

Acknowledgement of Vendor Compliance Manual Revision 2.0

Vendor Name: _____ Vendor # _____

Wood Composite Requirements (CARB- California Air Resource Board)

- Requirements only applicable to products with wood composite construction.
- Improvement vendors are responsible for meeting the Improvement requirement due dates listed.
- Improvement vendors are responsible for compliance of the full regulation including materials, labeling and documentation.
- For the full CARB regulation summarized herein, please go to <http://www.arb.ca.gov/toxics/compwood/compwood.htm>

Advance Shipment Notice (ASN)

- All shipments (Domestic and Import) require a Advance Shipment Notice. **No faxed ASN's will be accepted.** Please use the ASN form that is to be downloaded from www.ccsinc.com/improvements.htm and email to our warehouse as instructed. ASN's must be sent by EDI, Vendor Net or emailed through the New ASN Creator the same day the shipment leaves, to arrive 24 hours prior to delivery.
- Your ASN must be 100% accurate and match the P.O.
- Only 1 ASN per container. One ASN may not be spread over multiple containers.

UCC-128 Case Labels

- Individual case label must be affixed to each master carton.
- The UCC-128 case label must be placed on the smallest side of the master carton.

Case Contents

- Case must contain only 1 SKU.
- Each item **MUST** be individually labeled with a product label with the Improvements SKU number and description.

Conveyable Case Boxes

- All cases must be conveyable unless size of item is outside conveyable range.
- All smaller cases must be master packed in a conveyable master case.
- No straps on conveyable cases.

Transportation

- Freight shipments must be shipped terms "collect."
- UPS shipments must use terms, Collect Billing and us our account number. (See Routing Guide)
- Correct carriers must be used for shipping point/merchandise type
- Overweight shipment must call Routing Department for specific instructions.
- Shipments must follow authorized weight, cube, and cartons.
- No unauthorized air shipment.
- Vendor must consolidate same day/destination shipments.
- Merchandise cannot be consigned to the wrong location.
- **Carton count and purchase order numbers must be present on Bill of Lading and match ASN.**

It is hereby acknowledged that the undersigned agree to comply with the requirements as outlined in the Improvements Catalog Vendor Compliance Manual. If purchase orders are shipped in any manner not in compliance with the Improvements catalog manual, the vendor will be responsible for all expenses incurred by Improvements Catalog. as a result of the non-compliance issue.

Please acknowledge your understanding by legibly completing this form, signing where indicated and returning the executed copy VIA fax or mail to the address below.

Company name/address/phone no.

Company Representative/Title

(Please print)

(Signature)

(Date)

WOOD COMPOSITE REQUIREMENTS (CARB)

All Vendors of Wood Composite Products,

California Air Resources Board (CARB or ARB) has released a regulation to reduce formaldehyde emissions from composite wood products sold in California. Emissions standards are broken into Phase 1 and Phase 2 with varying dates for compliance.

Here is a summary for your reference. You are responsible for reviewing the full regulation and being fully compliant (*the full regulation may be found at <http://www.arb.ca.gov/toxics/compwood/compwood.htm>.*)

The regulation affects ALL parties in the supply chain:

“Manufacturer” means any person who manufactures or produces a composite wood product.

“Distributor” means any person to whom a composite wood product or finished good is sold or supplied for the purposes of resale or distribution in commerce, except that manufacturers and retailers are not “distributors.”

“Importer” - means the person or entity as defined in the regulations of the Bureau of Customs and Border Protection, 19 Code of Federal Regulations, section 101.1.

“Fabricator” - means any person that uses composite wood products to make finished goods. “Fabricator” includes producers of laminated products. Most of Improvements direct import suppliers would fall into this definition.

“Retailer” means any person or entity that sells, offers for sale, or supplies directly to consumers composite wood products or finished goods that contain composite wood products.

There are differing requirements for each party involved.

Materials Covered:

- Hardwood Plywood (HWPW) (separated into veneer core and composite core)
- Particleboard (PB)
- Medium Density Fiberboard (MDF) (Standard or Thin) –includes Low-and High-Density
- All products made from above materials regardless of finish (ex. paint, laminate, coatings, etc.)
- Finished and Unfinished Products

For full definition of these and other terms in the regulation see the internet link below under resources.

Items Covered:

It includes all items with these composite woods. It therefore includes wood wall decorations & shelves, wood mirrors, pallets made of composite woods, jewelry boxes, wood desk caddies and all furniture ...

Raw Material Emission Limits & Sell Through Dates:

Table 1 Phase 1 and Phase 2 Formaldehyde Emission Standards for Hardwood Plywood (HWPW), Particleboard (PB), and Medium Density Fiberboard (MDF) ⁽¹⁾					
Effective Date	---- Phase 1 (P1) and Phase 2 (P2) Emission Standards (ppm) ----				
	HWPW-VC	HWPW-CC	PB	MDF	Thin MDF
1-1-2009	P1: 0.08	-----	P1: 0.18	P1: 0.21	P1: 0.21
7-1-2009	-----	P1: 0.08	-----	-----	-----
1-1-2010	P2: 0.05	-----	-----	-----	-----
1-1-2011	-----	-----	P2: 0.09	P2: 0.11	-----
1-1-2012	-----	-----	-----	-----	P2: 0.13
7-1-2012	-----	P2: 0.05	-----	-----	-----

⁽¹⁾ Based on the primary test method [ASTM E 1333-96(2002)] in parts per million (ppm).
HWPW-VC = veneer core; HWPW-CC = composite core.

