

Clerk of the Board
Air Resources Board
1001 I Street, Sacramento
California, 95814

**COMMENTS OF THE
AUSTRALIAN WOOD PANELS ASSOCIATION (AWPA) AND
THE ENGINEERED WOOD PRODUCTS ASSOCIATION OF AUSTRALASIA (EWPAA)
ON THE PROPOSED AIRBORNE TOXIC CONTROL MEASURE TO REDUCE
FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS.**

Dear Clerk

The AWPA and the EWPAA appreciate the opportunity to make comments relating to the proposed airborne toxic control measure to reduce formaldehyde emissions from composite wood products.

The AWPA represents the manufacturers of Particleboard and MDF in Australia and the EWPAA represents manufacturers of plywood, LVL and I beams in Australasia. Both associations support the appropriate use of reconstituted wood products and are heavily involved in the education, research and quality certification.

Our comments can be summarised as follows

1. Underlying Health science.

We support the data and interpretations of the science of the health effects of Formaldehyde presented by the FCI that :

- a. there are safe levels of Formaldehyde as modelled by the CIIT.
- b. the most sensitive health end-point for formaldehyde is sensory irritation to the eyes.
- c. at or below the levels where sensory irritation occurs there is adequate protection of human health from other potential health endpoints such as cancer.
- d. there is inadequate evidence to suggest that Formaldehyde causes asthma or that asthmatics are more sensitive to Formaldehyde.

We therefore recommend to the board that they review their risk assessment based on the most recent science as presented by the FCI.

2. Exemptions from Certification

We also support the comments made by representatives of the adhesive manufacturers that the proposed rule be applied equitably to low formaldehyde emission panels. Either the requirement for certification should be applied to products with “No added formaldehyde” (NAF) or more preferably panels with low emissions regardless of binder type should qualify for exemption from the proposed rule.

3. Emission standards

Most countries around the world have used the emission standard of E1 as an appropriate standard that is protective of human health. We also believe that the correct application of the E1 standard will provide adequate protection of human health from the acute (sensory irritation) health effects and therefore any potential chronic potential health effects of formaldehyde such as cancer.

We recommend that the board adopt an emission standard that reflects the internationally accepted standard of E1.

4. Recognition of Certification Programs

We are also concerned about the protocols for product certification. At present it is unclear how international manufacturing companies can comply with the proposed rule. Due to complex supply chains it may be possible for manufacturers to be indirectly and inadvertently supplying products to the Californian market in the form of finished furniture and be unaware of the need for compliance.

We propose that the board consider recognition of other internationally recognised product certification schemes. The AWPA and the EWPAA as well as other organisations in other countries operate internationally recognised schemes, which include product emission testing as well as other performance requirements. Both our schemes are conducted in accordance with the ISO type 5 product certification system as detailed in SAA HB.44 and SANZ HB 18.44. The AWPA and the EWPAA also meet the requirements of ISO Guide 65, “General Requirements for Bodies Operating Product Certification Systems” and both apply the requirements of ISO Guides 23,27,28 and 40.

In these schemes emissions are monitored and products are stamped according to their emission class. If recognition protocols were established this would alleviate the need for wasteful multiple certifications.

5. Recognition of alternative emissions tests

We are also concerned by the reliance of the rule on the emissions based on ASTM E1333, which is not readily available internationally. It would be useful to allow other international standards to be recognised such as the large-scale chamber method BS EN 717.1 or their equivalents thereby allowing the use of already established international testing facilities.

Our understanding is that the Phase 1 and Phase 2 emission standards were based on the JIS standard F*** and F**** classifications. We therefore propose that the test method according to JIS 1460 for Formaldehyde should be automatically accepted as a test method for compliance testing to any new rule if they are implemented, as the JIS emissions were the basis for setting the Phase 2 emission requirements. This would alleviate the need for any lengthy and expensive process to establish correlations.

The AWPA and EWPA would be happy to discuss these matters further with the board if it would assist them in their decision-making.

Yours Sincerely



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