European Furniture Industries Confederation

# MANIFESTO FOR A COMPETITIVE EUROPEAN FURNITURE INDUSTRY

# 2024-2029

# WHO WE ARE

### EU FURNITURE SECTOR AT A GLANCE





MICROENTERPRISES

1 MILLION EMPLOYEES

120 000 ENTERPRISES,

ENTERPRISES, 116 BILLION US\$ MAINLY SMEs & (23% OF WORLD

> FURNITURE PRODUCTION)

PRODUCTION



EXPORTS 71 BILLION US\$

(36% OF WORLD FURNITURE

EXPORTS)

(44% OF WORLD FURNITURE IMPORTS)

IMPORTS

80 BILLION US\$



CONSUMPTION 124 BILLION US\$

(26% OF WORLD FURNITURE CONSUMPTION)

SOURCE FOR PRODUCTION, TRADE AND CONSUMPTION FIGURES: @CSIL WORLD FURNITURE OUTLOOK - DATA FOR 2022 REPRESENTING EU27+NO, CH, IS

The European furniture industry is a creative, versatile and dynamic sector that contributes to society by improving the quality of everyday life, creating functional and ergonomic products for both public spaces and people's homes. Our industry, composed mainly by SMEs and microenterprises, has a prestigious image among designers and consumers and is a design trendsetter at global level. It combines traditional craftsmanship with modern industrial processes and is an important employer that creates many jobs.

Our manufacturers embrace sustainability and the opportunities that the twin transition will bring, including new products in line with lifestyle changes and sustainability trends, as well as new business models. Some best practices already exist and many more are to come as we transition to a more circular economy, our main expected contribution to climate neutrality objectives. Our industry is part of a complex value chain, with a broad range of designs, products and materials used. We rely on many materials and semi-finished products, such as wood and wood-based products, foam, steel, components, fabrics and others. The market for furniture is diverse with customers within businesses, public procurement and private consumers. Furniture products often reach customers via furniture retailers, but can also be sold directly via own retail channels.

Our industry faces increased competition from third countries, counterfeiting – also due to increased online purchases, increased raw materials prices and material availability fluctuations, high energy costs, a shortage of skilled workers and a relatively low attractiveness among youngsters, as well as a slowdown in the European housing market which affects demand for new orders. Due to a highly interconnected global supply chain, we depend on the import of certain materials and components from third countries, which renders the industry vulnerable in situations such as the coronavirus crisis or distortions in trade. Internally, the industry is highly fragmented (many small companies).

The industry is represented in Brussels by EFIC, the European Furniture Industries Confederation, representing over 70% of the total turnover of the European Furniture Industries, a sector employing 1 million people in about 120.000 enterprises across the EU and generating a turnover of over 100 billion Euros. EFIC wishes to be a close partner to the EU institutions in addressing the challenges above and in the development of legislation affecting the sector. We look forward to contributing with industry-specific expertise during a continuous dialogue.

# OUR RECOMMENDATIONS IN SHORT

HARMONISED EU LEGISLATION FOR A FUNCTIONING SINGLE MARKET WITH STANDARDISATION AS ITS BACKBONE

HOLISTIC APPROACH ON CIRCULAR ECONOMY TO FULLY CLOSE THE LOOP AND A COMBINATION OF DIFFERENT TOOLS ALLOWING SCALABILITY OF SOLUTIONS AND ACCESS TO (SECONDARY) RAW MATERIALS

LEVEL PLAYING FIELD FOR ALL PRODUCTS AND OPERATORS, INCREASED MARKET SURVEILLANCE AND ENFORCEMENT OF EU RULES

FAIR & FREE INTERNATIONAL TRADE & FIGHTING ILLEGITIMATE TRADE

INCREASED DESIGN PROTECTION & MEASURES AGAINST COUNTERFEITING

ADDRESS LABOUR SHORTAGES AND LACK OF SKILLED WORKFORCE

ENSURE THAT THE EU STAYS COMPETITIVE GLOBALLY AND PROVIDE SUPPORT TO SMALL AND MEDIUM SIZED ENTERPRISES (SMEs)

