

2023 ANNUAL REPORT

AMERICAN WOOD COUNCIL

LETTER FROM THE CHAIRMAN & CEO

Dear AWC Members and Friends:

It is our pleasure to share with you a snapshot of AWC's most notable achievements in 2023 related to building codes and standards, fire service engagement, policy advocacy at the state and federal levels, and sustainability.

AWC released six new design standards and supporting publications in 2023. These new publications are the culmination of over five years of work by AWC staff and our technical committees. The quality and relevancy of these standards is already apparent as five of the new releases are already referenced in the 2024 I-codes. AWC is also poised to seek adoption of the updated *Fire Design Specification* in the 2027 I-codes, a process that kicked off early in 2024 and will run through the end of 2026. Along with these new standards, AWC has continued its work to support states as they adopt mass timber provisions into their building codes, including in states like Florida that have been particularly challenging. In that state, AWC designed and successfully promoted an innovative guide to facilitate mass timber project approvals even as Florida drags its feet on formal code adoption.

In 2023, AWC also continued to position wood products as the most climate-friendly and low carbon building material available. The launch of our Wood Sourcing Tool in partnership with the Softwood Lumber Board and the U.S. Endowment for Forestry & Communities represents the first of its kind tool that traces wood products from the forest to the end user, highlighting the sustainability of our industry. AWC's Sustainability team was also successful in their efforts to have Whole Building Lifecycle Assessment included as an amendment to the 2022 California Green Building Standards Code. This achievement supports AWC's fight to ensure wood products face a level playing field as governments set policy and procurement strategies to lower the carbon footprint of their buildings, which in turn will set important precedent for the marketplace.

AWC also expanded its government affairs, communications and fire engagement efforts during 2023 to further strengthen our initiatives to promote and protect the wood products industry. For example, AWC's success in incorporating favorable mass timber provisions into the *National Defense Authorization Act* paid dividends when the U.S. Army Corps of Engineers issued a policy directive that requires Project Delivery Teams to consider mass timber for vertical Army MILCON and Civil Works construction projects. This directive throws open the door for mass timber in ways that were historically unavailable. As we look to 2024, AWC will continue to seek new opportunities to promote wood products and advocate for approaches in legislation, regulation and codes and standards that favor and do not unduly harm our industry.

Thank you for your continued support of AWC and its mission.

Sincerely,



RICKY STANLEY
CEO, T.R. Miller Mill Company
AWC Chairman of the Board



JACKSON MORRILL
President & CEO
American Wood Council

PROTECT AND EXPAND OPPORTUNITIES FOR WOOD USE

ISSUE 01



CODES

With more than 29 states adopting the mass timber provisions, AWC has continued to proactively support their adoption by developing a specific guide to support Florida building code officials as they review the provisions.

Page 03

ISSUE 02



STANDARDS

Capping off five years of work by technical committees and staff, AWC released six new design publications, five of which are referenced in the 2024 I-codes, helping assure the broad acceptance of wood products in the national model building codes.

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ISSUE 03



FIRE SERVICE ENGAGEMENT

AWC led a multipronged response to a North Carolina construction fire, providing guidance, education and a media response that reached millions. AWC also added a West Coast Fire Relations Manager to focus on wildland urban interface issues.

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ISSUE 04



CLIMATE & SUSTAINABILITY

AWC publicly launched the first of its kind Wood Sourcing Tool that allows users to track the source of wood products and received a Wood Innovations Grant to further strengthen our ongoing data collection and transparency efforts.

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ISSUE 05



ADVOCACY

AWC increased our engagement in D.C., using creative means to reach the House Working Forest Caucus, Congress and Administration representatives on the vital role of mass timber, garnering bipartisan support for mass timber in the *National Defense Authorization Act*.

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ISSUE 06



ENVIRONMENTAL REGULATIONS

AWC pursued every avenue in response to the EPA's proposed lowering of PM NAAQS including three letters to the White House, testifying before a House Subcommittee, filing written comments, and a targeted digital campaign.

