

Builderase

US Regulations

Research conducted by NEXREG Compliance November 2016

Nexreg are not aware of any prohibitions for selling this product in the US, however the following regulations may need to be met prior to sales commencing;

California's Air Resources Board (CARB) VOC Regulations

Builderase contains 2.9% VOC (Butyl CARBITOL™). The Consumer Products Program is an important part of CARB's overall effort to reduce the amount of volatile organic compounds (VOCs) that are emitted from the use of consumer products in homes and institutions. "Consumer product" means a chemically formulated product used by household and institutional consumers, including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. It does not include other paint products, furniture coatings, or architectural coatings. Regulations for these consumer products are based on the weight percent of VOCs in the finished product, with an exemption for compound or mixtures with a vapor pressure less than 0.1 mmHg at 20 degrees C. Butyl CARBITOL™ meets this low vapor pressure exemption and, therefore, does not need to be included when accounting for VOCs in one of the regulated consumer product categories.

The Department of Toxic Substances Control's (DTSC) Safer Consumer Products Regulations

DTSC has not yet implemented a regulatory response for products listed on the initial priority product list as of yet. Additionally, the Builderase product is not listed on the initial priority product list so no action is required.

Proposition 65: Safe Drinking Water and Toxic Enforcement Act of 1986

For products sold in the state of California that contain a chemical listed on the Proposition 65 chemical list, must include a clear and reasonable warning on the product label is required under Section 25249.6 of the Act. The product formula does not contain any Proposition 65 chemicals included on the current Office of Environmental Health Hazard Assessment (OEHHA) list.

Occupational Safety and Health Administration (OSHA GHS)

If this product is supplied/sold industrially to workplaces in the US, an OSHA GHS compliant SDS and label will need to be provided along with the product.

Consumer Product Safety Commission (CPSC)

If the product is being sold to the general public (consumers) via retail, a CPSC compliant consumer label will need to be present at the time of sale.

California Weights and Measures Label Requirements

The three basic requirements are:

1. A declaration of identity that is the common or usual name of the commodity.
2. A declaration of responsibility that includes the name, address, and zip code of the manufacturer, packer, or distributor. A street address is required if the name is not listed in a current directory. The connection of a distributor must be shown (e.g., "packed for, distributed by"). This statement is not required to be on the principal display panel.
3. A declaration of the quantity of the commodity in the lower 30% of the principal display panel area, in a size depending upon the area of the principal display panel.

Principal display panel area determination

1. A rectangular package where an entire side is the principal display panel - height times width.
2. A cylindrical or nearly cylindrical container - 40% of the product of the height times the circumference
3. Other shaped containers - 40% of the entire square area of the container.
4. Obvious principal display panels - the actual square area of the panel.

NUMBERS AND LETTERS IN THE DECLARATION OF QUANTITY Square Area of Panel	Minimum Height (Printer)	Minimum Height (Blown/Molded)
32 cm ² (5 in ²) or less	1.6 mm (1/16 in)	3.2 mm (1/8 in)
Over 32 cm ² (5 in ²) to 161 cm ² (25 in ²)	3.2 mm (1/8 in)	4.8 mm (3/16 in)
Over 161 cm ² (25 in ²) to 645 cm ² (100 in ²)	4.8 mm (3/16 in)	6.4 mm (1/4 in)
Over 645 cm ² (100 in ²) to 2581 cm ² (400 in ²)	6.4 mm (1/4 in)	7.9 mm (5/16 in)
Over 2581 cm ² (400 in ²)	12.7 mm (1/2 in)	14.3 mm (9/16 in)

Fluid declarations:

The words "net" or "net contents" are optional.

"Fluid" is required with ounces (eg. 12 fl oz) unless the meaning is obvious by association (e.g., 1 pint 4 ounces) 1 liter or more - liters and decimal fractions of a liter up to three places.

Canadian Regulations

Research conducted by NEXREG Compliance November 2016

Nexreg are not aware of any prohibitions for selling this product in Canada, however the following regulations may need to be met prior to sales commencing;

Volatile Organic Compound (VOC) Concentration Limits Regulations

The Builderase product type is not included in the active and/or proposed regulations. There are currently no VOC restrictions on this product in Canada.

Canadian Environmental Protection Agency (CEPA)

- Toxic Substances List – Schedule 1
- Ozone Depleting Substances Regulations (Schedules 1, 3, 4)
- Prohibition of Certain Toxic Substances Regulations, 2012 (Amendment proposed)

None of the chemicals in the Builderase product are listed in the regulations therefore no restrictions apply.



Workplace Hazardous Materials Information Systems (WHMIS 2015)

If this product is supplied/sold industrially to workplaces in Canada, a WHMIS 2015 compliant SDS and label will need to be provided in both official languages (French and English).

Consumer Chemicals and Containers Regulations, 2001

If the product is being sold to the general public (consumers) via retail, a CCCR compliant consumer label will need to be present at the time of sale.

(NB Product does not contain any substances of special concern as per CCCR 2011).