



FRAGRANCE CREATORS  
ASSOCIATION®

June 7, 2022

**VIA ELECTRONIC SUBMITTAL [<https://www.arb.ca.gov/lispub/comm/bclist.php>]**

California Air Resources Board  
Clerks' Office  
1001 I Street  
Sacramento, California 95814

**Re: Comments on Second Notice of Public Availability of Modified Text for Proposed Amendments to the Consumer Products Regulation**

Fragrance Creators Association (Fragrance Creators) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB's) Second Notice of Public Availability of Modified Text for 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 (Second 15-Day Notice).

Fragrance Creators is the principal trade association representing the fragrance industry in the U.S. and Canada. Fragrance Creators has approximately 60 member-companies, many of which are small businesses. The organization's member companies create and manufacture fragrances and scents for home care, personal care, home design, fine fragrance, and industrial and institutional products. Fragrance Creators also represents companies that market finished products containing fragrance as well as those that supply fragrance ingredients, including natural extracts and other raw materials that are used in perfumery and fragrance mixtures.<sup>1</sup>

Fragrance Creators very much appreciates CARB's consideration of Fragrance Creators' prior comments and continuing efforts to address the industry's concerns, and Fragrance Creators values the ongoing dialogue and collaboration with CARB staff to address fragrance-related issues. Fragrance Creators is in general support of the modifications proposed in the Second 15-Day Notice. Fragrance Creators therefore writes only to reiterate its commitment to working with CARB on a technology assessment to reevaluate the feasibility of the Tier 2 VOC Standard for Personal Fragrance Products that would go into effect on January 1, 2031.

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<sup>1</sup> More information about Fragrance Creators can be found at <https://www.fragrancecreators.org>.

Thank you for your time and consideration. Please do not hesitate to contact me if you have any questions or if there is additional information Fragrance Creators can provide to assist with the rulemaking process.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Nguyen". The signature is stylized with a large, looped initial 'A' and a cursive 'N'.

Amanda Nguyen, JD  
Vice President, Government Affairs & Legal