

Proposal for Legal Inspection of Plywood Products

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Background:

Plywood has been widely used as a kind of furniture and building materials these days. The public is concerned about pollution of indoor air by formaldehyde emitted from adhesive bonded wood products and demands restriction on the use of formaldehyde glue in plywood products. The BSMI, after having consulted with interested parties, intends to regulate formaldehyde emission for plywood products.

Proposed date of implementation:

- 1 July 2007

Products (HS/CCCN codes) covered:

HS/CCCN 4412.13.10.10.5	Dark Red Meranti Light Red Meranti, White Lauan, unfinished plywood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.13.10.20.3	Sipo, limba, okoume, obeche, acajou d'afrique, sapelli, virola, mahogany (swietenia spp.) palissandre de para, palissandre de rio or palissandre de rose, unfinished plywood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.13.10.90.8	Other unfinished plywood, with at least one outer ply of tropical wood specified in Subheading Note 1 to this Chapter, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.13.20.00.5	Processed plywood, with at least one outer ply of tropical wood specified in Subheading Note 1 to this Chapter, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.14.10.00.6	Other unfinished plywood, with at least one outer ply of non-coniferous wood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.14.20.00.4	Other processed plywood, with at least one outer ply of non-coniferous wood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.19.10.00.1	Other unfinished plywood, with both outer plies of coniferous wood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.19.20.00.9	Other processed plywood, with both outer plies of coniferous wood, each ply not exceeding 6mm thickness (inspection scope: Plywood)
HS/CCCN 4412.22.21.00.3	Other unfinished plywood, veneered panels and similar laminated wood, with at least one outer ply of non-coniferous wood, with at least one ply of tropical wood specified in Subheading Note 1 to this Chapter (inspection scope: Plywood)

HS/CCCN 4412.22.22.00.2	Other processed plywood, veneered panels and similar laminated wood, with at least one outer ply of non-coniferous wood, with at least one ply of tropical wood specified in Subheading Note 1 to this Chapter (inspection scope: Plywood)
HS/CCCN 4412.29.10.00.9	Other unfinished plywood, veneered panels and similar laminated wood, with at least one outer ply of non-coniferous wood (inspection scope: Plywood)
HS/CCCN 4412.29.20.00.7	Other processed plywood, veneered panels and similar laminated wood, with at least one outer ply of non-coniferous wood (inspection scope: Plywood)
HS/CCCN 4412.92.21.00.8	Other unfinished plywood, veneered panels and similar laminated wood, with both outer plies of coniferous wood, containing at least one ply of tropical wood specified in Subheading Note 1 to this Chapter (inspection scope: Plywood)
HS/CCCN 4412.92.22.00.7	Other processed plywood, veneered panels and similar laminated wood, with both outer plies of coniferous wood, containing at least one ply of tropical wood specified in Subheading Note 1 to this Chapter (inspection scope: Plywood)
HS/CCCN 4412.99.10.00.4	Other unfinished plywood, veneered panels and similar laminated wood, with both outer plies of coniferous wood (inspection scope: Plywood)
HS/CCCN 4412.99.20.00.2	Other processed plywood, veneered panels and similar laminated wood, with both outer plies of coniferous wood (inspection scope: Plywood)

Inspection standards:

CNS 1349, CNS 8058, CNS 11671

Conformity assessment procedures:

Registration of Product Certification (RPC) Scheme (Module II + IV, V or VII) or Type-Approved Batch Inspection (TABI) Scheme

Notes:

Registration of Product Certification (RPC) Scheme

Under this procedure, manufacturers must have their products type-tested by the BSMI or designated testing laboratories recognized by the BSMI (Module II) before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration that all products made at their manufacturing facilities are in conformity with the prototypes submitted for type testing in Module II.

For Module IV or V, manufacturers may establish a quality system complying with the requirements of ISO 9001 and obtain ISO 9001 certificates from the BSMI or certification bodies recognized by the BSMI.

For Modules VII, manufacturers may establish a quality system that complies with the requirements stipulated by the BSMI and obtain a factory inspection report issued by the BSMI or inspection bodies recognized by the BSMI.

Products will be allowed to use the Commodity Inspection Mark, the letter “R” and the identification number given by the BSMI, after they are certified and registered with the BSMI. These products can then pass through customs directly without any further inspection. The application fee and annual fee for RPC is NT\$5,000 for each type of product, and a RPC certificate is valid for three years.

Type-approved Batch Inspection (TABI) Scheme

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or designated testing laboratories recognized by the BSMI, and then file an application for type approval with the BSMI, in Taipei or at branch offices, depending on where the manufacturer or importer is located.

After manufacturers or importers have obtained a type-approval certificate, they are required to file an application for inspection with the BSMI each time before their products are to be released from the production premises or arrive at the port of entry. The BSMI will then review the application and accompanying documents according to the simplified procedures. Additional samples may be required for further testing if it is deemed necessary. The fees for type testing vary by product and depend on the testing laboratories. The fee for a type approval is NT\$3,500, and a type approval certificate is valid for three years.

Further information on the two procedures is also available on the BSMI web site at http://www.bsmi.gov.tw/english/regulatory_index.htm

Locations to apply for Type Testing:

- The BSMI or designated testing laboratories recognized by the BSMI

Locations to apply for Registration of Product Certification or Type Approval:

- The BSMI or its branches with jurisdiction over the applicant.

Time required for Registration of Product Certification or Type Approval:

- Fourteen working days. (This does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples; another 7 days may be required if additional tests are required)

Locations to apply for Type-approved Batch Inspection:

- The BSMI or its branch of jurisdiction over the applicant.

Rate for Type-approved Batch Inspection:

- 2.5% of CIF.