As an importer and retailer, Improvements Catalog must sell through inventory that can be shipped to California by the following dates for these items:

Phase 1 -

HWPW (Veneer Core) – Finished Product – June 30, 2010

PB and/or MDF – Finished Product – June 30, 2010

HWPW (Composite Core) – Finished Product – December 31, 2010

Phase 2 -

HWPW (Veneer Core) – Finished Product – June 30, 2011

PB and/or MDF – Finished Product – June 30, 2012

HWPW (Composite Core) – Finished Product – December 31, 2013

Comparison of Standards:

For reference here is a comparison of the standards provided by Bureau Veritas.



Comparison of Standards

	CARB ATCM 93120. using ASTM E1333	European E1 using EN717-1 and EN120	Japan using JIS A1460
Products	Hardwood Plywood (Veneer Core and Composite Core), Particleboard, Medium Fiberboard	Hardwood Plywood, Particleboard, Medium Fiberboard	Hardwood Plywood, Particleboard, Medium Fiberboard
Type of Limits	"cap" standards (no levels above limit allowed)	"average" standards (allows for levels above limit)	"average" standards (allows for levels above limit)
Limits for HWPW-VC	P1: 0.08ppm P2: 0.05ppm	EN 717-1: 0.12 mg/m ³ (0.14ppm)	F-3 star: 0.5 mg/L ⁻¹ (0.07 ppm) F-4 star: 0.3 mg/L ⁻¹ (0.04 ppm)
Limit for HWPW-CC	P1: 0.08ppm P2: 0.05ppm		
Limit for Particleboard	P1: 0.18ppm P2: 0.09ppm	EN 717-1: 0.12 mg/m ³ (0.14ppm) EN120: 8mg/100g ⁻¹ (0.10ppm)	F-3 star: 0.5 mg/L ⁻¹ (0.07 ppm) F-4 star: 0.3 mg/L ⁻¹ (0.04 ppm)
Limit for MDF (Standard)	P1: 0.21ppm P2: 0.11ppm	EN 120: 8 mg/ 100g ⁻¹ (0.10ppm) (does not separate thicknesses)	F-3 star: 0.5 mg/L ⁻¹ (0.07 ppm) F-4 star: 0.3 mg/L ⁻¹ (0.04 ppm)
Limit for MDF (Thin)	P1: 0.21ppm P2: 0.13ppm		
Summary of Method.	Samples are placed in a constant temp. and humidity chamber. Air is continuously replaced. Samples remain in chamber for 16-20 hours. Air is sampled and collection solution tested on UV/VIS	EN120: 110g of sample is extracted using toluene. Formaldehyde is transferred to water. The concentration is measured by a chemical reaction followed by spectrophotometry. EN-717-1: Samples are placed in a constant temp. and humidity chamber. Air is continuously replaced. Samples remain in chamber until constant emission is reached – this may take several weeks. Air is sample and Collection solution tested on UV/VIS	Samples are placed in glass desiccator for 24 hours at 20C. The humidity is uncontrolled. Formaldehyde is collected in water. The concentration is measured by a chemical reaction followed by spectrophotometry.

Documentation & Labeling:

Manufacturers of these wood composites must be tested & certified by a CARB 3rd party certifier. Manufacturers must label and document all compliant products. See full regulation for details.

Fabricators are not required to test & be directly certified.

Fabricators must notify each of their suppliers to comply & document confirmation.

They must document each finished product with a label listing:

- Improvements vendor number (do not list the vendor name)
- Date of production for the finished good
- Notation that the goods comply with Phase I or 2 of the regulation by listing "CARB Phase 1" or CARB Phase 2"

This can be applied next to the current production # labels being used on the back or bottom of each item. As with country of origin stickers and production # stickers, the location of this additional label is to be in a discreet location on the back or bottom of the item; it should not be seen when the item is in use.

Documentation from each supplier to the fabricator must be kept to show that compliant materials are being used; this documentation should include dates of purchase and supplier.

Documentation to show compliance is followed on the bill of lading or invoice designating the specific phase

These records are to be kept electronic or hard copy for 2 years.

Distributor & Importers are not required to test & be directly certified.

Distributor & Importers must notify each of their suppliers to comply & document confirmation.

No additional labeling beyond the Fabricators label is required.

Documentation from each supplier to the distributor or importer must be kept to show that compliant materials are being used; this documentation should include dates of purchase and supplier.

Documentation to show compliance is followed on the bill of lading or invoice designating the specific phase.

Add to the current carton mark either CARB Phase 1 or CARB Phase 2.

These records are to be kept electronic or hard copy for 2 years.

3rd Party Certifiers:

See the CARB website listed below for the 3rd Party Certifiers approved.

Resources:

For the entire final regulation, updates, translations in foreign languages, fact sheets, and approved 3rd party certifiers please visit the CARB website at:

<http://www.arb.ca.gov/toxics/compwood/compwood.htm>

Improvements Catalog requirements:

- Sign and return the updated acknowledgement sheet confirming receipt & understanding of the requirements.
- Documentation and labeling should begin ASAP. All vendors to be following by January 1, 2009.
- All product shipped by January 1, 2010 must be HWPW (Veneer Core), PB and/or MDF Phase 1 compliant.
- All product shipped by June 31, 2010 must be HWPW (Composite Core) Phase 1 compliant.
- All product shipped by January 30, 2011 must be HWPW (Veneer Core) Phase 2 compliant.
- All product shipped by January 30, 2012 must be PB and/or MDF Phase 2 compliant.
- All product shipped by June 30, 2013 must be HWPW (Composite Core) Phase 2 compliant.