



# EEB and BEUC comments on Revision of EU Ecolabel and GPP criteria for Furniture

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# Summary

The European Commission is revising the EU Ecolabel and GPP criteria for Furniture. In September 2013, the Joint Research Center presented the study carried out to support this process and criteria proposals. These documents were discussed at the 1<sup>st</sup> AHWG meeting organised in Seville on 7 October 2013<sup>1</sup>. This position paper provides EEB and BEUC comments to the draft proposal.

BEUC and EEB can support the extension of the scope to cover other types of furniture than wooden furniture (including leather), although we recommend privileging wood as principal material as far as possible (e.g. domestic indoor furniture). The extension of the criteria to cover other materials than wood, should also ensure that meaningful criteria are set for those materials (e.g. recycling and restriction of hazardous substances). EEB and BEUC would not be able to endorse this Ecolabel if PVC furniture is allowed.

To prevent consumers from accidentally misusing labelled outdoor furniture indoors, the criteria for outdoor furniture would have to fulfil the same requirements as indoor furniture. Additionally, NGOs strongly support inclusion of requirements addressing indoor air quality.

EEB and BEUC call for criteria where 100% of all wood, wood-based and other forest materials are covered by independent certification schemes. In addition we call for 100% of certified sustainable origin.

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<sup>1</sup> <http://susproc.jrc.ec.europa.eu/furniture/whatsnew.html>

No.	Comment from	Contact Person	Reference: - document - section/task - page	Subject of the comment	Comment
1	EEB and BEUC	Blanca Morales	Draft criteria proposal, first version as of September 2013  Scope definition Page 26 ff	Scope definition	<p>EEB and BEUC can support the extension of the scope for furniture. Nevertheless, wood has a better environmental profile than plastic and metals, provided it originates from certified sustainable sources. In this respect, we would be in favour of solutions where wood is still the principal material in pieces of furniture as far as possible (e.g. domestic indoor furniture). The extension of the criteria to cover other materials than wood, should also ensure that meaningful criteria are set for them.</p> <p>EEB and BEUC would not be able to endorse this Ecolabel if PVC furniture is allowed.</p> <p>EEB and BEUC support the extension of the scope to cover leather. Leather for furniture represents 14% of the worlds' total leather production (S. 144 background document), which can be considered as a relevant market share. There are currently 4 companies with 10 different leather products labelled with the Blue Angel in Germany (RAL-UZ 148), showing the interest of producers for Ecolabelled furniture with leather in Germany. If leather is covered, we suggest that criteria from the EU Ecolabel for footwear are met. In addition to these criteria indoor air quality should also be addressed, e.g. VOC emissions have to be measured in a 28 day test</p> <p>To prevent consumers from accidentally misusing labelled outdoor furniture indoors, the criteria for outdoor furniture would have to fulfil the same requirements as indoor furniture (no biocides etc.) At least clear information should be given to the consumer that the piece of furniture shall be used outdoors to prevent indoor air pollution.</p>

2	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013 Hazardous substances Page 33	Criterion 2: Hazardous substances (a) Hazardous substances and mixtures  <i>Substances or mixtures which change their properties .....are exempted</i> ....	This is reasonable with regard to the product, but not for the production process (workers, environment) which has to be included (LCA). If this criterion will be adopted clear assessment and verification requirements have to be defined for the evaluation of possible changes of properties and for the toxic/ecotoxic impact of these substances in the LC.
3	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013 Hazardous substances Page 35	Criterion 2: Hazardous substances (a) Hazardous substances and mixtures  <i>Derogations</i>	The report says: <i>"Nevertheless, the EU Ecolabel Regulation recognizes also that in certain circumstances restriction of some substances may not be technically possible or economically viable".</i>  Please correct the statement. Article 6.7 of the regulation has addresses substitution potential as far as technical possibilities is concerned but it does not take into account economic considerations.
4	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013 Hazardous substances Page 35 ff	Criterion 2: hazardous substances (c) Specified substances and mixtures <i>Halogenated compounds</i> <i>Flame retardants</i> <i>Bisphenol A</i>	EEB and BEUC support the exclusion of halogenated compounds as proposed in the "Draft Criteria Proposal".  <i>Halogenated organic compounds</i>  Halogenated organic compounds have a very wide structural variety. It is therefore not possible to describe toxicological properties for the whole group. Some are very toxic, some are very persistent. What is true for all is that dioxins may be produced when organic matter is burned in the presence of chlorine/bromine. We would like to refer to all the arguments already provided by JRC in the Draft Criteria Proposal page 40.  In addition, according to the background report and the environmental improvement potential identified in LCA of avoiding halogenated organic compounds is high.