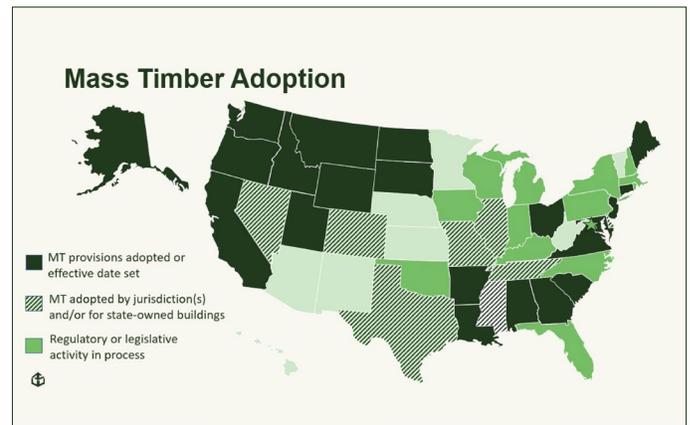
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CODES



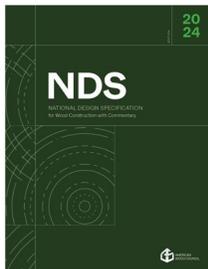
2024 I-Codes Favorable to Wood Products; Hit Ground Running on 2027 Updates

The International Code Council (ICC) published the final 2024 I-codes in the first quarter of 2023, and the results were strongly favorable to the wood products industry. AWC was successful in ensuring all significant threats were either disapproved, withdrawn, or favorably modified to address industry concerns. In addition, a majority of AWC's proposals were adopted, including most notably references to AWC's updated *National Design Specification® for Wood Construction* and *Wood Frame Construction Manual*. While AWC was unsuccessful in securing a reference to the new *Fire Design Specification for Wood Construction* in the 2024 I-codes, AWC has made it a priority for the 2027 code cycle, which kicked off in early 2024. AWC's Subcommittee on Codes and Product Evaluation worked during the second half of 2023 to vet AWC's proposed code change proposals, including the reference to the FDS, ensuring AWC could submit all industry proposals by the January 2024 deadline.



Mass Timber Adoption Continues

Mass timber construction continues to gain traction across the United States with 29 states now having adopted the *International Building Code (IBC)* mass timber provisions. Mississippi, Ohio, and Tennessee are the latest states to adopt mass timber provisions. AWC has been involved in the adoption and support of Ohio and Tennessee's recent approvals and continues outreach efforts to states and localities. AWC efforts to encourage more states and localities to adopt the tall mass timber provisions is vital to increasing market opportunity, especially since states that have not yet adopted them represent the potential for an additional 2 BBF of lumber annually.



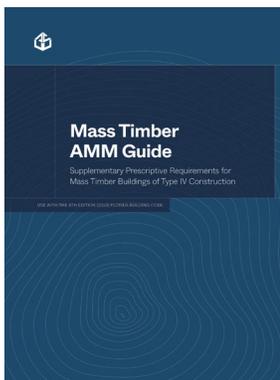
The 2024 *National Design Specification (NDS) for Wood Construction* is available for free viewing on the [AWC website](#).

Creative Approach in D.C. for Mass Timber Adoption

Faced with several challenging jurisdictions that have been slow to adopt updated I-codes – or have rejected them – AWC has pursued creative solutions for stand-alone adoption of mass timber provisions. In Washington, D.C., for example, AWC worked with the District’s Construction Codes Coordinating Board (CCCB) to develop a comprehensive, standalone set of changes to its existing building code to incorporate mass timber. Thanks to AWC’s technical support, the CCCB ultimately approved a provision allowing mass timber code changes to be considered for enactment by the District Council in 2024, even as the CCCB continues to review the full 2021 I-codes for possible enactment in 2025.

Progress in Florida Thanks to Fire Service Outreach and Novel AMM Guidelines

In Florida, the tall mass timber provisions narrowly failed to be included in the 2023 Florida Building Code. AWC responded by increasing outreach and education in the state, which led to a presentation on mass timber in the 2021 *International Building Code* to the Florida Fire Marshals and Inspectors Association leadership in 2023. Following the presentation, the National Association of State Marshals revised its policy to support mass timber construction.



