

May 5, 2022

Honorable Julie Gonzales, Chair
Senate Committee on Finance
200 E Colfax Avenue
Denver, CO 80203

RE: House Bill 22-1345 (Cutter) - PFAS

Dear Chair Gonzales and Members of the Committee on Finance:

On behalf of the Household & Commercial Products Association (HCPA), we respectfully request amendments to address a concern related to aerosol propellants.

HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. Products HCPA represents include disinfectants that kill germs in homes, hospitals, and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

Broad Application Has Unintended Consequences for Aerosol Products

The safety of consumers is the highest priority for HCPA members and we thank you for your leadership on behalf of the residents of Colorado. However, the broad application of the bill captures an important tool for cosmetic products that do not represent the attributes of Per- and Polyfluoroalkyl Substances (PFAS) as generally understood.

Hydrofluoroolefins (HFOs) have emerged as a next-generation aerosol propellant that is safe for humans and the environment. HFOs bring a very low Global Warming Potential (GWP)¹ and reduce ground level ozone formation, giving them an important role in Colorado's climate and environmental goals. As it relates to PFAS, **HFOs are not persistent², bioaccumulative, or toxic.** Indeed, after rigorous review, the US Environmental Protection

¹ Global warming potentials (GWP) is less than 1.

² The Intergovernmental Panel on Climate Change: HFO-1234ze(E) has an atmospheric lifetime of 16.4 days: https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_Chapter08_FINAL.pdf

Agency has deemed HFOs acceptable as it relates to human health and the environment. Furthermore, the HFO-1234ze aerosol propellant is vital for aerosol manufacturers and marketers to have available for compliance with upcoming new limits.

Unfortunately, HB 22-1345 would remove these compounds from the cosmetics market. HCPA respectfully requests an amendment to allow the use of HFOs given their role in overall climate ambitions and providing safe products to consumers. Thank you for your consideration of this request. I welcome any opportunity to discuss these concerns and can be reached at cfinarelli@thehcpa.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Finarelli', with a stylized flourish at the end.

Christopher Finarelli
Director, State Government Relations & Public Policy - Western Region