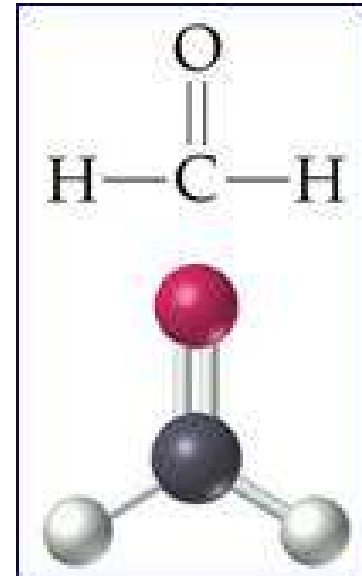


# Opportunities in the Post-CARB World

## A Supplier's Perspective




# Topics for Today

- What we know
- What we think
- What we can do

# What We Know

- CARB is for real
- The consumer is asking a lot more questions

 California Environmental Protection Agency  
**AIR RESOURCES BOARD**

Home Programs Rulemaking Board Meetings Laws & Regulations Data & Statistics Permits, Etc. Events

COMPOSITE WOOD ATCM

Monday, March 23, 2009


**UP LINKS**

- ARB Programs
  - Toxics Program
    - Composite Wood Products ATCM

**LOCAL LINKS**

- Advisories
- Background
- Certified Mills List
- Contacts
- Current Regulation(s)
- Fact Sheets
- FAQs
- Join Email List
- NAF/ULEF
- Outreach

This page last revised March 17, 2009



Formaldehyde is produced on a large scale worldwide. One major use includes the production of wood binding adhesives and resins. The Air Resources Board (ARB) evaluated formaldehyde exposure in California and found that one of the major sources of exposure is from inhalation of formaldehyde emitted from composite wood products containing urea-formaldehyde resins. The International Agency for Research on Cancer (IARC) reclassified formaldehyde from "probably carcinogenic to humans" to "carcinogenic to humans" in 2004, based on the increased risk of nasopharyngeal cancer. Formaldehyde was also designated as a toxic air contaminant (TAC) in California in 1992 with no safe level of exposure. State law requires ARB to take action to reduce human exposure to all TACs.

Staff of the ARB conducted a [formal rulemaking process](#) to address formaldehyde exposure from composite wood products. On April 26, 2007, ARB approved an airborne toxic control measure (ATCM) to reduce formaldehyde emissions from composite wood products including hardwood plywood, particleboard, medium density fiberboard, thin medium density fiberboard (thickness  $\leq$  8mm), and also furniture and other finished products made with composite wood products. The ARB's [April 26, 2007 Board Presentation](#) is available.

# CARB: What We Know

## –A history of sweeping legislation

- Smoke stack monitoring (1947)
- PCV valves in cars (1961)
- Tailpipe emission standards (1966)
- Two-way catalytic converters (1975)
- Lead limits for gasoline (1976)
- Regulations for weed-whackers (1998)
- VOC reduction rules for nail polish (1999)

# Home Depot Flyer, 2006

## GAS BLOWERS



	<b>RYOBI</b>	<b>RYOBI</b>	<b>ECHO</b>	<b>ECHO</b>
	<b>25.4cc Handheld Gas Blower</b> R02810 (181117)	<b>25.4cc Backpack Gas Blower</b> R02870 (180647)	<b>21.2cc Shred 'N' Vac® Gas Blower and Vac</b> R02860 (180648)	<b>25.4cc ProLite™ Backpack Gas Blower</b> R02900 (179833)
Engine	25.4cc, 2 cycle (EPA certified)	25.4cc, 2 cycle (EPA certified)	21.2cc, 2 cycle (EPA certified)	25.4cc, 2 cycle (EPA certified)
Air speed	205 MPH	180 MPH	140 MPH	155 MPH
Air volume	420 CFM	420 CFM	340 CFM (at housing)	427 CFM (at housing)
Weight	10.4 lbs.	11.75 lbs.	9.7 lbs.	14.5 lbs.
Start system	Zip Start™	Zip Start™	Pro-Fire® electronic	Pro-Fire® electronic
Warranty	2 year full	2 year full	2 year homeowner, 1 year commercial	2 year homeowner, 1 year commercial
Features	12:1 mulching ratio, variable speed throttle with cruise control	Lightweight design, pistol grip throttle, comfortable and lightweight with cooling airflow back support	12:1 mulch ratio, cruise control, metal shredding blades, adjustable throttle lock, bag. CARB-certified model also available (113770)	Padded backrest, adjustable hip mounted throttle with cruise control. CARB-certified model also available (112778)



25.4cc, 2 cycle (EPA certified)

155 MPH

427 CFM (at housing)

14.5 lbs.

Pro-Fire® electronic

2 year homeowner,

1 year commercial

Padded backrest, adjustable

hip mounted throttle with

cruise control.