Additionally, AWC met with building officials throughout the state and released the [Florida Mass Timber Alternative Methods and Materials \(AMM\) Guide](#). The AMM Guide is tailored specifically to support code officials in their review, permitting and approval of mass timber projects in Florida under the 8th Edition (2023) of the Florida Building Code (FBC).

The Florida AMM Guide is the culmination of several years of work from AWC staff to have mass timber provisions adopted into the FBC. After the narrow failure of the most recent attempt, AWC undertook a significant education and outreach campaign to persuade opponents, culminating in a presentation of the AMM Guide to the Building Officials of Florida (BOAF) Board of Directors. The BOAF Board ultimately supported and encouraged the Guide, which marks a significant milestone in advancing mass timber construction in Florida.

The launch of the Florida Mass Timber AMM Guide reflects AWC’s dedication to promoting timber as a sustainable and versatile building material. It also could prove to be a model for use in other jurisdictions that are slow to adopt the 2021 code. In fact, AWC is preparing a more generalized AMM Guide that could be used in other jurisdictions going forward.

CLT Shear Walls as Primary Structural Element

AWC led a significant effort to standardize cross-laminated timber (CLT) shear walls, the walls in a building designed to resist wind or seismic loads, through the AWC and ASCE standards development processes. These efforts are bearing fruit through the accelerated adoption of ASCE’s new load standard, *Minimum Design Loads and Associated Criteria for Buildings and Other Structures* (ASCE 7-22), which references AWC’s code-referenced wood design standard, the 2021 *Special Design Provisions for Wind and Seismic* (SDPWS).

We’ve seen success in Oregon. Officials there issued a Statewide Alternative Method (SAM) No. 15-01 that allows CLT shear walls in accordance with AWC’s 2021 SDPWS as one of two paths for the use of CLT shear walls as part of building’s seismic force resisting system.



Oregon has allowed use of CLT shear walls since 2015. But the new SAM permits the use of smaller seismic design forces (Path 1) when CLT shear walls are designed in accordance with AWC’s 2021 SDPWS and ASCE 7-22. Path 2 provides design flexibility by allowing design teams to use CLT shear walls that vary from requirements of the 2021 SDPWS when designed for increased seismic forces.

In Oregon and other states or local jurisdictions that adopt the 2021 SDPWS and ASCE 7-22, CLT shear walls will be permitted as the primary structural elements used to resist wind and seismic loads in wood structures and in very high seismic regions in structures up to 6 stories.

Building Out Field Staff, Another Recognized with ICC Honor

AWC made another key hire to meet goals for building out our field staff as part of the Board-approved staffing plan. Field staff plays a critical role in representing the industry among building code officials and in the code development process. These positions are also essential to maintaining AWC’s strong, trusted reputation.

Cade Booth was brought on as Regional Manager, Codes & Standards with responsibility for southern states in ICC Regions VIII and IX. Cade comes to AWC with more than 20 years of experience, including serving as a Certified Building Official for the City of Savannah, Georgia, where she currently resides. Before joining AWC, she was Founder and CEO of Code Consultants of Savannah. Cade has served on ICC Exam Development Committees and has numerous ICC certifications.

In the honors department, AWC South Central Region Director, David P. Tyree, P.E., C.B.O., was presented with a lifetime honorary membership in recognition of his exceptional contributions to ICC. The discerning process for this achievement involves nomination by peers, selection by the ICC Board of Directors, and approval by governmental voting representatives.

Through active participation and leadership in ICC committees, boards, and councils, he has been instrumental



in the development and revision of building codes and standards. His leadership in code development includes three terms as chair of the International Building Code Structural Committee, one term as chair of the International Residential Code Building Committee and one term on ICC's Life Safety Committee. Congratulations, Dave!

