



BAG-ON-VALVE TECHNOLOGY and NIST Handbook 130, Section 10.3

NATIONAL CONFERENCE ON WEIGHTS AND MEASURES LAWS AND
REGULATIONS

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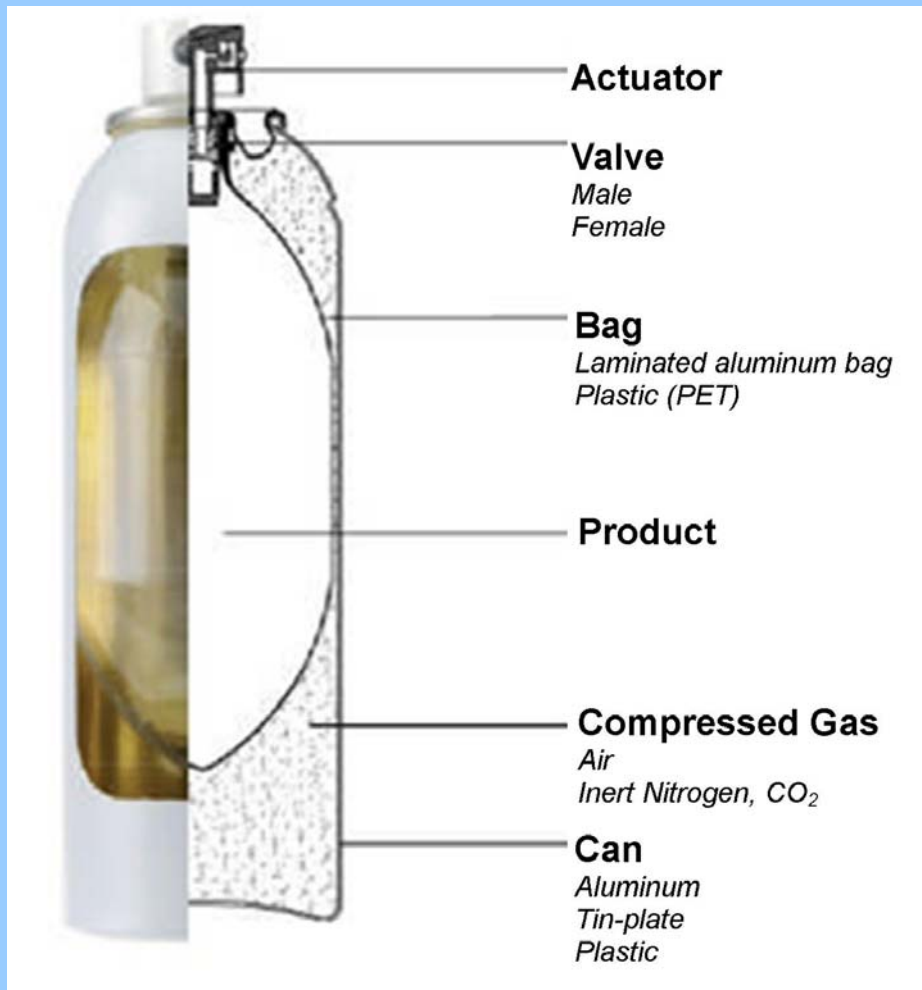
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BOV Technology



BOV v. Conventional Aerosol

Feature	Conventional Aerosol	PURE CITRUS “Non-Aerosol”
Spray Content	Fragrance, water, odor reducers and other ingredients, and chemical propellant	Fragrance only (no added water or chemical propellant)
Inactive ingredients	90% - 95%	0%
Active ingredient (fragrance) expelled	5% - 10%	100% Fragrance

Labeling BOV Products With Current Regulations Leads To Customer Confusion

	Total (wt. oz.)	Active Ingredient (%)	Active Ingredient (wt. oz.)	Container Price (\$)	Price/Total (\$/wt. oz.)	Price/Active Ingredients (\$/wt. oz.)	Price of Container with 100% Active Ingredients (\$)
Exemplary conventional aerosol air freshener	9	5%	0.45	\$1.19		\$2.64	\$23.80
Exemplary conventional aerosol air freshener	9	10%	0.9	\$1.19	\$0.13	\$1.32	\$11.90
Exemplary BOV technology air freshener	5.88	100%	5.88	\$4.49	\$0.76	\$0.76	\$4.49

Consumer Confusion - Labeling BOV Products Under Conventional Aerosol Regulations

- BOV does not expel propellant
- BOV inherently has less net weight
- Consumers do not have sufficient information from conventional aerosols to accurately compare with BOV

Consumer Confusion - Labeling BOV Products Under Conventional Aerosol Regulations

- Incomplete labeling for inactive ingredients in conventional aerosols leads
 - to deception with BOV products
 - misinformation for comparisons with BOV
- Consumers can be misled into purchasing a seemingly less expensive conventional aerosol product that can be more expensive than BOV

Consumer Confusion - Labeling BOV Products Under Conventional Aerosol Regulations

Underlying assumption of an ability to accurately compare BOV technology to conventional aerosol technology under the current regulations is flawed.

Solutions

10.3. The declaration of quantity on an aerosol package and on a similar pressurized package shall disclose the net quantity of the commodity (including propellant), in terms of weight, that will be expelled when the instructions for use as shown on the container are followed.

Solution 1

10.3. The declaration of quantity on an aerosol package and on a similar pressurized package shall disclose the net quantity of the commodity (including propellant), in terms of weight, that will be expelled when the instructions for use as shown on the container are followed.

10.3.1 Containers that separate propellant from the expelled product so that the propellant is not expelled (such as containers using bag-on-valve technology) shall be prominently labeled NON-AEROSOL. The declaration of quantity shall disclose the net quantity of the commodity in terms of fluid measure.

Solution 2

10.3. The declaration of quantity on an aerosol package and on a similar pressurized package shall disclose the net quantity of the commodity (including propellant), in terms of weight, that will be expelled when the instructions for use as shown on the container are followed, provided however that

containers that separate propellant from the expelled product so that the propellant is not expelled (such as containers using bag-on-valve technology) may be labeled either with weight or volume of the quantity of the commodity that will be expelled.

Summary of BOV Differences

- Fundamentally and inherently different since the propellant need not be expelled
- Consumers cannot make accurate and meaningful comparisons with conventional aerosols
- Compliance with existing NIST and state standards inhibits accurate consumer comparison
- Solutions to Avoid Confusion: Modify the conventional aerosol standards 1) to allow BOV labeling as NON-AEROSOL, or 2) to exclude BOV technology from weight labeling requirement
- Determining a volumetric amount of contents in a BOV product is simple