CARB-certified model

also available (527802)

# Consumers: What We Know

- A swing toward scrutiny
  - Healthier, organic choices
  - “Built to last” vs “On Sale”
  - Made in America bias
  - Probe for content & sourcing details
- Teaming up and trading info

# Theme: “Future-Proofing”

- Green and tech fixes to assure salability
  - Energy savings
  - Avoiding urea formaldehyde
  - No/low VOC paint

## THE WALL STREET JOURNAL.

THURSDAY, MARCH 5, 2009

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### *This Old House, Better Than New*

BY GWENDOLYN BOUNDS

Recently, I found my home of the future. Or, what it might be if I started from scratch and had \$4 million to spare.

This “New American Home” was showcased at the International Builders Show in Las Vegas earlier this year and boasted plenty of cosmetic perks -- from a luxe roof deck and outdoor kitchen to a

uct lines. Financial incentives are helping too, from “green” homeowner-insurance policies to expanded tax credits for energy-efficient home improvements in the new federal economic-stimulus package.

And these dwellings aren’t just for the wealthy: The average new green home is 2,477 square feet and costs

-- typically, the bigger the number, the better the insulation -- you can afford and fit with proper installation.

Batt or blanket insulation is often cheapest; fiberglass is still widely used. The main drawback is that batts must be trimmed to fit around pipes and fixtures, leaving spaces susceptible to air leaks.

# What We Think

- CARB evolves into a national standard
- Formaldehyde and China remain tricky issues going forward



Date: February 20, 2009

Subject: Formaldehyde Emissions Second Notification

Dear Supplier:

As you have been made aware, pursuant to Title 17, CCR § 98120, the California Air Resources Board (CARB) recently accepted an Airborne Toxic Control Measure (ATCM) establishing new formaldehyde emission limitations for composite wood products. Under CARB's formaldehyde ATCM regulations, all manufacturers of the above products are required to comply with applicable emissions standards by January 1, 2009 along with CARB's applicable labeling, self-through, third party certification and record keeping requirements (<http://www.carb.ca.gov/regaffairs2007/composite0709final.pdf>). The specific labeling requirements are identified in Advisory No. 2004 issued 12/02 by the Air Resources Board (ARB) and located at: <http://www.arb.ca.gov/toxics/composite0709research/labelingarb.pdf>. Refer to this advisory for your specific labeling requirements. If required, all artwork changes must be approved by the appropriate group within The Home Depot prior to implementation.

As stated in previous communications, The Home Depot will require all of its suppliers that supply and offer for sale any composite wood products or relevant finished goods to comply with the CARB ATCM requirements throughout the U.S. beginning on January 1, 2009.

The requirements include:

- Ensuring your product complies with both Phase I and Phase II emission limits per the standard;
- Obtaining Third Party Certification from a CARB-approved certifier and providing a "statement of compliance" as required that includes (1) the assigned number of the third party certifier, and (2) a statement that the wood products comply with the applicable Phase I or Phase II standards (if this is required for your product / function as noted in the standard);
- Labeling all products according to the requirements in the standard for your applicable function in the supply chain (i.e. manufacturer, fabricator, etc.);
- Maintaining records of certification activity for two years.

In order to meet requirements outlined for retailers, The Home Depot has mandated that all suppliers acknowledge the receipt of the previous notification explaining CARB standards for all products sold at any Home Depot Store, Home Depot Affiliate(s) or HD.com. Your acknowledgement submitted to The Home Depot via the communication ensures your compliance with all standards and will meet ongoing requirements of product traceability and ownership. Suppliers are required to validate that all product shipped to The Home Depot the previous quarter was compliant to the applicable regulation of the standard noted above. You will receive an e-mail notification from The Home Depot Supplier Performance mail box each quarter requiring you to acknowledge that product you have shipped is compliant to the standards outlined in CCR § 98120. The first communication will be emailed out in April 2009 for the first quarter one of  Fiscal Year 2009, to the contact that receives this notification. If someone else should receive the on going communications for your company, please respond to the survey below with the proper contact and their email information. These acknowledgements are in addition to all requirements for manufacturers, distributors, importers, and fabricators outlined in the CCR § 98120 and any advisories issued by CARB. In order to ensure that products are compliant, they must meet the labeling requirements outlined in the standard, which may vary by product and the applicable part's position in the supply chain. All product delivered to The Home Depot must be labeled correctly in order to meet regulations.

Thank you for your support in implementing these controls.  
Please contact us at [Supplier\\_Performance@homedepot.com](mailto:Supplier_Performance@homedepot.com) with any concerns or questions.

Thank you,

Paul Gray  
Director of Quality, Global Sourcing  
The Home Depot

# Corporate Practice



- "...will require all of its suppliers...to comply with the CARB requirements throughout the U.S. beginning on January 1, 2009..."



This email was sent by [woglesby@homedepot.com](mailto:woglesby@homedepot.com)

This email was sent by The Home Depot Global Supplier Performance  
2425 Booneville Road Atlanta, GA, 30339 USA

# Association Practice



## **RVIA Board Sets Date for CARB Adoption**

The RVIA Board of Directors set an effective date at its June 12 meeting in Washington, D.C. for member manufacturers to begin using wood products that meet the California Air Resource Board (CARB) formaldehyde emission levels.

