Federal Wood Industries Coalition

Statement on Deconstructive Testing

A number of questions have arisen regarding formaldehyde testing that has been done on finished goods and particularly laminated flooring. The California Air Resources Board’s (CARB) formaldehyde regulation and the EPA regulations that are to go into effect in the future regulate the panel substrates that are used as component parts of finished goods (e.g. furniture, cabinets, flooring) and require manufacturers of these finished goods to use composite wood panels complying with CARB’s strict requirements. The regulation also includes a third party certification program for composite wood panel producers to validate their compliance. We support these regulations and encourage their strict enforcement.

Most finished goods have laminates, coatings or finishes that further reduce the emission of residual formaldehyde in common use. The regulations do not consider these effects – they only regulate the unfinished panel substrates.

Some laminated flooring recently has been the subject of “deconstructive testing” -- the mechanical removal of the outer laminates and finishes by planers or sanders to expose the substrate. This type of testing is not required by CARB to demonstrate compliance. CARB has used this approach as a “rough” screening method, but the procedure is not part of the regulation nor has it been adopted by ASTM or other consensus standards bodies. The deconstructive method is “rough” because the process can fundamentally change the emission properties of the panel substrate. It should only be used by professionals who understand its use and limitations.

CARB now has under consideration a proposal that would test laminated panels without removing the laminate, using well established and vetted test methods. We support the use of this technique.

The Federal Wood Industries Coalition is a broad group representing manufacturers of panels, furniture, cabinets, other finished goods, resins and others. FWIC has worked closely with CARB officials throughout its rulemaking process and was instrumental in the passage of federal legislation to adopt the California regulations on a nation-wide basis.