

SAFEGUARDS

SGS CONSUMER TESTING SERVICES

HARDLINES

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CALIFORNIA FORMALDEHYDE EMISSION REQUIREMENTS FOR COMPOSITE WOOD PRODUCTS UPDATES: PART 2

The Airborne Toxic Control Measure (ATCM) to control formaldehyde emissions from composite wood products was approved by the Office of Administrative Law in April 18, 2008. The California Air Resources Board (CARB) has recently published a series of FAQs and guidelines

The ATCM specifically focuses on three composite wood products: hardwood plywood (HWPW), particle board (PB) and medium-density board (MDF). These three types of composite wood products are commonly used to make finished goods, such as furniture, cabinets, shelving, countertops, flooring, and molding. The ATCM applies to panel manufacturers, third party certifiers, distributors, importers, fabricators, and retailers of HWPW, PB, MDF, and finished goods containing those products, sold or delivered to California¹.

The ATCM defines 'fabricator' as are anyone including individuals and/or companies that use composite wood products to make finished goods such as furniture, cabinets, doors, etc. Those entities that manufacture HWPW, PB, or MDF panels are considered as manufacturers under the ATCM².

Fabricators are required to take reasonable prudent precautions to ensure that the composite wood products they procure for producing finished goods comply with applicable emission standards by asking for compliant products from their suppliers, and by receiving written verification that they were supplied with compliant materials. They are normally required to ensure the composite wood products they bought are in compliance with the standard and they do not need to perform the emission test.

¹ Safeguard 60/08 'California: Formaldehyde Emission Requirements to be Lowered for Composite Wood Products', September 2008

² 'Factsheet - Requirements for Fabricators', <http://www.arb.ca.gov/toxics/compwood/engfabricator.pdf>



Fabricators must label all finished goods produced for the California market to indicate they are made with complying products. The label shall be applied as a stamp, tag, sticker, or bar code on every finished good produced,

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or on every box containing finished goods. The minimum label requirements are:

- Fabricator's name,
- Production date,
- Markings showing the product was made with compliance wood products.

Fabricators are also required to designate the use of no-added formaldehyde based resins (NAF) or ultra-low emitting formaldehyde based resins (ULEF) if this is so for all of the HWPW, PB, and MDF used in fabricating a given finished good. Fabricators must also include a statement of compliance on bills of lading or invoices, which serves as a record of the sale of compliant products for downstream customers.

Fabricators who produce composite wood products for California market should keep records in either electronic or hard copy form for at least two years. The minimum information to be kept is:

- Date of purchase,
- Supplier of composite wood products,
- Whom the fabricators sold their products to.

CARB inspectors may inspect any fabricators located both inside and outside California. Fabricators located in California may also be subject to inspection by local air district personnel. The inspection may include auditing of records and securing samples for compliance testing.

Exemptions³

The following product categories are exempted from ATCM:

- Decorative wood objects made of solid wood
- Pallets made prior to 2009. However, pallets made with the three types of regulated composite wood products from 2009 would be affected by ATCM and must be made with compliant materials
- Curved plywood. This is not included in the definition of hardwood plywood under ATCM. CARB, however, will evaluate curved plywood and will make regulatory amendments when necessary

- Floorings consisting of solely bamboo veneer. These are excluded from the definition of hardwood plywood. However, products made with laminated veneer of bamboo with a platform are regarded as laminated products and are regulated by ATCM.
- In some situations, flat panels are treated with steam and then bent by a fabricator to the desired shape, making what some refer to as bent plywood. In this case, the fabricator would need to use flat panels that comply with ATCM

SGS is committed to inform as development on formaldehyde emissions in composite products occurs.

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy for chemical and non-chemical parameters in a comprehensive range of toys and consumer products for worldwide markets. Our laboratory in Hong Kong is approved by CARB to conduct third party certification services of composite wood products destined for California⁴.

Please do not hesitate to contact us for further information.

³Frequently Asked Questions (FAQ's) Categories'; <http://www.arb.ca.gov/toxics/compwood/implementation/faq.htm>

⁴Designation TPC-014; Executive Order W-08-014; <http://www.arb.ca.gov/toxics/compwood/listoftpcs.htm>

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