As a condition of association membership, RV manufacturers must build their units for sale in all 50 states using CARB compliant wood by January 1, 2009 and CARB certified wood by July 1, 2010.

- Embracing the CARB Standard
  - RVIA
  - KCMA
  - ANSI





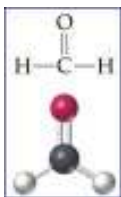
# Formaldehyde & China

- Suffering the same treatment in the court of public opinion
  - Continuous and growing suspicion
  - Feelings driving the issue over facts

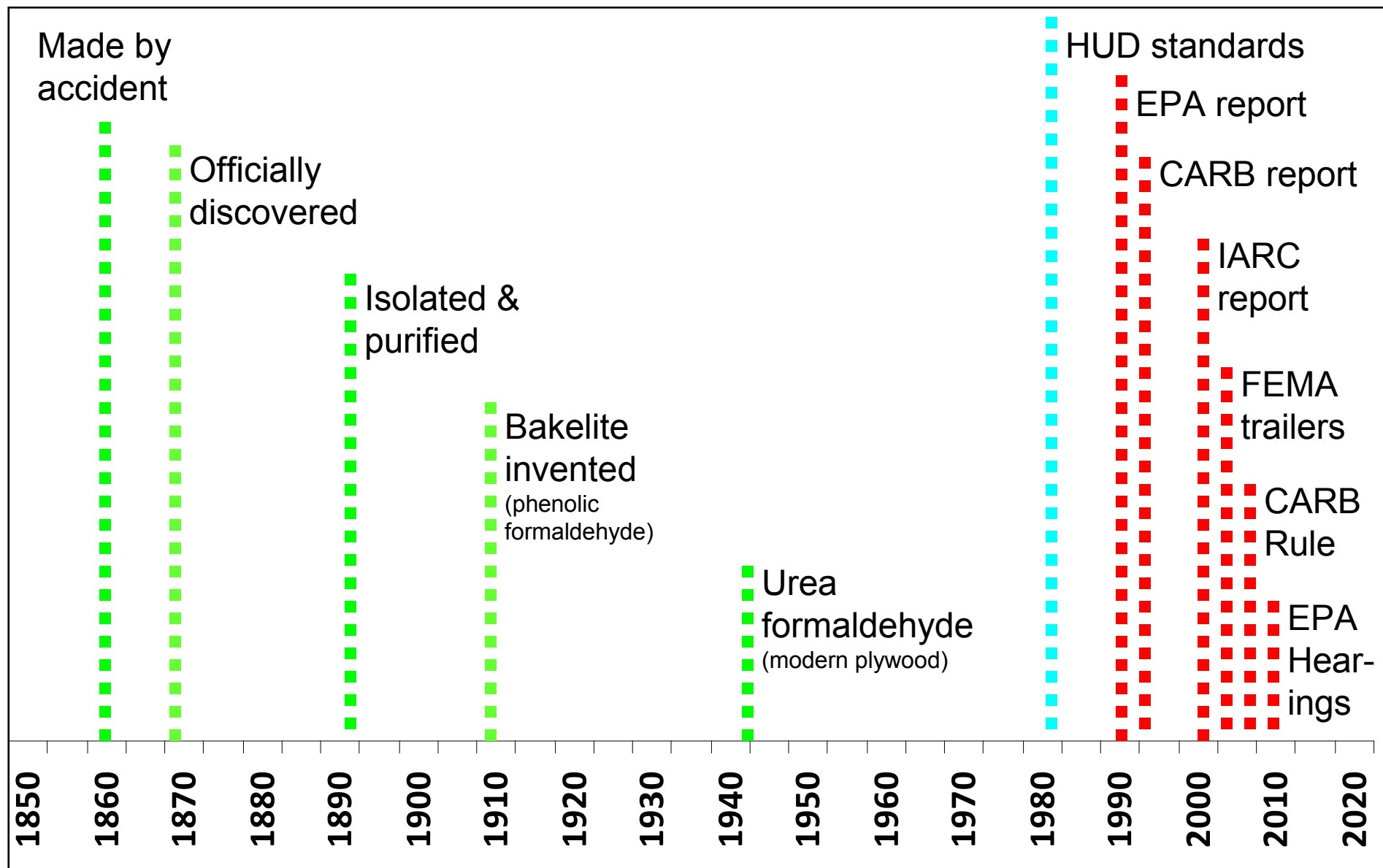
# How Did We Get Here?



