

CHURCH & DWIGHT CO., INC.

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September 3, 2020

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

Subject: Proposed Amendments to CARB Consumer Products Rule

Dear Mr. Calavita,

Church and Dwight (C & D), a leading Consumer Packaged Goods Company, appreciates the opportunity to work with CARB staff on these important amendments.

C & D has the following comments to submit for the CARB amendments.

Dry Shampoo category

C & D commends the staff on their willingness to meet with the Industry. CARB's proposed limits for the Dry Shampoo category are 55% VOC effective 1/1/2023 and 50% VOC effective 1/1/2029. Currently this product category does not have a VOC standard. C & D will support both limits for their product and will market this product nationally once reformulated to meet the new standard. In addition, C & D appreciates the staff raising the future effective limit from 45% VOC to 50% VOC. This change will assist in the reformulation efforts in the future.

Next, C & D supports and appreciates the changes to the Product Category name and to the definition. The definition changes clarify the purpose and use of this product.

Reactivity

C & D supports the Concept of Reactivity as sound science for controlling VOC emissions. C & D urges CARB staff to continue to explore this science and find a path forward to utilize this method of regulation. As VOC standards are decreased it is important to provide flexibility to assure that real emission reductions are occurring. Reducing the MIR value of a product is the only way to ensure the reduction of smog.



Conclusion

C & D supports the staffs VOC limits and definition changes for the Dry Shampoo category for their products which are supplied throughout the United States. In addition, C&D requests CARB to use Reactivity for future VOC reduction goals.

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 djraymond@me.com.

Sincerely,



Jeffrey Shaul
Director, Global Regulatory Affairs
Church & Dwight Co., Inc.

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