

**CODE OF PRACTICE FOR THE CERTIFICATION OF THE PANEL
PRODUCERS**

PT MUTU CERTIFICATIONAGUNG LESTARI
US EPA Recognized-Third Party Certifier

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1. INTRODUCTION

EPA is issuing a final rule to implement the Formaldehyde Standards for Composite Wood Products Act, which added Title VI to the Toxic Substances Control Act (TSCA). The purpose of TSCA Title VI is to reduce formaldehyde emissions from composite wood products, which will reduce exposures to formaldehyde and result in benefits from avoided adverse health effects.

This final rule includes formaldehyde emission standards applicable to hardwood plywood, medium-density fiberboards, and particleboard, and finished goods containing these products, that are sold, supplied, offered for sale, or manufactured (including imported) in the United States.

Composite Wood Product Producers	Requirement	Compliance date
Hardwood plywood (made with a veneer core or a composite core)	0.05 ppm	December 12, 2017
Particleboard	0.09 ppm	December 12, 2017
Medium Density Fiberboard (MDF)	0.11 ppm	December 12, 2017
Thin MDF	0.13 ppm	December 12, 2017

¹⁾ Based on the primary test method (ASTM E 1333-10) in parts per million (ppm) composite core mean the core using Particleboard or Medium Density Fiberboard (MDF)

TSCA Title VI establishes formaldehyde emission standards for composite wood products (hardwood plywood, particleboard, and medium density fiberboard) so that when they take effect on December 12, 2017, the standards are identical to the CARB ATCM Phase 2 emission levels. Under this final rule, composite wood products that are sold, supplied, offered for sale, or manufactured (including imported) within the United States must be certified, unless they are specifically exempted by TSCA or excluded by this final rule. In general, this means that the formaldehyde emission levels from the composite wood products would have been demonstrated to be below the emission standards in TSCA Title VI. EPA is requiring panel producers of composite wood products to apply to an EPA TSCA Title VI TPC for product certification, and to design and establish a quality control program, including testing, that is both approved by the TPC and specific to the panel producer.

TSCA Title VI requires that composite wood products be measured for compliance with the statutory emission standards by quarterly tests pursuant to test methods ASTM E1333-10 or ASTM D6007-10. TSCA Title VI also requires that quality control tests be conducted pursuant to ASTM D6007, ASTM D-5582, JIS A 1460, EN 120, EN 717-2, Dynamic Micro Chamber or such other test methods as maybe established by EPA through rulemaking. EPA proposed to require that accredited TPCs conduct the quarterly tests required by TSCA Title VI.

Panel producers of composite wood products are required to demonstrate compliance with the new formaldehyde emission standards by being certified by an independent party known as a “third party certifier”. Third party certifiers must be recognized by US EPA and follow specified requirements to verify that a Panel producers’ production meets applicable formaldehyde emission standards. Compliance testing flexibility is provided to Panel producers that elect to manufacture panels using either NAF or ULEF resins. Panel producers would also be required to label their

hardwood plywood, particleboard, and medium density fiberboard panels to identify them as meeting formaldehyde emission standards, or as being made with either NAF or ULEF resins. Recordkeeping requirements are also imposed on Panel producers to document that they are complying with applicable regulatory requirements.

Concerning the matters above, PT Mutuagung Lestari (MUTU CERTIFICATION) compile a guidance to accelerate the EPA certification program, and based on the regulation, MUTU CERTIFICATION apply to United States Environmental Protection Agency (US EPA) with the scope of certification covers Hardwood Plywood (HWPW), Particle Board (PB) and Medium Density Fiberboard (MDF).

The guidance contains the certification procedure from initial contact, certification process and inspection after certification. The Code of Practice is made based on:

- 1.1 United States Federal Register – Rules and Regulation, Environmental Protection Agency (EPA) 40 CFR Part 770, Formaldehyde Emission Standards for Composite Wood Products.
- 1.2 ISO/IEC 17065:2012(E), Conformity assessment – Requirements for bodies certifying products, processes and services
- 1.3 ISO/IEC 17025:2005(E), General requirements for the competence of testing and calibration laboratories
- 1.4 ISO/IEC 17020:2012(E), Conformity assessment – Requirements for the operation of various bodies performing inspection
- 1.5 US EPA Quality Manual of MUTU CERTIFICATION
- 1.6 ISO 19011:2002, Guidelines for Quality and/or Environmental Management System Auditing

With the appearance of this guidance hopefully can give an illustration and guidance concerning to ARB certification code of practice which will affect the better cooperation between MUTU CERTIFICATION and Panel producers.

2. SCOPE OF THE CERTIFICATION CONDUCTED BY MUTU CERTIFICATION

Each panel producer is allowed to use MUTU CERTIFICATION services for US EPA certification of the following product categories:

No.	Product Category	Item of Products
1	Hardwood Plywood (HWPW)	Hardwood Plywood-Veneer Core (HWPW-VC)
		Hardwood Plywood-Composite Core (HWPW-CC)
2	Particle Board	Particleboard
3	Medium Density Fiberboard	Medium Density Fiberboard
		Thin Medium Density Fiberboard

3. ADDRESSES and WORKING HOUR

The developed quality system only implemented for MUTU activity especially for ARB certification activities, which is address in:

The addresses of MUTU CERTIFICATION's offices and laboratories are as follows :

Depok Head Office & Laboratory

Jln. Raya Bogor KM 33.5, No. 19
Cimanggis, Depok 16953, West Java,
The Republic of Indonesia
Phone : (+62 – 21) 8740202
Fax : (+62 – 21) 87740745 – 46
E-mail : webmaster@mutucertification.com
Inspector@mutucertification.com

China Office and Laboratory

A114-115 Sun Square Pizhou City, Jiangsu
Province, China
Phone : (+86) 51686261002
Email: mutuchina@vip.163.com

Office hours of MUTU CERTIFICATION are as follow:

Weekdays: 8:00 am – 12:00 pm; 1:00 pm – 5:00 pm

Closed: Saturday, Sunday and holidays (specified under the law for holidays of Indonesia) and from 31st of December to 2nd of January.

