



California Air Resources Board proposes cuts to VOC limits in consumer products

Proposed amendments to consumer products regulations would affect retailers and manufacturers of aerosol air fresheners, hair care products, fragrances, and insecticides

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Suppliers and distributors of many consumer products sold in California are currently subject to one of the strictest volatile organic compound (VOC) content standards in the world under the California Air Resources Board (CARB)'s Consumer Product Regulation. After seven years of gathering consumer and commercial products data, CARB recently proposed new changes to its regulations seeking to reduce VOC emissions by 8-10 tons per day statewide by 2031.

The proposed amendments would cut limits for VOCs in consumer items, including aerosols, hair products, fragrances, and insecticides, in light of rising emissions from these products.

CARB's proposed amendments would also sunset a long-standing Two Percent Fragrance Exemption by 2031, bar the use of certain compounds in seven product categories subject to lower VOC limits, encourage the sale of products with zero-emission compressed gas propellants, and update other provisions to improve program transparency.

CARB's proposed amendments would introduce new or lower VOC limits for the following categories, effective January 1,

2023 for Tier 1, and between 2027 and 2031 for Tier 2, depending on category:

Category	Existing VOC Standard	Proposed Tier 1 Standard ^[1]	Proposed Tier 2 Standard
Manual aerosol air freshener ^[2]	20%/30%	10%	5% ^[3]
Hair care products: - Finishing spray - Dry shampoo - Hair shine - Temp. hair color	55% 81% ^[4] 55% 55%	50% 55% N/A N/A	50% ^[5]
Personal fragrance product	75%	70%	50% ^[6]
Aerosol crawling bug insecticide	15%	N/A	8% ^[7]

CARB's proposed amendments would also phase out, by 2031, an exemption for fragrance products that allowed up to 2 percent of a fragrance's ingredients to be exempt from the product's VOC limits.

Further changes include barring the use of specific problem VOCs (perchloroethylene, trichloroethylene, methylene chloride, and p-chloro- α , α , α trifluorotoluene) for the product categories listed above, making rule amendments to encourage use of compressed gas propellant over greenhouse gases, revising certain test methods, and other more specific and technical rule changes that will impact certain businesses and utilities.

CARB is accepting written public comments through Monday, March 22, 2021. CARB will consider approval of these proposed changes during a public hearing on Thursday, March 25, 2021.

Learn more about this development by contacting any of the authors.

^[1] Effective January 1, 2023.

^[2] Subcategories of "Concentrated Aerosol Air Freshener" and "Total Release Aerosol Air Freshener" are subject to alternate standards.

^[3] Effective January 1, 2027.

^[4] Refers to "Dry Shampoo" sales-weighted VOC content, based upon 2015 Consumer Products Survey data. "Dry Shampoo" is not currently subject to a VOC content standard.

^[5] Effective January 1, 2029.

^[6] Effective January 1, 2031.

^[7] Effective January 1, 2030.

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