

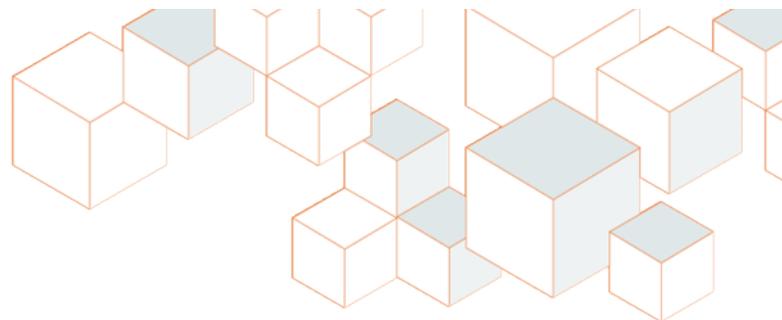
PANELISTS

- Robert Courtnage, Associate Chief of the Fibers and Organics Branch of the US Environmental Protection Agency
<https://www.epa.gov/formaldehyde/resources-and-guidance-materials-translations-formaldehyde-emission-standards-composite>
- Kimberly Wise White, Senior Director of the American Chemistry Council's Chemical Products & Technology Division www.americanchemistry.com
- David Jones, Director of Project Services for Benchmark International, an EPA and CARB approved third party certifier www.benchmark-intl.com
- Cindy Squires, Esq. Executive Director of the International Wood Products Association www.iwpawood.org



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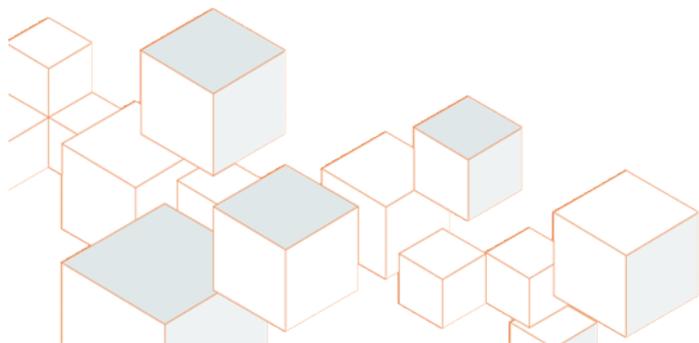
Formaldehyde Panel



NWFA EXPO - PANEL DISCUSSION

Regulations and Science

April 13, 2018



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Formaldehyde Panel

UNDERSTANDING EXPOSURE AND CHEMICAL ASSESSMENT

REGULATORY LANDSCAPE

THE FORMALDEHYDE PANEL

Formaldehyde occurs naturally and is all around us

Formaldehyde is found in every living system -- from plants to animals to humans. It metabolizes quickly in the body, breaks down rapidly, is not persistent and does not accumulate in the body.

Humans Produce Formaldehyde

Formaldehyde is a naturally occurring substance made of carbon, hydrogen and oxygen. Humans produce about 1.5 ounces of formaldehyde a day as a normal part of our metabolism. Inhaled formaldehyde is rapidly metabolized and ultimately converted to carbon dioxide and exhaled. Formaldehyde does not accumulate in the body.

A Natural By-Product

Formaldehyde also occurs as a by-product from all combustion processes, such as forest fires, automotive exhaust and cooking. Low levels of formaldehyde occur naturally in a variety of fruits and vegetables, including apples, carrots and bananas. It does not accumulate in the environment or within plants and animals.



Human Exposure to Formaldehyde

The general effects of formaldehyde on the human body are well-known. Everyday exposures to inhaled formaldehyde do not reach the lungs or other distant sites in the body. According to the large body of research available, the levels of formaldehyde to which the public is exposed are not high enough to cause adverse any health effects.



One of the Most Studied Chemicals In Use Today

Formaldehyde is found naturally in rural, urban and indoor air, and can be found at very low levels in many household products such as latex paint, furniture and cabinets. Formaldehyde levels in typical indoor environments are well below concentrations that could trigger sensory irritation in most people. **The World Health Organization has set protective indoor air guidelines for formaldehyde at 80 ppb.** Typical household formaldehyde concentration levels are between 16 and 32 ppb.

As one of the most-studied chemicals in use today, formaldehyde has been researched extensively to scientifically support that the current standards and safeguards are protective.

