



August 25, 2014

## **Break Pad Packaging: ASCCA Requests Clear Markings Indicating Standards are Met**

ASCCA lobbyist Jack Molodanof submitted comments last week to the California Department of Toxic Substances Control (DTSC) related to draft informal regulations on brake friction material law. ASCCA has been working with DTSC staff to obtain clarification regarding the implementation and enforcement of the new brake pad law and to develop FAQ's to educate and assist the automotive industry to achieve compliance. [The FAQ's are on the ASCCA website.](#) ASCCA board member Ted Walters also represented the association during a regulatory workshop on August 20 reiterating our written comments.

In our comments ASCCA requested amendments to include language similar to the State of Washington which requires brake friction material manufacturers to mark packages to include a "three leaf logo" which indicates whether the brake friction material complies with the law. ASCCA believes these markings would provide consistency among the states and more importantly, would allow a repair shop or consumer to easily ascertain and verify that the product is California compliant. Otherwise, shops will continue to have to remove the brake pads from the box package, remove plastic coverings, search for numbers/letters on the brake pad, then go on the NSF website (which is difficult to navigate) to determine whether brake pads are compliant. This administrative process is unnecessarily burdensome and frustrating for small business.

It was recently brought to our attention that a distributor in southern California provided brake pads to a shop with the three leaf logo, which means that some manufactures are already starting to use the three leaf marking because of the Washington requirement, but not all manufacturer's are doing so. ASCCA included in its comments a request to make sure that California has the same requirement.

We will continue to keep you informed of any new developments in the brake pad regulations.