



Innovative Products For **Home. Work. Life.**

December 7, 2020

via electronic transmission

Clerk of the Board
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Proposed Amendments to the Existing California Hydrofluorocarbon Regulation

Dear Clerk of the Board,

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to offer comments to the California Air Resources Board (CARB) on the proposed amendments² to the Prohibitions on Use of Certain Hydrofluorocarbons (HFCs) in Stationary Refrigeration, Stationary Air-Conditioning, and Other End-Uses. HCPA supports CARB's goal of reducing HFC emissions and appreciates the updates in the regulation for aerosol products.

HCPA represents a wide range of products, from household cleaners and air fresheners to commercial disinfectant and pest control whose use of aerosol technology makes the aerosol industry an integral part of the household and commercial products industry. HCPA has represented the U.S. aerosol products industry since 1950 through its Aerosol Products Division, representing the interest of companies that manufacture, formulate, supply and market a wide variety of products packaged in an aerosol form.

Historically, the use of high global warming potential (GWP) HFCs by the aerosol industry was limited to a small number of product categories where their usage was necessary, many of which remain exempted as they are still necessary today. The U.S. aerosol industry has always strived to improve the lives of consumers and workers through innovations that permit a better environment impact of aerosol products while continuing to provide the highest possible efficacy and safety when used in accordance with label instructions. This includes using aerosol propellants that have a better environmental profile than the high-GWP within the scope of this

¹The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

² The proposed amendments can be found at https://ww3.arb.ca.gov/regact/2020/hfc2020/appa.pdf?_ga=2.165606903.91348517.1606265616-436578632.1573751814

regulation when possible, and formulating new products and reformulating existing products to use propellants such as nitrogen, compressed gas and hydrofluoroolefins.

It is critical to harmonize definitions across regulations to the maximum extent possible. With this in mind, HCPA thanks CARB staff for updating the definition of an aerosol propellant to match that found within CARB's Consumer Products Regulation.³ By developing consistent regulations, states can achieve a reduction in HFC emissions without imposing impediments to interstate commerce.

If you have any questions about our support for the proposed amendments, please do not hesitate to contact me directly at (202) 833-7304 or ngeorges@thehcpa.org.

Sincerely,



Nicholas B. Georges
Vice President, Scientific & International Affairs
Household & Commercial Products Association

³ 17 CCR §§ 94507-17