ISSUE 02

Expanding Wood Use through Standards & Education

STANDARDS



2024 Standards Released, Referenced in I-Codes

After five years of incredible work by our technical committees and staff, AWC released five new design standards and supporting documents that are all referenced in the 2024 International Code Council (ICC) I-codes.

- [ANSI/AWC NDS-2024: National Design Specification \(NDS\) for Wood Construction](#)
- [2024 NDS Supplement](#)
- [ANSI/AWC WFCM-2024: Wood Frame Construction Manual for One- and Two-Family Dwellings](#)
- [2024 Span Tables for Joists & Rafters \(STJR\)](#)
- [2024 Design Values for Joists & Rafters \(DVJR\)](#)



The 2024 *Wood Frame Construction Manual* is available for free viewing on the [AWC website](#).

AWC's work in the building code development process helps assure the broad acceptance of wood products in the approved national model building codes, which set the minimum requirements for how structural systems and many other aspects of residential and commercial buildings should be designed and constructed in the U.S.

The principal building blocks of the model building code are standards, such as those recently updated and released by AWC, according to the [National Institute of Standards and Technology](#). AWC maintains an ANSI-approved consensus process where interested parties update AWC's wood design standards, which are referenced in the building code. In essence, to properly design and build a wood structure in the United States, someone must use AWC's design standards.

AWC also released a new fire design standard, [ANSI/AWC FDS-2024: Fire Design Specification for Wood Construction](#), that is not yet referenced in the building codes. AWC has introduced a series of code change proposals to the 2027 ICC model code development process to add several new references to this fire design standard. This model code development process will continue for the next three years.

Following this significant effort to bring all these standards into the building codes, AWC is now poised to begin updating one of its other design standards, the *Special Design Provisions for Wind and Seismic* (SDPWS). One critical update will be to incorporate the results of wood structural shear wall system tests, which may become a powerful new tool for designers to meet ever-increasing seismic loading requirements if incorporated into the 2027 SDPWS (and ultimately the 2027 ICC Codes).

WUI Fire Tests Show Home Hardening Possible

AWC conducted four full-scale fire tests to assess the performance of exterior walls and soffits. The test plan helped develop construction and detailing solutions to "harden" wood-frame buildings and prevent structure loss and fire from spreading into the interior of wood-framed buildings in severe Wildland Urban Interface (WUI) fires involving direct flame intrusion. The data and findings from these tests demonstrated that WUI fire resistance can be accomplished using a single layer of 5/8" fire-rated

gypsum board behind wood siding and is more effective than relying on ignition resistance siding materials alone.

The fourth test was carried out for 90 minutes when the contents of the exposure source were almost fully consumed. **No fire or significantly elevated temperatures penetrated the 5/8" Type X gypsum board hardening at any location on either the wall or soffit.**

The test demonstrated positive results and performance. The data and findings from this test series will be used to support AWC's strategy of advocating for retaining a WUI fire resistance option rather than specifying the use of ignition resistant materials alone. AWC has already been presenting the findings to key audiences whose support will be needed to make major progress in future codes and standards efforts. This includes California's update of its Building Code Chapter 7A, the discussions around the update of the ICC's *International WUI Code*, and the development of the ICC Multi-Hazard Resiliency for Residential Construction standard.



Resource Hub Relunched

AWC relunched its [Resource Hub](#), which includes all of our publications for design, code and fire officials. The redesign was based on member feedback with the goal of improving the user experience and updating search and filter functions.

The Resource Hub is a critical component of the AWC website, acting as the clearinghouse for standards, technical reports, calculators, publications and other resources for design professionals and code officials. The materials found in the Resource Hub represent approximately two-thirds of AWC's website traffic.

FIRE SERVICE ENGAGEMENT



AWC Responds on Two Key Fronts in Wake of North Carolina Construction Fire

After a construction site fire in Charlotte, North Carolina, AWC responded by providing guidance and education to various officials and committees. In the immediate aftermath, AWC's Fire Service Relations Manager Ray O'Brocki was quoted in a [news piece](#) about the fire and emphasized the importance of following fire safety codes and regulations. It was later reported that the contractor violated state fire codes by not alerting the Fire Marshal about construction, failing to have a fire inspection done and not having a standpipe in place for a fire hose connection.

edition of NFPA 241, which includes new safeguards for large buildings regardless of construction type.