# OUR RECOMMENDATIONS IN DETAIL

#### HARMONISED EU LEGISLATION FOR A FUNCTIONING SINGLE MARKET WITH STANDARDISATION AS ITS BACKBONE

The EU Single Market is one of the most cherished accomplishments of the EU, bringing many opportunities to businesses and citizens. The EU's prosperity is based on an internally competitive, well-functioning and resilient Single Market. A single market approach is essential to make Europe a competitive place for growth and investments. Harmonisation of EU legislation is needed to enable a functioning single market. Differing national rules and requirements, standards, certification schemes or labelling requirements risk bringing additional costs and administrative burden for companies, as well as uncertainty. They may even be contradictory to the purposes and ambitions of EU legislation.

Standards are key for a functioning Single Market, for a competitive European industry and for enhanced innovation in Europe. As a member of the European Commission's High-Level Forum on European Standardisation, EFIC is proactive in identifying standardisation priorities in support of EU policies and legislation. The Furniture industry experts are keen to be involved in the development of standards affecting the sector via CEN TC 207 as well as other relevant standardisation processes.

#### What is needed, in a nutshell:

Harmonised legislation and definitions at EU level, developed through a transparent and participative process, avoiding duplication of requirements. One way of achieving full harmonisation in the Single Market is by **converting** existing Directives into Regulations setting clear requirements. Another is by addressing national legislation that may pre-empt EU legislation or be contradictory to EU objectives and goals. Another is by **strengthening the EU** Better Regulation agenda to avoid that EU proposals lead to the fragmentation of the Single Market.



- **1.2** Harmonised EU circular economy rules, considering existing standards and ongoing standardisation work when developing upcoming legislation:
- a) Harmonised ecodesign performance and information requirements across the EU, considering existing standardisation or standards under development for upcoming legalisation, such as ongoing work in CEN TC 207 (Furniture) - on product aspects of the Ecodesign for Sustainable Products Regulation (ESPR).
- b) Harmonised methodologies to verify compliance with EU legislation, based on EU & international standards (tools to compare the environmental and climate performance of products, conduct lifecycle analysis, substantiate green claims...).
- c) Harmonised labelling rules, for example for sorting instructions for packaging waste under the Packaging and Packaging Waste Regulation (PPWR) for consumers across the EU. Many EU Member States come forward with diverging packaging labelling requirements bringing barriers and logistical and economical hurdles.
- d) A harmonised Extended Producer Responsibility scheme for furniture at EU level; with a common EU regulatory framework for reporting requirements and based on common definitions.
  - Secure alignment with the multilateral rules-based trading system for globally accepted definitions and standards. Local regulations should be aligned and made interoperable with these global rules. This will support and enable change among member countries, their customs agencies, and other competent government agencies involved with trade. For example, from a customs perspective, the rules for material recovery from products classified for customs purposes as waste are very complicated and regulated based on the specific material. Here we also need the Harmonized System at the six-digit level codes to make clear distinctions between recirculated raw materials and waste and scrap.

## HARMONISED EU RULES

Harmonised furniture flammability requirements across the EU to support the industry in reducing the use of unwanted flame retardants and comply with sustainability legislation, by converting EN 1021/1 (smoulder ignition test) into a harmonised standard and using it as the reference standard to prove compliance with the General Product Safety Regulation (GPSR) / Ecodesign for Sustainable Products Regulation (ESPR).

> Support and strengthen standardisation processes by removing existing bottlenecks and barriers to the system and ensure consultation with standardisation bodies. An in-depth expertise and a flexible process are needed to **take into account innovations on the market**, in close dialogue with standardisation bodies and the industry concerned.

Make the EU an ambitious player at global level by aligning EU legislation with similar legislation in large international markets in line with trade agreements, to help reduce the costs of doing business for entities in Europe and create a more harmonised flow of goods across borders and investments.





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# CIRCULAR ECONOMY & MATERIAL AVAILABILITY

#### HOLISTIC APPROACH ON CIRCULAR ECONOMY TO FULLY CLOSE THE LOOP AND A COMBINATION OF DIFFERENT TOOLS ALLOWING SCALABILITY OF SOLUTIONS AND ACCESS TO (SECONDARY) RAW MATERIALS

The European furniture industry welcomes circular economy ambitions and is ready to contribute to making sustainable products the norm in the EU. Furniture is generally well suited for a circular economy. Furniture products can be designed for longevity and one of the most prominent raw materials for the industry is wood, which is renewable.

