

No. : 2094.6/EXT-MUTU/VII/2017

Jakarta, July 31, 2017

To. : TPC 6 CARB Certified Panel Producers
 Subject: Early Labelling Provision


Dear Sir/ Madam,

On July 11, 2017 US EPA had took direct final action to amend a final rule that published in the Federal Register on December 12, 2016 concerning formaldehyde emission standards for composite wood products. This proposed amendment would allow compliant composite wood products and finished goods that contain compliant composite wood products that were manufacture prior to December 12, 2017 to be labeled as Toxic Control Substances Act (TSCA) Title VI compliant. This final rule will be effective on August 25, 2017. This means that regulated composite wood products and finished goods that meet the required formaldehyde emissions standard could voluntarily labeled as compliant as soon as compliance can be achieved. With regard to this voluntarily early labelling provision, we would like explain as below:

1. Product may be labeled as compliance with TSCA Title VI is product that were manufactured on or after August 25, 2017. Product that were manufactured before August 25, 2017 may not be labeled as TSCA Title VI compliant.
2. Since this early labelling is voluntarily, panel producer can wait until December 12, 2017 to begin offering TSCA Title VI labeled products for sale, and only put CARB label.
3. Panel producers are free to combine the TSCA Title VI labels with CARB labels so long as the required information is present, legible, in English and accurate.

Herewith we inform to you the example of labeling depend on your current certificate status. The label may be applied as stamp, tag or sticker.

1. For panel producers that have certifications from a CARB-approved TPC


 COMPANY NAME Address	TPC Number	: TPC-6 (CARB-approved and EPA-recognized)
	CARB Certificate Number	: TPC 6/CARB-ATCM/Mxxx-CWP*xxx
	Products	: Composite Wood Products*
	Formaldehyde Emission	: CARB 93120.2 (a) Phase 2 (0.05 ppm) EPA TSCA Title VI 0.05 ppm
	Resin type	: Urea/Melamine/Phenol Formaldehyde (interior)
	Product size (mm)	: <i>thickness x width x length</i>
	Production date	: MM/DD/YYYY **
	Lot Number	: XXXXXXXXXXXX
	Crate Number	: XX
	"This Product is compliant with CARB 93120 Phase 2 and meet EPA TSCA Title VI"	

Head Office & Laboratory :


Jl. Raya Bogor KM 33.5 No.19 Cimanggis - Depok 16953 Indonesia
 Phone : (62-21) 8740202, Fax. : (62-21) 87740745 - 46

E-mail : webmaster@mutucertification.com Website : www.mutucertification.com

2. For panel producers that have certifications from a CARB-approved TPC and an EPA-recognized TPC

 COMPANY NAME	TPC Number : TPC-6 (CARB approved and EPA recognized) CARB Certificate Number : TPC 6/CARB-ATCM/Mxxx-CWP*xxx EPA Certificate Number : TPC 6/EPA-TSCA/Mxxx-CWP*xxx Products : Composite Wood Products*
	Formaldehyde Emission : CARB 93120.2 (a) Phase 2 (0.05 ppm) EPA TSCA Title VI 0.05 ppm Resin type : Urea/Melamine/Phenol Formaldehyde (interior)
Address	Product size (mm) : <i>thickness x width x length</i> Production date : MM/DD/YYYY ** Lot Number : XXXXXXXXXXXX Crate Number : XX "This Products are compliant with CARB 93120 Phase 2 and EPA TSCA Title VI"

3. For panel producers that have certifications from an EPA-recognized TPC

 COMPANY NAME	TPC Number : TPC-6 EPA- recognized EPA Certificate Number : TPC 6/EPA-TSCA/Mxxx-CWP*xxx Products : Composite Wood Products*
	Formaldehyde Emission : CARB 93120.2 (a) Phase 2 (0.05 ppm) TSCA Title VI 0.05 ppm Resin type : Urea/Melamine/Phenol Formaldehyde (interior)
Address	Product size (mm) : <i>thickness x width x length</i> Production date : MM/DD/YYYY ** Lot Number : XXXXXXXXXXXX Crate Number : XX "This Product is compliant with EPA TSCA Title VI"

Note: * CWP = HWPW for Hardwood Plywood, PB for Particleboard or MDF for Medium Density Fiberboard
 ** MM = month, DD = day, YYYY = year

Labeling requirement, especially for panel producers that have certifications from a CARB-approved TPC:

1. Panel producer have to establish Quality Control Manual (QC Manual) in accordance with US EPA 40 CFR Part 770.20, 770.21, 770.22, 770.40 and 770.45 requirements (attached) and submit to TPC for review and get the approval.
2. Panel producer establish a draft of labeling and submit to TPC for review and get the approval.

Thank you for your attention and cooperation.

Best regards,



Didik Heru Untoro
Executive Director

NB : For further information and queries, please contact to:

1. James J. Apituley (phone: +62 81296136220, email: james@mutucertification.com)
2. Dudi Iskandar S. (phone: +62 81324710368, email: dudi@mutucertification.com)
3. Ervina Marissa (phone: +62 81328287711, email: vina@mutucertification.com)
4. PT. Mutuagung Lestari Office (+62 21 8740202, email: inspector@mutucertification.com)

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