

Message

From: Cindy Squires [cindy@iwpawood.org]
Sent: 7/10/2017 1:48:44 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Joe O'Donnell [joe@iwpawood.org]
Subject: RE: Flooring industry stress from delay in early labeling relief

Nancy,

We just saw that the PR and DFR will publish tomorrow.

Thank you!!!!

Cindy

Cindy Squires, Esq.
Executive Director
International Wood Products Association
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www.iwpawood.org



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From: Cindy Squires
Sent: Friday, July 07, 2017 3:33 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Joe O'Donnell <joe@iwpawood.org>
Subject: Flooring industry stress from delay in early labeling relief

Nancy,

I just got off the phone with a major flooring retailer member and they are getting quite stressed about the lack of resolution of the early labeling issue with the formaldehyde rule. This retailer will have to pull the trigger for orders by the end of the July so they have enough in store inventory to make it through the roll out period. This company is very concerned that they are not allowed to order EPA / TSCA product now to fill their inventory. The disruption that the lack of early labeling is causing to the supply chain is quite severe.

To meet the Dec. 12th date for compliance this is what has to happen.

- Orders placed ... July/August
- MDF Production August / September (this is shipped to the flooring manufacturer)
- Flooring Production September / October
- Shipping consumer product to US distribution center October / November.
- Time in transit – November / December

Note all the Asian plants completely shut down for 2 weeks for Chinese New Year Feb. 15. So your last shipments go out around Feb. 1st. They have to plan for this shutdown by having enough inventory to make it through this period. The Third Party Certifiers are telling all the MDF and flooring plants that they can't do anything for them until Dec. 12th.

Bottom line we need to have the early labeling issue resolved by July 20th.

Do we have an ETA for the labeling guidance or rulemaking to solve this early labeling problem?

Thanks so much for your help and guidance.

Cindy

Cindy Squires, Esq.
Executive Director
International Wood Products Association

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