4. CONFIDENTIALITY

MUTU CERTIFICATION is responsible for ensuring that the secrecy is well maintained by its employees and those of its sub-contractor, concerning all confidential information in which they become acquainted as a result of their contact with MUTU CERTIFICATION. MUTU CERTIFICATION shall not disclose any information pertaining to a supplier or particular product without written consent of the Panel producer. Should the law require information to be disclosed to a third party; the client will be informed of the information provided as permitted by law.

5. GENERAL CONDITION

The basic conditions for obtaining registration are that the Panel producer agrees to and conform to the following procedures and rules:

- 5.1 All information deemed necessary by MUTU CERTIFICATION in order to complete the evaluation program shall be made available by the manufacture;
- 5.2 MUTU CERTIFICATION, if not satisfy that all the requirements of registration being met, shall inform the Panel producer of those aspects in which the application has failed
- 5.3 When the Panel producer can show that remedial action has been taken within a specified time limit to meet the requirements, MUTU CERTIFICATION will arrange, at an extra cost to the Panel producer to repeat only the necessary part of evaluation.
- 5.4 If the Panel producer fails to take remedial action within specified time limit, it may be necessary for MUTU CERTIFICATION at an extra cost to repeat the evaluation in full.

- 5.5 Identification of conformity shall refer only to the site(s) evaluated and apply to the scope of the issued certificate as state on the certificate.

6. FORMALDEHYDE EMISSION STANDARDS

- (1) Except as otherwise provided in this part, the emission standards in this section apply to composite wood products sold, supplied, offered for sale, or manufactured (including imported) in the United States. These emission standards apply regardless of whether the composite wood product is in the form of a panel, a component part, or incorporated into a finished good.
- (2) The emission standards are based on ASTM E1333–10 test method, and are as follows:
 - a. For hardwood plywood made with a veneer core or a composite core, 0.05 parts per million (ppm) of formaldehyde
 - b. For medium-density fiberboard, 0.11 ppm of formaldehyde
 - c. For thin medium-density fiberboard, 0.13 ppm of formaldehyde
 - d. For particleboard, 0.09 ppm of formaldehyde

7. COMPOSITE WOOD PRODUCT CERTIFICATION

- (1) Only certified composite wood products, whether in the form of panels or incorporated into component parts or finished goods, are permitted to be sold, supplied, offered for sale, or manufactured (including imported) in the United States
- (2) Certified composite wood products are those that are produced or fabricated in accordance with all of the provisions of this part.
- (3) To obtain product certification, a panel producer must apply to an EPATSCA Title VI TPC.
- (4) The EPA TSCA Title VI TPC must act on a panel producer's complete application within 90 calendar days of receipt by reviewing all of the components of the application.
- (5) If a product is certified by a CARB-Approved TPC, it will also be considered certified under TSCA Title VI until December 12, 2018 after which the TPC needs to receive recognition as an EPATSCA Title VI TPC under § 770.7(d) in order for the product to remain certified.
- (6) To maintain certification, the panel producer making the certified product must get inspected by EPA TSCA Title VI TPC quarterly as well as meet the testing requirements under § 770.20.
- (7) If the certified product fails a quarterly test, certification for any product types represented by the sample is suspended until a compliant quarterly test result is obtained in accordance with § 770.22.

8. TESTING REQUIREMENTS

- (1) General requirement
 - a. All panels must be tested in an unfinished condition, prior to the application of a finishing or topcoat, as soon as possible after their production but no later than 30 calendar days after production
 - b. Facilities that conduct the formaldehyde testing required by this section must follow the procedures and specifications, such as testing conditions and loading ratios, of the test method being used
 - c. All equipment used in the formaldehyde testing required by this section must be calibrated and otherwise maintained and used in accordance with the equipment manufacturer's instructions.
- (2) Quality control testing
 - a. Allowable methods.
Quality control testing must be performed using any of the following methods, with a showing of correlation for each method pursuant to paragraph (d) of this section:

