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From: Barrowcliff, Aria <ABarrowcliff@sac.shiseido.com>
Sent: Friday, July 15, 2022 10:09 AM
To: Malinowski, Kerri
Cc: Aiba, Shiori
Subject: [Shiseido Americas] Maine PFAS in Products Concept Draft - Comments

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Dear Kerri,

Thank you for your informative webinar. I would like to submit several comments regarding the draft rule.

1. We support the extension of the notification deadline and propose a period of 6 months extension.
2. We support the potential feature to report as a category.
 - a. For example, we may have one product, such as makeup with up to 40 shades but the same base formula. We would find it helpful to be able to associate all relevant UPC codes to one category.
3. Because the regulation covers only intentionally added PFAS, we would request that in all circumstances if the manufacturer is able to provide the theoretical amount of a PFAS intentionally added to a product that they are able to do so without also needing to undergo additional testing via commercially available analytical methods.
4. Regarding the implementation of ranges, we are uncertain what the department is considering in this regard. If the department wishes to divide to reportable concentration ranges such as 0-5% PFAS, 5-10% PFAS 10-20% PFAS, 20-30% PFAS and so on in conjunction with the ability to provide theoretical range base on manufacturer processes we are in favor.
5. We request the ability to add multiple contact personnel for visibility
6. As requested during the webinar, our rough impact estimate that we will be reporting is around 200 UPCs although as mentioned in my comment above we have few "formulas" with many shade variants So group reporting would be a large benefit to us.

Thank you!

Kind regards,

Aria Barrowcliff

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