Formaldehyde: An Economically Important Chemical

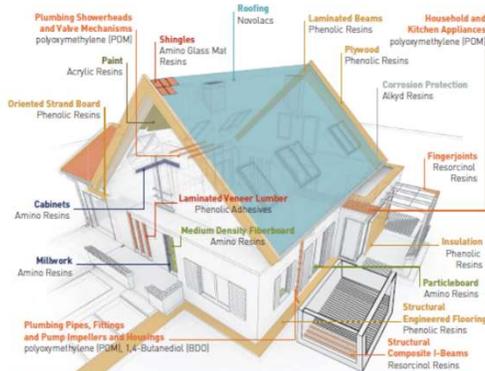
963k jobs

\$65B payroll

\$553B sales

Total Economic Impact of Consumer Industries

FORMALDEHYDE HOUSING APPLICATIONS



Formaldehyde Technologies Contribute to Sustainable Building Materials

The wood-based panel industry relies heavily on the dependable performance of formaldehyde-based resins for wood products such as plywood, particleboard and fiberboard, which are used in laminated countertops, cabinets, moulding and other applications.

Formaldehyde-based resins are also used in the housing industry to make sheathing and cladding, asphalt shingles, furniture and paneling, insulation and flooring systems, as well as paints and varnishes. In addition, formaldehyde-based resins are used to make household and kitchen appliances, such as washers and dryers – and for plumbing applications, such as: plumbing pipes, fittings and pump impellers and housings; as well as showerheads, valve mechanisms for blending hot and cold water and in faucets on/off operations.

Few compounds can replace formaldehyde as a raw material without compromising quality and performance or making the final products more expensive. While formaldehyde is an essential building block in a diverse range of products, its end use is primarily in a converted form. That means virtually all the formaldehyde is consumed in making the final product.

www.formaldehydefacts.org

Formaldehyde: Contributing to a Sustainable Future for Wood Products



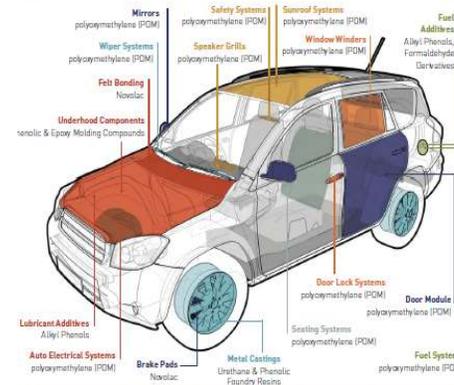
Renewable High Performance Efficient

Wood Fiber & Wood Waste	Formaldehyde Resins	Composite Wood Panels
<p>63% of a tree can be used for solid lumber.</p> <p>95% of composite panels allow 30% use of every tree.</p> <p>Formaldehyde-based resins help the utilization rate of wood resources, resulting in a wide variety of value-added composite wood products.</p> <p>Carbon Neutral</p> <p>Wood panel products can be carbon neutral based on greenhouse gas emissions.</p>	<p>Formaldehyde is a natural substance produced by every living organism. Studies have shown that formaldehyde does not accumulate in the environment, plants or animals.</p> <p>Technical Performance + Economic Value</p> <p>Currently, there is no alternative that can provide a better combination of technical performance and economic value than formaldehyde-based resins.</p> <p>Formaldehyde-based glues and resins provide versatility and innovative solutions to wood products.</p>	<p>Quality: longer lifespan, durability</p> <p>Value: workability</p> <p>Composite Wood Panels are typically made from recovered wood waste that would otherwise be burned or disposed of in a landfill, or they allow us to make better use of wood fiber.</p> <p>Over the course of 100 years, net GHG emissions associated with wood-based boards are 30% to 50% lower than emissions associated with thermally compatible boards using steel or concrete-based building systems.</p>

Stringent Formaldehyde Regulations and Emissions Standards in North America

<p>U.S. EPA Clean Air Act Standards</p> <p>Formaldehyde is a regulated air pollutant under the Clean Air Act (CAA). The U.S. EPA has established a framework for the regulation of formaldehyde emissions from various wood products at the national level.</p>	<p>California Air Resources Board (CARB)</p> <p>Under the authority of the California Air Resources Board (CARB), formaldehyde standards for composite wood products are enforced in California. CARB has established a framework for the regulation of formaldehyde emissions from various wood products at the national level.</p>	<p>The Formaldehyde Standards for Composite Wood Products Act</p> <p>Under the authority of the U.S. EPA, formaldehyde standards for composite wood products are enforced in the United States. The U.S. EPA has established a framework for the regulation of formaldehyde emissions from various wood products at the national level.</p>	<p>Product Stewardship</p> <p>The ISO-Certified Composite (ICC) Sustainability Standard is a voluntary industry standard developed by the Composite Panel Association (CPA) to improve wood panel and related products made with particleboard, MDF, hardboard and engineered wood, gluing, and fire.</p>
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FORMALDEHYDE AUTOMOTIVE APPLICATIONS



