California Environmental Protection Agency
Air Resources Board

2025 Personal Fragrance Products Technical Assessment Reporting Tool Instructions

Per California State Law, Completion and Submittal of Special Reporting is Mandatory.

Completed Reporting
Due: March 31, 2026

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Background

In 2021, the California Air Resources Board (CARB) amended the Consumer Products Regulation to lower the volatile organic compound (VOC) standard for non-aerosol Personal Fragrance Products (PFPs) that contain 7% or less fragrance, with an initial VOC standard of 70% instead of the previous 75%. By January 1, 2031, non-aerosol PFPs that contain 10% or less fragrance must meet a 50% VOC standard. CARB will also require aerosol PFPs made on or after January 1, 2031, to meet the 50% VOC standard. CARB is conducting the 2025 PFP Technical Assessment to evaluate whether manufacturers can continue to meet the 50% VOC standard using current or new technology.

Who must report?

Any company listed on the label of a personal fragrance product with **10% or less fragrance** sold or supplied for use in California in 2025 must report.
- The following Personal Fragrance Products subcategories may be included:
    - Deodorant Body Spray
    - Fragrance Mist
    - Eau de toilette / Eau de parfum
    - After Shave
- **Foreign companies:** must also complete the Special Reporting for Personal Fragrance Products.
- **If two companies are listed:** the Responsible Party is the one labeled "manufactured for" or "distributed by."

**Deadline:
Submit to CARB by
March 31, 2026**

Personal Fragrance Products Reporting Tool

For ease of reporting, the Personal Fragrance Products Reporting Tool (PFP-RT), was designed to input data interactively via manual entry, via built-in forms or via import. The determining factor for using the interactive pages, forms or import features will vary by company, but will mainly be dictated by size.

Note: When using the data upload feature, data must be saved in a comma delimited file, or *.csv format (CSV). The PFP-RT will not accept data in any other format (e.g., excel).

Note: A desktop version of Microsoft Excel is required to run the reporting tool; a web-based version of the software is not compatible.

Note: Users must import all their data into the PFP-RT for data checks. It is NOT acceptable to directly submit unprocessed CSV files to CARB.

Getting Started

1) Download the **PFP-RT** from the [2025 PFP Tech Assessment webpage](#).

2) Prior to opening the PFP-RT, set security settings to Trust the Tool, and Enable Macros:
   a) **Trust Tool**: Go to File Explorer ->right click PFP-RT ->Properties ->Security Tab -> Check Unblock.
   b) **Enable Macros:** In Excel -> Options -> Trust Center Settings -> Macro Settings -> Enable VBA Macros

3) Navigate the PFP-RT using the **'Menu'** button located on any of the pages. The 'Menu" button gives the option to enter data, import data, delete data, check data, certify data, and export data to comma delimited files (CSVs) to submit to CARB.
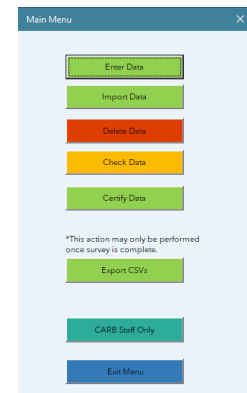
Entering Data

Go through each page and provide information about your company and products as requested. Since not all fields must be filled out by the Responsible Party, the PFP-RT uses different colors to identify those responsible for each field. Take note of the following legend:
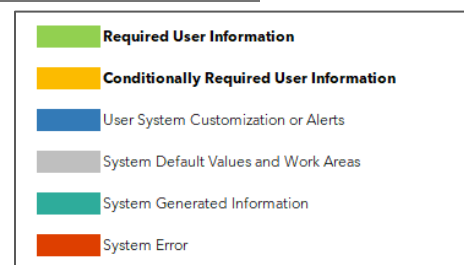
> *Note:* This legend is available on the bottom left of the Start page.