- i. ASTM D6007-10
 - ii. ASTM D5582-02
 - iii. JIS A 1460:2001(E) (24-hour Desiccator Method)
 - iv. DMC 2007 User's Manual
 - v. DMC 2012 GP User's Manual
 - vi. BS EN 120:1992 (Perforator Method)
 - vii. BS EN 717-2:1995 (Gas Analysis Method)
- b. Frequency of testing
- i. Particleboard and medium-density fiberboard must be tested at least once per shift (eight or twelve hours, plus or minus one hour of production) for each production line for each product type. Quality control tests must also be conducted whenever:
 - (a). A product type production ends, even if eight hours of production has not been reached;
 - (b). The resin formulation is changed so that the formaldehyde to urea ratio is increased;
 - (c). There is an increase by more than ten percent in the amount of formaldehyde resin used, by square foot or by panel;
 - (d). There is a decrease in the designated press time by more than 20%; or
 - (e). The quality control manager or quality control employee has reason to believe that the panel being produced may not meet the requirements of the applicable standards.
 - ii. Particleboard and medium-density fiberboard panel producers are eligible for reduced quality control testing if they demonstrate consistent operations and low variability of test values.
 - iii. Hardwood plywood must be tested as follows:
 - (a). At least one test per week per product type if the weekly hardwood plywood production at the panel producer is more than 100,000 but less than 200,000 square feet
 - (b). At least two tests per week per product type if the weekly hardwood plywood production at the panel producer is 200,000 square feet or more, but less than 400,000 square feet
 - (c). At least four tests per week per product type if the weekly hardwood plywood production at the panel producer is 400,000 square feet or more
 - (d). If weekly production of hardwood plywood at the panel producer is 100,000 square feet or less, at least one test per 100,000 square feet for each product type produced; or, if less than 100,000 square feet of a particular product type is produced, one quality control test of that product type every month that it is produced
 - (e). Quality control tests must also be conducted whenever:
 - ❖ The resin formulation is changed so that the formaldehyde to urea ratio is increased;
 - ❖ There is an increase by more than 10 (ten) percent in the amount of formaldehyde resin used, by square foot or by panel;
 - ❖ There is an increase by more than 20% in the adhesive application rate;
 - ❖ There is a decrease in the designated press time by more than 20%; or
 - ❖ The quality control manager or quality control employee has reason to believe that the panel being produced may not meet the requirements of the applicable standard.
- c. Results
- Any test result that exceeds the QCL established pursuant to § 770.7(c)(4)(i)(C) must be

reported to the EPA TSCA Title VI TPC in writing within 72 hours. The panel producer must comply with § 770.22 with respect to any lot represented by a quality control sample that exceeds the QCL. Where multiple products are grouped in a single product type for testing, this includes all products in the group represented by the sample.

- (3) Quarterly testing
 - i. Allowable methods
Quarterly testing must be performed using ASTM E1333–10 or ASTM D6007–10.
 - ii. Sample selection
 - (a). Samples must be randomly chosen by an EPA TSCA Title VI TPC.
 - (b). Samples must be selected from each certified product type for quarterly testing purposes. For hardwood plywood samples, the samples must be randomly selected from products that represent the range of formaldehyde emissions of products produced by the panel producer
 - (c). Samples must not include the top or the bottom composite wood product of a bundle
 - iii. Sample handling
Samples must be closely stacked or air-tight wrapped between the time of sample selection and the start of test conditioning. Samples must be labeled as such, signed by the EPA TSCA Title VI TPC, bundled air-tight, wrapped in polyethylene, protected by cover sheets, and promptly shipped to the TPC laboratory. Conditioning must begin as soon as possible, but no later than 30 calendar days after the samples were produced.
 - iv. Results
Any sample that exceeds the applicable formaldehyde emission standard in § 770.10 must be reported by the EPA TSCA Title VI TPC to the panel producer in writing and to EPA, in accordance with § 770.8, within 72 hours. The panel producer must comply with § 770.22 with respect to any lot represented by a sample result that exceeds the applicable formaldehyde emission standard. Where multiple products are grouped in a single product type for testing, this includes all products in the group represented by the sample.
 - v. Reduced testing
Composite wood products that have been approved by an EPA TSCA Title VI TPC or CARB for reduced testing under § 770.18(c) need only undergo quarterly testing every six months.
- (4) Equivalence or correlation
Equivalence or correlation between ASTM E1333–10 and any other test method used for quarterly or quality control testing must be demonstrated by EPA TSCA Title VI TPCs or panel producers, respectively, at least once each year for each testing apparatus or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel. **Once equivalence or correlation have been established for 3 (three) consecutive years, equivalence or correlation must be demonstrated every two years or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel.**
- (5) Quality assurance and quality control requirements for panel producers
Panel producers are responsible for product compliance with the applicable emission standards.

7. QUALITY CONTROL MANUAL, FACILITIES AND PERSONNEL FOR PANEL PRODUCER

Basic requirements for Panel Producer to participate in this certification program are specified in 770.20.(e) of United States Code of Regulation. Panel producer must demonstrate compliance

with the emission standards by the way of TPC, and must comply with the quality assurance requirements as follow:

7.1 Quality Control Manual

Each manufacturing plant must have a written quality control manual, which shall, at minimum, contain the following:

- (1) A description of the organizational structure of the quality control department, including the names of the quality control manager and quality control employees;
- (2) A description of the sampling procedures to be followed;
- (3) A description of the method of handling samples, including a specific maximum time period for analyzing quality control samples
- (4) A description of the frequency of quality control testing;
- (5) A description of the procedures used to identify changes in formaldehyde emissions resulting from production changes (e.g., increase in the percentage of resin, increase in formaldehyde/urea molar ratio in the resin, or decrease in press time);
- (6) A description of provisions for additional testing;
- (7) A description of recordkeeping procedures;
- (8) A description of labeling procedures;
- (9) The average percentage of resin and press time for each product type;
- (10) A description of product types, and if applicable, a description of product variables covered under each product type;
- (11) Procedures for reduced quality control testing, if applicable, and
- (12) Procedures for handling non-complying lots, including a description of how the panel producer will ensure compliance with the notification requirements.

7.2 Quality Control Facilities

Each panel producer must designate a quality control facility for conducting quality control formaldehyde testing.