For the circular economy to work, harmonised rules will be needed at EU level, preventing a patchwork of national divergent requirements. While the Ecodesign for Sustainable Products Regulation (ESPR) can drive a circular economy forward, it focuses on products. Hence, a holistic approach is recommended and a combination of tools allowing scalability of solutions (see below) to fully close the loop and enable a real transition to the circular economy. Innovation and investment needs, as well as sufficient time for their deployment, should also be considered.

Combination of tools needed, in a nutshell, to drive a more circular economy forward in our industry:

- 2.1 Harmonised legislation at EU level (see point 1 - Harmonised EU legislation for a functioning Single Market, with standardisation as its backbone - also touching upon harmonised circular economy rules)
- 2.2 Incentives to make circular business models - refurbishment, remanufacturing - economically viable and possible at a larger scale:
  - a) **Reform VAT rules** for second-hand purchases.
  - b) Fiscal measures to make secondary raw materials more competitive than virgin materials.
  - c) Mandatory Green Public Procurement criteria.
  - d) Reduced taxes on services and labour to support labour intensive activities such as repair or refurbishment.

# CIRCULAR ECONOMY & MATERIAL AVAILABILITY

- **2.3** The setting, via the Ecodesign for Sustainable Products Regulation (ESPR) and delegated act for furniture, of ecodesign performance and information requirements that are appropriate and truly support a sustainable development and product lifetime extension[1], in close coordination with the furniture industry and relevant standardisation bodies.
  - a) When setting ecodesing requirements, consider that the furniture range is very diversified, with many furniture types and materials used. Therefore, the delegated act on furniture products must allow for a diversity of relevant requirements, focusing on a reduced ecological and climate footprint. Requirements should be set having a holistic approach and from a lifecycle perspective. Any requirement should not have a negative effect on other important ecodesign criteria or be in contradiction.
    - In view of the delegated act on furniture, it should be investigated per requirement whether and in which way they are generally applicable to all furniture or rather separately and considering furniture subgroups.
    - Some requirements may be applicable to many types of furniture, such as design for disassembly or separability. Here it should be considered that a) not all furniture has to be fully disassemblable and that the focus of disassemblability should be on `priority parts' and that b) separability should focus on materials that hinder the recycling process. Other requirements are material-specific (recycled content) or product type-specific (durability).
    - Some sort of categorisation will be needed within the delegated act, most probably in furniture subgroups, considering a) the differences or commonalities in product types (functionality, materials, design, composition, structure, spare parts) and b) the environmental impact of each subgroup.
- b) When developing the digital product passport, which is a great opportunity to modernise the transmission of information and support the circular economy, the elements to be included should be carefully considered, as the information should be provided on a need-to-know basis and considering the value to the receiver. Confidential business information should also be protected.

- c) Involve industry representatives in all stages of developing product specific legislation via delegated acts, including in the preparatory study, the impact assessment and participation in the Ecodesign Forum.
- Consider d) existing and ongoing developments on standards, such as in CEN 207 (Furniture) and its WG 10 тс (Requirements and tools for furniture circularity), which has developed a standard on dis/reassembly (prEN 17902). It will be followed by further and more far-reaching initiatives such as standards for repairability, durability and product life aimed at supporting a circular approach in the furniture industry, as well as evaluation methodologies. These standards represent early efforts from the furniture industry to accompany the policy objectives of the ESPR. We believe that this work should be used as a basis or considered in parallel for the development of a delegated act for furniture.



 [1] EFIC position paper in view of ESPR consultation on prioritisation of products: https://www.efic.eu/\_files/ugd/a1d93b\_ec6b31aec97a40909f8e5a6aac98e04a.pdf Ensuring the availability of raw materials that are needed for the circular transition[2] and their efficient use, and that valuable secondary materials that can be reused in products are not wasted or end up in incineration, landfill or energy recovery. In a context where the extraction of new raw materials has a high impact for the environment, we need to increase the use of secondary raw materials. Today, we don't have the capabilities in Europe yet (e.g. infrastructure, quality of recycled material at a competitive price) to reach the ambitious goals of the Green Deal.

