



EEB comments on the second AHWG meeting EU Eco-label furniture (held in Brussels, November 05th 2002)

Up to now the EEB is, with the exception of the criteria on credible certification, plastics and brominated flame retardants, quite satisfied with the current proposal of the eco label scheme for furniture.

With reference to credible certification criteria the EEB calls for the immediate drafting of a separate and horizontal 'credible wood and wood fibre' criteria document to be used and referred to by all future relevant EU Ecolabel criteria development and revision. The EEB and interested members would be prepared to start the discussion with a proposal on essential criteria for such a document.

In addition to the comments made during the last AHWG meeting on the Eco-label furniture the EEB wants to point out some of the mentioned aspects.

Comment on product group definition

The EEB still prefers the exclusion of OUTDOOR furniture as stated in the comments made after the first AHWG meeting.

If as proposed OUTDOOR furniture has to fulfil the same criteria as INDOOR furniture (e.g. no pesticides, no biocides, no other special treatments for outdoor requirements) an inclusion might be possible. As a possible effect the inclusion of OUTDOOR furniture seems to become redundant, because only OUTDOOR furniture which can also be used as INDOOR furniture will be covered by the labelling scheme.

Therefore the preferred solution should be to create two separate schemes on furniture:

1. Furniture for INDOOR use
2. Furniture for OUTDOOR use

This would provide consumers with a higher level of transparency.

Materials used for furniture

The EEB welcomes the proposal to give the opportunity to label main materials as pre-products used for furniture production, with respect to reduce costs for producers of furniture.

With respect to the usability of the labelling scheme the materials included should be restricted to the main input streams used in furniture production:

1. Wood
2. Wood-based panels
3. Plastic panels
4. Foams
(*might be also covered by the BED-MATTRESSES labelling scheme*)
5. Textiles
(*might be also covered by the TEXTILE labelling scheme*)
6. Filling materials (e.g. fibres, feathers)
(*might be partially covered by the TEXTILE labelling scheme*)

-
7. Glues , adhesives
 8. Coatings (e.g. paints, varnishes, oils, waxes)

(Annotation: It should be mentioned that the materials are labelled for the use in furniture only.)

Life Cycle related criteria

During the discussion it became clear that due to the missing comparable data basis the inclusion of life cycle related criteria (esp. energy use) is not possible at the moment.

The EEB therefore proposes that applicants should be encouraged to provide data on the energy used for the production of their products.

The applicant should provide a voluntary declaration of energy input for the product with the declaration of the material mass balance.

The inclusion of specific criteria should be taken into account on the next revision of the criteria.

Comments on material specific criteria

1. Wood and wood based materials

– Certification

- i. As stated in the last comments the EEB welcomes the inclusion of criteria on the use of certified wood, the proposed percentage of **70% certified for solid wood** seems to be reasonable and acceptable. This criterion should apply **to each type of solid wood** used in the furniture.
(Annotation: This should for example include veneer used in wood panels).
- ii. The use of **endangered wood species** (especially those to be found in the CITES appendices) should be forbidden.
- iii. The proposed percentage of **30 % certified timber used for wood based panels of** is acceptable.
- iv. The certification should be carried out by **credible independent third party forest certification schemes**, that are supported equally by all stakeholders and are based on minimum performance based standards. These should be equal to the Pan European Operational Level Guidelines, for Europe and equal to the FSC's international principles and criteria for outside Europe.

The remaining non-certified 30% for solid wood and 70% for wood based panels **should not come from a controversial source**¹ or contain a tree species listed on one of the CITES appendices – this is designed to exclude, among others, illegally sourced timber. Companies need to have systems in place to assure themselves they are not using controversial sources and be committed to de-listing suppliers if it can be shown that the sources are controversial.