- (1) The quality control facility must be an EPA TSCA Title VI TPC, a contract laboratory, or a laboratory owned and operated by the panel producer
- (2) Each quality control facility must have quality control employees with adequate experience and/or training to conduct accurate chemical quantitative analytical tests. The quality control manager must identify each person conducting formaldehyde quality control testing to the EPA TSCA Title VI TPC

7.3 Quality Control Personnel

(1) Quality Control Manager

Each panel producer must designate a persons quality control manager with adequate experience and/or training to be responsible for formaldehyde emissions quality control. The quality control manager must:

- a. Have the authority to take actions necessary to ensure that applicable formaldehyde emission standards are being met on an ongoing basis
- b. Be identified to the EPA TSCA Title VI TPC that will be overseeing the quality control testing. The panel producer must notify the EPA TSCA Title VI TPC in writing within 10 (ten) calendar days of any change in the identity of the quality control manager and provide the EPA TSCA Title VI TPC with the new quality control manager's qualifications
- c. Review and approve all reports of quality control testing conducted on the production of the panel producer
- d. Ensure that the samples are collected, packaged, and shipped according to the procedures specified in the quality control manual; and

- e. Inform the EPA TSCA Title VI TPC in writing of any significant changes in production that could affect formaldehyde emissions within 72 hours of making those changes.

(2) Quality Control Employee

Each plant shall appoint quality control employees with adequate experience and/or training to conduct accurate chemical quantitative analytical tests. The Quality Control Manager shall identify each person conducting routine small scale tests to TPC. All quality control employees must be certified annually by TPC.

(3) Chemical Analysis Test

a) Duplicate Analysis

The panel producer shall contact TPC to request certification of any quality control employee identified by the Quality Control Manager. TPC or plant's Quality Control Manager shall test one portion of a formaldehyde solution; the employee to be certified shall test another portion of the same solution. The result of each test must be within a range of concentration established by Third Party Certifier, to verify the correlation of quality control test method

b) Blind Samples

The employee to be certified must determine the formaldehyde content of four sample solutions submitted to them by the third party certifier or plant Quality Control Manager. The formaldehyde content of the four sample solutions must be determined to be within a range of concentrations established by the third party certifier, to verify the correlation of the quality control test method.

8. NON-COMPLYING LOT

- (1) Non-complying lots are not certified composite wood products and they may not be sold, supplied or offered for sale in the United States except in accordance with this section.
- (2) Non-complying lots must be isolated from certified lots.
- (3) Non-complying lots must either be disposed of or retested and certified using the same test method, if each panel is treated with a scavenger or handled by other means of reducing formaldehyde emissions, such as aging. Tests must be performed as follows:
 - a. Quality control tests
 - i. At least one test panel must be selected from each of three separate bundles. The panels must be selected so that they are representative of the entire non-complying lot and they are not the top or bottom panel of a bundle. The panels may be selected from properly stored samples set aside by the panel producer for retest in the event of a failure
 - ii. All samples must test at or below the level that indicates that the product is in compliance with the applicable emission standards in § 770.10.
 - b. Quarterly tests
 - i. At least one test panel must be randomly selected so that it is representative of the entire non-complying lot and is not the top or bottom panel of a bundle. The panel may be selected from properly stored samples set aside by the panel producer for retest in the event of a failure.
 - ii. The sample must test at or below the applicable emission standards in § 770.10.
- (4) If composite wood products belonging to a non-complying lot have been shipped to a fabricator, importer, distributor, or retailer before the test results are received, the panel producer must:
 - i. Ensure that the composite wood products are not distributed further by notifying, within

72 hours of the time that the panel producer is made aware of the failing test result, the fabricators, importers, distributors, and retailers that received the composite wood products. The notification must include the following:

- (a). Panel producer name, contact information, and date of notice;
 - (b). A description of the composite wood products that belong to the non-complying lot that is sufficient to allow the fabricator, importer, distributor, or retailer to identify the products;
 - (c). Whether the failed test result was of a quarterly test, a quality control test, or a retest of composite wood products belonging to a non-complying lot;
 - (d). A statement that composite wood products belonging to the non-complying lot must be isolated from other composite wood products and cannot be further distributed in commerce; and
 - (e). A description of the steps the panel producer intends to take to either recall the composite wood products belonging to the non-complying lot or to treat and retest the products and certify the lot.
- ii. Do one of the following:
- (a). Recall the composite wood products belonging to the non-complying lot and either treat and retest products belonging to the non-complying lot or dispose of them; or
 - (b). Treat and retest composite wood products belonging to the non-complying lot while they remain in possession of a fabricator, importer, distributor, or retailer.
- (5) Information on the disposition of non-complying lots, including product type and amount of composite wood products affected, lot numbers, mitigation measures used, results of retesting, and final disposition, must be provided to the EPA TSCA Title VI TPC within seven calendar days of final disposition.
- (6) Fabricators, importers, distributors, or retailers who are notified that they have received composite wood products belonging to a non-complying lot and who have further distributed the composite wood products are responsible for notifying the purchasers of the composite wood products in accordance with paragraph (d)(1) of this section.

9. SAMPLES FOR TESTING

Composite wood products may be shipped into and transported across the United States for quality control or quarterly tests. TPCs that ship composite panels into or across the United States solely for quality control or quarterly tests are not considered importers or distributors or importers for the purposes of § 770.7(c)(3)(i).

- (1) Such panels must not be sold, offered for sale or supplied to any entity other than a TPC laboratory before testing in accordance with § 770.17, § 770.18, or § 770.20.
- (2) If test results for such products demonstrate compliance with the emission standards in this subpart, the panels may be relabeled in accordance with § 770.45 and sold, offered for sale, or supplied.