#### Hence we need support from the EU institutions in:

- a) Creating a harmonised Extended Producer Responsibility scheme at EU level for furniture (see also point 1 – Harmonised rules at EU level). A mature EPR system may establish relationships between producers and their customers, which may in turn support and accelerate transformation towards a circular economy. It may incentivise producers and industry to develop more recyclable products and materials, leading to longer product lifetime and to higher awareness and participation among consumers concerning recycling.
- b) Creating systems and facilities for the collection of furniture (for example as part of EPR schemes) which would allow conducting different operations as returning whole pieces of furniture for instance for refurbishment to the original manufacturer as well as systems for sorting and recycling of furniture at the end of its lifecycle.
- c) Making sure that Europe has recycling capabilities that are shared across the EU, and that there is real possibility to move around products and materials.
- d) Creating incentives for a functioning return logistics by making it more lucrative to conduct that type of business. This could be achieved by changing and revising uniformly the definition of waste, leading to more commercial actors to make use of what is today called waste but which is actually a resource. This would remove regulatory barriers to waste ownership due to the current definition - which results in expenses or restrictions for its transport or storage - and would in turn enable more repair or refurbishing and a higher uptake of secondary raw materials.

- e) Applying an obligation for the cascade use of materials (material recovery before energy recovery), to ensure there is no competition for wood waste, residues and industrial grade wood and that these are not diverted from material use (in particleboards) to energy use. Deter member states from providing financial and other incentives which could divert the use of wood from the furniture industry to be used as biomass for energy. Financial incentives and tax breaks artificially skew the market towards biomass for energy, reducing the availability of precious raw material for the furniture industry.
- f) Under the EU Deforestation Regulation, create a workable information system for economic operators for reporting on due diligence efforts, with information to be provided on a need-to-know basis.
- Considering 3rd party verification schemes a) such as FSC or PEFC or ISO 38200 for wood (for example with regard to the EU Deforestation Regulation), as they are a force multiplier, aiding the industry in meeting its sustainability and due diligence ambitions, with their varied verification and assurance mechanisms. We ask policymakers to critically examine the role that voluntary certification can play in meeting regulatory requirements, and how they could play a role in reducing the compliance load for the industry. These chain of custody forest certifications are also a successful example of traceability for wood.

[2] See also Circular Choices coalition policy recommendations on raw material availability - <u>https://www.efic.eu/\_files/ugd/ald93b\_bd2bfa633cb14b25a662c0fa2b34df95.pdf</u>

# LEVEL PLAYING FIELD

LEVEL PLAYING FIELD FOR ALL PRODUCTS AND OPERATORS AND INCREASED MARKET SURVEILLANCEAND ENFORCEMENT

The furniture industry is predominantly composed by SMEs and microenterprises. With legislation such as the Ecodesign for Sustainable Products Regulation (ESPR), a number of new actors will appear on the market who will modify existing products in certain ways. The furniture industry is also facing a fierce competition from third countries. In this context, a level playing field will be needed for all products and operators.

#### What is needed, in a nutshell:

- 3.1 A level playing field between imported products, existing products and secondhand products and economic operators, with the ambition that all products placed on the EU market must meet equivalent requirements regardless of their origin or whether they are new, upgraded or remanufactured.
  - 2 Increased market surveillance and enforcement of EU rules for imported products by Member States to ensure compliance with EU requirements and therefore a level playing field.

Equal obligations for online marketplaces to ensure that for imported products, either traders selling on their platform meet the requirements of the EU legislation or they demonstrate that they have a liable economic operator registered in the EU or EEA.

FAIR & FREE INTERNATIONAL TRADE & FIGHTING ILLEGITIMATE TRADE

In a context where protectionism and trade barriers are rising the EU should actively protect an open and rules-based international trade system that ensures the free flow of goods around the globe. The last decade has seen the number of product regulations almost triple, creating an increasingly complex legislative landscape. While proliferation of scattered and misaligned rules and compliance schemes have detrimental effects on businesses, international regulatory co-operation has the potential to achieve a coherent regulatory response, necessary for challenges that cannot be dealt with in isolation.

