



Oral Testimony of Andy S. Counts  
American Home Furnishings Alliance

Before the U.S. House of Representatives Subcommittee on  
Commerce, Trade, and Consumer Protection

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Good Morning. I am Andy Counts, the Chief Executive Officer of the American Home Furnishings Alliance (AHFA). I would like to thank Chairman Rush, Ranking Member Stearns and Members of the Subcommittee for the opportunity to testify. I would especially like to thank Congresswoman Doris Matsui for her leadership, along with Congressman Vern Ehlers, for advancing this important legislation.

The AHFA is the world's largest trade organization serving the home furnishings industry. Member companies comprise an extensive global network of manufacturers who produce home furnishings or component parts constructed of composite wood products. AHFA supports the regulation of formaldehyde emissions from composite wood products and we support H.R. 4805. We believe that a national approach is crucial in order to avoid conflicting state standards and allows for the harmonized distribution of products and supplies.

The AHFA along with the wood products industry, environmental, health, and labor organizations worked for more than seven years with the California Air Resources Board (CARB) to establish formaldehyde emission limits for composite wood products. These new emission limits are the lowest anywhere in the world. Outside these emission limits there are several aspects of the California rule that can not be implemented nationally. H.R. 4805 provides EPA the platform and flexibility needed to address these issues and modify the California approach providing a commonsense, pragmatic national regulation.

Of critical importance will be the inclusion of adequate compliance timelines and sell through provisions. Due to the unprecedented economic conditions of the last few years inventory levels remain high. Unlike in California where non-compliant inventories could be moved to other markets; adequate sell through provisions are needed nationally to accommodate increased inventories and slow inventory turns. We request a sell through period of 36 months for finished goods following the compliance deadline for composite wood products.

It is important to note that the California formaldehyde standard and the national standard proposed under H.R. 4805 regulate emissions from composite wood products and not the finished products that contain composite wood components. EPA must focus compliance and enforcement where it belongs, at the point of manufacture and process control. The regulation should not contain any provisions for the testing of finished goods, such as furniture or cabinets. If the raw board component parts are properly regulated, downstream users of these products will be required to purchase only these regulated products, and to only use or resell these safe products to consumers. This ensures the overall safety of the global supply chain and the citizens who purchase our products.

AHFA applauds the efforts of our global suppliers that have worked tirelessly to comply with the California standards. We stand ready to educate the industry on the new national standard and provide the tools necessary to ensure compliance on a global basis. We also look forward to working closely with EPA during the development of this regulation.

Thank you again for the opportunity to share our views on this important issue and I look forward to answering any questions you may have.