will be detrimental to this product category, especially as the average current VOC level is closer to 93%. Having knowledge of the science of these products, this drastic reduction would completely change the category and change the basic nature of this particular set of products.

More specifically, the use of propellant 152A would be necessary to meet these levels and this would ultimately change how the products perform and are used. 152A is in many cases not a direct substitution for other propellants as each has different vapor pressures and other key characteristics that make the Dry Shampoo/Conditioner work. That being said, lowering the VOC level so drastically would have a huge effect on customer satisfaction with the product and result in a significant business impact especially felt by small Companies. The reduction in sales could significantly reduce or eliminate the category.

It is also worth noting that should dry shampoos wind up reduced or eliminated from the market, a ripple effect would touch on quality of life improvements in the care for certain vulnerable populations. These products are highly sought after by organizations like homeless and battered women's shelters. They are a valuable hygiene resource for individuals who may not have routine access to showers and can be some of the fastest depleted products from shelters' donation supplies. Dry shampoos are also used by patients, and caregivers, who are sick or injured and cannot traditionally wash their hair easily.

We recommend that the Board consider starting with a reduction level of 80% VOC as it first did with Hair Sprays many years ago. We believe this reduction would be feasible using current technology that could be perfected in the next few years, as the industry continues to work on additional reductions. While there would still be many challenges for this category as it would result in reformulations and re-designs, we believe that this 80% level is something that may be achieved within the allotted time without sacrificing performance.

Independent Cosmetic Manufacturers & Distributors, Inc.

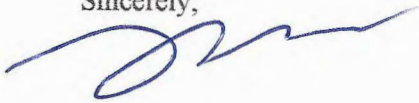
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ICMAD

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We appreciate CARB opening up this forum to stakeholders and look forward to continuing the dialogue moving forward. Should you wish to discuss this any further moving forward, please do not hesitate to let us know.

Sincerely,



Kenneth D. Marenus Ph.D.
President

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