



European Furniture Industries Confederation

Towards an EU Product Policy Framework contributing to the Circular Economy

POSITION PAPER

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EFIC key messages:

- EU rules can support Circular Economy goals
- Product-related rules must apply equally to all goods sold in the EU market (both produced and imported, including online trade)
- Regulations should aim at non-technical demands
- Rules must be enforceable – both for companies to fulfil them and for market surveillance authorities to check their enforcement, including imports.

Background

- **About the European furniture industry**

The furniture sector is labour-intensive sector which employs about 1 million workers in close to 118.000 companies. Most companies are SMEs and micro firms (99%).ⁱ In 2017, the EU production reached about 90 bill €.ii Europe accounts for about 25% of total world furniture production. The European furniture industry is highly export-oriented, with the main export share happening in the EU.ⁱⁱⁱ

While the EU remains a competitive producing region, today 54% of world furniture is produced in Asian and Pacific regions, accounting for 211 billion € in 2017, mainly from China and Vietnam.

Furniture products are currently not subject to harmonised European legislation, and in the absence of European rules, certain Member States have been active in drafting country specific regulations and standards for different types of furniture. Office furniture and furniture for the public and contract market can be subject to different standards and regulations, comparing to those applied to domestic furniture intended for private use.

From a “circularity” point of view, furniture products are a complex type due to the wide range of materials used e.g. wood, plastics, textile, steel, glass, composites. Use of chemicals is a key issue to consider.

EFIC comments to EU public consultation

1. EU product policy (in general)



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EU harmonised rules on products requirements can support the goals of an increased sustainability, industry competitiveness and consumers' protection. However, it is crucial that the same rules apply in the whole EU, to facilitate trade and to equally protect consumers. Equally, it is key to apply the same rules to products produced in the EU and imported in the EU market and to enforce adequate market surveillance.

Long lifetime is the central tool to reduce waste. Reuse, reparability, high quality, durability, all together increase life time and keep products and materials in life cycle. However, the following conditions are key: 1) It is important that EU set "good rules". Not rules for technical solutions but rather objectives. E.g. lower emission or less waste; 2) The life of a product must be adapted to its intended use and its safety regime. We see big challenges in generally defying by regulation what a long life time is.

Consumers have a big role to play in a circular economy transition and additional consumers rights are an interesting perspective. However, they should be prior carefully considered. For example, we fear that SMEs operating in the Single market would not be able to comply with EU-wide reparability rules. Moreover, the possibility of repairing products or parts of products is not always possible at low costs, most of all for SMEs.

2. Policies in the different phases of the product life cycle

- **Product design** is a key factor in enhancing the circularity of products. Potential EU-level regulatory action could support the company in defining *what* should be achieved. For instance, promote lower emissions or less waste generation – but should let the industry come up with technical solutions on *how* to achieve the needed result.
- **Consumers' information** should be focused to useful information for the consumers, such as e.g. materials used, safety criteria, health criteria (e.g. free of SoHC), circular criteria (e.g. reparability, recyclability). Consumers' information is a must, but should not happen by labelling only.
- The number of **environmental labels** should be kept at a minimum and with the wider application possible. There is already an overabundance and too many schemes confuse consumers. Eco-label should be considered labels for extraordinary products, and not for ordinary ones. The EU should offer homogenous schemes for environmental labels, and invest in consumer awareness. However, the EU should not promote specific products or labels.
- **Extended producer responsibility (EPR) schemes** can support the transition of the circular economy. EFIC agrees with the principles of EPR schemes at the conditions that: 1) One model is agreed in Europe; 2) An easy system to comply with is put in place; 3) The burden is economically shared; 4) A level playing field is granted. Part of its resources should be smartly invested in research and innovation, preferably at the European level.
- **Green Public Procurement (GPP) criteria** can boost demand for more sustainable products. When furnishing public spaces, the final choice should not be primarily based on economic-driven criteria.
- **Waste/end-of life:** together with setting requirements, it is key to ensure the existence of infrastructures. In addition, it would be useful in practice to define uniform EU rules that are easy to implement for industry and also easy to monitor by the authorities.

3. Furniture Products

Furniture consumers' choices are driven by different factors, such as purchasing power, interest in style/design, use perspectives. Such dynamics may apply differently in the consumers' market than in



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the office, contract or public market. There are also differences among product groups (e.g. upholstery, mattresses, chairs, tables) to be considered both in terms of materials used and circular/economic considerations. There are challenges to be addressed when selling / buying used furniture as, for example, on how to ensure that the requirements of the Product Safety Directive or chemical requirements according to REACH are met. The support of the EU in investigating these challenges is key for success.

EFIC proposals

1) Harmonise requirements

EFIC sees the opportunity that the EU-level harmonisation of certain requirements would have on the industry and society as a whole. For example:

1. **Flammability requirements for upholstery:** different flammability requirements are now in place in the EU, most of all for what the office/public/contract furniture market is concerned. Some of these requirements lead to the use of flame-retardant chemicals, many of those have harmful effects for consumers' health, the environment and circularity of furniture products. EU-wide harmonised requirements for the flammability of upholstered furniture, taking into account and weighing up the health risks of the flame retardants, would greatly support the goals of a circular and non-toxic economy as well as consumers' protection and the competitiveness of the industry.
2. **Formaldehyde emission level for wood-based panels:** today, there is no harmonised approach in Europe with regard to emission limits of formaldehyde from wood-based panel. While ECHA is working on an EU restriction of formaldehyde, some Member States are already looking at lower limits, as well as the international scenario is rapidly changing. EFIC strongly support one level of formaldehyde emission in Europe, for the benefit of consumers, the environment and the industry.

2) Investigate Challenges

EFIC is already looking at the potential existing for different furniture materials and/or products' type, and would be glad to support the European Commission in this type of investigation.

A product policy supportive of the circular economy should look at possible legal challenges and way to solve them. For example:

- Legal requirements compliance for **second hand and repaired products**, e.g. with concern to the General Product Safety Directive, Product liability, REACH and restricted substances;
- **EN standards with safety requirements:** the industry is frequently asked to tighten the requirements (e.g. for children furniture). However, this may mean that products which were safe at the date of manufacture, may not be considered safe now.

EFIC seeks the European Commission support in understanding and tackling the challenges.

3) Understand opportunities

Looking at existing idea would allow a better understanding of the impact of future policies: the European Commission should promote a collection of **best practices in the furniture sector**, as to take



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example from the valuable players already gathering experience for improving the circularity of the furniture sector. EFIC would be glad to support the European Commission to this extent.

ⁱ In the EU furniture sector, Micro companies account for about 85% (fewer than 10 employees), and another 12% being small (10 to 49). Medium-sized companies account for 2%. *Source*: “The EU Furniture Market Situation and a possible Furniture Products Initiative”, report commissioned by DG GROW, November 2014, page 62 ([link](#))

ⁱⁱ *Source*: CSIL World Furniture Outlook, Centre for Industrial Studies

ⁱⁱⁱ According to the different estimates and sources available, the EU accounts for about 40-45% of world furniture imports and for around 30-35% of world furniture exports, and accounts for about 45% of total world trade. The majority of this (about 85%) is represented by intra-EU trade. *Source*: “The EU Furniture Market Situation and a possible Furniture Products Initiative”, report commissioned by DG GROW, November 2014 ([link](#))