				<p>EEB and BEUC would like to refer to the criteria of Blue Angel RAL-UZ 148 leather for furniture (Polsterleder) and RAL-UZ 117 upholstered furniture there is a paragraph “Verwertung und Entsorgung” – “Recycling and Disposal” where all halogenated organic compounds are excluded. Then exemptions are made, e.g. for biocides.</p> <p><i>Flame retardants</i></p> <p>EEB and BEUC strongly support the exclusion of flame retarded furniture from the Ecolabel scope. If this approach is not supported, we would like to ask the JRC to investigate which flame retardants can be used in furniture to meet fire safety standards and that can be assessed as less hazardous solutions. For instance in the Blue Angel labels 148 and 117 flame retardants are excluded in general but with the exemption of inorganic Ammoniumphosphates and Aluminiumtrihydrates and comparable compounds.</p> <p>Another option that should be investigated is design solutions that can be used in furniture to meet fire safety requirements, e.g. hardly inflammable fibres, fire barriers etc. In this respect, some text should be included in the criterion that the flame retardant properties have to be achieved if any possible with design, e.g. hardly inflammable fibres.</p> <p>If flame retardants are used information must be provided to the consumer.</p> <p><i>Bisphenol A</i></p> <p>Additionally to the exclusion of Bisphenol as substance per se, the criterion should also address impurities and residues from incomplete polymerisation process in polycarbonate.</p>
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5	EEB and BEUC	Blanca Morales	<p>Draft criteria proposal, September 2013</p> <p>Hazardous substances (no page)</p>	<p>Criterion 2: hazardous substances (c) Specified substances and mixtures</p> <p>PVC</p>	<p>If the proposal to avoid the use of halogenated compounds made in the draft document is kept, there would not be any need to set a specific criterion to exclude the use of PVC. If the proposal is abandoned, specific requirements to address the issue of PVC will be needed. Please refer to all the arguments provided in the background report (page 139 ff ff, page 171 ff)</p> <p><b><i>PVC is produced by polymerization of the monomer vinyl chloride (chloroethene abbreviated as VCM) classified as Carc. 1A (...) The content of chlorine may contribute to increased development of dioxins in the waste gas from the waste incineration plant. (...) PVC waste may end in the rubbish deposited by consumers, which may be finally combusted.</i></b></p> <p><b><i>PVC is also difficult to recycle (...) In fact, PVC is considered a contaminant in other recycling streams. Currently only a small amount of PVC post consumer waste is being recycled, whereas the 82% of PVC post-consumer waste is landfilled, and 15% is incinerated. (...) In case of uncontrolled incineration (or incineration under non-BAT conditions) concerns related to dioxin formation are raised. From an LCA point of view, PVC disadvantages within a mixed waste fraction since the usability of the waste is limited.</i></b></p>

					(...) <b>The problem is that for a general consumer often is it difficult to distinguish between materials containing PVC and the ones not containing PVC. Therefore a large part of the PVC waste ends in the rubbish which is combusted, even though PVC is defined as not suitable for combustion.</b>
6	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013  Hazardous substances  (no page)	Criterion 2: hazardous substances (c) Specified substances and mixtures  <i>Chromium</i>	If leather is included: It might then be misleading to exclude only pigments and additives containing Chrome (VI). Chromium VI is formed from Chromium III which is used in the tanning process of leather and not only present in additives. Chromium VI must be completely avoided in the product. In addition also Chromium III should be regulated. Chromium (VI) is not used intentionally in the production of leather, but may be formed within the leather by oxidation of chromium (III) used for the tanning of the leather, during the different stages of production, manufacturing, use phase and incineration.
7	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013	Criterion 2: hazardous substances (c) Specified substances and mixtures  <i>Nanomaterials</i>	EEB and BEUC strongly recommend to introduce requirements on the use of nanomaterials in the EU Ecolabel for furniture restricting their use until the manufacturer proves that the substances have been adequately assessed and are safe for the environment and health. The criterion could be based in the approach followed by the NF Environment Label and the Nordic Swan.  Considering existing concerns on potential hazardous properties of nanomaterials, methodology gaps to assess their safety and regulatory loopholes, EEB and BEUC believes that the precautionary principle should be applied in this area by the EU Ecolabel.