Finally, because of Ray's initial media engagement, he was included as one of two fire safety experts in a local news station's investigative report into the fire. His appearance on WBTV reached 2 million viewers. [Watch the video here.](#)

Second Meeting of the Fire Service Advisory Committee

AWC's Fire Service Advisory Committee (FSAC) was established in 2019 to better understand and gain input on how the wood industry should engage with and act as a resource for the American Fire Service. The group's in-person meetings were disrupted during the pandemic but reconvened in 2023 in conjunction with the Congressional Fire Service Institute Conference.

The Committee discussed a variety of subjects, including construction fire safety, wildland urban interface codes, AWC's fire service education programs, and more.

The meeting attracted a diverse group, including Chief Carley Helwick of the Denver Fire Department; Rich Mikutsky, State Fire Marshal for New Jersey; Terri Reid, Captain in Baltimore County and active in the national "Women in Fire" organization; Adolph Zubia, former South Carolina State Fire Marshal and Past President of the ICC; Ray Reynolds, Fire Chief of the Nevada, Iowa Fire Department and former Iowa State Fire



In the months following the fire, AWC's Ken Bland participated in a meeting with the North Carolina Fire Code Revision Committee (FCRC) on the topic of construction site fire safety. The FCRC discussed, and AWC supported, a future amendment to adopt the latest



Marshal; Larry Conley, Deputy Chief for the City of St. Louis; David Blenman, Lieutenant in Baltimore County and President of the local chapter of the International Association of Black Professional Firefighters.

O'Brocki Interviewed on ICC Region I Radio

AWC's Manger of Fire Service Relations Ray O'Brocki was interviewed by ICC Region I Radio. The episode discussed fire safety in construction, the challenges of education and enforcement on construction fire safety, and the role of fire prevention managers. The episode



Listen now: [Apple Podcasts](#), [Spotify](#), and [iHeart Radio](#). Also watch the discussion on [YouTube](#).

concluded with a discussion on how to improve construction fire safety, emphasizing the enforcement of existing codes and standards, and resources that are available for fire marshal's offices and building departments.

Fire Service Team Expands to West Coast

AWC added a position to our Fire Service Engagement team as part of the Board-approved staffing plan. This team has proved extremely valuable in developing relationships with the fire service to preempt opposition to wood and mass timber construction through education.

Greg Womack is AWC's new Manager, Fire Service Relations for the Western region, where he will be growing the reach of the AWC fire service engagement program on issues that include WUI and construction fire safety. Greg is based in Boise, Idaho, and comes to AWC with 34 years of public safety experience, including more than 20 years in leadership of Boise Firefighters Local 149 and serving as Division Chief of Operations at Boise Fire. Greg has been recognized as

Boise Fire Department Firefighter of the year and he was given the IAFF Leadership Award in 2016.



ISSUE 04

Carving Out a Reputation as a Thought Leader

CLIMATE AND SUSTAINABILITY



LCA Database Meets Market's Transparency Demands

The market is increasingly demanding transparency around environmental impacts from all sectors, and the wood products industry has a unique and compelling story to tell. The annual [AWC Lifecycle Survey](#) collected 2022 mill-level production data from a significant majority of AWC's member mills to be aggregated and used in regional environmental product declarations ([EPDs](#)) to meet the demand from the design community. A number of improvements were made to the survey to help facilitate the process, thanks to input from AWC's Sustainability Committee members.

AWC was also awarded a Wood Innovations Grant (WIG) to support the expansion of the Life cycle Assessment database to include other manufacturers who are not already AWC members, without additional costs to the manufacturers. As the market increasingly demands transparency and environmental impact reports, the survey data provides a central hub for industry data.

