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Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, California 95814
<https://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Comments on the Proposed Amendments to the Antiperspirants and Deodorants Regulation; Consumer Products Regulation; Aerosol Coating Products Regulation; Alternative Control Plan Regulation; the Tables of Maximum Incremental Reactivity Values; and Test Method 310 August 19, 2021

Church and Dwight Co., Inc. (C & D), a leading Consumer Packaged Goods Company, appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) 15-Day notice of proposed changes to the Amendments adopted in March 2021 to the Consumer Products regulations.

C & D has worked with the CARB staff on this rulemaking since the beginning in 2020. C & D participated in all workshops and provide staff with valuable information on this rule. C & D commends the staff on their willingness to engage with the industry and make themselves available for meeting in person or virtually during these trying times.

C & D is only commenting on one portion of the 15-Day changes.

Section 94511 Innovative Products

C & D supports the changes to this section. C & D supports the inclusion of the Liquefied Propellant Product. The addition of the Innovative Products section using Liquefied Propellant Product is a unique and forward-thinking approach to allow manufacturers to comply with CARB's new stringent VOC limits for aerosol products Hair Finishing Spray, Dry Shampoo and Personal Fragrance Product. Allowing the use of Liquefied Propellant provides greater flexibility to the manufacturers while complying with the new stringent VOC limits. This approach will allow manufacturers to limit their dependency on ingredients that contribute to Greenhouse Gases (GHG) and allows for the use of ozone forming potential (OFP) to be employed to maintain reductions in ozone formation. Using (OFP) to regulate the reduction of ozone formation is the best science.

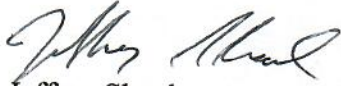
This new Innovative approach to regulation will provide much needed flexibility to formulate products that are efficient and effective products for the public to use, while maintaining much needed emission reduction for the state. This is truly a win for the manufacturers, a win for the public and a win for the state.

The staff should be commended for their work on this rule. Again C & D supports the changes for the Innovative product exemption.



Thank you for your consideration for these comments. Any questions or comments feel free to contact our Consultant Doug Raymond at djraymond@reg-resources.com or at 440-339-4539.

Respectfully submitted,



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