10. REPORTING AND RECORDKEEPING

- (1) Panel producers must maintain the following records for a period of 3 (three) years, except that records demonstrating initial eligibility for reduced testing or third-party certification exemption under § 770.17 or § 770.18 must be kept for as long as the panel producer is producing composite wood products with reduced testing or under a third party certification exemption. The following records must also be made available to the panel producers' EPATSCA Title VI TPCs. Panel producers must make the records described in paragraph

(a)(1) of this section available to direct purchasers of their composite wood products. This information may not be withheld from direct purchasers as confidential business information

- a. Records of all quarterly emissions testing. These records must identify the EPA TSCA Title VI TPC conducting or overseeing the testing. These records must also include the date, the product type tested, the lot number that the tested material represents, the test method used, and the test results.
- b. Records of all ongoing quality control testing. These records must identify the EPA TSCA Title VI TPC conducting or overseeing the testing and the facility actually performing the testing. These records must also include the date, the product type tested, the lot number that the tested material represents, the test method used, and the test results.
- c. Production records, including a description of the composite wood product(s), the date of manufacture, lot numbers, and tracking information allowing each product to be traced to a specific lot produced.
- d. Records of changes in production, including changes of more than 10 (ten) percent in the resin use percentage, changes in resin composition that result in a higher ratio of formaldehyde to other resin components, and changes in the process, such as changes in press time by more than 20%.
- e. Records demonstrating initial and continued eligibility for the reduced testing provisions in §§ 770.17 and 770.18, if applicable. These records must include:
 - i. Approval for reduced testing from an EPA TSCA Title VI TPC or CARB;
 - ii. Amount of resin use reported by volume and weight;
 - iii. Production volume reported as square feet per product type;
 - iv. Resin trade name, resin manufacturer contact information (name, address, phone number, and email), and resin supplier contact information (name, address, phone number, and email); and
 - v. Any changes in the formulation of the resin.
- f. Purchaser information for each composite wood product, if applicable, including the name, contact person if available, address, telephone number, email address if available, purchase order or invoice number, and amount purchased.
- g. Transporter information for each composite wood product, if applicable, including name, contact person, address, telephone number, email address if available, and shipping invoice number.
- h. Information on the disposition of non-complying lots, including product type and amount of composite wood products affected, lot numbers, purchasers who received product belonging to non-complying lots (if any), copies of purchaser notifications used (if any), mitigation measures used, results of retesting, and final disposition.
- i. Representative copies of labels used.

(2) Panel producers must provide their EPA TSCA Title VI TPC with monthly product data reports for each production facility, production line, and product type, maintain copies of the reports for a minimum of 3 (three) years from the date that they are produced. Monthly product data reports must contain a data sheet for each specific product type with test and production information, and a quality control graph containing the following:

- a. QCL;
- b. Shipping QCL (if applicable);
- c. Results of quality control tests; and
- d. Retest values

11. LABELLING

Panels or bundles of panels that are sold, supplied, or offered for sale in the United States must be labeled with the panel producer's name, the lot number, the number of the EPA TSCA Title VI TPC, and a statement that the products are TSCA Title VI certified. If a composite wood panel is not individually labeled, the panel producer, importer, distributor, fabricator, or retailer must have a method (e.g., color-coded edge marking) sufficient to identify the supplier of the panel and linking the information on the label to the products. This information must be made available to potential customers upon request. The label may be applied as a stamp, tag, or sticker.

- (1) A panel producer number may be used instead of a name to protect identity, so long as the identity of the panel producer can be determined at the request of EPA.
- (2) Only panels or bundles of panels manufactured in accordance with §770.17 may also be labeled that they were made with no-added formaldehyde-based resins in addition to the other information required by this section.
- (3) Only panels or bundles of panels manufactured in accordance with §770.18 may also be labeled that they were made with ultra low-emitting formaldehyde resins in addition to the other information required by this section.

12. INITIAL CONTACT

A panel producer that wants to certify its products shall contact MUTU CERTIFICATION in writing by letter, facsimile, email, etc.

13. REQUEST FOR THE SCOPE OF CERTIFICATION

After receiving a contact from Panel producers, MUTU CERTIFICATION will send "Request for the Certification of Panel Producer" (MEPA-002) together with Code of Practice (MEPA-06) to Panel producer. Panel producer shall fill the MEPA-002 form, and if Panel producers agree with the code of practice, they must sign at the available space in MEPA-002 and send back to MUTU CERTIFICATION. General Manager will review the request for the scope of certification.

14. QUOTATION

Based on product request for the scope of certification of Panel producer, Manager of Product Certification will prepare a quotation (MEPA-003), approved by General Manager and send it to Panel producer. If Panel producers agree with the quotation, they must sign at the available space and send it back to MUTU CERTIFICATION.

15. CONTRACT

MUTU CERTIFICATION will prepare a contract for certification. The contract must be agreed by both side and signed at the available space.

16. INITIAL ON-SITE INSPECTION

Upon completion of contract between MUTU CERTIFICATION and a Panel producer, MUTU CERTIFICATION shall conduct one or more inspection of each Panel producer. The purpose of the inspection shall be to determine that the procedures and processes of each

plant conform, or can be made to conform, to the requirements of appendix 2 of section 93120.12 of United States Code of Regulation. Initial On-site Inspection requirements include:

- 1) A written quality control manual approved by MUTU CERTIFICATION;
- 2) Quality control facilities and personnel approved by MUTU CERTIFICATION;
- 3) Passage a large chamber qualifying test(s) (ASTM E 1333-96);
- 4) Routine small scale quality control test(s), either desiccators (ASTM D 5582-00) or small chamber (ASTM D 6007-02), approved by MUTU CERTIFICATION;
- 5) A procedure for selecting samples, approved by MUTU CERTIFICATION; and
- 6) Correlation values between the routine small scale quality control test(s) and the large chamber test(s) that are approved by MUTU CERTIFICATION.

