

# SAFEGUARDS

SGS CONSUMER TESTING SERVICES

HARDLINES

NO. 122/09 JULY 2009

## US CARB UPDATES: PART 7 REVISED ADVISORY ON LABELING REQUIREMENTS

The California Air Resources Board (CARB) made a revision to clarify the labeling requirements for composite wood products destined for the California market. The revised advisory specifies the minimum information required for a label but allows flexibility on format, color, size and font to meet the needs of individual companies. The required information may be on a separate label or incorporated into other existing labels.

In the beginning of 2009, we informed you the labeling requirements for composite wood products for manufacturers, fabricators, importers, distributors and retailers <sup>1</sup>. In January 2009, the revision to advisory number 384 on labeling requirements was published <sup>2</sup>. The revised advisory specifies the minimum information required for a label but does not specify any specific format. Highlights of the revised advisory on labeling requirements for manufacturers, fabricators, importers, distributors and retailers are summarized below and in Table 1.

### I. Manufacturers

- Manufacturers of HWPW, PB or MDF are required to clearly label each panel or bundle [section 93120.3 (e)]
- CARB strongly recommends labeling each panel.
- Labels must include at least the following information
  - Manufacturer's name
  - Product lot number or batch number
  - CARB assigned number for third party certifier [not required if products were made using no-added formaldehyde (NAF) and certain ultra-low emitting formaldehyde (ULEF) based resins
  - Statement of compliance to denote composite wood product complies with requirements

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<sup>1</sup> US CARB Updates 3: Labeling Requirements for Manufacturers, Fabricators, Importers, Distributors and Retailers, [Safeguards 18/09, SGS Consumer Testing Services, February 2009](#)

<sup>2</sup> Labeling Requirements for Manufacturers, Fabricators, Importers, Distributors and Retailers; Advisory Number 384 - Revised 'To Composite Wood Products Industry', California Environmental Protection Agency, Air Resources Board, January 2009. [MORE](#)

The logo for SGS, consisting of the letters 'SGS' in a bold, sans-serif font. A vertical line is positioned to the right of the 'S', and a horizontal line is positioned below the 'S' and 'G', forming a partial frame around the letters.

- CARB recommends the statement of compliance to contain at least the word 'California' or CARB, and include section 93120, the applicable compliance Phase [Phase 1, Phase 2] or NAF / ULEF.  
For example, statement of compliance may read 'California 93120 Phase 2 Compliant for Formaldehyde'
- It is acceptable for a company to replace an original manufacturer's label with a label listing their own company name in place of the 'manufacturer name' as long as all the other required label information is retained on the new label. The company who appears on the label as the manufacturer assumes responsibility for the product.
- Alternatively, a company may contract with foreign or domestic manufacturers to make panels and label the panels using the company's name in place of the 'manufacturer name'. All other required information in section 93120.3(e) must also be on the label
- Date of manufacture (mm/dd/yyyy) is recommended to be included on labels
- Example:  
Company ABC  
Lot number 2, 02/06/2009  
California 93120 compliant for formaldehyde Phase 1  
TPC-\_\_
- Alternatively, a company may contract with foreign or domestic fabricators to make furniture or other finished goods and label the finished goods using the company's name in place of the 'fabricator name'. All other required information in section 93120.7(d) must also be present on the label
- Finished goods containing boards that meet different phases of compliance
  - Statement of compliance does not need to identify each specific phase of compliance
  - If all of the composite wood products contained in the finished good are made with NAF or ULEF based resins it must be stated as such.

## II. Fabricators

- Fabricators are required to clearly label all finished goods containing HWPW, PB or MDF [Section 93120.7 (d)]
- CARB strongly recommends labeling both the finished good and the box the finished good is contained in.
- Labels must contain at least the following information:
  - Fabricator's name
  - Date of finished good was produced
  - Statement of compliance. Finished goods made of NAF / ULEF based resins shall be labeled as such
- CARB recommends the statement of compliance to contain the word 'California' or CARB, and the section 93120. For example, statement of compliance may read 'California 93120 Compliant for Formaldehyde'
- ATCM requires labels be applied as a stamp, tag, sticker or bar code
- Date of fabrication must include the month and year
- It is acceptable for a company to replace an original fabricator's label with a label listing their own company name in place of the 'fabricator name' as long as all of the other original required label information is retained on the new label. The company who appears on the label as the fabricator assumes responsibility for the product.
- Example of Label:  
Company ABC  
02/2009  
California 93120 compliant for formaldehyde  
OR  
California 93120 compliant for formaldehyde. Produce with all ULEF-based products
- Exemption:
  - Labeling not required for components being shipped intra-company as long as they are exclusively used by fabricator



