



**The Procter & Gamble Company**  
NA Regulatory & Technical Relations  
One Procter & Gamble Plaza (C-6)  
Cincinnati, OH 45202  
[www.pg.com](http://www.pg.com)

September 24, 2013

Via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95912

**RE: 2013 Proposed Amendments to the Consumer Products Regulations (California Code of Regulations, Title 17, Section 94508).**

Dear Chair Nichols:

The Procter & Gamble Company (P&G)<sup>1</sup> appreciates the opportunity to comment on the 2013 Proposed Amendments to the Consumer Products Regulations scheduled for consideration by the California Air Resources Board on September 26, 2013. We support specific comments submitted by the Consumer Specialty Products Association and the Personal Care Products Associations on the 2013 Proposed Amendments.

The consumer products industry has been actively engaged with the California Air Resources Board since the promulgation of the Consumer Products Regulation in the late 1980s. Product formulators expend countless hours and considerable amount of research and development resources to reformulate products that meet consumers' needs and comply with the ARB's stringent regulatory standards. We have worked collectively to achieve the specific VOC limits by category to address air quality standards and have invested hundreds of millions of dollars in research and development to achieve these results.

P&G appreciates the multiple opportunities for stakeholder input that were available as the proposed regulation was developed. The Planning and Technical Support Division staff conducted several public workshops; met individually with P&G Regulatory and Product Development Scientists for a technology discussion of heat/thermal protectant hair care products; and considered the technical input of stakeholders in revising the Proposed Amendments. This engagement of the regulated community and interested stakeholders enabled the development of a final draft that achieves the required emissions reductions, but does not compromise the statutory requirements for a technically and commercially feasible regulation.

P&G commends the Planning and Technical Support Division staff for recognizing the unique chemistry needed for heat/thermal protectant products to function as intended and deliver the desired consumer benefits of hair preparation and protection. It is not appropriate or technologically feasible to regulate heat/thermal

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<sup>1</sup> The Procter & Gamble Company is the world's leading consumer products company with on-the-ground operations in more than 80 countries and sales in more than 180 countries worldwide. Our strong portfolio of recognized, quality, and leadership brands includes numerous household, industrial, and personal care products. Procter & Gamble is fully committed to helping solve sustainability challenges, which is embedded in our Company Purpose "to improve the lives of the world's consumers, now and for generations to come." Please visit <http://www.pg.com> for the latest news and in-depth information about P&G and our brands.

protectant products as a Hair Styling Product with the category's respective VOC limit. We are pleased to see in the final draft that heat/thermal protectant products are specifically excluded from the Hair Styling Product category. We sincerely thank staff for their consideration of the technology information we shared during our visit to Sacramento in January 2013 to support this very outcome for heat/thermal protectant products.

We believe that the 2013 Proposed Amendments are a reasonable approach to meeting the required emissions reductions and we commit to expend the necessary time and effort to meet these new regulatory standards.

Should you have any questions about these comments, please contact me directly at (513) 983-2531 or [froelicher.jm@pg.com](mailto:froelicher.jm@pg.com), or contact Beth Percynski in P&G's Sacramento office at (916) 442-3135 or [percynski.ba@pg.com](mailto:percynski.ba@pg.com).

Sincerely,

Julie Froelicher  
NA Regulatory & Technical Relations Manager  
The Procter & Gamble Company  
One Procter & Gamble Plaza Cincinnati, OH 45202  
(513) 983-2531  
[froelicher.jm@pg.com](mailto:froelicher.jm@pg.com)