



August 30, 2021

Alberta E. Mills  
Division of the Secretariat  
Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Subject: Petition Requesting Rulemaking on Duster Aerosol Products;  
Docket No. CP-21-1

Dear Ms. Mills,

The Alliance for Consumer Education<sup>1</sup> (ACE) appreciates the opportunity to share an overview of our efforts in educating children, parents, teachers, and the media about the dangers of inhalation abuse. ACE will continue to encourage healthy discussions between community leaders and children about the risks and prevention of inhalation abuse until this is no longer a widespread issue.

More than 1,400 products can be abused, many of which are common products that can be found in the home, garage, office, school, or local convenient store. These everyday items are easily accessible, including gasoline, markers, aerosolized whipped cream, glue, nail polish remover, and some cleaning products. While these products are safe when used as intended and according to the directions on the label, they can be harmful (or even deadly) when misused intentionally, and that is what ACE aims to avoid.

According to the National Institute on Drug Abuse (NIDA), nearly 21.7 million Americans aged 12 and older have used inhalants at least once in their lives to get high, and recent surveys reveal that 13.1 percent of eighth graders have engaged in this activity.<sup>2</sup>

ACE agrees that this problem needs to be addressed and that education is the best preventable measure, which is why the Foundation launched Inhalant Abuse Prevention resources<sup>3</sup> to provide parents, school nurses, counselors, and resource officers with essential information about the risks and prevention of inhalant abuse so adults can have healthy discussions with children. These resources are intended to facilitate conversations that help children and teens

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<sup>1</sup> The Alliance for Consumer Education (ACE) is a 501(c)(3) nonprofit foundation founded in 2000. ACE works to educate consumers about the safety and benefits of household products, including the correct use, storage, and disposal. ACE's core program areas are Consumer Care, Health & Wellbeing, and Inhalant Abuse Prevention. ACE is affiliated with the Household & Commercial Products Association (HCPA).

<sup>2</sup> NIDA. 2020, May 28. Letter from the Director. Retrieved from <https://www.drugabuse.gov/publications/research-reports/inhalants/letter-director>

<sup>3</sup> ACE's Inhalant Abuse Prevention resources are available at <https://www.consumered.org/programs/inhalant-abuse-prevention>

understand the dangers of inhalation abuse, as well as provide tools to help resist peer pressure. ACE has worked with the American Association of Poison Control Centers (AAPCC) – and even CPSC – to distribute these resources in hundreds of schools across the country. As a result of these and other educational efforts, self-reported inhalation abuse rates have decreased nearly 60 percent over the past 20 years – from 20.3 percent to 8.9 percent.<sup>4</sup>

Education remains our most effective measure for preventing inhalation abuse. It's important for adults to discuss the purpose of household products with children and emphasize that certain fumes or gases may harm the body or cause illness if they are not used appropriately. The dangers of inhalation abuse should be discussed in the same manner as underage drinking and illegal drugs. ACE recognizes the importance of serving as a resource on this issue, and while we are proud of the work we have accomplished in this space, we recognize that there is still more to be done. We will continue to develop and provide educational research and outreach materials to raise awareness, educate individuals, and prevent the epidemic of inhalation abuse among children.

The Alliance for Consumer Education appreciates the opportunity to address this issue and provide these comments.

Respectfully submitted,

Alexandra Hayes  
Vice President, Communications & Program Development  
Alliance for Consumer Education

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<sup>4</sup> Jeffery C. Batis (2017) Effectiveness of Inhalant Abuse Legislation, Substance Use & Misuse, 52:2, 175-181, DOI: 10.1080/10826084.2016.1223135