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ASSOCIATION

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Résultats éprouvés.*

August 18, 2025

Michael Krause,  
Assistant Deputy Executive Officer,  
South Coast Air Quality Management District  
1865 Copley Dr,  
Diamond Bar, CA 91765

Dear Mr. Krause,

## INDUSTRY RESPONSE

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### SCAQMD Working Group Meeting # 1 – August 12, 2025

The Canadian Coatings Association (CCA) is a voluntary, not-for-profit trade association representing the coatings and adhesives supply chain across Canada. Our advocacy efforts prioritize fair and balanced regulation, with a strong emphasis on achieving—and sustaining—regulatory alignment with key trading partners, particularly the United States and California.

CCA appreciates and thanks SCAQMD for the opportunity to participate in the working group meeting held on August 12th to discuss the rule development process respecting the prohibition of parachlorobenzotrifluoride (pCBtf) and tert-butyl acetate (t-Bac). Decisions made by the SCAQMD Governing Board have far reaching and international implications because the United States and Canadian coatings and adhesives sectors are highly integrated.

CCA is concerned by the ambition of proposing amendments to 12 separate VOC rules either at the same time or within close proximity to each other. CCA confirms that our members, who are also amongst the regulated parties, do not have the resources or capacity to provide meaningful and adequate inputs to the rulemaking process for such a large endeavor. Put simply, it will be impossible for our members and CCA staff to engage with your teams effectively. This approach creates extraordinary burden as our members may be subject to multiple rulemaking processes over a very wide range of coatings categories and within a very short period of time.

During the working group discussions both VOC exempt solvents were referred to as “potent” carcinogens that require immediate and urgent action by regulators in California. Notwithstanding the hazard-based approach that has resulted in a Proposition 65 Listing for pCBtf, the need for urgent action is not warranted as the assessment of carcinogenicity is not definitive because neither solvent is classified by recognized international authorities **as probable or confirmed human carcinogens**. This reinforces the need for decisions to continue to use sound scientific evidence as the basis for regulation, including prioritization of regulatory policy and actions based on risk. Canadian regulators are closely monitoring your jurisdictions processes and final decisions as these will influence Canadian regulatory policy.

The announcement that SCAQMD will also take advantage of this grouping initiative to review current VOC limits for all 12 rules is concerning from the coatings products categories perspective. Slide 15

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revealed very encouraging news with respect to the reduction of VOC emissions from the coatings sectors despite growth in population and use of the various coatings categories regulated. These successes should be welcomed and are indicative that to achieve further VOC emission reductions focus should be placed on those products and categories that have seen remarkable increases in emissions, namely consumer products (+23%), waste disposal (+6%), and off-road vehicles (+6%).

A review of each different coatings category should be done on an “individual” basis rather than as a group for many reasons including, but not limited to, resource availability and capacity by regulated parties. Those categories with no uses of pCBtF or t-BAc should be excluded from a review at this time.

CCA reiterates the comments and submissions made by the American Coatings Association regarding the working group meeting and proposed approaches being considered by SCAQMD.

## Conclusion

Key points are iterated on slide 7 of the presentation regarding Working Group meeting objectives that must be respected:

- Build consensus and work through challenges – there is **no consensus** amongst the regulated parties that the proposed approach is efficient or achievable; and
- The opportunity for early engagement must also include an acknowledgement that the **regulated parties are heard and that their commentary and recommendations should be carefully considered** – it is definitive that regulated parties do not have the capacity to rise to the challenge of this overly ambitious plan. A further concern is that your teams have similar, if not identical, capacity issues to contend with which will be exacerbated by the proposed approach and apparent scope creep.

Given that the coatings sector and its regulated categories have and continue to achieve reductions in VOC emissions, including those containing pCBtF and t-BAc, the urgency of this matter should be focused on those products and sectors that have increased emissions. CCA hopes that a reconsideration of the urgency being placed on the prohibition of pCBtF and t-BAc will be undertaken as it is our view that the proposed approach is unreasonable and burdensome for our members.

Thank you for considering our comments and recommendations. We will continue to participate in the rulemaking process. We remain available to discuss any questions you or your team may have.

Sincerely,  
David Saucier,  
Director, Issues Management

cc: Dave Carey, Canadian Coatings Association  
Rhett Cash, American Coatings Association

### *Advocating for Sustainable Practices, Economic Growth and Industry Innovation Since 1913.*

Founded in 1913, the Canadian Coatings Association (CCA) is one of the country's oldest and most respected trade associations, representing the Coatings, Adhesives, Sealants, and Elastomers (CASE) industry. With over a century of regulatory experience, CCA is a trusted partner in public policy, providing credible, science-based input to support effective, balanced regulation.

The CASE industry plays a vital role in Canada's economy, contributing \$24 billion annually and supporting over 120,000 jobs across manufacturing, distribution, and retail. The sector includes 269 production facilities and thousands of retail outlets supplying essential products to Canadians and key industries such as construction, automotive, and infrastructure.

As one of the most highly regulated chemical sectors, the CASE industry is committed to working collaboratively with government to ensure regulations are protective, practical, and rooted in science. CCA's team of regulatory and technical experts offers proactive approaches to complex policy issues, ensuring that regulation enhances—not hinders—innovation, competitiveness, and environmental responsibility.

CCA is dedicated to being a constructive stakeholder in policy development, advancing smart regulation that benefits Canadians, the environment, and the economy.