- Retrace our steps
- Map a path to the future

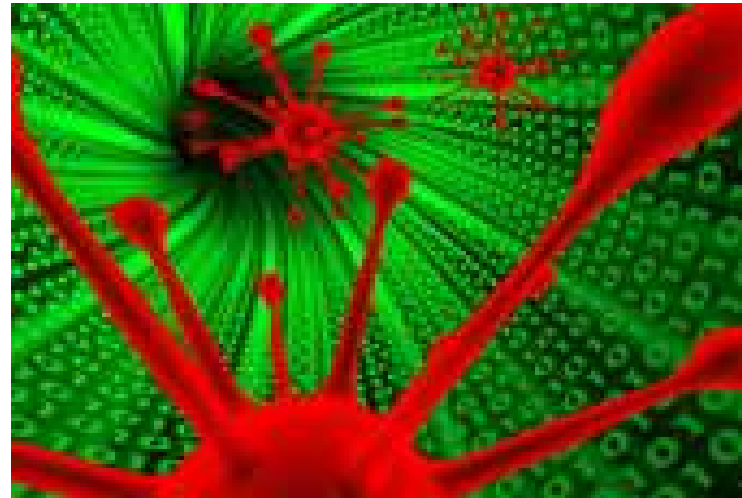


# History of Formaldehyde



# Formaldehyde Frenzy: A Viral Pandemic

- Starts in a lab
- Breaks loose
- Multiplies
- Finds new hosts
- Attracts the attention of authorities
- Faces containment & avoidance



# Multiplying: Blog Sites



# Mama DRAMA

Juggling two full-time jobs  
— the one with a salary and the one with saliva



## Toxic Trailers

### About ToxicTrailers.com

ToxicTrailers.com is dedicated to providing information about formaldehyde poisoning, and advocating effective government regulations to regulate this carcinogen. The government spent more than \$2 billion on FEMA trailers that were found to have hazardous levels of formaldehyde. The FEMA trailer tragedy just exposed what is a widespread problem in RVs, mobile homes, modular buildings and even conventional homes and offices. If you are having symptoms such as burning eyes, congestion, sore throat, coughing, breathing difficulties, frequent sinus infections or rashes, you may have a formaldehyde problem. Send an e-mail to [stories@toxictrailers.com](mailto:stories@toxictrailers.com) and you may qualify for a free test kit.

THURSDAY, MARCH 19, 2009

### formaldehyde poisoning from desk and bed set

My sister bought a desk and bed set which over a period of 4 years made her so sick she has long term damage to her respiratory system. Once we finally figured out what was making her sick, it was too late and she will most likely suffer long-term damages. There are no doctors that really specialize in any treatment from formaldehyde irritation that I could locate. Would you have a Doctor(s) that you know from your experience that may help? Margaret

### Follow Mama Drama on Twitter

To get updates and more, go to [www.twitter.com/taratrower](http://www.twitter.com/taratrower).

Home > Mama Drama > Archives > 2009 > March > 03 > EN

### What's in your crib? Formaldehyde?

By Nicole Villalpando | Tuesday, March 3, 2009, 01:39 PM

The Sierra Club is petitioning the EPA to put tougher regulations on formaldehyde, which is in all kinds of furniture made from composite wood, including items made specifically for babies and children.

The EPA is taking public comment until March 10. You can submit yours at <http://action.sierraclub.org/formaldehyde>.

The issue of formaldehyde in home products has made news in the last few years. In 2006, Sierra Club studies showed that children living in FEMA trailers after Hurricane Katrina were exposed to as much formaldehyde in those trailers as a professional embalmer would regularly encounter. The levels were more than three times higher than what the EPA considers "elevated" or capable of causing respiratory problems and nausea. Pediatricians were seeing increased illnesses in children who lived in FEMA trailers.

Then in 2008, Environment California Research & Policy Center tested 21 nursery products and found that six of the products had high levels of formaldehyde emissions:

- ▶ Of the products tested, the Child Craft Oak Crib emitted the highest levels of formaldehyde. The crib includes a drawer made with composite wood, which is often manufactured using formaldehyde-based glue.
- ▶ Other products with high formaldehyde emissions included the Bridget 4-in-1 Crib by Delta, the Kayla II Changing Table by Storkcraft, the Berkley Changing Table by Jardine Enterprises, the Country Style Changing Table by South Shore Furniture, and the Rochester Cognac Crib by Storkcraft.\*

What do you think? Should the EPA regulate formaldehyde emissions more carefully? Or is this just alarmist environmentalism?

Permalink | Comments (2) | Post your comment Categories: Toys and gear

## The Mommy Files

[« Friday Five: Your... | Main | Why my family is... »](#)

### Carcinogens in some kids' shampoos

Remember when the news broke in 2007 that many brand-name [lipsticks contained lead](#)? The same [Campaign for Safe Cosmetics](#) (CSC) has now gone after children's bath products. In a report titled, "[No More Toxic Tub.](#)" the Washington, D.C.-based nonprofit accuses companies such as Johnson & Johnson of putting chemicals linked to cancer in shampoos, soaps, sunscreen, bubble bath, and lotions.



The CSC tested 48 different name-brand kids' bath products for 1,4-dioxane; 28 of those items were also tested for formaldehyde. According to the CSC, 61 percent of 28 products tested contained both chemicals. Twenty-three out of 28 contained formaldehyde at levels ranging from 54 to 610 parts per million. In the broader spectrum test of 48 products, 35 contained 1,4-dioxane with levels up to 35 parts per million.

The Environmental Protection Agency classifies 1,4-dioxane as a probable carcinogen, and the European Union bans the chemical from personal care products at any level and has recalled products that contain the chemical. Several samples of American Girl shower products were found to contain the highest levels of 1,4-dioxane.

