

Discussion Proposal

Alternate Regulatory Approach for Laminated Products

Proposal

Establish 0.11 ppm formaldehyde emission performance standard for laminated products (finished and unfinished).

- Under California's ATCM, the standard would apply to all laminated products (synthetic laminates and wood veneers affixed to certified, compliant platforms).¹
- Other requirements for laminated products (i.e., labeling, use of certified platform material) would continue.
- Routine quality control testing and third party certification of laminated products not required. Fabricators would determine the best way to ensure finished goods meet the standard.
- Suggest process be established by which panel producers provide more transparent emissions data to fabricators.

Basis

- Performance standard is based on the highest Phase 2 emission standard for products typically used as platforms for laminated products, that of medium density fiberboard.
- Approach appropriately treats laminated products as a subset of hardwood plywood.
 - Unlike HWPW-CC, laminated products are not subject to the bond line requirements or strength testing of hardwood plywood; are not sold as hardwood plywood panels; and are not labeled as complying with the ANSI/HPVA HP-1 standard for hardwood plywood.
 - Laminated products only produced by fabricators of finished goods in which the product is incorporated.
- HWPC-CC panels produced by several hundred mills worldwide; laminated products produced by fabricators that number in the tens of thousands – not sufficient TPC/testing capacity to require fabricators to be subject to similar testing requirements as panel producers.

Benefits

- Establishes an emission ceiling and achieves additional emission reductions beyond the current ATCM by ensuring that a finished laminated product does not result in emissions any greater than an MDF certified platform.
- Performance based.
- Minimizes economic burden on small businesses.
- Simplifies enforcement - no deconstruction of laminated products will be needed to determine the type of platform material. Laminated products sold as finished goods or incorporated into component parts of finished goods will be enforced to laminated product standard.

¹ It is our understanding that under a federal regulation this approach could only be applied to laminated products with wood veneers.