SPCR 171

Certification rules for
Third-party certification
of manufacturers of
composite wood products
in accordance with the
requirements in U.S. EPA
TSCA Title VI Regulation
Abstract

Third-party certification of manufacturers of composite wood products in accordance with the requirements of U.S. EPA TSCA Title VI.

A product can be granted permission to display RISE by EPA assigned number after certification by RISE Certification. Certification includes verification of the product’s compliance with the technical requirements verification and the manufacturer’s quality control procedure as stated in the EPA 40 CFR Part 770 Formaldehyde Emission Standards for Composite Wood Products.

Continuous quality control is performed by the manufacturer and consists of among others a small-scale testing of panels.

Surveillance inspection is performed by RISE or by a RISE approved inspection body, with the purpose of ensuring that the supplier’s inspection procedures are operating properly. During these inspections, sample products will be taken for subsequent performance and compliance testing at RISE laboratory.

Keywords: Certification, quality control
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Preface

This document sets out the rules for third-party certification of manufacturers of composite wood products, regarding formaldehyde emission.

The technical requirements and the quality control procedure are stated in the EPA 40 CFR Part 770 Formaldehyde Emission Standards for Composite Wood Products.

The actual process of certification is carried out by RISE Certification, as described in Section 2 of these rules.

These certification rules are based on current editions of the relevant regulations but can be revised in future as necessary to reflect future editions of regulations. This issue replaces earlier issue from 2008.

Borås, 29 June 2018

RISE Research Institutes of Sweden AB
Certification

Dag Sjöholm
1 Introduction

1.1 General
Certification involves confirmation by an independent third party that a product fulfils requirements set out in standards or some other form of specification. Certification by RISE is performed by RISE Certification, a department that is separate from the testing and inspection departments. Certification of products by RISE Certification is performed in accordance with ISO/IEC 17065.

1.2 Scope
These rules involve certification of composite wood products, with respect to formaldehyde emission, in accordance with the requirements in U.S. EPA TSCA Title VI. The following product types are concerned:

- Hardwood Plywood
- Particleboard
- Medium Density Fibreboard

Ongoing inspection consists of two elements: the manufacturer’s own inspection, and surveillance inspection performed by a third party. The former consists of inspection of the production process and of the finished products. Surveillance inspection is performed by RISE or by a subcontractor to RISE by means of visits to the manufacturer, to check that the manufacturer’s own inspection is operating in accordance with the inspection instructions as approved by RISE. In addition, samples will be taken of finished products for testing.

A list of issued certificates, which is continuously updated, is available on RISE web site (www.ri.se).

1.3 Certification scheme
The certification scheme consists of the following activities:
- Initial assessment of documentation over the manufacturers own inspection procedures
- Initial inspection on site including sampling of test samples of finished products
- Evaluation of result from the inspection and results from test of samples
- Review of the evaluation
- Decision on certification and issue of certificate
- Quarterly surveillance inspections including sampling of test samples of finished products
- Re-issue of certificate every 5 year
2 Conditions for Third-party certification of manufacturers

2.1 The certification process
The certification process is described in steps 2.1.1 -2.1.4 below. RISE General certifications rules for product certification, CR000, also applies.

2.1.1 Application
Application for certification shall be submitted in writing and shall contain information and/or be accompanied by documentation as stated in the application form. An application form can be found in appendix 1.

The applicant shall provide technical data for the product(s) concerned.

2.1.2 Review of application
When reviewing the application, RISE Certification checks that the application is complete and that the application can be handled within RISE rules. The review may result in that RISE cannot accept the assignment, which is communicated to the manufacturer with a justification. If the application is adopted, which is communicated to the manufacturer through an order confirmation. A plan for the evaluation is set up, and a time for the initial inspection visit will be agreed with the manufacturer.

2.1.3 Evaluation
The evaluation consists of an initial assessment, which involves assessment of the quality manual and the inspection procedures, against the requirements set up in the regulation EPA 40 CFR Part 770. 10 Subpart C.

The implementation of the procedures will be audited at the manufacturer's premises. At the visit, samples of test specimens will be taken and sent to RISE where they will be tested in the aspect of formaldehyde content. All deviations, if any, found during the evaluation phase, shall be corrected by the applicant and approved by RISE Certification. When the evaluation is complete, it will go further to the review and decision.

2.1.4 Review, decision and issuing of a certificate
The evaluation work is reviewed, and if the result is approved, a certification decision will be taken. When a certification decision has been taken, a certificate will be issued and sent to the manufacturer.

2.1.5 Period of validity
The certificate will be valid as long as all conditions are met, including that the manufactured products fulfil the requirements and that the manufacturer's quality control and own inspection procedures are operating as intended, see also CR000. Quarterly audits and sampling of products will be performed by RISE or by a subcontractor to RISE to verify the effectiveness of the quality control.

The validity of the certificate is five (5) years. Depending on the content of reports from surveillance inspections, and on other factors, the holder of the certificate may apply for extension of the time validity. If regulatory conditions have changed, it may be necessary to perform a new evaluation. See also Section 5 concerning validity of the certificate.
2.1.6 Manufacturer's continuous quality control and inspection including small scale testing

An agreement on continuous quality control and inspection, as described in Section 4.2, shall be written between the holder of the certificate and RISE. In the case of RISE using a subcontractor, an agreement between all three parties shall be set up.