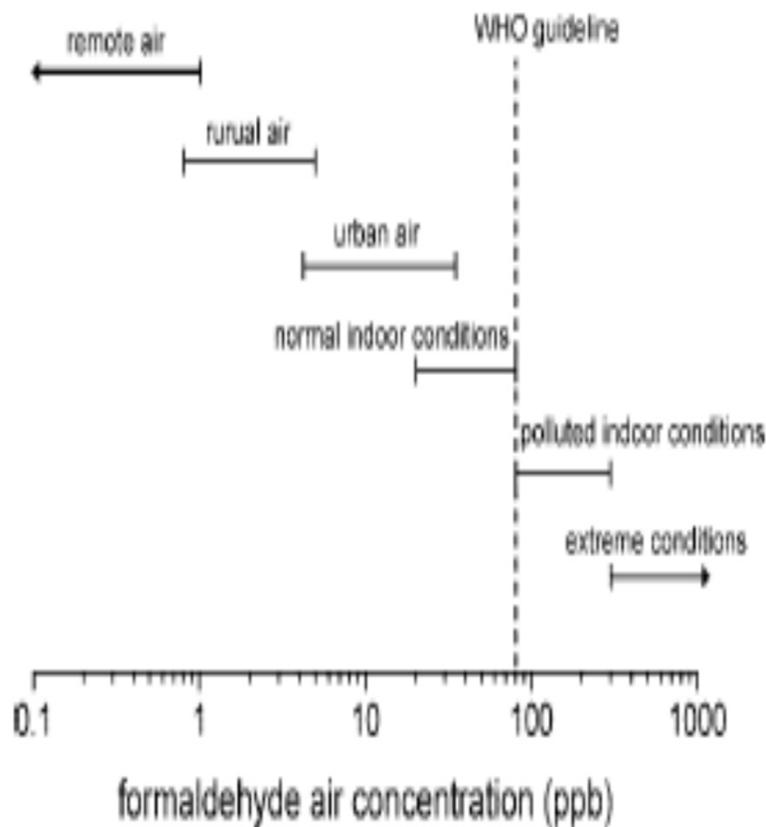
Formaldehyde Technologies Contribute to Lighter Vehicles and Higher Fuel Efficiency

In the automotive industry, formaldehyde-based technologies are used to make interior molded and under-the-hood components that allow for higher fuel efficiency by reducing vehicle weight. It is also used in the production of highly durable exterior primers, clear coat paints, tire-cord adhesives, brake pads and fuel system components.

Few compounds can replace formaldehyde as a raw material without compromising quality and performance or making the final products more expensive. While formaldehyde is an essential building block in a diverse range of products, its end use is primarily in a converted form. That means virtually all the formaldehyde is consumed in making the final product.

www.formaldehydefacts.org

UNDERSTANDING ENVIRONMENTAL EXPOSURE TO FORMALDEHYDE



Excerpted from Salthammer et al 2010. Formaldehyde in the indoor environment. Chem Rev. Apr 14;110(4):2536-72.

Recent 2017 Publication Assessing Indoor Formaldehyde Exposure

- ❑ Evaluated approximately 32,000 badge samples from more than 19,000 residences
- ❑ Approximately 91% had formaldehyde concentrations ≤ 81 ppb (WHO Guideline);
- ❑ Substantial majority were < 40 ppb

Data from Sheehan et al 2017 . Potential Exposure and Cancer Risk from Formaldehyde Emissions from Installed Chinese Manufactured Laminate Flooring. Risk Anal. Nov 15.

US Chemical Evaluations of Formaldehyde

Formaldehyde is the subject of governmental assessments that seek to determine if there is a connection between formaldehyde and certain health effects, including cancer.

Evaluations

- ❑ A 2012 Review by the International Agency for Research on Cancer (IARC) classified formaldehyde as carcinogenic to humans.
- ❑ A 2012 European Chemical Assessment Agency Committee for Risk Assessment review found that there is limited evidence of carcinogenicity in humans
- ❑ A 2012 National Toxicology Program (NTP) Report on Carcinogens (RoC) classified formaldehyde as known to be a human carcinogen
- ❑ EPA Integrated Risk Information System (IRIS) assessment evaluating formaldehyde and potential impacts to human health

Formaldehyde Emission Regulations - World-Wide

Standard	Japan	European Union (E1)	California – ARB (Phase I – 2009)	California – ARB (Phase II – 2011)	U.S. EPA – TSCA
Maximum Emission Limit	<ul style="list-style-type: none"> ▪ F***0.09 ▪ F****0.05 	<ul style="list-style-type: none"> ▪ Hardwood Plywood - 0.14 ▪ Medium-Density Fiberboard - 0.10 ▪ Particleboard - 0.14 	<ul style="list-style-type: none"> ▪ Hardwood Plywood - 0.08 ▪ Hardwood Plywood – Composite Core - 0.08 ▪ Medium-Density Fiberboard - 0.21 ▪ Thin Medium-Density Fiberboard - 0.21 ▪ Particleboard - 0.18 	<ul style="list-style-type: none"> ▪ Hardwood Plywood – Veneer Core - 0.05 ▪ Hardwood Plywood – Composite Core - 0.05 ▪ Medium-Density Fiberboard - 0.11 ▪ Thin Medium-Density Fiberboard - 0.13 ▪ Particleboard - 0.09 	<ul style="list-style-type: none"> ▪ Hardwood Plywood – Veneer Core - 0.05 ▪ Hardwood Plywood – Composite Core - 0.05 ▪ Medium-Density Fiberboard - 0.11 ▪ Thin Medium-Density Fiberboard - 0.13 ▪ Particleboard - 0.09