					<p>For additional information on the use of nanomaterials in furniture, we would like to refer to the study “Nano in Furniture – State of the art 2012” Van Broekhuizen (IVAM UvA BV, NL) <a href="http://www.efbww.org/pdfs/Nano.pdf">http://www.efbww.org/pdfs/Nano.pdf</a></p> <p>According to the conclusions of the study, while the market for nanomaterial use in furniture is at an early phase of development, a number of market applications for nanomaterials have been observed (liquid-glass based coatings, water repellence, anti-microbial or easy to clean effects, UV protective coatings, bactericidal and easy-to-clean textiles and ultra high performance concrete).</p> <p>Also the study has identified important gaps in terms of the information available to furniture manufacturers, as they are typically not well informed about the nanomaterials that they may use and the information that is communicated is often difficult to interpret (e.g. how to apply them responsibly).</p>
8	EEB and BEUC	Blanca Morales	<p>Draft criteria proposal, first version as of September 2013</p> <p>Material requirements</p> <p>Page 45 ff</p>	<p>Criterion 3 Material requirements</p> <p>3 (a) Sustainable Forest Management</p>	<p>In line with proposals for other Ecolabel product groups EEB and BEUC would support a requirement where 100% of all wood, wood-based and other forest materials are covered by a certification scheme. In addition we call for 100% of certified sustainable origin. If this is not supported, the requirements should not go below criteria set for labelling by well-established certification schemes in the field of forestry. In this respect, EEB and BEUC could endorse the UK proposal.</p> <p>Additionally to cork and bamboo there is also rattan as non-wood forest product, which is a very relevant furniture raw material, and for which FSC certification is available.</p> <p>EEB and BEUC propose that these are also covered by certification schemes in the criteria.</p>



9	EEB and BEUC	Blanca Morales	<p>Draft criteria proposal, September 2013</p> <p>Material requirements</p> <p>Page 46 ff</p>	<p>Criterion 3 (b)</p> <p><i>Recycled wood fibres</i></p> <p><i>Migration of elements</i></p>	<p>EEB / BEUC endorses the JRC suggestion to apply the toy norm 2009/48/EC for this issue.</p> <p>Even proactive industry participants (Wilkahn) stated that they have no problem to comply to the toy norm, but that the application process is complicated.</p>
10	EEB and BEUC	Blanca Morales	<p>Draft criteria proposal, September 2013</p> <p>Material requirements</p> <p>Page 55 ff</p>	<p>Criterion 3 Material requirements</p> <p><i>Formaldehyde and Indoor air emissions</i></p>	<p>During the discussions of the AHWG it was postulated that meeting the requirements of 50% of E1 was too challenging, but that setting requirements for the final product would give better guarantees of reduction of formaldehyde emissions. If the requirement of 20% E1 would be not workable, EEB and BEUC suggest following the Blue Angel RAL-UZ 38 for wooden furniture and derived timber products for the restriction of formaldehyde:</p> <ul style="list-style-type: none"> <li>- Unprocessed wood 0.1ppm (E1) emission</li> <li>- Final product Day 28 HCHO 0,05ppm emission</li> </ul> <p>In addition, EEB and BEUC recommend extending the scope of the criterion to cover indoor air emissions as proposed by the Blue Angel (and in the EU Ecolabel for bed mattresses) based on the Emission test chamber method. Taken into account growing consumers 'concerns on air indoor pollution, by setting such requirement a strong added value would be provided to this Ecolabel.</p>

11	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013 Material requirements Page 68 ff	Recycled material Plastics	<p>EEB and BEUC support criteria on recycled plastic in furniture. However, it should be ensured that hazardous substances will be restricted by the criteria as for virgin plastics.</p> <p>A requirement on recycling potential as proposed during the meeting would be irrelevant as it cannot be guaranteed that the piece of furniture will be recycled.</p>
12	EEB and BEUC	Blanca Morales	Draft criteria proposal, September 2013 Material requirements Page 69 ff	Recycled material Metals	<p>EEB and BEUC see advantages in a high recycling content for metals. We thus recommend to increase the minimum content for recycling metals to 80%, which should allow for all static and design requirements to be fulfilled even for ambitious design requirements.</p>