California Adds WBLCA as Pathway to Reduce Embodied Carbon

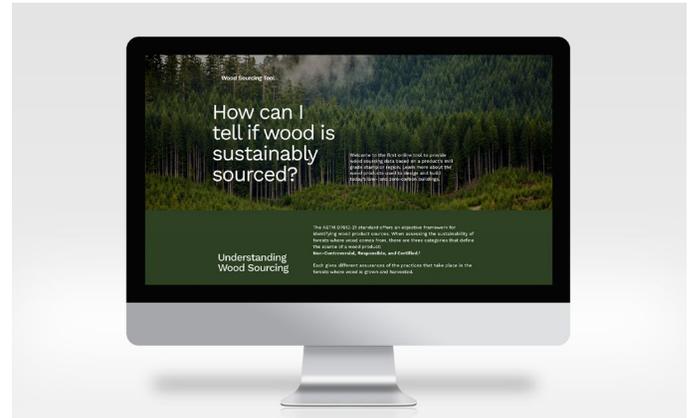
AWC was successful in getting Whole Building Life cycle Assessment (WBLCA) to be included as a part of amendments to 2022 California Green Building Standards Code (CALGreen) for commercial buildings and school projects larger than 100,000 and 50,000 square-feet, respectively. AWC's Markets and Sustainability team submitted comments and testified in the process and has since been actively reaching out to work with the state on implementation. The changes to CALGreen go into effect on July 1, 2024.

This is an important win for AWC's sustainability platform, as WBLCA is the centerpiece of AWC's policy strategy to help drive further wood use by directing designers and builders to select building products at the design phase to best maximize embodied carbon reductions. This ensures wood products can be considered against competing building materials on a level playing field before design decisions are made, giving our products the opportunity to demonstrate their overall superior carbon and sustainability attributes. Armed with this precedent in California, AWC is now poised to carry it forward in 2024 in other states through our planned Build Clean efforts.

Wood Sourcing Tool Launched

AWC released a new online tool that enables users to track the source of wood products from the forest to the end user. The [Wood Sourcing Tool](#), funded by the Softwood Lumber Board and the U.S. Endowment for Forestry & Communities, provides insight into where wood products are originating and the safeguards in place throughout the supply chain that ensure sustainability.

The Wood Sourcing Tool tells the sustainability story based on a wood product's mill grade stamp or region, information critical to tracking a specific product's journey from the forest to the end user. It also features a set of frequently asked questions about sustainable forestry and regional facts about wood sourcing, information that can give users broader understanding about the wood products being used in buildings across the country.



Spreading the Word of Wood's Sustainability Story

In 2023, AWC expanded its role as the industry's leading voice on sustainability and climate and carbon issues. Rachael Jamison, AWC's Vice President of Markets and Sustainability, appeared on [The Living Shelter Podcast](#) to discuss the role of wood in a sustainable future, carbon sequestration, and diversity in the timber industry. Rachael talked about the industry's recognition of climate issues, Environmental Product Declarations (EPDs), the importance of working forests, as well as the biophilic benefits of wood.



Listen to *Natural Carbon Capture* on the Living Shelter Podcast [here](#).

In October, Jamison and Heather Stegner, the Vice President of Education and Communication, traveled to Bordeaux, France, as the keynote speakers for the 2023 Woodrise Conference. Their presentation shared how the U.S. wood products industry is increasing transparency and data collection across the industry. During the conference, AWC's work was cited by leading American architect Susan Jones, as well as international organizations like the UN Food and Agriculture Organization.

The work AWC is doing in collaboration with member companies is emerging as internationally relevant and is raising the bar for the wood products sector around the world.

ADVOCACY



Congressional Staff Led Through Mass Timber on National Mall

AWC hosted the House Working Forest Caucus on the National Mall where they toured two modular mass timber buildings to discuss how wood products can provide a sustainable solution to our nation's housing crisis. The tour was coordinated as part of the Department of Housing and Urban Development's (HUD) Housing Innovation Summit. In addition to the tour, the members were able to hear from U.S. Forest Service staff and HUD's Affordable Housing Research & Technology team about how mass timber is helping solve economic and housing issues.