Canadian Composite Wood Rule Activities

- ❑ On March 18, 2017, a Notice of Intent to develop regulations respecting formaldehyde
- ❑ Introductory webinars held on April 5 and April 19, 2017
- ❑ Voluntary data gathering questionnaire launched on April 5, 2017 introductory webinars were launched on April 5 and April 19, 2017 and a voluntary data gathering questionnaire was launched on April 5, 2017
- ❑ Multi-stakeholder workshop on September 6, 2017
- ❑ Proposed regulations expected in 2018

The 1976 Toxic Substances Control Act regulated the production & use of industrial chemicals in commerce

New Chemicals:

Any chemical introduced or a significant new use of an existing chemical required notice and/or EPA review before commercialization. Generally viewed as effective.



Existing Chemicals:

All chemicals in commerce when TSCA was enacted were “grandfathered” - no EPA review was required for the chemicals to remain in use. Became a greater source of debate.



Lautenberg Chemical Safety Act: Protect Americans' health and the environment



Subjects all chemicals in commerce to an EPA review for the first time



EPA must review and make an affirmative safety determination before a new chemical can come to market



Requires EPA to consider vulnerable groups like infants, pregnant women, and the elderly when reviewing chemicals for safety



Requires EPA to prioritize chemicals so those that need it most are reviewed first



Makes it easier for EPA to require more safety testing of chemicals



Gives EPA clear authority to manage risks posed by chemicals, including labeling requirements, use restrictions, phase-outs, or bans



Sets aggressive deadlines for EPA to complete its work

LCSA Goal: Strengthen federal oversight to ensure a robust, uniform national chemical management system that promotes the safe use of chemicals & public confidence in chemical safety.

EPA's final decisions will preempt existing & future state chemical laws and regulations...

EXCEPT in certain cases:

- State laws enacted before Aug. 31, 2003
- State rules pertaining to a chemical enacted before April 22, 2016 - unless & until EPA acts on the same chemical



*Preemption is limited to the scope of EPA's evaluation i.e., the same conditions of use

States can continue to act on chemicals EPA has not evaluated

* Including low priorities



Once EPA publishes the scope of a risk evaluation, states' ability to place new restrictions on that chemical is PAUSED while EPA conducts its work.

*States can apply for waivers from PAUSE & final preemption



CHEMICAL MEETS SAFETY STANDARD

Preemption remains in place & states can not apply new restrictions

CHEMICAL REQUIRES RISK MANAGEMENT

States can enact restrictions that are identical to EPA's requirements

The Formaldehyde Panel



Formaldehyde Panel Science To Inform Chemical Assessment

- Evaluation of differences between effects caused by formaldehyde in the environment vs what the body produces naturally
- Understanding and bounding risk from formaldehyde exposure
- Analysis of how conservative models can over predict risk for formaldehyde exposures
- Evaluation of exposure thresholds
- Evaluation of formaldehyde workers and risk of nasopharyngeal cancers
- Evaluation of respiratory endpoints and formaldehyde exposure

COLLABORATE AND ENGAGE

- ✓ Coordinate and join the Formaldehyde Panel to be kept up to date on the most relevant information impacting formaldehyde regulations.
- ✓ Support scientific research through the Foundation for Chemistry Research and Initiatives to ensure regulations are science-based.
- ✓ Share information and best practices.
- ✓ Engage in legislative and regulatory activities.

FORMALDEHYDE PANEL CONTACT

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Formaldehyde Panel

Thank you.

And now it's TSCA TIME!

Overview of Compliance with the Formaldehyde Emission Standards for Composite Wood Products – Wood Flooring Industry–

Robert Courtnage
Office of Pollution Prevention and Toxics
April 2018



Presentation Overview



1. Background on TSCA Title VI
2. Regulation Summary
3. Regulated Product Definitions
4. Emission Standards
5. Compliance Timeline/Dates
6. Manufactured-by Date
7. Rule Framework and Impacted Entities
8. Responsibilities Under Title VI
9. Outreach/ Compliance Information
10. For More Information

Background on TSCA Title VI



- On July 7, 2010, the Formaldehyde Standards for Composite Wood Products Act was signed into law to become Toxic Substances Control Act (TSCA) Title VI.
- TSCA Title VI establishes formaldehyde emission standards identical to the California Air Resources Board (CARB) limits.
- TSCA Title VI directs the implementation of regulations to ensure compliance with formaldehyde emission standards.
- The final rule is available in the Code of Federal Regulations under 40 CFR Part 770 and posted online at <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0461-0001>.