Initial qualifying shall be carried out according to MUTU CERTIFICATION procedure (MEPA-01). The evaluation shall be conducted following procedures below:

16.1 Auditor selection

Product Certification Sub Division Manager (hereinafter referred to as Operation Manager) with the Certification and Service Division General Manager (hereinafter referred to as General Manager) guidance shall select auditor to conduct the evaluation. The number of audit team is one as a minimum.

16.2 Document review

Appointed auditor(s) shall carry out a detail examination of submitted application document and prepare a detail report which should be submitted to Manager or General Manager to be reviewed and approved prior to send to the Panel producer.

16.3 Preparation for Initial On-site Inspection

The auditor(s) should prepare the document necessary for evaluation such as itinerary, check list, etc. Manager or General Manager shall inform the Panel producer about the itinerary contained of date of evaluation, time table, location, opening and closing meeting times, name of auditor(s), etc. prior to visit to have applicants approveal

16.4 Conduction of Initial On-site Inspection

In opening meeting at Panel producer's plant, auditor shall explain the procedure and key issues of evaluation and also request cooperation from the Panel producer in providing accesses and an escort during the initial qualifying.

During the Initial On-site Inspection, auditors shall record on the check list whether the requirement being accepted or not. Details must include reference to document, item product, etc. used to establish objective evidence.

When the non-conformance being identified, Auditor(s) shall inform to Panel producer's representative and show the evidence in order that there is no misunderstanding and to provide an opportunity to the Panel producer to challenge the evidence and where appropriate produce evidence to the contrary.

In closing meeting, auditor shall issue Non-Compliance Report of the non-conformance being identified (if available) and ask the Panel producer's representatives approval/signature.

All records produced for the implementation and operation of the Panel producer quality assurance system shall be readily available for initial qualifying.

Panel producer shall ensure that responsibility to MUTU CERTIFICATION for the quality product system is clearly defined by appointing a designated person who is authorized to maintain contact with MUTU CERTIFICATION. Any changes to the designated appointee must be confirmed to MUTU CERTIFICATION in writing.

16.5 Initial On-site Inspection Report

Within 15 working days of the Initial Qualifying, auditor shall prepare the Initial Qualifying report and forwarded to Manager and/or General Manager for review. General Manager shall prepare the Initial Qualifying Review and submits it to Judgment Team together with all application documents.

Should the General Manager have issues to be revised or corrected, the Panel producer will be informed in writing through following procedures :

- (1) General Manager inform the Panel producer issues to be revised or corrected and request the Panel producer to report on the measures taken for the revision or correction of the issues concerned by a specific date.
- (2) On the receiving the Panel producer report on the measures taken, General Manager makes the auditor re-initial qualifying whether the measures taken are conformed to the requirement
- (3) Lead Auditor prepares re-initial qualifying report and forwards it to General Manager for review.
- (4) General Manager submits the Initial Qualifying report and Re-initial Qualifying as well to Judgment team.

Should the General Manager tell the Auditors to conduct once further Initial Qualifying visit, the General Manager must inform the Panel producer and MUTU CERTIFICATION will apply part 9.3 until 9.5 of this Code of Practice

16.6 Judgment and decision on the certification.

The Chief of Judgment Team shall form a panel of minimum 3 members of the committee. The Judgment Team Panel shall review the submitted Initial Qualifying report to ensure that the Initial Qualifying was effectively and efficiently conducted at a level consistent with :

- (1) Environmental Protection Agency 40 CFR PART 770 of United States Code of Regulation; Quality Assurance Requirements for Panel producers
- (2) MUTU CERTIFICATION working regulations
- (3) Quality control manual of the Panel producer

If necessary, Judgment Team Panel may invite Technical Expert(s) to ask their advice during the panel. However the Technical Expert(s) can only give advice, Technical Experts will not take any active part during the panel.

16.7 Judgment team panel chairman should report the Initial Qualifying result to the President Director who will inform the Panel producer. The result should be:

- (1) Decision of certification to the Panel producer

- (2) Issues further needed the corrective measures. In this case, General Manager informs the Panel producer of the issues pointed out in the report of evaluation result and requests the Panel producer to take necessary corrective measures and to report back the result of the measures taken by a specific date.
- (3) On receiving the report on corrective measure from the Panel producer within a specific period of time, minimum one of the Judgment team panel re-evaluates and confirms the conformance with requirements on issues concerned.
- (4) If the auditor(s) have to conduct once further Initial Qualifying visit, part 11.3 until 11.6 of this procedure should be conducted then.

17. GRANTING THE CERTIFICATION

When certificate is issued. The Certificate shall remain the property of MUTU CERTIFICATION and shall not be copied or reproduced in any manner the prior approval of the President Director of MUTU CERTIFICATION. Granting the certification shall be done according to the following conditions :

Matters specified in the certificate are as follows:

- (1) Name and address of company
- (2) Name and address of Panel producer
- (3) Category and Item of product
- (4) Standard and Technical criteria on which the certification process is based
- (5) Name and address of Laboratory which conduct Primary or Secondary Method test
- (6) Number and date of certificate.

18. INSPECTION BY PT MUTU CERTIFICATIONAGUNG LESTARI

18.1 Purpose

After a Panel producer has been validated by MUTU CERTIFICATION to report their products as being validated with assigned number, MUTU CERTIFICATION shall conduct periodic on-site inspections of the plant and production line where each validated product type is produced to ensure full compliance with the provision of appendix 2 of section 93120.12 of United States Code of Regulations, and the plant's quality control manual and practices. ARB may also conduct on-site inspections at the Panel producer to ensure compliance with the standard.

