In March 2021, CARB recognized that its consumer product regulations have directly resulted in the increased use of HFC-152a as a regulatorily-exempt aerosol propellant alternative for hydrocarbon propellants. The regulation the Board was adopting at that time increased use of HFC-152a in hairsprays and other aerosol household products in order to reduce near-term VOC.

While HFC-152a was a good step for reducing local pollution burdens, HRC-152a is a moderate-GWP intensity GHG. CARB recognized at the time[[1]](#footnote-1) that the negative warming effects of increased use of HFC-152a should and would be addressed in the Scoping Plan Update to potentially include measures to reduce consumer product GHG emissions to mitigate this CARB-regulation-driven increase in the use of HRC-152a.

The draft Scoping Plan appears to not honor this commitment, as there is no identification in the Plan of any “technologically and commercially feasible actions to reduce GHG emissions from consumer products, while maintaining or improving upon regional air quality progress”. Indeed, this particular source of GHGs appears to not be included as a GHG source in the draft Scoping Plan at all.

Industry is unlikely to introduce HFC-152a alternatives for aerosol products if CARB doesn’t require them to do so. Since the large manufacturers that dominate this industry formulate, advertise, distribute and sell identical/interchangeable products in national markets, California requirements generally result in national adoption. The result in this case is that aerosol products containing HFC-152a propellants have been sold nationally over the past 30 years.

When considering the potential reductions in GHGs in addressing HRC-152a propellants in consumer products, any mitigation would appear to be a relatively small contribution to the overall Scoping Plan. However, consumer products are unique in that it is impracticable for large consumer product manufacturers to make products just for the California market.[[2]](#footnote-2) Therefore, consumer products manufactured to meet CARB requirements will be sold nationally (as they are today). National GHG reductions achieved by such a measure may not be fall into the accounting performed for the Scoping Plan, but they are real and just as impactful as GHG reductions that occur within California. They will only occur nationally if California acts. As manufacturers such as Proctor & Gamble reformulate hairsprays, dry shampoos, aerosol body sprays, and a multitude of other aerosol household and personal care products to meet California requirements, these reformulated products will be sold nationally.

Such a reduction is meaningful, easily achieved, and falls squarely on CARB to carry out because of its responsibility in regulating this problem into existence in the first place. Please revisit your earlier commitment and find a way to phase out the use of HRC-152a propellant in consumer products as rapidly as possible. And please formally include a commitment to do so in the draft Scoping Plan prior to its adoption. Please grab what appears to be the GHG equivalent of “low hanging fruit”.

1. <https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2021/res21-7.pdf> (pages 3, 9) [↑](#footnote-ref-1)
2. CARB; Staff Report: Initial Statement of Reasons: Public Hearing to Consider the Proposed Amendments to the

   Consumer Products Regulation; Page 239. [↑](#footnote-ref-2)