Regulation Summary

- TSCA Title VI requires that composite wood products be tested and certified, ensuring only compliant products enter the product supply chain.
- Composite wood products must be certified by an EPA-recognized third-party certifier (TPC), also called an EPA TSCA Title VI TPC.
- Composite wood products covered under TSCA Title VI:
 1. Hardwood Plywood;
 2. Medium-Density Fiberboard, including thin-MDF; and
 3. Particleboard.

* There are limited testing and certification exemptions for no-added formaldehyde (NAF) resins or ultra-low emitting formaldehyde (ULEF) resins.
- The new regulation includes recordkeeping, reporting, and labeling requirements.
- All applications and notifications submitted to EPA under the final rule must be done through the EPA Central Data Exchange (CDX) at: <https://cdx.epa.gov>

Regulated Product Definitions



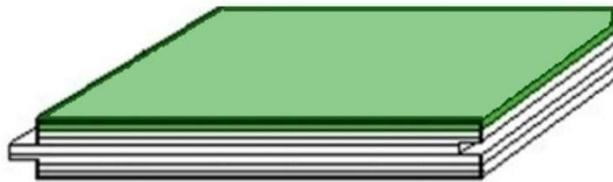
Regulated composite wood products under TSCA Title VI include:

- 1. Hardwood Plywood (HWPW):** Hardwood or decorative panel that is intended for interior use and composed of an assembly of layers or plies of veneer, joined by adhesive with a lumber core, a particleboard core, a medium-density fiberboard core, a hardboard core, a veneer core (or any other special core or special back).
- 2. Medium-Density Fiberboard (MDF):** Panel composed of cellulosic fibers made by dry forming and pressing a resonated fiber mat.
- 3. Particleboard (PB):** A panel composed of cellulosic material in the form of discrete particles (as distinguished from fibers, flakes, or strands) that are pressed together with resin.
- 4. Laminated Product:** Product with wood, or woody grass veneer affixed to a composite wood platform by a fabricator as a finished product or a component part.

Examples of Regulated and Exempt Flooring

Regulated products must meet the emission standards beginning June 1, 2018

Regulated



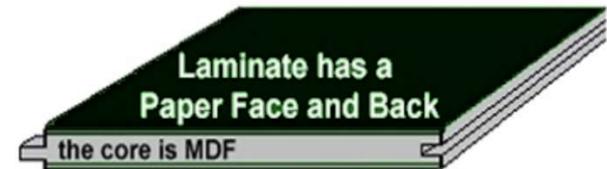
Plywood Core

Regulated

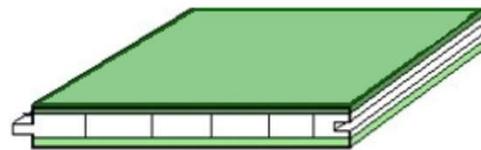


MDF Core

Regulated



Exempt

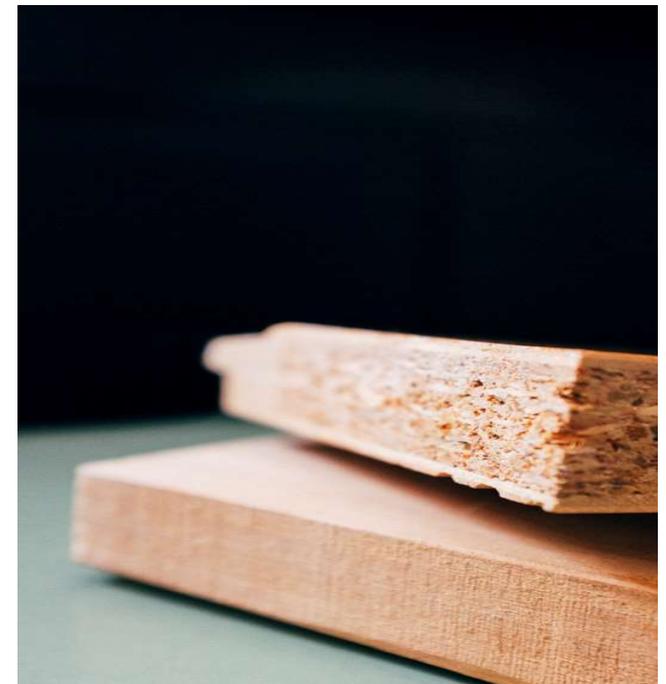


Lumber Core

Emission Standards

Regulated products must meet the emission standards beginning June 1, 2018:

Product	Emission Standard
Hardwood Plywood – Veneer Core	0.05 ppm of formaldehyde
Hardwood Plywood – Composite Core	0.05 ppm of formaldehyde
Medium-Density Fiberboard	0.11 ppm of formaldehyde
Thin Medium-Density Fiberboard	0.13 ppm of formaldehyde
Particleboard	0.09 ppm of formaldehyde



Compliance Timeline/Dates

- May 22, 2017 – final rule became effective.
- August 25, 2017 – early labeling for compliant product became effective.
- **June 1, 2018*** – beginning this date all regulated products (manufactured in the U.S. or imported) must comply with the emission standards, certification, testing, recordkeeping and labeling provisions.
- **March 22, 2019** – reciprocity transition period for CARB approved/EPA-recognized TPCs and products certified by them ends.
- March 22, 2019 – beginning this date importers must comply with import certification provision (will occur as part of CBP import process).
- March 22, 2024 – beginning this date non-exempt laminated products are regulated as hardwood plywood and must comply with panel producer requirements.

***This date is now official due to the March 13, 2018 Order of the U.S. District Court, Northern District of California from the litigation over the compliance date.**

Composite Wood Product Manufactured-by date (compliance date): Begins June 1, 2018*

- Composite wood products and finished goods containing composite wood products that are sold, supplied, offered for sale, or manufactured must comply with the rule starting on the manufactured-by date.
- Imports: under TSCA, the definition of manufacture includes imports. Therefore the manufactured-by date also means the imported-by date for imported composite wood products or finished goods containing them.
- Composite wood products or finished goods manufactured (or imported) **before June 1, 2018*** are not subject to the rule; in other words, if imported, composite wood products must have entered the customs territory of the U.S. no later than **May 31, 2018**.
 - Composite wood products can be incorporated into finished goods at any time after June 1 until the stock is depleted. Retailers, fabricators, and distributors are permitted to continue to buy and sell these composite wood products, laminated products, as well as finished goods that incorporate these products.
 - Composite wood products or finished good containing regulated composite wood must have associated records documenting they were in the inventory or imported prior to the manufactured-by date.

***This date is now the required compliance date due to the March 13, 2018 Order of the U.S. District Court, Northern District of California from the litigation.**

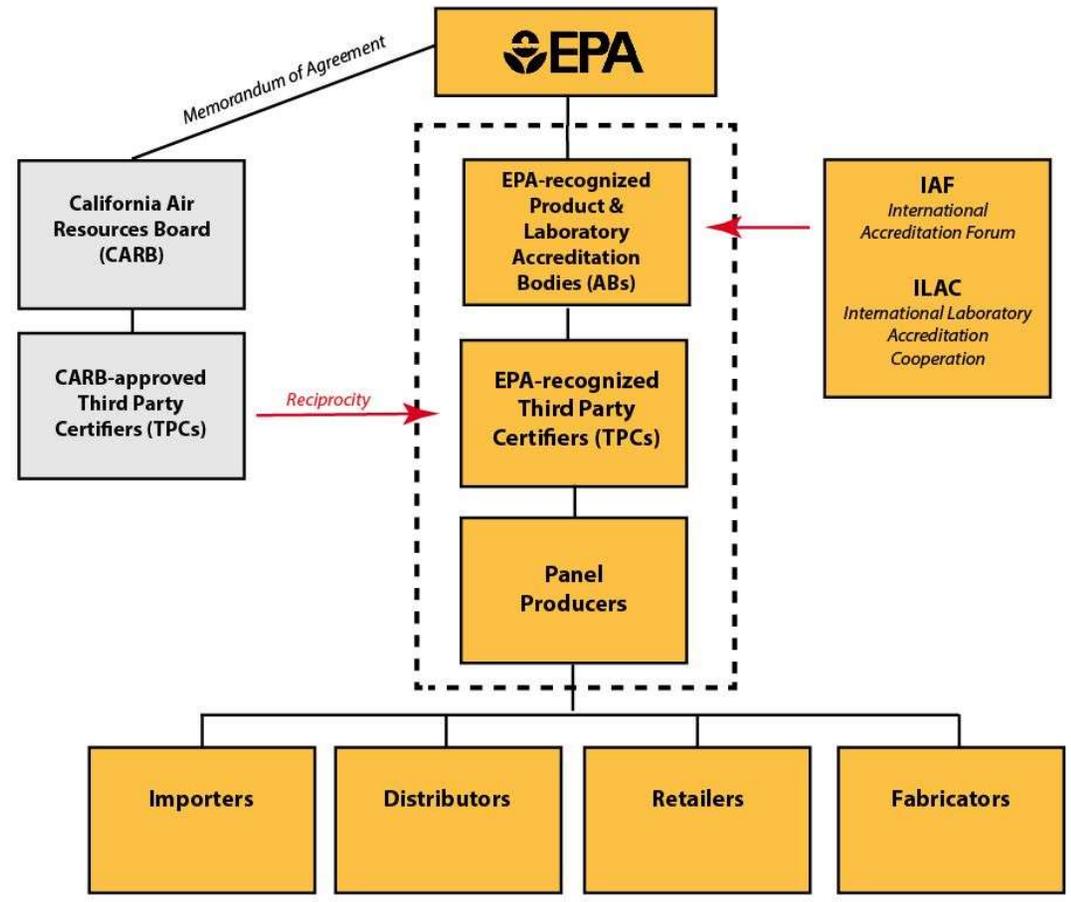
***Laminated Product Manufactured-by date:
Beginning March 22, 2024.***

