

BULLETIN APRIL 2018

Furniture Regulatory Updates

U.S.EPA vs. CARB Formaldehyde Regulations

A)-The standard for formaldehyde emissions from furniture containing composite wood for both regulations are exactly the same.

B)-However, there are many other sections in the regulations that differ. So to cover these sections CARB and the

EPA have developed a comparison table which details which regulation should be followed when there are differences between the stated requirements in each regulation.

The answer is to follow the regulation that is more restrictive. This is revealed in the Comparison Table (attached).

The dates for compliance to these other sections are detailed in the table.

This table is for all parties and stakeholders in the supply chain to be aware of, including the mills, subsuppliers, factories, fabricators, distributors, importers and retailers.

LABELING EXAMPLES:

Fabricators must label the

furniture item itself and the outside carton that contained the item.

Importers, distributors and retailers must leave intact labels on finished goods to facilitate inspections by regulatory authorities.

- 1)-The US EPA Federal label must include;
 - a)-The fabricators name,
- B)-The date the finished goods were produced and
- C)-A statement that the finished goods are "TSCA Title

- VI compliant for Formaldehyde emissions"
- 2)-The combined Federal & California CARB label must include:
 - A)- The company name,
- B)-Date finished goods were produced Month & Year
- C)-The Statement "TSCA Title VI Compliant for formaldehyde emissions" And
- D)-The statement "California #93120 Compliant for formaldehyde Phase Two".

California Carb Labeling

we suggest in order to be comprehensive that both the US EPA and CARB compliant labeling be used to avoid confusion since many retailers and consumers in California are accustomed to seeing the CARB phase two label. Or use the above combined label.

Also Carb compliant products are considered to be TSCA Title VI compliant through March 22,2019 for emission standards.

We will follow this information on the two formaldehyde regulations through any additional changes as we proceed.

Bulletins are published when information that is vital to all parties in the supply chain and the information is timely with new dates of enforcement or changes in compliance dates so that the most recent and accurate data is available to all clients and their source manufacturers upstream.

Best Regards, Robert Schoenfeld Schoenfeld Consulting Furniture Laws & Regulations 20 Owl Ridge CT, Novato Ca.94945 415-290-4144

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