Removing obstacles to trade not only within the EU internal market but also towards third countries, as well as avoiding new trade barriers is important to boost the involvement of our smart and agile SMEs in the international market. EFIC is pleased to be a member of the Commission's Market access advisory committee that addresses market access barriers on exports to third countries. Fighting counterfeiting is extremely important as well.

## INTERNATIONAL TRADE

#### What is needed, in a nutshell:

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Promote the internationalisation of companies abroad, especially SMEs.

Trade policies that offer stability, predictability and openness for EU businesses, while protecting them from unfair practices and increased competition from third countries, ensuring that EU values and high standards are not undermined through trade.

International regulatory cooperation to achieve a coherent and effective regulatory response to cross-border challenges, such as climate change and the transition to a circular and digitalised economy.

Promote, through bilateral and multilateral trade negotiations, internationally recognised standards and labels, harmonised regulatory procedures and conformity assessment, technical regulations and testing requirements, preventing companies from going through costly type-approval procedures when exporting to third countries.

**4.5** Enhanced market access by eliminating (tariff and non-tarif) barriers to trade by promoting standardisation and regulatory cooperation with third countries (via the Market access advisory committee), by monitoring of FTAs and preserving tools supporting businesses such as the Market Access Database or Export Helpdesk.

6 Reform and modernise the World Trade Organisation (WTO) as the body guaranteeing world trade order to ensure effectiveness of the multilateral trading system.

**4.7** Enhance cooperation with main partners of importance for the furniture industry, including FTA developments, such as the US, China, Vietnam, Japan, New Zealand, Australia, India, Canada, South Korea, India. To name some examples:

The **United States** is an important destination for European furniture products. The ambitions of reaching a free trade agreement with the US should be kept despite the difficulties in negotiations. EU businesses and U.S. businesses should receive equal opportunities, notably in the U.S. public procurement system. Tariff and nontariff barriers, including the fragmented U.S. public procurement system, are a limitation for EU companies.

**China** became over the last decade the largest furniture producer and exporter worldwide. While it is an important export destination for EU furniture producers, these are often confronted with non-tariff barriers. EU companies must to a higher extent be included in the Chinese standardisation process and standards notified to the WTO. Increased regulatory cooperation between the EU and China is needed, through an adequate protection of IPR rules and increased custom controls to tackle challenges related to the rising imports of non-compliant products.

India has seen decades of high economic growth and will become a more important trade partner. The ongoing negotiations, while challenging, should be continued. The difficult regulatory landscape and the lack of ease of doing business are growing and the EU-India regulatory exchange is therefore necessary. An important factor weighing in India's favour will be the size and potential of its domestic market and the first mover advantage for those remaining there.

Set international rules on e-commerce at WTO level, supporting businesses and SMEs against the risks related to illegal trade practices.

Devote special efforts to stop ecommerce illegal practices placing on the market counterfeited products, though, e.g., improved cooperation with internet service providers.

Increase market surveillance, customs control effectiveness and risk analysis to illegitimate trade. Ensure that safe and compliant products enter the EU market. Member States must strengthen their control actions at the EU borders in a consistent and harmonised implementation of the Customs Union.

## DESIGN PROTECTION

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**INCREASED DESIGN PROTECTION & MEASURES AGAINST COUNTERFEITING** 

Design is a key aspect for the furniture industry and the protection of intangible assets remains a priority to preserve its competitiveness. High quality and design are major assets considering the growing competition the industry has faced over the past decade from third countries. Intellectual Property Rights (IPRs) infringements are a major detriment to both the industry and the economy at large, as they jeopardise the significant benefits of innovation and creativity. Furniture products and new prototypes are especially vulnerable at trade fairs, in particular when their design has not been registered in advance thereof.

In this context, EFIC and the <u>European Union Intellectual Property Office (EUIPO)</u> signed a collaboration agreement in December 2021. Through the EUIPO's network <u>Ideas Powered for Business</u>, which EFIC is part of, EFIC and the EUIPO work closely together to raise awareness about tools to protect design and IPRs, in particular towards SMEs.

