



WOMEN'S VOICES FOR THE EARTH

OUR HEALTH. OUR FUTURE. TOXIC FREE.

November 3, 2020

Joe Calavita
Manager

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

By email: csmrprod@arb.ca.gov

Re: Comments on Consumer Products Regulation amendments – Workshop, November 10, 2020

Mr. Calavita,

I am writing on behalf of Women's Voices for the Earth, a national environmental health advocacy organization whose mission is to eliminate the toxic chemicals that harm our health and communities. We represent thousands of people in the state of California, interested in protecting environmental and human health from toxic chemicals exposure.

Again, we are writing to **strongly support the proposal to sunset the 2% fragrance exemption in the CARB regulations.** We continue to be concerned about the impact fragrances in products have on public health, and on their contributions to VOC emissions. We also believe fragrance components should not be given special treatment in regulation compared to any other types of ingredients in products. Fragrances are not necessary to the function of a product – but are merely an aesthetic choice that impacts marketing and sales. CARB has already established a need for reductions in VOCs - and this should be applicable across the board for all types of ingredients in products.

Sunsetting the 2% fragrance exemption will mean that companies will need to do their due diligence to better understand and quantify the VOC emissions associated with their fragrances. This will benefit all of us in improving our overall understanding of VOC emissions from fragrance and could lead to the development of fragrances with lower emissions. This is also no different from the diligence and research already required to quantify VOC emissions associated with other ingredients in numerous product sectors. Again, there is no logical or ethical reason to give fragrance the special treatment of an exemption.

The fragrance exemption could also reduce overall exposure to fragrance by consumers which can have significant public health benefits. Recent research has especially highlighted the role of fragrance from products in the causation and exacerbation of skin allergies. A recent study on fragrance allergens in detergents concluded

“The study shows that detergents could play a relevant role for the exposure of consumers toward fragrance allergens and that they should not be underestimated as an exposure source during the exposure assessment.”¹

Similarly, a 2020 study found that contact dermatitis from personal care products in the U.S. has doubled in the last two decades, and fragrance was the allergen responsible for largest percentage of skin reactions. The study also found that women were twice as likely as men to experience contact dermatitis caused by hair care products specifically.²

These public health impacts from fragrance exposure are occurring now and need to be abated. For this reason, **we do not support the proposal to extend the deadline for sunseting the exemption.**

In summary, we believe that the time is right for CARB to sunset the 2% exemption for fragrance. CARB is the primary state agency responsible for actions to protect public health from the harmful effects of air pollution. The 2% fragrance exemption, unfortunately, both promotes and encourages the unnecessary use of excess fragrance in consumer products, which both harms public health and results in greater air pollution. This is antithetical to the mission of CARB. **We support the decision to sunset the 2% fragrance exemption as soon as is feasible.**

Sincerely,



Alexandra Scranton
Director of Science and Research
Women’s Voices for the Earth

¹ Wieck S, Olsson O, Kümmerer K, Klaschka U. Fragrance allergens in household detergents. Regul Toxicol Pharmacol. 2018 Aug;97:163-169. doi: 10.1016/j.yrtph.2018.06.015. Epub 2018 Jun 22. PMID: 29940212.

² Warshaw EM, Schlarbaum JP, Silverberg JI, DeKoven JG, Fransway AF, Taylor JS, Maibach HI, Fowler JF Jr, Atwater AR, Reeder MJ, Zug KA, Belsito DV, Sasseville D, DeLeo VA, Pratt MD. Contact Dermatitis to Personal Care Products is Increasing (but Different!) in Males and Females: North American Contact Dermatitis Group (NACDG) Data, 1996-2016. J Am Acad Dermatol. 2020 Oct 8:S0190-9622(20)32754-7. doi: 10.1016/j.jaad.2020.10.003.