Regulatory Issues

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The date or date-code information shall be located on the container or inside the cover/cap so that it is readily observable or obtainable (by simply removing the cap/cover) without irreversibly disassembling any part of the container or packaging. Information may be displayed on the bottom of a container as long as it is clearly legible without removing any product packaging.

CARB's standard code must be represented separately from other codes on the product container so that it is easily recognizable, *e.g.*: YY DDD = Year Year Day Day Day. A manufacturer who uses this standard CARB code to indicate the date of manufacture does not have to report this code.

Failure to register a date code is subject to a fine. Date code explanation needs to be submitted to CARB Enforcement on an annual basis, on or before Jan. 31 of each year. Email: *cpenforcement@arb.ca.gov*.

Oregon

The State of Oregon is working on a Consumer Products Rule. The current timeframe is:

- **Late January 2026:** Workgroup meeting
- **Feb.–April 2026:** Proposal work-through
- **May 2026:** The rule will go out for public comment
- **July 2026:** A hearing will take place

Oregon is considering going right to the Ozone Transport Commission (OTC) Model Rule V, and would be the first State to do so.

New Jersey

As a friendly reminder, New Jersey has updated its Consumer Products Regulation from OTC Model Rule II to IV. VOC limits become effective Aug. 18, 2026.

Aerosol Coating Reporting

Every three years, aerosol coatings manufacturers need to report to the U.S. Environmental Protection Agency (EPA)—and it is that year once again. Reports are due March 31, 2026, and the requirements can be found at 40 CFR 59.51(i).

HFC Reporting

Hydrofluorocarbons (HFC) reporting to the EPA is also due March 31, 2026, and manufacturers using HFCs under the American Innovation & Manufacturing (AIM) Act's Technology Transition Rule will need to report their products. We will discuss this more in next month's column. SPRAY

Mexico reports growth in 2024

The Latin American Aerosol Federation (FLADA) via the Mexican Aerosol Institute (IMAAC) recently released figures for aerosol production in Mexico in 2024. In 2023, Mexico produced 786 million units; that number rose to 838 million in 2024 for an increase of 6.6%.

2024 Mexican Aerosol Production
(in millions of units)

2023	2024	% change
786	838	6.6%

With 138.5 million inhabitants, Mexico's consumption per capita for the year 2024 was 3.9 units, according to FLADA, and the country exported 280 million units.

2024 Mexico Statistics

- **Population:** 138.5 million
- **Consumption per capita:** 3.9 units
- **Exports:** 280 million units

Additionally, FLADA noted that Mexico is responsible for 4.8% of aerosol production globally, and the country accounts for 26% of Latin American aerosol production. SPRAY