18.2 Frequency

Inspection shall initially occur at least once per month for a period of 3 (three) months. The frequency may subsequently be reduce if MUTU CERTIFICATION determines that the quality control tests are consistent, but shall be no less than quarterly.

18.3 Inspection Procedures

MUTU CERTIFICATION shall be given full cooperation by the Panel producer in all aspects of the

inspection including, but not limited to, the following:

- (1) Reviewing formaldehyde emission quality control records;
- (2) Reviewing production records for press times and urea-formaldehyde resin usage;
- (3) Examination formaldehyde emission quality control procedures;
- (4) Selection of sample panels for emission testing;
- (5) Interview and testing of quality control employees; and
- (6) Complete access to the Quality Control Manager and any quality control employee involved with formaldehyde certification.

MUTU CERTIFICATION may be excluded from plant areas considered confidential, providing such exclusion does not prevent or hinder MUTU CERTIFICATION from performing the required duties.

18.4 Sample Selection and Testing Procedures

MUTU CERTIFICATION may conduct a small scale test during his visit. One panel of composite wood product to be certified shall be selected for a single test. The result of this test shall be entered into the record of test values maintained by the Panel producer. If the addition of this test value to the record causes the tested lot to be a non-complying lot, the lot shall be isolated and handled following the procedures for non-complying lots in appendix 2 of section 93120.12 of United States Code of Regulation

18.5 Report of Findings

Upon completion of the inspection, MUTU CERTIFICATION shall prepare findings in writing and review them with the Quality Control Manager or plant Manager, if available. As soon as complete data are available, the MUTU CERTIFICATION shall provide a written report to the plant stating the test results and advising the plant of any deficiencies that must be corrected to maintain evaluation.

18.6 Re-inspections

In the event that a Panel producer produces product lots that consistently exceed the applicable QCL, MUTU CERTIFICATION shall be notified promptly. MUTU CERTIFICATION may inspect the plant at least once per month for a period of three months, before returning to the prior inspection frequency. MUTU CERTIFICATION may also require the Panel producer to demonstrate conformance to the requirements of Initial On-site Inspection.

19. THE CHANGE OF THE CERTIFICATE SCOPE

The change of the certificate scope could be extension or reduction of the scope. Due to the extension of the scope, in this case for the extended product for example, the Panel producer shall fill a new application form (see clause 7). The Evaluation will be carried out only on the area or extended product including its production process. The cost of extending the certificate scope will be based on the nature and program of work.

Due to the reduction of the certificate scope, the resignation form shall be filled by the certificate holder including the item to be resigned and its reasons and sent to MUTU CERTIFICATION together with certificate.

MUTU CERTIFICATION's President Director shall evaluate the resignation as well as Panel producer's obligation before draw an approval decision, then General Manager instruct the

Administration Coordinator to publish this resignation.

20. THE CHANGE OF CERTIFICATION REQUIREMENT

The certified Panel producer will be informed If there is a change in certification requirement in regard with quality system standard, product standard or certification system.

MUTU CERTIFICATION shall take account of views expressed by interested parties before deciding on the precise form and effective date of the change. Following the decision on and publication of the changed requirement, MUTU CERTIFICATION shall verify that each certificate holder makes any necessary adjustments within such time as in the opinion of MUTU CERTIFICATION is reasonable.

21. PUBLICITY OF CERTIFICATE HOLDERS

A certified Panel producer has a right to publish that the product, and its production has been validated and applies the relevant mark of conformity to stationary and promotional material relating the scope of registration as detailed on the Certificate.

22. MISUSE OF A CERTIFICATE

MUTU CERTIFICATION shall take all reasonable pre-cautions to control the use of its Certificates. Incorrect reference to registration or misleading use of Certificate found in advertisement, catalogues, etc. shall be dealt with by suitable actions which could include suspension or withdrawal of a certificate, legal action and/or publication of transgression

23. SUSPENSION OF A CERTIFICATE

A Certificate may be suspended for a limited period in cases such as the following :

- (1) If non-compliance reports have not been closed out within the designated time limit.
- (2) If a case of improper use of a certificate, e.g. misleading prints or advertising is not solved by suitable retractions or other appropriate remedial measures by the company.
- (3) If there has been any other contravention of the MUTU CERTIFICATION Codes of Practice.

The company shall not identify as registered any product that has been offered under a suspended certificate and immediately stop all advertising in this respect.

An official suspension of a certificate will be informed in writing by MUTU CERTIFICATION to the company. At the same time, MUTU CERTIFICATION shall indicate under which conditions the suspension will be removed. At the end of suspension period, an investigation will be carried out to determine whether the indicating conditions to reinstating the certificate have been fulfilled. On the fulfillment of these conditions the suspension shall be lifted and the company notified of the certificate reinstatement. If the conditions are not fulfilled, the certificate shall be withdrawn.

All costs incurred by MUTU CERTIFICATION in suspending and reinstating of certificate will be charged to the company.

24. WITHDRAWAL OF A CERTIFICATE

A certificate may be withdrawn in the following cases :

- (1) If inadequate measures are taken by the Panel producer in the case of suspension.

- (2) If the Panel producer fails to comply with due settlement of its financial obligation.
- (3) If the product, production process is no longer offered or the company ceases trading. In this case the Panel producer shall submit a resignation request to MUTU CERTIFICATION and stating the reason
- (4) Lack of ability to carry out production process of the Panel producer because of natural disaster
- (5) If Panel producer cannot keep the quality of product stabilize.
- (6) If Panel producer would not receive inspection by MUTU CERTIFICATION
- (7) If Panel producer did not report the implementation of quality control test.
- (8) If Panel producer makes a misuse of marking.

