

**Melanie:** Thank you. Next up, we have Nicolas Georges. You may begin.

**Nicolas Georges:** Thank you. My name is Nicholas Georges with the Household & Commercial Products Association. On behalf of HCPA and our members, I appreciate the opportunity to offer this oral testimony and follow-up with the written comments on today's proposed permanent regulation. HCPA supports the goals of this proposal. However, we have a couple of recommendations to provide further clarity. HCPA is representing the US aerosol proxy industry since 1950 through its aerosol proxy division representing the interests of companies that manufacture, formulate, supply, and market a wide variety of products packaged in the aerosol [unintelligible 00:09:19] foam.

HCPA requests for clarification on the applicability of the labeling requirements for aerosol products as aerosol products had to transition from the use of high global warming potential hydrofluorocarbons before the [unintelligible 00:09:31] date. HCPA interprets this with the respect to aerosol products to mean that aerosol products which previously contained HFCs but have since been reformulated to utilize other propellants or other aerosol products that have never used HFCs they're not subject to the requirements within the disclosure section of this proposed regulation.

HCPA also recommends rewarding the first labeling requirement method for aerosol products by listing products regulated by the US Consumer Product Safety Commission ahead of products regulated by the US Food and Drug Administration excluding prescription drugs. We request this so that it cannot be misinterpreted that products regulated by the US Consumer Product Safety Commission are excluded from this section. HCPA would also request that specific nomenclature for labeling and disclosure of substitute not be required for aerosol products. We request it because of the vast number of aerosol product categories, which use the blurry form are regulated by several different federal agencies. These federal agencies have different requirements and one specific nomenclature requirement may be restricted for aerosol products to comply.

HCPA appreciates the opportunity to offer these comments on Ecology's new proposed permanent regulation, would like to thank the Ecology staff from the transparent collaborative process under which this proposed regulation was developed. Thank you.