



U.S. EPA TSCA TITLE VI LAMINATED PRODUCTS FREQUENTLY ASKED QUESTIONS

Beginning March 22, 2024, certain “laminated product” producers as defined under the EPA TSCA Title VI (40 CFR Part 770) will lose their exemption status and will be subject to certification.

WHAT IS A LAMINATED PRODUCT?

A laminated product under EPA TSCA Title VI is defined as a finished good or component part that has a wood or woody grass veneer affixed to a certified particleboard (PB), medium density fiberboard (MDF), or a veneer core. This includes panels used in engineered wood flooring, cabinetry, furniture, architectural panels, and other similar products when the fabricator does the veneer laminating.

ARE ALL LAMINATED PRODUCTS COVERED AND SUBJECT TO THE CERTIFICATION REQUIREMENT?

The term “laminated product,” as defined in the regulations does not apply to other decorative surface-faced panels such as thermally fused laminate (TFL), paper, aluminum, acrylic, melamine, paint, vinyl, high pressure laminate (HPL), etc. While these products do not require additional certification, the underlying raw composite panel substrate must be certified to TSCA Title VI and continues to be subject to certain purchasing, labeling, and recordkeeping requirements.

WHICH LAMINATED PRODUCT PRODUCERS WILL LOSE EXEMPTION FROM CERTIFICATION ON MARCH 22?

Beginning March 22, 2024, laminated product producers that use a resin system to affix the wood or woody grass veneer to the substrate, other than those that use no-added formaldehyde (NAF) or phenol formaldehyde (PF) resins, will now be considered hardwood plywood producers. Those producers must be third-party certified to EPA TSCA Title VI and will now be responsible for the same testing, certification, recordkeeping, and labeling as a panel producer of hardwood plywood.



COMPOSITE PANEL ASSOCIATION

Advancing the wood-based panel and decorative surfacing industries

19465 Deerfield Avenue, Suite 306, Leesburg, Virginia 20176

Tel 703.724.1128

www.CompositePanel.org

WHAT LAMINATED PRODUCT PRODUCERS WILL CONTINUE TO BE EXEMPT FROM CERTIFICATION?

On March 22, 2024, the exemption remains in place only for product producers for which the wood or woody grass veneer is affixed to a substrate by means of a NAF or PF resin. Regardless of exemption status, all laminated products are required to use certified cores. For these laminated product producers that continue to be exempt, there are additional specific purchasing and recordkeeping requirements that will now be required under TSCA Title VI, even though third-party certification is not required.

QUESTIONS?

Please contact the [CPA Certification Team](#) or view [EPA's FAQ](#) and [TSCA Title VI Resources and Guidance Materials](#)