Representatives Bruce Westerman (R-AR), Derek Kilmer (D-WA), and John Rutherford (R-FL), congressional staff, and more joined AWC President & CEO Jackson Morrill in discussing how mass timber is one of the tools HUD is considering in the quest to reduce housing cost nationwide.

Mass Timber Highlighted in NDAA and by Army Corps

This year AWC saw great success in its efforts to get mass timber and wood products included in language in the *National Defense Authorization Act* (NDAA). The NDAA dictates the annual budget, including construction funding, of the U.S. military and inclusion of mass timber provisions saw bipartisan support. The provisions:

- Require each branch of the military to consider mass timber construction in all new vertical construction projects.
- Ensure each military department will build at least one mass timber building by January 1, 2025.
- Require military and Army Corps joint continuing education curriculum, which must include, among other items, wind, seismic and fire performance, life-cycle sustainability, and innovative building materials and innovative construction methods.

In addition to the NDAA, the U.S. Army Corps of Engineers issued policy directive ECB 2023-14, which requires Project Delivery Teams (PDT) to specifically consider mass timber solutions when designing Army MILCON and Civil Works vertical construction projects. The directive specifically highlights the AWC as a resource for the PDT.

Los Angeles Abandons Wood Construction Limitations

After five years of AWC's advocacy efforts, the Los Angeles City Council motion to extend the Fire District One ban on Type IV and V construction officially

expired. Over the years, AWC has built a coalition of sustainable building and affordable housing advocates in the state to speak against the measure.

AWC Regional Code Manager Paul Armstrong attended neighborhood meetings and provided his technical and code expertise. Whereas, during these neighborhood discussions, concrete lobbyists failed to properly identify themselves, resulting in ethics violations and coverage by the [Los Angeles Times](#) calling for lobbying reforms.

National Forest Products Week Fly-in

AWC organized and hosted a fly-in to educate members and staff during National Forest Products Week. During the week, AWC members visited with more than 40 members of the Senate, House, and their staff. The meetings focused on emphasizing the value of wood products, supporting the *Timber Innovation for Building Rural Communities*

Act (TIRBC), and highlighting the potential negative impacts posed by the EPA's final PM2.5 NAAQS ruling.

NAFO also joined AWC in hosting a Congressional reception at 80 M Street, D.C.'s first mass timber office building. The event was well attended, with nearly 100 guests including the Chief of the Forest Service, Members of Congress, staff members, and industry allies.



ISSUE 06

Advocating for Science-Based, Reasonably Tailored Rules

ENVIRONMENTAL REGULATIONS



PCWP MACT Process Shaped by AWC

AWC led a coalition of seven wood product trade groups in filing extensive comments to the EPA on its proposed Plywood and Composite Wood Products (PCWP) Maximum Achievable Control Technology (MACT). While supporting the overall framework of the rule, AWC objected to the unnecessary limitations on wastewater systems and log vats while seeking more appropriate and limited work practices and dropping PAHs limits on biomass dryers.

The filing of our PCWP MACT rule comments is not normally viewed as a milestone and is certainly not the end of AWC's efforts to engage in this rulemaking, but these comments reflect years of thoughtful engagement with EPA staff, technical experts, and our members to achieve optimal results through the rulemaking process.

These years of effort helped to significantly shape the draft rule before it was issued for comment, ensuring that hundreds

of millions of dollars of costly regulatory provisions would not be up for consideration. Moreover, it gave AWC the time and ability to submit robust comments that were well-informed and technically sound, even under the tight comment deadline provided. While EPA has made the decision to delay issuance of the rule for two additional years to allow for further notice and comment, AWC is well-positioned to continue its effective engagement to achieve optimal results for the industry.

Pursuing Every Avenue on PM NAAQS

AWC pursued every avenue to reach White House, Environmental Protection Agency (EPA) and Federal Agency officials, as well as key state and federal office holders, to push back on the proposal to reduce the National Ambient Air Quality Standards for Fine Particulate Matter (PM_{2.5} NAAQS) to near background levels.