1) **Responsible Party:** enter reporting contact information for CARB to use to contact your company in the event of PFP special reporting related questions. The reporting contact information may or may not be the same management level representative that will certify the information prior to submitting it to CARB.
   a) Foreign-based Companies: Enter the street address for the company listed above. Enter the country name in the "State" data field. Enter either the postal code or the number "1" in the "Zip" data field.
   b) Report total worldwide gross annual receipts.
   c) "Contract Employees" include temporary, consultant, contractor, and/or contract service employees. As the number of these employees can be fluid, choose a representative number of employees that best describes the overall number of contract employees throughout the year.
   d) Select/Enter the Primary 2022 NAICS code(s) from the dropdown menu related to consumer and commercial products that apply to the responsible party for the products covered by this special reporting. If applicable, select the Secondary and Tertiary NAICS codes from the dropdowns. For more information about NAICS codes, see Appendix B.
2) **Product List:** List all requested product information for each product sold in California in 2025.

a) Each Product Name must be unique. Please enter any additional qualifying information from the label as necessary. This can be information such as fragrance, size, product form, etc.

b) List "Self" under "Who Provides Formula" if the Responsible Party is the Product Formulator.

c) If a Formula Name is used for multiple products, only one label is needed. Use the same label name for all those products.

d) For Product forms:
   i) Report **non-foaming gels** as **"semisolid."**
   ii) Most **impregnated wipes/towels/cloths/sheets/pads and ink** dispensing products should be reported as "**liquid**" here. Report **mist or dispersed sprays** under the "**mist/dispersed spray**" option.
   iii) Report <u>post-foaming</u> gels under "post-foaming gel" option.
   iv) To specify "other," click Other (specify), then click next to the highlighted section of the data field. This activates and allows users to manually enter a description in the data field

e) Entry of "NA" is required for products that are not FIFRA registered products. The PFP-RT does not allow a blank entry for this data field.

f) For products that include more than one fragrance, enter the additional "Fragrance Name," "Fragrance Formulator," and "Fragrance Tracking Code" information as a comment in the comment section.

g) Responsible Parties that generate fragrances "in-house" must complete the three fragrance information fields.

3) **Product Ingredients:** If the Responsible Party holds all formulation information, then the Responsible Party will complete this formulation information section.

The ProductIngredients page stores all formulations entered into the EnterFormula page. It is not recommended for users to start by entering information manually into the ProductIngredients page as errors will not be caught. First enter data into the EnterFormula page to familiarize yourself with the ProductIngredients fields before importing any data. Click the "Product Ingredients" button on the "Enter Data" Menu to begin or go to the EnterFormula page:

a) **Select a Formula** from the dropdown menu.
   i) Formula Names come from the ProductList page.
   ii) If the needed Formula Name is missing, it hasn't entered into the ProductList page yet.

b) **Fill out ingredient columns**.
   i) Enter data manually in EnterFormula or use the "Select Chem" button to choose chemicals from the CARB_Chem page.

c) **Ensure total weight percentage equals 100%**.

i) The Total Wt. Percent (shown at the top) must sum all values in the Wt % column.

d) **Click "Save Record"**.

e) **Check for errors** in the **ErrorList** column.

    i) If errors exist, correct them and save again.

    ii) If no errors, the record is saved and transferred to the ProductIngredients page.

Note: Any fragrance ingredients must have their VOC content reported in the Fragrance VOC Content field.

4) **Product and Fragrance Formulators:** Each Product that has a formulator other than the Responsible Party needs contact information for that formulator on the ProductFormulator page. Likewise, each product with a fragrance formulator needs the FragranceFormulator information on the FragranceFormulator page.

Note: Responsible Parties cannot list themselves in either of the Formulator pages. If products are made "in-house," report "self" under the "Who Provides Formula" field in the ProductList page and leave the Formulator pages blank.

Importing Data

The following pages in the PFP-RT allow for optionally importing data directly through a CSV:

1. ProductList
2. ProductIngredients (Formulations)
3. ProductFormulator
4. FragranceFormulator

Although data can be imported through a CSV, it is recommended at least for the first few data entries that the user does this manually or using the built-in forms to familiarize themselves with the data requirements for each page.

1) **File type:** Only **CSV files** can be imported.
2) **Access import:** Click **Menu → Import Data** on any page.
3) **Import options:**
   a) Choose a specific sheet **or** click **Import All** to upload CSVs for multiple pages.
   b) You can skip pages you don't want to import.
4) **Multiple imports:**
   a) You can import the same page multiple times.
   b) Importing **does not delete** existing data.
5) **Headers:**
   a) CSV headers must match the page.
   b) Header row is removed during import.
   c) Templates are available on the PFP-RT webpage.
6) **Responsibility:** Users must delete any incorrect data they import.