### III. Distributors and Importers

- Additional labeling not required unless composite wood products and / or finished goods are modified <sup>3</sup>.
- Cutting the product to create new items would be considered a modification
- New label required if original product has been cut or modified to create new products
- If modified, assumes role of a fabricator and must label goods according to section 93120.7 (d).
- If bundles are broken down, CARB strongly recommends labeling smaller units with same information as original manufacturer label. Each panel must be traceable to original manufacturer.
- Acceptable for an importer or distributor to replace an original label with a label listing their own company name in place of the manufacturer name or fabricator name as long as all of the other original required label information is retained on the new label. The company who appears as the manufacturer or fabricator assumes responsibility for the product.
- Alternatively, an importer or distributor may contract with foreign or domestic companies to make composite wood products and label those products using the importer's or distributor's name in place of the 'manufacturer name' or the 'fabricator name'. All other required information in sections 93120.3(e) and 93120.7(d), where applicable, must also be on the label.



### IV. Retailers

- No additional labeling requirements
- Existing labels should not be removed
- Acceptable for a retailer to replace an original label with a label listing their own company name in place of the manufacturer name or fabricator name as long as all of the other original required label information is retained on the new label. The company who appears as the manufacturer or fabricator assumes responsibility for the product. [If the retailer replaces the name of the manufacturer or fabricator, the retailer's name on the label would be regarded as the 'manufacturer or fabricator' and retailer assumes responsibility of the product].
- Alternatively, a retailer may contract with foreign or domestic companies to make composite wood products and label those products using the retailer's name in place of the 'manufacturer name' or the 'fabricator name'. All other required information in sections 93120.3(e) and 93120.7(d), where applicable, must also be on the label.

<sup>3</sup>Examples of modification: coating, laminating, gluing, heating, or bending. Breaking down bundles for individual sale not considered to be modification. Cutting off an end for trimming would not constitute a modification.

Label	Party		
	Manufacturer	Fabricator	Distributor / Importer / Retailer
Minimum information	<ul style="list-style-type: none"> <li>Name</li> <li>Product lot number or batch number</li> <li>CARB assigned number for third party certifier</li> <li>Statement of compliance</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Date finished good produced (mm/yyyy)</li> <li>Statement of compliance</li> <li>Finished goods made with NAF / ULEF based resins labeled as such</li> </ul>	<ul style="list-style-type: none"> <li>No additional Labelin</li> <li>[Distributor / Importer requires labeling if modified</li> </ul>
Other Recommendations	<ul style="list-style-type: none"> <li>Label each panel</li> <li>Statement of compliance to contain the word 'California' or CARB, section 93120, and applicable compliance Phase or NAF/ULEF</li> <li>Date of manufacture (mm/dd/yyyy)</li> </ul>	<ul style="list-style-type: none"> <li>Label both finish goods and box containing finished goods</li> <li>Statement of compliance to contain the word 'California' or CARB, section 93120</li> </ul>	
Example of label	<ul style="list-style-type: none"> <li>Company ABC</li> <li>Lot number 2, 02/06/2009</li> <li>California 93120 compliant for formaldehyde Phase 1</li> <li>TPC- _ _</li> </ul>	<ul style="list-style-type: none"> <li>Company ABC 02/2009</li> <li>California 93120 compliant for formaldehyde</li> <li>OR</li> <li>California 93120 compliant for formaldehyde. Produced with all ULEF-based products</li> </ul>	

Table 1

SGS will follow up and inform interested parties as development on formaldehyde emissions in composite wood products under CARB and other legislation as they occur.

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy for the emission of formaldehyde in composite wood products destined for California and international markets.

Please do not hesitate to contact us for further information.

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WHEN YOU NEED TO BE SURE

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