Concepts for Changes to the Consumer Products Regulation

1. **Most Restrictive Limit**
   Modify Section 94512 (a), changing "...anywhere on the principal display panel..." to "...anywhere on the product label or attached information...". In Section 94508 (a) remove "Principle Display Panel" definition and replace with a definition for "Label", which would include "any documentation appearing anywhere on the product, attached to the product, or pertaining to the product and displayed where the product is sold".

2. **Code-Dating**
   For Section 94512 (b), suggest that the date of manufacture appear on products, rather than a code indicating such date.

3. **Diluted Products**
   Modify Section 94509 (b) (1) to allow windshield washer fluids to have multiple dilution instructions for other states and for different areas within California.

4. **Notification that sell through period expires**
   Modify Section 94509 (c) to require distributors to notify buyers in writing 90 days prior to sell through periods expiring, so that non-complying products are not sold.

5. **Modify/clarify definitions of "Anti-Perspirant/Deodorant" and/or "Personal Fragrance Products"**
   For Section 94508 (a), and Sections 94501 (b) and (d), ensure there is no overlap between categories and clarify that products making deodorizing claims are included as deodorants.

6. **Add a definition for "Foam" in Section 94508 (a).**

7. **Clarify/Modify "Aerosol Product" definition, Section 94508 (a) (5)**
   Modify to include a reference to driving propellants (bag-in-can situation), and possibly define "Driving Propellant".

8. **"Gel" to "Semisolid"**
   Change all occurrences of "gel" to "semisolid" in the regulation.

9. **Modify definition of LVP-VOC**
   Remove item (B) from Section 94508 (a) (80), ("12 carbon atoms") from definition of LVP-VOC.

10. **Clarify reporting requirements**
    Clarify that the responsibility to report includes, but is not limited to formulators, manufacturers, parent companies, private labelers, distributors, re-packagers and any other entity otherwise associated with providing consumer products.

    Clarify that reporting requirements are mandatory and that state law requires that information provided must be accurate, complete, and submitted in a timely manner, and clarify that there are consequences to mis-reporting including fines and other enforcement action.

11. Changes to Method 310

Section 94515 (a) (1) needs to be revised to reflect the most recently amended date for Method 310, and there are several test method dates in Section 94515 that need to be revised. We are also considering other changes to Method 310.

12. Other "Minor" changes to regulation

- In Table of Standards, Section 94509 (a), move "Wasp and Hornet Insecticide" to appear under other "Insecticides" for clarity and simplification.
- Rectify inconsistency between Sections 94509 (c) and (i) relating to sell through of aerosol adhesive products.