



Advisory

To: Manufacturers, Distributors and
Retailers of all Consumer Products

Number 422

January 2011

Consumer Products Regulations: Hairspray/Hair Styling Products

Effective December 31, 2006, aerosol and pump products that were both a hair styling product and finishing product were considered to be a hairspray if they met certain criteria under the Consumer Products Regulations. Since that time, staff of the Consumer Products Enforcement Section has found many products on the market that identify themselves as hairsprays without satisfying the criteria found in the definition for the category [Section 94508(a)]. The products typically make numerous representations and directions for use as a styling product, however, the claims or directions for use to finish the hair style are absent or vague at best. Changing the label of a hair styling product by adding "finish" or "finishing spray" to the statement of identity does not qualify the product as a hairspray and compromises the intent of the regulation which could result in less emission reductions than anticipated for the category.

The purpose of this advisory is to clarify the definitions for hair spray products versus hair styling products. Products manufactured on or after December 31, 2006 that are both a styling and finishing product fall under the hairspray category **only** if they make claims to hold, retain, and finish the hair style for a period of time. We consider claims that a product may be used to (including but are not limited to) sculpt, mold, curl, scrunch, add volume, define, shape, etc. to be hairstyling products that must comply with the 6% VOC limit. Additionally, products that claim to enhance, rejuvenate or fix the hair style will not be considered to satisfy the criteria for hairspray unless it is clear the products are to be used after the hair is styled to **maintain** and **hold** the hair style.

The failure to include any directions for use of the product to finish, maintain, and hold **previously styled** hair means that the product is not a hairspray under the current definition, but is a hair styling product. We will be taking a closer look at the applications and directions for use on hair care products in the near future and caution you to review the representations made on your labels for these products. Please note that hair gels, effective December 31, 2006, now fall under the sub-category of all other forms hair styling product.

The California Code of Regulations (CCR), Title 17, Section 94509(a) lists standards for VOC (by weight percent) for hair spray and hair styling products. The chart below lists those standards:

**Table of Standards
Percent Volatile Organic Compound by Weight**

Product Category	Effective Date	VOC Standard (percent VOC by weight)
Hair Spray	6/1/99	55
Hair Styling Product: aerosol and pump spray all other forms	12/31/2006	6
	12/31/2006	2

If you have any questions or comments regarding this advisory, please contact Steven Giorgi, Manager of the Consumer Products Enforcement Section, at (916) 322-6965 or by e-mail: sgiorgi@arb.ca.gov. Address written inquiries to: **Steven Giorgi, Manager, Consumer Products Enforcement Section, California Air Resources Board, P.O. Box 2815, Sacramento, CA 95812**

You may access the California consumer products regulations via the Internet at: <http://www.arb.ca.gov/consprod/regs/regs.htm>.