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For Immediate Release

EPA Requires Certification Statement Complying with Formaldehyde Emission Standards on Imported Composite Wood Products

Beginning March 2019

International Exhibitors Should Take Note for Booth Construction Material & Shipping to the U.S.

Elizabeth, NJ -- A compliance date set by the U.S. Environmental Protection Agency (EPA) regarding imported composite wood is rapidly approaching and should be addressed by international exhibitors shipping hardwood plywood, medium-density fiberboard (MDF), or particleboard to spring trade shows in the United States. The EPA has identified March 22, 2019 as a compliance date related to the Toxic Substance Control Act (TSCA), Title VI, requiring importers to provide a statement that composite wood materials being shipped into the U.S. meet formaldehyde emission standards. As of March 22, 2019, importers will be required to document that their composite wood products have been tested and are certified as compliant with TSCA Title VI in order to enter the U.S. **Imported composite wood products that are not intended for sale, but for use at a trade show, are subject to these regulations and need to be certified and labeled. These types of products are heavily used in the construction of trade show exhibits particularly large-scale exhibits that incorporate walls and floors.**

TSCA Title VI establishes formaldehyde emissions standards for three types of composite wood products: hardwood plywood, MDF and particleboard. The purpose of the TSCA is to reduce exposure to formaldehyde emissions and to benefit human health. These standards are identical to the emission standards currently in effect in California. The rule governs the manufacture (including import), distribution and sale of composite wood products, component parts that contain composite wood products and finished goods that contain composite wood products.

These composite wood products must be certified as compliant by an EPA-recognized third-party certifier (TPC). International exhibitors that use composite wood products in the construction of exhibit spaces are responsible for adhering to this compliance requirement. This past June, the EPA began implementation of Title VI by requiring importers to begin record keeping – maintaining documents that indicate compliance with these formaldehyde emission standards on documents

such as bills of lading for a period of three years. Importers are required to have the ability to make records identifying the panel producer, the date that the products were produced, the supplier (if different), as well as the date of purchase, available to the EPA within 30 calendar days of a request.

For international exhibitors who are importing composite wood materials into the U.S., the EPA recommends that importers specify TSCA Title VI compliant products when ordering or purchasing from suppliers. Importers should obtain records to show that they have taken all reasonable precautions to comply with this regulation and should ensure that labels applied by the manufacturer remain intact and readable.

Beginning March 22, 2019 each imported shipment of composite wood products or component parts of finished goods that contain composite wood products, must be accompanied by this statement from the importer under TSCA section 13: “I certify that all chemical substances in this shipment comply with all applicable rules under the TSCA and that I am not offering a chemical substance for entry in violation of TSCA or any applicable rule or order under TSCA.” This statement on a company’s letterhead must appear on the entry document or invoice for each imported shipment that contains composite wood products.

According to Phil Hobson, President of Phoenix International Business Logistics (PIBL), a leading freight forwarder and U.S. Customs Broker specializing in trade show shipments, “Container loading deadlines for spring trade shows will occur in February & March. If international exhibitors are purchasing wood and constructing exhibits presently, they should be reviewing the EPA regulations and receiving confirmation from their composite wood suppliers that these materials meet the current formaldehyde emission standards in order to enter the United States. If your company is planning to ship composite wood items, particle wood and MDF panels for the purpose of constructing exhibits at U.S. trade shows, this is an important regulation that you must immediately address prior to shipping by sea or air. PIBL will be requesting that overseas exhibitors planning to attend future U.S. shows, specifically those importing composite wood products for use with exhibits, provide the necessary certification statement on letterhead for Customs entry purposes.”

PIBL is the official freight forwarding company for many domestic and international trade shows and exhibits, including COVERINGS the global tile and stone show taking place in Orlando, Florida this April. PIBL is available to answer customer questions regarding shipments of composite wood products to the United States for trade shows and urges overseas exhibitors and Pavilion coordinators to be vigilant in their compliance with this regulation as they prepare for the shows this spring.

The EPA identifies certain materials that are exempt from this regulation such as hardboard, structural plywood and structural panels. Information on this regulation and its requirements, as well as a listing of exempt materials, can be found in the following links:

TSCA VI Regulation

https://www.epa.gov/sites/production/files/2018-06/documents/small_entity_cg_for_importers_distr_and_ret_june_2018.pdf

<https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>

Regulation in the Federal Register: <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0461-0001>