

Policy Issues in Air Freshener Ingredient Disclosure



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October 27, 2009

Bridging Science and Policy



- Need a strong bridge between science and policy
- Policy should be based on science when possible (and based on precaution when we don't know enough science)
- Scientists are starting to look at known ingredients and possible health risks; advocates must better understand what science can tell them
- Advocates must make their questions known to scientists
- Scientists must tell advocates when they're on the wrong track
- Avoid a train wreck on the science-policy bridge

“Air Care Products”

- A multi-billion dollar product heavily marketed to consumers including young teenagers - \$1.7 billion in sales in 2007, excluding scented candles & incense
- Designed to deliver fragrances and other chemicals into our lungs
- Many ingredient chemicals are associated with health problems including asthma attacks, lung damage and other risks



Ingredients of Concern



- Fragrances
- Preservatives
- Byproducts of normal use

...and these are the most contentious ingredients to disclose & regulate

Hazardous Ingredients Aside, They Mask Odors We Need to Smell

- Mold (and hidden water leaks)
 - Pests (rodents, cockroaches)
 - Sewage backups and sewer gas
 - Gas leaks
 - Drifting tobacco smoke
- ...and they don't freshen or clean the air!



We Are All Affected



- Used in 75% of U.S. homes; use is growing
- Common in public bathrooms, offices, stores, restaurants, etc.
- The public usually is unaware of the nature, extent, and consequences of the exposure

Current Situation

- Air freshener ingredients are virtually unregulated and need not be disclosed
- In 2007, EPA got 7 largest manufacturers to “voluntarily” disclose ingredients; some of this info was made public (and more in 2008 after a lawsuit was filed by health & environment groups)
- To date, EPA hasn’t looked at list to identify, prioritize or regulate hazardous ingredients



Industry Wants to Get Ahead of Strict Regulation



- With voluntary programs and other forms of “transparency,” to deflect regulation and win consumer trust
- With proposed legislation it can live with (that protects CBI, fragrances) – including federal legislation that could preempt state laws
- By taking a seat at the table for defining “TSCA reform” (and addressing other policy threats)

Recent Announcements of Voluntary Programs



- CSPA and SDA announced in 2008 a voluntary ingredient disclosure program for their member companies effective Jan. 2010 – no specific fragrances
- SC Johnson announced in 2009 a voluntary ingredient disclosure program – fully implemented in Jan. 2012
- Dial announced in 2009 that they will have a voluntary ingredient disclosure program, too. Details are secret for now.
- FMA announced in 2009 a Jan. 2010 release of list of all fragrances used by its members in consumer products
- FMA announced publication of ingredient dictionary to standardize ingredient nomenclature – to be published every 4 years thereafter

New Regulation on the Horizon



- New CARB rule (effective Dec. 31, 2012) on high VOC aerosol air fresheners
- Federal Household Products Labeling Act (Sen. Franken and Rep. Israel)
- New EPA proposal on harmful “inert ingredients” in pesticides
- Possible new CA (and federal) legislation on ingredient disclosure
- Federal “Kid Safe Chemical Act (Sen. Lautenberg and Rep. Waxman) or other “TSCA Reform” – reverse the burden of proof and require manufacturers to demonstrate new chemicals are safe for infants, children and other vulnerable populations in order to get on the market

Contentious Issues: 2008-2009 Negotiations

- CBI vs. right to know
- Fragrance as automatic CBI exemption
- Hazard vs. risk
- Ingredients vs. how they act
- Ingredients vs. concentrations
- Ingredients vs. byproducts
- How labeling is done
- What amount is too small?
- Definition of “fragrance ingredient”



Stay Tuned...



For more information,

- Visit Alliance for Healthy Home’s web site:
www.afhh.org
- Contact Ralph Scott at rscott@afhh.org