- Before this date all laminated product producers must comply with the general requirements for fabricators.
- Beginning on this date, laminated products must either be made using a no-added formaldehyde (NAF), phenol-formaldehyde (PF), or other EPA approved resin through the petition process to attach the wood or woody grass veneer to the compliant platform to be exempt from the definition of HWPW (see 40 CFR 770.4(a) - (b)) or comply with the testing, certification, and recordkeeping requirements for HWPW producer in addition to requirements for fabricators.
- Producers of HWPW exempt laminated products must maintain records that demonstrate eligibility for the exemption in order to claim the exemption.

Rule Framework and Impacted Entities

Each entity must fulfill certain requirements to ensure that only compliant composite wood products enter the supply chain.

The dotted line represents the EPA's third-party certification program.



Accreditation bodies (ABs) - the primary responsibility of ABs is to conduct oversight of third-party certifiers (TPCs) and their laboratories to ensure they are qualified to conduct formaldehyde emission testing and certify products.

- ABs must apply to and be recognized by EPA before they can accredit TPCs and conduct oversight activities.

Third-party certifiers (TPCs) - the primary responsibility of TPCs is to conduct emission testing on composite wood products (panels) and to certify that the products meet the emissions standards.

- TPCs must apply to and be recognized by EPA before they can perform any testing and certification activities.
- After March 22, 2019, CARB TPCs *must be accredited by an EPA-recognized AB and have the required additional ISO accreditations* issued by the EPA-recognized AB, and their scope of accreditation must also include 40 CFR Part 770 (the rule) to retain EPA recognition as a TSCA Title VI TPC under reciprocity.



Panel producers are responsible for the following:

1. Applying for and receiving third-party certification of regulated products by an EPA-recognized TPC;
2. Conducting quality control tests on a regular basis to ensure regulated composite wood products meet emission standards:
 - For particleboard and MDF, at least *once per 8- or 12-hour shift plus or minus one hour for production* for each product line for each production type (unless reduced testing has been approved); and
 - For HWPW, varies (x times per week or month) by square feet of product produced.
3. Meeting reporting and recordkeeping requirements, and ensuring that all quality control requirements are met; and
4. Labeling products they produce either separately or by the bundle/box.



Fabricator: a person or entity who incorporates composite wood products into component parts or into finished goods. Includes laminated product producers but persons or entities in the construction trades are not fabricators by renovating or remodeling buildings.

Fabricators are responsible for the following:

1. Ensuring they purchase only compliant composite wood products, whether unfinished panels or incorporated into component parts or finished goods;
2. Keeping records documenting their supplier's information and that they received compliant products; and
3. Labeling individually any finished goods they produce or every box/bundle containing finished goods they produce.



Responsibilities Under TSCA Title VI

Fabricators and Laminated Product Producers



- Fabricators may also be laminated product producers.
- A laminated product producer is:
 - A manufacturing plant or other facility that manufactures (excluding facilities that solely import products) laminated products on the premises.
- A laminated product is:
 - A product in which a wood or woody-grass veneer affixed to a regulated composite wood product platform under TSCA Title VI; or
 - A component part used in the construction or assembly of a finished good.
- *Non-exempt* laminated products made with formaldehyde-based resins (other than phenol-formaldehyde (PF)) to attach a veneer to composite wood products must be tested and certified to meet the HWPW emission standard beginning March 22, 2024.
- *Exempt* laminated products are those products that are made with PF resin or NAF resin to attach a veneer to an already compliant platform.
 - Any person may petition the agency to initiate a rulemaking for additional exemptions for laminated products from the term “hardwood plywood” if using alternative resins.



Additional Laminator Records

Laminated product producers exempt from the hardwood plywood definition beginning March 22, 2024 must keep records for composite wood products and resins, including those they purchase or produce, such as:

NOTE: Beginning March 22, 2024, laminated product producers that are not exempt from hardwood plywood are considered to be panel producers and must keep panel producer records.

	For Products You Purchase	For Products You Produce
Composite Wood Products	<ul style="list-style-type: none"> • Purchase records. • Panel producer information. • Contact Information. 	<ul style="list-style-type: none"> • Records demonstrating that the panels have been certified by an EPA TSCA Title VI TPC; or • Records showing they were produced under a limited third-party certification exemption for panels made with NAF resins or ULEF resins.
Resins	<ul style="list-style-type: none"> • Purchase records. • Resin trade name. • Resin manufacturer contact information. • Resin supplier contact information. 	<ul style="list-style-type: none"> • Records demonstrating the production for NAF or PF resins, or eligibility of an additional resin exemption established after petition to EPA.