A coalition of AWC members, AF&PA, and manufacturing organizations from across the country pushed back in two separate letters to the White House, calling on the Administration to step in and preserve the current standard. The [first letter was signed by more than 40 AWC and AF&PA member CEOs](#). The [second included more than 70 executives](#) and leaders from a diverse range of manufacturing groups. AWC President & CEO, Jackson Morrill, then [sent a letter to White House Chief of Staff Jeff Zients](#) to follow up on the joint AWC and AF&PA CEO letter requesting a meeting.

AWC's Vice President of Environment Tim Hunt testified before the House Energy and Commerce Environment, Manufacturing, and Critical Materials Subcommittee on the forest products industry's significant concerns with EPA's potential lowering of PM NAAQS. In his testimony, Tim made clear that EPA's proposed tightening of the PM NAAQS without a workable implementation plan would threaten modernization and expansion projects across the country and undermine the President's promise to grow and reshore manufacturing jobs. AWC filed written comments jointly with AF&PA that provided much greater detail on concerns with both the potential PM NAAQS regulatory amendment and the overall cumulative regulatory challenge facing the forest products industry.

AWC and member companies also worked tirelessly to engage Members of Congress, urging them to contact the White House directly on this issue. AWC reached out to Administration officials in the Department of Defense and USDA, among others, who helped raise concerns to the White House following our request. AWC participated in meetings directly with the White House, including with the Council of Environmental Quality and OMB/OIRA. Further, AWC has helped facilitate several OMB and OIRA meetings for state-based trade associations, including the Oregon Business & Industry and Oregon Forests & Industry Council.

Finally, AWC and AF&PA ran a three-phase paid digital campaign in November and December targeting White House and EPA officials specifically. The campaign performed at or above benchmark for all tactics, which is significant given the difficulty of engaging this particular audience. It garnered 2.4 million impressions (views on our messages or ads) and more than 8,700 clicks. Because the rule had not yet been announced by the end of 2023, AWC and AF&PA engaged a fourth phase of the paid digital campaign, continuing to specifically target White House and EPA officials that gained an additional 85,000 impressions and 870 clicks.

Despite pulling every lever available to push back on this proposal, the final rule was released in early February. AWC President and CEO Jackson Morrill said in a joint statement: "EPA's rule delivers a devastating blow to U.S. manufacturing and the economy while doing nothing to address the largest sources of particulate matter, including wildfire smoke. This unworkable air rule undermines President Biden's promise to grow and reshore manufacturing jobs. We are very concerned that many of the modernization projects in the paper and wood products industry and across U.S. manufacturing will no longer be able to move forward."

[You can read the joint statement in its entirety here.](#)

AWC will now pivot to pursue both a legislative and legal strategy that challenges the rule and the timeline for implementation. AWC is also actively participating in manufacturer coalitions engaged on the issue and is exploring opportunities to work with states to raise implementation challenges with EPA regarding air monitoring, exceptional events and more.

Testifying on Significant Flaws in EPA Formaldehyde Review

AWC's Chief Scientist Stewart Holm testified before the EPA's Human Studies Review Board (HSRB) on the risks associated with formaldehyde. The EPA is in the process of reviewing formaldehyde under the Toxic Substances Control Act (TSCA), and AWC and the American Chemistry Council (ACC) are working closely together to raise concerns about the potential for significant and unnecessary negative impacts to our industry of a final risk value below background levels.

In addition to testifying to EPA's HSRB, AWC has met twice with the agency. In the first meeting, we provided information on current indoor air concentrations and common formaldehyde sources to the indoor environment. In our subsequent meeting, which included the Assistant Administrator of the Office of Chemical Safety and Pollution Prevention, we discussed how using existing data and the best available science could result in establishing a workable Existing Chemical Exposure Limit that is below the existing OSHA Permissible Exposure Limit but could still be achieved in existing forest product work environments.

A proposed Risk Evaluation is expected in the first half of 2024. AWC will continue to coordinate with ACC, the Composite Panel Association, AF&PA and others to push for EPA to develop a reasonable Risk Evaluation that is based on the best available science as required under TSCA.



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