The EPA considers formaldehyde as a probable human carcinogen; the chemical can also trigger adverse skin reactions in children and adults who are sensitive to the chemical. Formaldehyde is banned from personal care products in Japan and Sweden. Baby Magic Baby Lotion, made by Ascendia Brands, contained the highest levels of formaldehyde found in the tests: two samples had

# Spreading to Other Consumer Products

 PureBond.  
FORMALDEHYDE-FREE TECHNOLOGY

# Spreading to Other Hosts

## Canadians Sue Tennessee Insulation Company

March 23, 2009. By Brenda Craig

 SHARE 

*Windsor, ON:* Two Canadian homeowners in Southern Ontario thought they couldn't lose and jumped at a chance to get a government grant to make their home in downtown Windsor more energy efficient. A licensed inspector did an energy audit of their home and recommended that Robert and Michelle Cecile contract **RetroFoam** to update the home's insulation. Everything looked good--a government approved plan would subsidize the project and save them money in the years ahead.



Then in February, a Health Canada bulletin in the local newspaper caught their eye. There it was in black and white--the **RetroFoam spray insulation** the Ceciles had sprayed into their attic and walls contained Urea Formaldehyde, a substance banned from use in insulation products in Canada for many years.

"And that's how my clients found out they had a problem," says the Cecile's lawyer Sharon Strosberg from Sutts, Strosberg in Windsor.

Attorney Strosberg believes there are at least 700 other homeowners in the area that also had their houses retrofitted with RetroFoam insulation as part of the Eco Energy program sponsored by the Canadian Department of Energy. She is currently preparing documents to launch a class action suit on behalf of Robert and Michelle Cecile and 140 other homeowners. Strosberg will argue RetroFoam and the Federal Department of Energy knew or should have

known the product contained Urea Formaldehyde insulation or UFFI, as Canadians call it.

"This is not a lawsuit about personal injury," says Strosberg, "we are not alleging that Urea Formaldehyde insulation causes health problems nor are we making any allegations about levels of Urea Formaldehyde fumes in the houses."

Strosberg says this is more about property values than anything else. "Our point is that UFFI is banned in Canada and has been for years," she says. "When an individual goes to sell their home they must tell potential buyers that there is UFFI in the home and this will affect the value of the home."

- UF Foam insulation
- Banned in Canada
- Suit to defend against lost property values

  
FORMALDEHYDE-FREE TECHNOLOGY

# How a “Perception Virus” Spreads

## Children's bath products tainted with probable carcinogens

Posted by bdaley March 16, 2009 12:05 PM

Email | Link | **Comments (81)**

By Beth Daley, Globe Staff

UPDATE: I've been inundated with requests where to find safer products. Read to the end of the blog for info from Campaign for Safe Cosmetics about that question.

Dozens of children's bath products sold across New England are tainted with chemicals the federal government say are likely carcinogens, a new report by the Campaign for Safe Cosmetics and the Alliance for a Healthy Tomorrow say.

