

November 14, 2006

Clerk of the Board
California Air Resources Board
1001 "I" Street
Sacramento, California 95812



Pamela G. Bailey
President & CEO

Re: Board Agenda Item 06-10-8 (November 17, 2006): Proposed Amendments to the California Consumer Products Regulation

To the Chair and Members of the Board:

This comment is submitted on behalf of The Cosmetic, Toiletry, and Fragrance Association ("CTFA")¹ regarding proposed amendments to the California Consumer Products Regulation.

We wish to express our support of the ARB Staff recommendation to modify the standard for nail polish removers from 0% VOC to 1% VOC. The staff states that this is recommended to address "technical reformulation issues", including "...the fact that VOCs are created by chemical reactions that occur in the product container even after the inclusion of high grade ingredients (which contain low levels of VOC contaminants) and reaction inhibitors in the formulation."²

Recognizing that it is not feasible to comply with the current 0% VOC limit, the staff has proposed to change this standard to 1% VOC to avoid future, irresolvable compliance issues. CTFA supports that recommendation.

The continued willingness of the staff to recognize unforeseen formulation issues and make mid-course corrections contributes to the ability of the industry to work cooperatively with the ARB on aggressive efforts to improve air quality.

Respectfully submitted,

Elizabeth H. Anderson

Elizabeth H. Anderson
Executive Vice President-Legal & General Counsel

cc: Robert Fletcher (rfectche@arb.ca.gov)
Robert Barham (rbarham@arb.ca.gov)
Janette Brooks (jbrooks@arb.ca.gov)
David Mallory (dmallory@arb.ca.gov)

¹ CTFA is the national trade association representing the personal care products industry. Founded in 1894, CTFA represents approximately 600 companies involved in manufacturing and distributing cosmetics, toiletries and fragrances to California consumers.

² Initial Statement of Reasons, Executive Summary, p.13