Responsibilities Under TSCA Title VI

Importers, Distributors, and Retailers



Under TSCA Title VI, **importers**, **distributors**, and **retailers** are responsible for recordkeeping and labeling requirements, including:

1. Ensuring they purchase only compliant composite wood products, whether unfinished panels or incorporated into component parts or finished goods;
2. Ensuring labels stay intact on individual items **or** are on file if items were purchased by the box or bundle and sold separately (label information must be made available to potential customers upon request);
3. Using a method sufficient to identify the supplier of the panel or finished good, and linking the information on the label to the product; and
4. Importers must *also* provide an import certification for all imports beginning on March 22, 2019.



Importer-specific provisions

- Importers must take reasonable precautions to ensure the products (panels, finished goods, component parts) they import comply with the emissions standards.
 - Demonstrate reasonable precautions by maintaining for 3-years records that include a written supplier provided statement that the products, finished goods or component parts are TSCA Title VI compliant.
- Importers must be able to provide the following records to EPA within 30 calendar days of request:
 - Identification of the producer of the composite wood product(s) and the date the composite wood product(s) were produced;
 - Identification of the supplier (if different from the producer); the date the composite wood product(s), component part(s), or finished good(s) (as applicable) were purchased.
 - Importers are not required in advance to obtain these records directly from suppliers, but must have a means to obtain them.



Import Certification

- Beginning March 22, 2019, for all imported articles that are regulated composite wood products (or that contain regulated composite wood products), you must sign and file the following certification:
“I certify that all chemical substances in this shipment comply with all applicable rules or orders under TSCA and that I am not offering a chemical substance for entry in violation of TSCA or any applicable rule or order under TSCA.”
- Signing and filing of this certification statement will occur through the routine CBP import process.



Responsibilities Under TSCA Title VI

Distributors and Retailers



- **Distributor** means any person or entity to whom a composite wood product, component part, or finished good is sold or supplied for the purposes of resale or distribution in commerce, except that manufacturers and retailers are not distributors.
- **Retailer** means any person or entity that sells, offers for sale, or supplies directly to consumers composite wood products, component parts or finished goods that contain composite wood products, except that persons or entities in the construction trades are not considered retailers by selling, renovating, or remodeling buildings.
- Note that importers can also be distributors and retailers.
- **Beginning June 1, 2018**, distributors, and retailers must demonstrate that they have taken reasonable precautions by obtaining bills of lading, invoices, or comparable documents that include a written statement from the supplier that the composite wood products, component parts, or finished goods are TSCA Title VI or CARB Phase II compliant or that the composite wood products were produced **before** June 1, 2018.



Records

You must take reasonable precautions to ensure that any composite wood products you sell, supply, offer for sale, or hold for sale (whether in the form of panels, component parts, or finished goods) comply with TSCA Title VI.

- Importer records specifically must include:
 - An identification of the producer of the composite wood product;
 - The date the composite wood product was produced; and
 - An identification of the supplier (if different from the producer).
- Importer, distributor, and retailer records must include:
 - Bills of lading, invoices, or comparable documents that include a written statement that the composite wood product is compliant with TSCA Title VI.
- These records must be kept on file for a period of three years from the import date or the date of the purchases or shipments.



Outreach/Compliance Information

- General Information
 - ✓ <http://www.epa.gov/formaldehyde>
- Small Entity Compliance guides
 - ✓ <https://www.epa.gov/formaldehyde/accreditation-bodies-and-third-party-certifiers-compliance-guide-formaldehyde-emission> (English, Spanish, French, Chinese (simple); to come Vietnamese, Portuguese, Indonesian)
- List of EPA-recognized/CARB approved TPCs
 - ✓ <https://www.epa.gov/formaldehyde/recognized-third-party-certifiers-under-formaldehyde-emission-standards-composite-wood>
- Webinars
 - ✓ <https://www.epa.gov/formaldehyde/webinars-small-entity-compliance-formaldehyde-emission-standards-composite-wood>
- Frequently Asked Questions (more coming soon)
 - ✓ <https://www.epa.gov/formaldehyde/regulated-stakeholder-frequently-asked-questions-implement-formaldehyde-standards>

For More Information



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Visit EPA's website for updates: <http://www.epa.gov/formaldehyde>.



PANELISTS



- Robert Courtnage, Associate Chief of the Fibers and Organics Branch of the US Environmental Protection Agency <https://www.epa.gov/formaldehyde/resources-and-guidance-materials-translations-formaldehyde-emission-standards-composite>
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