



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

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sent *via* electronic mail

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

Subject: Comments on Second Notice of Public Availability of Modified Text to 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

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) Second 15-Day Notice² of Public Availability of Modified Text³ to the proposed amendments to the Antiperspirants and Deodorants Regulation; Consumer Products Regulation; Aerosol Coating Products Regulation; Alternative Control Plan; the Tables of Maximum Incremental Reactivity Values; and Test Method 310.

HCPA is a voluntary, non-profit U.S. trade association representing approximately 240 companies engaged in the manufacture, formulation, distribution and sale of products for household, institutional, commercial and industrial use. HCPA member companies' wide range of products includes home, lawn and garden pesticides, antimicrobial products, air care products, automotive specialty products, detergents and cleaning products, polishes and floor maintenance products, and various types of aerosol products. For over 30 years, HCPA member companies spent hundreds of millions of dollars in researching and developing reformulated products to help improve air quality in California while maintaining our industry's ability to supply effective products that consumers can rely upon to contribute positively to their health, safety, and quality of life.

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar 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 Available at
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/consumerproducts2021/2nd15daynotice.pdf>

³ Available at
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/consumerproducts2021/2nd15dayatta.pdf>

HCPA is in support of the modifications proposed in this Second 15-Day Notice. The proposed changes add clarity for the regulated community on the enforcement of the General Consumer Products Regulation.

HCPA will continue to work proactively with CARB and its staff on any regulatory activity which potentially impacts the household and commercial product industry.

Respectfully submitted,



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