#### What is needed, in a nutshell:

- Modernisation of EU design legislation, through more а harmonised framework for the protection of design. The system must be more user-friendly and consistent with current European policies - as the European Green Deal. A deeper harmonisation of the system would significantly reduce costs and administrative hurdles and the protection of intellectual property would be facilitated. The complexity of the system at EU level has led to a low uptake of IP, especially by SMEs. the duration of the Increasing protection of unregistered EU designs beyond 3 years is also needed.
- 5.2 Promoting a better uptake and deployment of IP via the envisaged action (for example via the EUIPO awareness raising programmes).

A higher EU-level design and patent protection, accompanied by higher controls on counterfeited goods both inside the EU market and at its borders, including online market places and other online channels.

Facilitating the implementation of a system based on the so called "Standard Essential Patents" - in connection with the proposal for an EU Regulation on standard essential patents - in order to reduce R&D costs of the SMEs and small entities.

Supporting SMEs with their innovative design and product development.

#### ADDRESS LABOUR SHORTAGES AND LACK OF SKILLED WORKFORCE

For our companies it is fundamental to attract skilled personnel throughout the entire processing chain. A highly skilled workforce, able to creatively incorporate new skills and competencies, to work with a variety of materials and to make an intelligent use of the potential for new combinations is essential for a competitive furniture sector competing on an increasingly global market. SMEs already apply a broad set of measures to find and retain workers. This includes efforts to make better use of talent within the company (e.g. staff mobility or job rotation), more investment in training, or increasing the attractiveness of jobs.

Labour shortages and lack of skilled workforce are however a challenge in our industry, as well as a relatively low attractiveness for youngsters. EFIC is an EU Social partner in the sectoral Social Dialogue for the Woodworking and Furniture industries and Social Partners are committed to taking an active role in finding solutions for common labour challenges, EFIC has also participated in EU funded projects addressing skills needs in relation to the transition to the circular economy and digitalization (SAWYER, Digit-Fur).

# What is needed, in a nutshell, to address these challenges and ensure that economic activity and the sector's competitiveness is not weakened:





Better tools for assessing the skills of applicants and company's skills needs.

**Identifying new skills needs,** monitoring supply and demand for skills, identifying positions for which there is shortage of labour and collecting data on sectoral needs (skills gaps, skills mapping and development, skills forecast). Policy actions supporting the recognition of qualifications, investment in professional education, continuous learning upskilling, opportunities and upgrading workers' competences, for example via special courses on innovative aspects (circular economy, sustainability, application of climate friendly materials).

**Fromoting the attractiveness of and supporting Vocational Education Training considering differences in the Member States**, increased mobility for apprenticeships via eg. Erasmus+ and cross-border cooperation, including school-based VET and workplace training.



# SMALL AND MEDIUM ENTERPRISES (SMEs)

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ENSURE THAT THE EU STAYS COMPETITIVE GLOBALLY AND PROVIDE SUPPORT TO SMALL AND MEDIUM SIZED ENTERPRISES (SMEs)

What is needed, in a nutshell:

- 2.1 Secure the competitiveness of the EU and EU industry globally amidst geopolitical tensions and times of economic recess.
- **7.2** Policy measures to reduce inflation & securing energy at affordable prices.
- **7.3** Reduce regulatory hurdles and administrative burden and ensure that EU policies are implementable on the ground/in practice (and by the specific deadlines of entry into force).
- 7.4 Allow flexibility and room to SMEs & microenterprises to adapt to circular economy legislation, to innovate and to deliver on the Green Deal by putting in place a simple and predictable framework. Consider that some companies produce customised furniture, are project based or produce in small quantities.

Support companies with digital tools - including generic databases that companies can freely use - to ensure compliance with circular economy legislation - e.g. the digital product passport and work with Life cycle analysis (LCAs).

- Provide access to financing programs and funding opportunities, especially for micro companies and SMEs, to explore new business models. Market trends are not always aligned with what banks offer.
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Ensure access to a skilled workforce (see also section 6).

Support the internationalisation of SMEs (see also section 5)