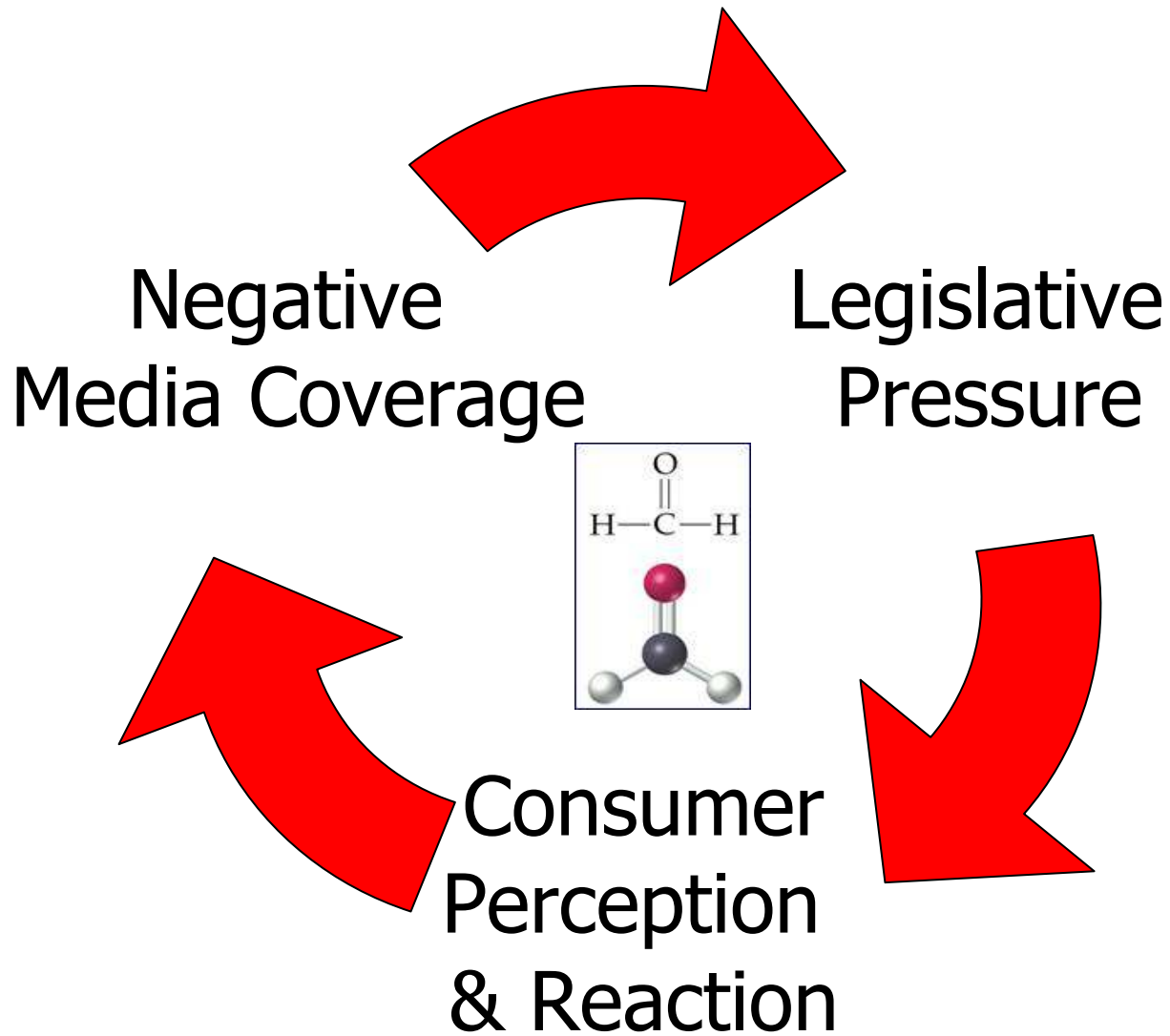


Despite label claims like “gentle” and “pure”, the bath products can contain formaldehyde and 1,4 dioxane that the federal government say “may reasonably be anticipated to be a carcinogen.” Formaldehyde can also cause skin rashes in children. Lax label laws do not require the chemicals to be listed on product labels. The U.S. Consumer Product Safety Commission says that “the presence of 1,4-dioxane, even as a trace contaminant, is cause for concern.”

81 comments attached to this story alone

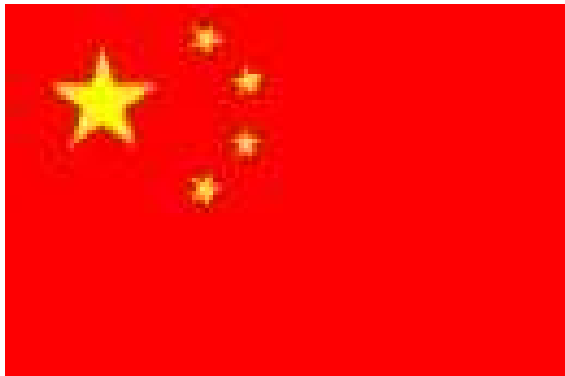
“I can't imagine any parent covering their infant with a baby lotion that lists formaldehyde on the label along with 'natural fragrance.’”

# Formaldehyde Frenzy: Vicious Cycle

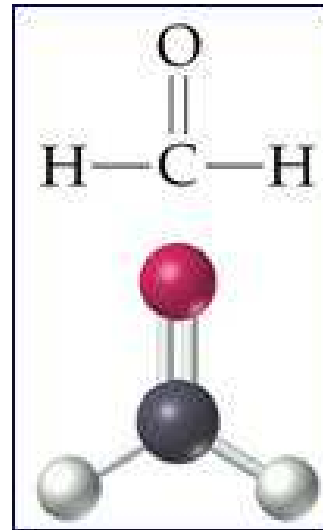


# Fuel on the Fire...

- Furniture made in China with urea formaldehyde



+



=

!!!

# Chinese Flu: Spreading Across Categories

- Dog food
- Toothpaste
- Medical equipment & drugs
- Cell phones
- Milk formula
- Drywall

INTERNATIONAL  
**Herald Tribune**

Another consumer product disaster in China: exploding mobile phone batteries

By David Barboza  
Friday, July 6, 2007

SHANGHAI: After concerns over pet food, toothpaste, seafood and defective tires, China may now have to cope with another consumer product disaster: exploding mobile phone batteries.

**Recall of China-made toys unnerves parents**  
By Mindy Fetterman, Greg Farrell and Laura Petrecca, USA TODAY

**BusinessWeek**

CHINA April 23, 2008, 7:50AM EST

## Chinese MRIs, Coming to Your Hospital

The heparin scare notwithstanding, multinationals are strengthening their ties with the Chinese medical industry

by Bruce Einhorn

In the U.S., people worried about the safety of Chinese-made toys, food, and other products have been focusing on pharmaceutical company Baxter International ([BAX](#)), which has recalled much of its blood thinner heparin after suspicions that a tainted ingredient in the drug from China caused illness and deaths among some patients. The U.S. Food & Drug Administration on Apr. 21 announced that the Chinese factory producing the ingredient continued to have problems meeting safety standards. Meanwhile, Chinese officials deny that the problem originated in China.