In case of 19 (1) and (2) above, MUTU CERTIFICATION has a right to withdraw the certificate and informing the company in writing.

No reimbursement of evaluation fee shall be given and withdrawal of a certificate shall be published by MUTU CERTIFICATION.

Note: If certificate has been withdrawn, Panel producer could not submit a new application during 1 year after withdrawing date.

25. FEES

Cost and fees necessary for the certification of the typical case would be as follows :

- (1) Application Fee
- (2) Cost and fees necessary for the certification process:
 - a) Certification evaluation fee (per one product item).
When a Panel producer applies for several product items at a same time, additional cost for each product item shall be added.
 - b) Initial On-site Inspection Fee
 - c) Primary or Secondary Method test Fee
 - d) Travel expense for evaluation: Flight fare, transportation on site and hotels – applicant responsibility
 - e) Cost and fees necessary for the registration of certification: (per one product category of a Panel producer). When a Panel producer applies for several product category additional costs for each category shall be added.
- (3) Cost and fees necessary for the maintenance of certification
 - a) Registration and certification maintenance fee (per one item product per month)
 - b) Inspection fee
 - c) Primary or Secondary Method testing fee
 - d) Travel expense
Travel expense for evaluation: Flight fare, transportation on site and hotels – applicant responsibility

Note :

Costs and fees necessary for certification process and registration of certification would be paid in advance.

Costs and fees necessary for the maintenance of the certification would be paid according to Certification Contract.

When the additional evaluation or audit is necessary for the confirmation or corrective measures or other, additional costs and fees shall be necessary.

The fees quoted shall exclude traveling and subsistence expenses which will be charge extra cost. All fees and additional charges are subject to local taxes in the country concerned at the appropriate rate.

26. COMPLAINTS FROM PANEL PRODUCER TO MUTU CERTIFICATION

Should the Panel producer have cause to complaint, regarding the conduct of MUTU CERTIFICATION employees or sub-contractors, the complaint should be made in writing and addressed to the General Manager of MUTU CERTIFICATION.

27. NOTICE OR WARNING LETTER FROM MUTU CERTIFICATION TO PANEL PRODUCER

MUTU CERTIFICATION's Notice or Warning Letter to customer is notice or warning letter regarding non-complying product against product standard requirement. All non-complying shall be closed out within the designated time limit.

The customer shall file MUTU CERTIFICATION's non- complying Report and together with corrective action to be carried out. The result of corrective action will be verified by MUTU CERTIFICATION's inspector / auditor within designated time limit or in the next visit.

28. JUDGMENT TEAM RESPONSIBILITIES

The Judgment Team, under the direction of the Chief of The Judgment Team, shall be responsible for taking appropriate action on any relevant mater where their advice or decision is not taken or acknowledge respectively.

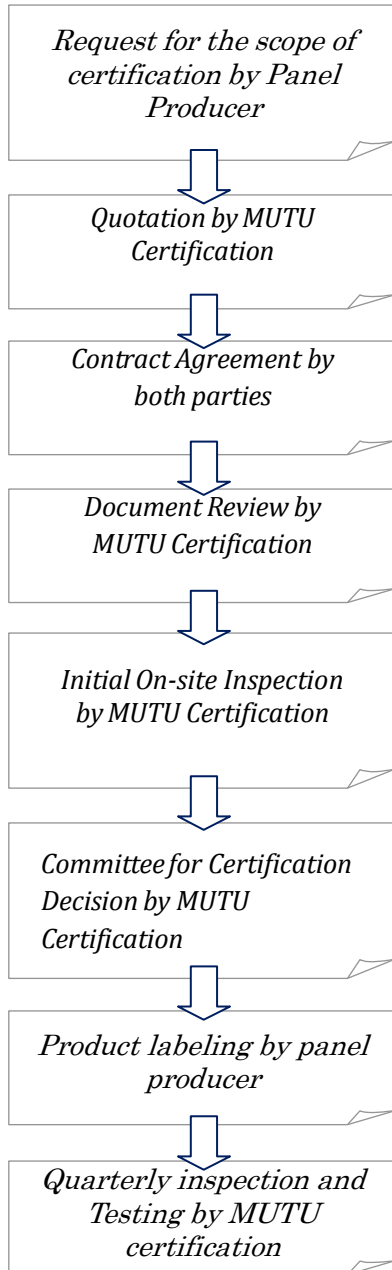
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Date: June 28, 2017

Annex 1. The Mechanism of Certification Process

The mechanism of the certification process can be described in the following scheme:

CERTIFICATION PROCESS FLOW CHART



When MUTU Certification receives an initial contact from a panel producer, MUTU Certification will submit the “Request for the scope of Certification of Panel Producer” form.

After receiving Request for the scope, MUTU Certification will submit a costs and fees necessary for the certification.

If panel producer agree with the quotation, MUTU Certification and the panel producer must sign a contract agreement.

Panel producer shall submit QC Manual, Procedure and other relevant documents to be reviewed by MUTU Certification.

MUTU Certification will conduct initial audit to verify quality assurance of the panel producer and taking sample for initial testing.

MUTU Certification will arrange committee to evaluate the audit and testing report. Initial On-site Inspection must be re-conducted if product testing result does not comply with formaldehyde emission standards.

The certified panel producer is allowed to put EPA-recognized TPC number at the product or bale, and can export the product to United States.

MUTU Certification will conduct inspection at least once per quarter to verify that quality assurance system is well implemented at the panel producer and the products are complied with the applicable formaldehyde emission standards.

