



# FORMALDEHYDE EMISSIONS FROM COMPOSITE WOOD PRODUCTS REGULATIONS

*CANADIAN  
ENVIRONMENTAL  
PROTECTION ACT,  
1999*

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## Background

- Rule proposed in 2020
- Issued pursuant to Canadian Environmental Protection Act
- Administered by Health Canada
- Finalized in June 2021
- Became effective in January 2023; Laminated Products January 2028
- Amendments proposed in June 2023

# Overview

Purpose:

- Reduce potential health risks
- Align with EPA TSCA Title VI

Import or sale prohibited unless:

- Emissions are below limits
- Declarations of Certification (Attestations) retained



# Scope



Particleboard  
(PB)



Hardwood  
Plywood



Medium Density  
Fibreboard  
(MDF)



Laminated  
Product (LP)

**Finished Goods & Component Parts**  
that incorporate a composite wood product



# Testing

## Primary

- Four times annually
- ASTM E1333 or ASTM D6007

## Quality Control

- Frequency based on production
- Variety of test methods may be used
- Must be correlated to E1333 or D6007
- Reduced testing for NAF/ULEF



# Certification

Certification by TPC required for panels and LPs

- Panel in finished goods must be certified
- LPs that use NAF or PF resins; certification only for core panels

Accepted certification

- TSCA Title VI
- CANFER



# Third Party Certifier (TPC)

## Qualifications:

- ISO 17065 accreditation
- Access to a laboratory accredited to run ASTM E1333 and/or D6007

## Additional Guidance (July 2021):

- [Guidance – TPC roles & responsibilities](#)



# Declaration of Certification

- Produced by panel manufacturer upon certification
- Contents:
  - Name of TPC (or TPC number from EPA)
  - TPC contact information
  - List of certified product types
  - Date of certification





# Declaration of Certification

- DoC information needs to be made available to importers, fabricators, and retailers
- Specific process of sharing this information under revision through rule amendments (more later)
- The DoC does not track which panels have been incorporated into which good



# Non-Compliant Lots

- Primary or QC test exceeds applicable limit; may not be sold until treated and re-tested
- Customers need to be notified within 72 hours
- Treated to reduce emissions through chemical scavenger or aging
- Retested to ensure emission limit is met (one sample for primary; three for QC), using same test method as initially performed



# Labelling

- Compliance statement can be one of the following:
  1. CANFER compliant / conforme au CANFER
  2. TSCA Title VI compliant / conforme au titre VI de la TSCA
  3. TSCA Title VI certified / certifié conformément au titre VI de la TSCA
- Optional label statements for NAF or ULEF resins
- Manufacturers/importers must ensure label is affixed to panels
- Buyers who purchase panels from manufacturer/importer do not need to affix label as long as info is available.



# Labelling

## Panels

1. Manufacturer
2. Lot number
3. Compliance statement
4. TPC name (or TSCA Title VI #)

## Finished Goods

1. Manufacturer
2. Date of manufacture
3. Compliance statement



# Reporting

- No annual reports
- One-time self-identification report:
  - Manufacturers, importers and sellers
  - Contact information and role (i.e., manufacturing, importing and/or selling; panels, finished goods and/or component parts)
  - Due within 60 days of coming into force date or when manufacturing, importing and/or selling begins
  - Updates required if information changes



# Proposed Amendments

- QC testing
- Declarations of certifications/attestations
- Timeframe to report non-conforming lots
- Retesting of non-conforming lots
- Grace period for providing documents to ministry



# Recordkeeping

| Record                        | Panels             |          | Finished Goods                |          | Retailer |
|-------------------------------|--------------------|----------|-------------------------------|----------|----------|
|                               | Manufacturer       | Importer | Manufacturer                  | Importer |          |
| Declaration of Certification  | X                  | X        | X                             | X        | X        |
| Manufacturer and Date         | X                  | X        | X                             | X        |          |
| Supplier and Purchase Date    |                    | X        |                               | X        |          |
| TPC Qualifications            | X                  | X        |                               |          |          |
| TPC Verification Date         | X                  | X        |                               |          |          |
| Primary Test Data             | X                  | X        |                               |          |          |
| Non-Complying Lot Information | X                  | X        |                               |          |          |
| QC Test Data                  | X                  |          |                               |          |          |
| Reduced Testing Information   | X                  |          |                               |          |          |
| Resin Information             | X                  |          |                               |          |          |
| Total Volume of CWP Made/Sold | X                  |          |                               |          |          |
| Customer Information          | X                  |          |                               |          |          |
|                               |                    |          |                               |          |          |
| Key                           | Maintained On-site |          | Provided Within 14 or 40 Days |          |          |

# QUESTIONS?

**Additional Information from Health Canada:**

<https://www.canada.ca/en/health-canada/services/chemical-substances/other-chemical-substances-interest/formaldehyde.html>