- Video
- U.S.
- World
- Politics
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  - Primary Source
  - Investigative Roundup
  - Internet Terror Monitor
  - Reality Check
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# China Blamed For Homeowners' Nightmare

500M Pounds Of Drywall Imported During Housing Boom, Now Homes Are Rotting From The Inside Out

March 26, 2009 by Armen Keteyian

Comments 23

E-MAIL STORY PRINT STORY SPHERE SHARE TEXT SIZE: A A A

VIDEOS PHOTOS

AnswerTips™ enabled (What's this?)



1 | 2



Knauf Plasterboard Tian Jin Co. Ltd. is one of several Chinese companies blamed for exporting dangerously contaminated drywall to the United States, where it is causing houses to crumble and wiring to disintegrate in dozens of states. (CBS)

(CBS) George and Brenda Brincku spent their life savings to building their dream home in 2004.

"When we put the roof on, my son - I'll never forget - he said, 'Mom, it's a castle. You've built a castle'," Brenda Brincku said.

But before long their castle was crumbling, reports CBS Evening News chief investigative correspondent Armen Keteyian.

Anything copper corroded. Electrical wires were eaten away. Appliances broke down. And a noxious smell permeated nearly every room, forcing the family to leave.

"We were like, 'This is a brand new home. This should never be happening,'" Brenda said. "It's very difficult."

Now a growing number of Americans are suffering the same fate - wondering why their new homes.

# Drywall: The Next Big One ?

"How did 500 million pounds of contaminated and toxic drywall make its way into the United States without anyone checking it ?"



## Cheap Chinese furniture 'may poison you'

Font size:   Email article:  Print article:  Submit comment

By *Craig Johnstone*

**CHEAP imported furniture and shelving containing high levels of toxic chemicals may be endangering the health of Australian workers and families.**

Tests by Australian furniture manufacturers have shown flat pack furniture and shelving imported from China may be emitting very high levels of formaldehyde, known to cause cancer.

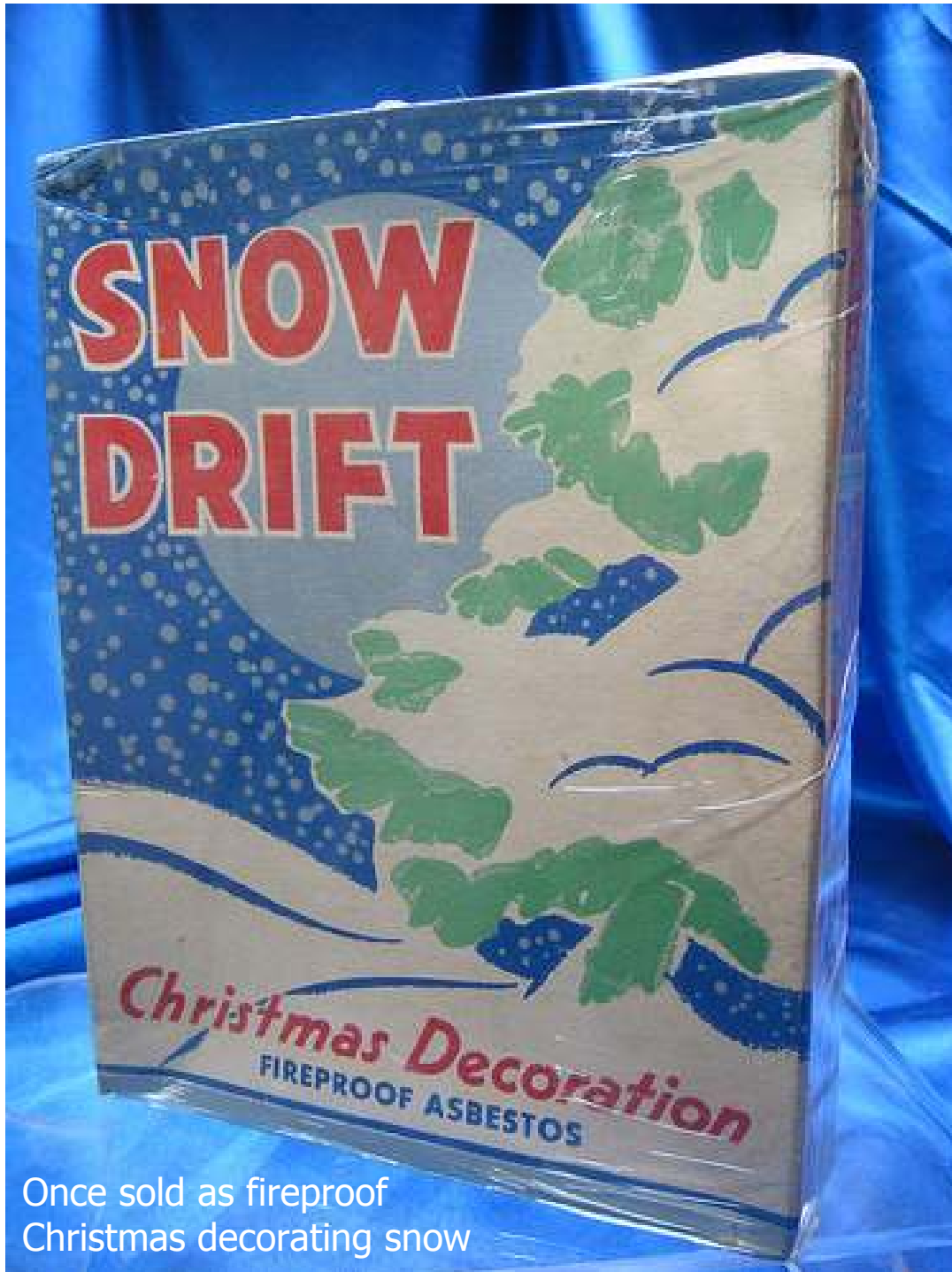
Tests on random samples of imported flat pack furniture have prompted Australian industry groups to complain that a "toxic timebomb" is being shipped into the country each day.

