

Securing the Industry's Future Since 1894

June 20, 2007

Mr. Kurt Karperos, P.E., Chief
Air Quality and Transportation Planning Branch
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812



Pamela G. Bailey
President & CEO

Dear Mr. Karperos:

The Cosmetic, Toiletry, and Fragrance Association (CTFA) provides the following comments on the Air Resources Board's (ARB) Proposed State Strategy for California's 2007 State Implementation Plan (SIP). CTFA is the national trade association representing the personal care products industry. Founded in 1894, CTFA has approximately 600 member companies involved in the manufacture and distribution of cosmetics, toiletries and fragrances in California and throughout the United States. Approximately one half of our members manufacture and distribute these products, while the remaining companies supply goods and services to the manufacturers and distributors of finished products.

The SIP projects that consumer products will become the largest source of reactive organic gas (ROG) emissions in the South Coast Air Basin, and the third largest source in the San Joaquin Valley Air Basin, by 2020, due to anticipated population growth. The assumption that population growth is tied in such a direct way to growth of consumer product usage and emissions is questionable at best. The SIP contains no data to support this assertion. Particularly in the area of personal care products, where purchasing decisions (and hence emissions) are affected by trends and other fluctuating factors, there is no predictable correlation between the growth in the population and growth in the sale/use of these products.

In any case, we agree with the ARB's observation that further emission reductions from the consumer products category will not be feasible along the current path. As we have noted in the past, most if not all of the feasible reductions under mass-based limits have already been realized. We commend the agency on its recognition that alternative approaches to emissions reductions, including the funding of projects to reduce emissions from non-consumer product sources, are possibilities in the near future, and look forward to collaborating with the ARB on such alternatives.

Respectfully submitted,

Frances K. Wu
Associate General Counsel