Finalizing & Submitting Data

The following section describes how users can use the tool functions to validate data to ensure minimal errors, digitally sign off on all data reported by certifying data, and export and submit finalized data to CARB.

1) **Certifying Data:** before exporting and submitting CSV files to CARB, users must certify data, which serves as an electronic signature confirming accuracy to the best of the Responsible Party's knowledge.
   a) For the date of certification, enter in a number for the day, month, and year.
2) **Validating Data:** Before exporting, check your data for errors by running the "Validation Report" on the Validate_Data page. Fix any errors shown, clear the report, and run it again until no errors appear.
   a) This report will output a description of the error as well as the page name and row number where the error has occurred.
   b) Fixing errors can sometimes create new errors.
   c) When all errors are resolved, the Validate_Data page will display "**No Errors**." Data cannot be exported until the Validate_Data report shows "No Errors."
   d) If an error says "**WARNING**," data can still be submitted without fixing it.
   e) Large datasets may take extra time to complete the validation report.
   f) The Validate_Data page includes an optional Chemical Correction Assistance feature that checks CAS numbers and chemical names for possible errors and suggests corrections, which can help CARB process data faster but is not required. This option can be turned on or off by selecting the "Turn Off Chemical Correction Assistance (Not Recommended)" checkbox.
3) **Exporting Data:** To export data, click "Menu" → "Export CSVs," validate the survey with no errors, choose a save location, confirm, and wait for the export to finish before submitting the files and required documents to CARB.
   a) If the Responsible Party listed Formulators to provide some formulation details, popups will notify that CARB will contact those Formulators for the remaining information.
   b) If the Responsible Party has a large dataset, a warning will appear that validation may take extra time.
   c) Do **not** edit the CSV files before submitting to CARB, including the file names.
4) **Submitting Data:** Once all CSV files have been exported, email CARB staff at the [Consumer Products help box](#) with the subject line: "**Kiteworks Link for 2025 PFP Tech Assessment"** to request an upload portal.

Required submittal documents:
1) Exported CSV files for the following pages:
   a. ResponsibleParty
   b. ProductList
   c. ProductIngredients

d. ProductFormulator
e. FragranceFormulator
f. Certification

2) All product label image files as described in the Entering Data page.

   Note: Before uploading, compress image files into a .zip folder by right-clicking the file, selecting "Send to," and choosing "Compressed (zipped) folder."

3) A written update describing any research and development work done to meet the 50% VOC standard by weight. A sample Table of Contents for the report will be posted on the [2025 PFP Tech Assessment webpage](#).

General Information

Reporting Tool for Formulators

- If formulation data is needed, CARB will send a separate tool (**PFP-RTF**) to Product Formulators after the Responsible Party submits its data.
- The PFP-RTF will include product names and formula names provided by the Responsible Party. CARB staff will use information on the Product Formulator page to contact formulators for completion of the PFP-RTF.
- Instructions for the PFP-RTF can be found on the [2025 PFP Tech Assessment webpage](#).

Fragrance Definition

When reporting fragrance ingredients, please keep in mind the definition for "Fragrance" as defined in sections 94501(f) and 94508(a)(55) of the Consumer Products Regulation:

"Fragrance" means a substance or complex mixture of aroma chemicals, natural essential oils, and other functional components with a combined vapor pressure not in excess of 2 mm of Hg at 20 degree C, the **sole purpose** of which is to **impart** an **odor or scent**, or to **counteract a malodor**.

Designation of Confidential Information

In accordance with Title 17, California Code of Regulations (CCR), sections 91000 to 91022, and the California Public Records Act (Government Code Section 6250 et seq.), State law protects the confidentiality of trade secrets. The full citations of these sections are provided at: https://govt.westlaw.com/calsitelist and https://leginfo.legislature.ca.gov/faces/codes.xhtml.

All information contained in submitted reporting data will be treated as "confidential information." A note is located at the bottom of the Start page indicating confidentiality for all information provided to CARB.

Contact Us

If you have any questions about the 2025 PFP Technical Assessment, email the [Consumer Products help box](#) and start your subject line with
"**PFP Tech Assessment: …**"