The tests found some furniture components had formaldehyde emissions at levels well above official international thresholds for eye and throat irritations and deemed by Australian standards as unsuitable for use indoors or in poorly ventilated outdoor areas.

Consumer watchdog the Australian Competition and Consumer Commission also has warned timber importers to test their products to ensure they are not toxic.

Unions had complained that some workers in temporary offices in the Northern Territory were being made sick by formaldehyde emissions from wood panels lining the interior of the buildings.

# Chinese Flu: Going Global; Expanding to Furniture



Once sold as fireproof  
Christmas decorating snow

## The “Asbestos Scenario”

- Widely used,
- Then scorned



# Can We Blame the Consumer?

- What they've been seeing, hearing (and maybe experiencing) has been scary and/or disappointing
- Which brings us to the opportunity...

# NMI's Top Ten Trends of 2009

## 2009 Overarching Theme: Recalibration



NMI, the leading consulting firm in health, wellness and sustainability is once again introducing its top trends for the coming year. The big news and overarching theme for 2009 is *Recalibration*, as consumers reset the scales after a decade of dualities, highs and lows.

From a rising demand for consistent and nourishing energy as an alternative to the roller coaster of caffeine and sleep aids to a reorganization of family finances — consumers are desiring “The Middle Way” — defined as a lifestyle approach grounded in comfort, safety, sustainability and moderation.



*Balanced Nutrition*



*Balanced Budget*



*Balanced Lifestyle*



*Balanced Energy*

# New Attitudes

- Let's play into them
- CARB compliance is the entry fee

# Among the Attitudes...

4. Consumers include their **own personal** health as a microcosm and reflection of the health of the planet
5. Consumers are expressing a desire to **eliminate anything toxic** from their lives
7. Consumers are beginning to ask not only “what,” but “why?” ... increased interest in a company’s supply chain — **where materials come from and how they’re made...**

# The 3 Legs of the Green Stool

- Sustainability
  - Environmentally accountable materials and practices
- Health concerns
  - Indoor Air Quality matters
- Cost-effectiveness
  - There's a bottom line to everything

Buy the piece, save a little. Buy the room, save a lot!

[Wish List - 0 items](#) [View Cart - 0 items](#) [Checkout](#)



**Customize your shopping!**  
**Tampa, FL**

Modify your location & we'll show you product in your area!

Change your Zip Code or City, State

Tampa, FL

**Set Location**

Search for furniture at RoomsToGoKids.com

**Search**



[click here](#)

shop  
space-saving  
**Bunk  
Beds**

**Disney**  
**Furniture  
for kids**  
[High School Musical](#)  
[Disney Princess](#)  
[Hannah Montana](#)  
[Disney Cars](#)  
[Disney Pirates](#)



**Shop The  
Collection**



When you're a fan,  
it's never  
"off-season!"

**SHOP NFL ROOMS**

**SHOP NFL ACCESSORIES**

# kids•TEENS ROOMS TO GO Marketing Post CARB...



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Buy the piece, save a little. Buy the room, save a lot!

[Wish List - 0 items](#) [View Cart - 0 items](#) [Checkout](#)

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**Customize your shopping!**  
**Tampa, FL**

Modify your location & we'll show you product in your area!

Change your Zip Code or City, State

Tampa, FL

[Set Location](#)

Search for furniture at RoomsToGoKids.com

[Search](#)



**NEW: VOC-Free  
Finishes &  
No Added  
Formaldehyde  
Construction !**

**Disney Furniture for kids**

[High School Musical](#)  
[Disney Princess](#)  
[Hannah Montana](#)  
[Disney Cars](#)  
[Disney Pirates](#)



**Shop The Collection**



When you're a fan, it's never "off-season!"

[SHOP NFL ROOMS](#)

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# Who is Leading by Example?

- Fringe operators, niche players, early adopters like



- “The Precautionary Principle” states that if an action or policy might cause harm to the public, the burden of proof falls on those who would advocate taking the action (website)

# And Others

- Simple Furniture Company
  - Obtained FSC chain of custody, but
  - “A bigger market impact has been realized by switching to hardwood plywood panels containing no added formaldehyde...”

# Final Thoughts

- CARB is here
  - We can and will get through it
- Use it to change your company
  - And gain a foothold in the growing green market