



EU ECOLABEL FOR BED MATTRESSES

BEUC and EEB comments on the criteria proposal of May 2013

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Summary

This position paper provides EEB and BEUC comments to the draft proposal of criteria for the revision of the EU Ecolabel for Bed Mattresses (version of May 2013)¹. NGOs call for the total restriction of biocides used to impart primary biocidal function, e.g. “antibacterial or odour-inhibition function”. In addition flame retardants should not be used in bed mattresses awarded with the label, as fire retardancy could be achieved by other means (ecodesing) than the use of hazardous substances. EEB and BEUC also call for avoiding the use of metal complex dyes and nanomaterials.

¹ <http://susproc.jrc.ec.europa.eu/mattresses/stakeholders.html>



Biocides

First of all, EEB and BEUC call for a total restriction of biocides that are used to impart a primary biocidal function, e.g. antibacterial or odour-inhibition function". As bed mattresses for medical devices are excluded from the scope that should not be a problem, considering that the Ecolabel focusses on bed mattresses as article of daily use which do not need any specific health properties.

The list of biocides that cannot be used should be expanded to include nanosilver and other substances that can cause bacterial resistance like silver into consideration. The main biocidal ingredients used in textiles and bed mattresses are silver and silver-ions.

Metal complex dyes

EEB and BEUC propose not to allow these type of dyes for eco-labelled textiles. Good qualities of unusual shades previously relying on metal complex dyes can be achieved without them, and the range of colours normally may not need their use.

Flame retardants

EEB and BEUC strongly support a total exclusion of flame retardants and are against the exception that allows use of flame retardants for regulatory reasons.

The criterion on flame retardants is particularly important in this product, due to people's long-time contact with the bed mattress. According to experts on flame retardants chemistry, most of these lipophilic substances are found in dust particles and are inhaled during the product life time.

Flame retardancy standards can be achieved by other means than use of specific flame retardants. An assessment of alternatives to decaBDE in textiles applications was carried out on behalf of the Swedish Chemical Inspectorate². The study has considered relevant legislation and fire requirements. The regulation obliges the manufacturer to take action to manage the fire regulation but it does not give any recommended means as to how to manage these standards. The study also shows that there are alternatives to achieve fabric made of 100 % flame-retardant polyester fibre. Flame-resistant fibres are alternatives technically feasible to achieve this requirement. For instance, the International Sleep Products Association's members are using fire-resistant barriers made from synthetic fibres and thereby avoiding the application of fire-resistant chemicals to the filling material³. Although flame-resistant fibres are generally more expensive this cannot be a reason to prevent the Eco-label from finally encouraging substitution of

² Posner, S 2004 *Survey and technical assessment of alternatives to decabromodiphenyl ether (deca BDE) in textile applications*
(http://www.kemi.se/upload/Trycksaker/Pdf/Rapporter/Rapport1_05.pdf)

³ Decabromodiphenylether: An Investigation of Non-Halogen Substitutes in Electronic Enclosure and Textile Applications (2005: p.42-43),
<http://www.sustainableproduction.org/downloads/DecaBDESubstitutesFinal4-15-05.pdf>



unnecessary and hazardous substances. There are examples of companies in Europe producing bed mattresses without need of flame retardants (even for hotel

mattresses where flammability standards are most strict), based on combination of natural fibres. For instance, Coco-Mat produces a bed mattress with natural materials including wool that past the strictest US fire safety standards in the US⁴. Given that alternatives are available to mire fire safety standards, we do not consider that it should be the role of the EU Ecolabel to green-wash those bed-mattresses that use hazardous substances.

Last but not least, EEB and BEUC have repeatedly expressed strong disagreement with the fact that halogenated flame retardants are not explicitly excluded from the criteria. The reason for this additional proposal is that focusing on the inherent properties of single substances (as in the risk statements) does not allow identification of all areas of concern which could occur during the whole lifecycle of a substance or a product such as formation of hazardous degradation products in the environment, release of hazardous substances in incineration or inappropriate waste management, formation of hazardous substances during metabolism in the human body, etc. Most of the scientific concerns towards brominated and chlorinated flame retardants are summarised in a consensus statement – the so called San Antonio Statement – signed by more than 210 scientists⁵.

Despite these scientific concerns, these hazardous substances have not yet been excluded. On the contrary, the current criteria proposal grants a derogation to Antimony. As Antimony is often used in combination with brominated flame retardants, the current proposal may be subsequently promoting the use of such substances in Ecolabelled products. We are extremely puzzled by this development and we disagree with this derogation, considering in addition that Antimony is classified as a substance suspected of causing cancer (H351) and that the precautionary principle should apply in this case. EU Ecolabel should not support such type of products.

Nanomaterials

EEB and BEUC suggest that nanomaterials are restricted until a proper toxicological and ecotoxicological assessment framework for nanomaterials is in place and the manufacturer can prove that the substances have been adequately assessed and are proved safe for the environment and health. Considering existing concerns on potential hazardous properties of nanomaterials, methodology gaps to assess their safety, regulatory loopholes and the potential use of nanoparticles in bed mattresses⁶, EEB and BEUC demand that this question is further discussed in the EUEB.

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⁴ TEST PROCEDURE: 16 CFR 1632, California TB 106, and FF-4-72 Mattress Pad Flammability Evaluation.
TEST PROCEDURE: 16 CFR 1633, Test Configuration B. Requirements and Test Procedure for Resistance of a Mattress and/or Mattress Box Spring Set to a Large Open-Flame.

⁵ <http://www.greensciencepolicy.org/node/269>

⁶ E.g. <http://nano.taenk.dk/products/night-therapy-mattress-toppers-with-nano-silver>