2.1.7 Product marking

The holder of the certificate shall be entitled to mark the products covered by the certificate with RISE number, TPC 13, and shall also be entitled to refer to the certificate in connection with advertising of, or other publicity for, the products. Advertising shall not be performed in such a way that there is any risk of confusion between marked and unmarked products. See also “Rules for the use of certificates and marks – Product certification”.

The marking shall be in accordance with the EPA 40 CFR §770.45. The labelling shall include the panel producer’s name, lot number, RISE TPC number (TPC 13) and a statement that the products are TSCA Title VI certified. Non-individual labelling is accepted under certain conditions set out in EPA 40 CFR §770.45. The use of a coded format of the producer name is accepted, if traceable. The label may be applied as a stamp, tag or sticker. See EPA 40 CFR §770.45 for detailed requirements and CR000 for additional terms.

Panels transported for quarterly or quality control testing purposes shall be labelled with “For TSCA Title VI testing only, not for sale in the United States”.

3 Product and production control requirements

See: EPA 40 CFR Part 770 Subpart C
4 Requirement for ongoing inspection

4.1 General
The aim of ongoing inspection is to verify that all certified products continue to fulfil the requirements in the certification rules. It consists of manufacturer's own inspection, for which the holder of the certificate is responsible, and of surveillance inspection which is performed by RISE Certification or by a sub-contractor approved by RISE Certification (hereinafter referred to as an inspection body). Arrangements for performance of this inspection shall be agreed in an agreement between the certificate-holder and RISE.

If the ongoing inspection finds that a certified product does not meet the requirements in these certification rules, the holder of the certificate is required immediately to cease marking the product in question, and to retain products from the same batch until the cause of the non-compliance, and its extent, have been determined. The approval marking shall be removed from all parts of the batch that do not meet the requirements.

See EPA 40 CFR Part 770 Formaldehyde Standards for Composite Wood Products for detailed requirements.

4.2 Manufacturer's own inspection
Each manufacturer shall have written instructions for in-house inspection procedures, in the form either of a separate system or inclusion in the company's quality management system.

4.3 Surveillance inspection

4.3.1 Performance
Surveillance inspection will normally be carried out once a quarter, usually in the form of a notified visit to the place of manufacture at times/dates decided by RISE. If necessary, RISE Certification shall be entitled to require further surveillance inspection visits.

4.3.2 Actions if products or surveillance fail to be approved
If surveillance of the manufacturer's quality control system results in failure, or if subsequent tests result in failure, the reasons for this failure shall be investigated. This investigation can result in a new surveillance visit, additional evaluation or failure of the inspection. RISE will notify EPA and the holder of the certificate for each failed quarterly test within 72 hours.

While the matter is under investigation, RISE is entitled to prohibit marking of the product.

4.3.3 Reports
The results of the surveillance inspection shall be presented in a report. The report will be sent/handed to the holder of the certificate. All reports from the surveillance inspections are sent to RISE Certification. A copy of the report will be archived by RISE.
5 Other terms and conditions

5.1 General
The terms and conditions in these certification rules, Sections 2 and 5, are based on principles set out in RISE Quality Manual for Certification. RISE Certification can approve subcontractors for the surveillance inspection (inspection bodies). The subcontractor shall be accepted by the certificate holder.

RISE General certifications rules for product certification, CR000, also applies.

Each certificate shall apply to one production plant but can cover more than one product type. Each product type shall be specified in the certificate.

5.2 Responsibilities of the holder of the certificate
The holder of the certificate is responsible for ensuring that the products covered by the certificate, and which are marked, fulfil in all respects the requirements of the certification rules to which the certificate refers. Certificates are not transferable.

5.3 Other inspection
RISE Certification shall be entitled, at any time, and at any place, to initiate or carry out any other tests or inspection, e.g. through purchase of products on the open market.

5.4 Changes of design, materials, production etc
Before making any changes to the design or materials of a certified product, the holder of the certificate shall notify RISE Certification in writing. RISE will decide which action has to be taken.

The certificate holder shall inform RISE Certification within 72 hours after making any significant changes in production that could affect formaldehyde emissions.

The holder of the certificate shall also inform RISE Certification within ten calendar days after of any change in the identity of the quality control manager. The information shall include qualification of the new quality control manager.

5.5 Fees
Fees for initial assessment, extension of validity, modifications of certificates and annual fees are shown in a special price list, and shall be paid by the holder of the certificate.

Fees for surveillance inspection are regulated by the contract between the holder of the certificate and RISE Certification or its subcontractor (the inspection body).

Fees for other inspection in accordance with Section 5.3 will be charged to the holder of the certificate if the results of such inspections show that the requirements of these certification rules are not being fulfilled, or where inspection has been performed due to special circumstances, such as the occurrence of a non-conformance needed to be verified on site.
5.6 Confidentiality
With the following exceptions, all information obtained by RISE Certification will be treated as commercially confidential:

- Certificates listed on the web site list can also be downloaded in their entirety as pdf files.
- EPA is entitled to examine any material submitted in connection with certification. RISE will also report to EPA.
- Accreditation body is entitled to examine any material submitted in connection with certification.