- v. The applicant shall present the certificates for the minimum 70% of the timber that comes from certified timber (and 30% for wood panels). For

¹ Controversial sources meaning those illegally harvested, from sources with disputed land-rights or primary old growth or high conservation value forests

the maximum 30% (70% for wood based panels) that is not certified the species, **quantity and origin of the timber used should be indicated**. The origin shall be indicated with sufficient precision to allow checks to be carried out that the timber is from well managed forests. Companies applying for the ecolabel need to have systems in place to assure themselves they are not using controversial sources and be committed to de-listing suppliers if it can be shown that the sources are controversial.

– **Emissions**

- i. The formaldehyde emissions should be limited to 50% of the threshold values of class 1 / class A quality.
(As stated in ecolabel criteria for mattresses chapter 7a/7b).
- ii. Coatings and glues used in furniture should have a minimum on VOC emissions, the maximum emission for the final furniture product should not exceed a maximum of 0,5 mg/m³ proofed by testing in emission chambers.*(As described in ecolabel criteria for mattresses chapter 3c).*
- iii. Pesticides should not be used, (e.g. chlorophenols, pyrethroides etc.).

Testing should preferably be made on the final product or pre-product.

2. Metals

- i. The minimum percentage of recycled metals should be fixed (?? %), although as discussed, there might be problems in availability on the market.
- ii. All metal parts used in furniture should be easily disassembled, to ensure a 100% reuse for recycling.

3. Plastics

– **Additives**

- i. The exclusion of additives based on **lead, cadmium, mercury** as well as the exclusion of **phthalates** in plastics or recycled plastics is highly appreciated.
- ii. In addition **organo-tin compounds** should also be excluded.

– **Chlorinated Plastics**

- i. The EEB welcomes the exclusion of chlorinated plastics in furniture, but would like to propose a more strict criterion, including the general **exclusion of all halogenated plastics (e.g. PVC)** and the **exclusion of halogenated organic compounds as additives** in plastics. Furthermore - there is no justification for the use of such plastics as there are plentiful alternative plastic materials (e.g. PE-Polyethylene, PP- Polypropylene) which can be used for furniture.
(Annotation: The manufacturer IKEA has replaced PVC in all produced furniture (except electric cables) by equally qualified and functional materials.)

-
-
- ii. The proposed usability of 100 % recycled chlorinated (halogenated) plastic materials is **not acceptable**.
1. Up to now the recycling rates for halogenated plastics, as PVC, are extremely low.
(Annotation: High quality recycled PVC, which might be used for furniture, can only be produced by using pre-consumer production waste, with a total recycling rate between 1 – 3 % of all waste PVC)
 2. The production of 100% recycled halogenated plastics is technically not possible, during the recycling process (e.g. for PVC) new material has to be added.
 3. Recycled halogenated plastic material (e.g. PVC) would not comply with the exclusion of additives based on lead or cadmium, due to their existence in the original materials.
 4. The quality of recycled halogenated plastic materials is very limited, it does not qualify for furniture purposes.
 5. A **Re-recycling** of halogenated plastic materials is practically not possible.

The EEB therefore proposes the **general exclusion of recycled halogenated plastic materials**

- **Labelling & Recycling**

- i. Although there have been statements in the working group, that labelling of plastics is obsolete, the EEB would like to include criteria on the labelling of plastic parts. It seems not logical that specific parts of furniture imply the use of certain plastics, and that therefore during disassembling the material would find its way to recycling.
- ii. All plastic parts used in furniture should be easily disassembled, to ensure a 100% reuse for recycling.
- iii. The plastics used in furniture should be preferably recycled plastic materials, a minimum percentage (e.g. 70%) of recycled material should be fixed.

4. Flame Retardants

- The use of flame retardants should be limited as stated in the ecolabel criteria for textiles (Chapter 28).
- Due to the ongoing discussions on environmental and health risks caused by **halogenated flame retardants (especially BFR)** and the unfinished risk assessments, the EEB proposes the **explicit exclusion of halogenated flame retardants** for use in materials in the ecolabel scheme for furniture.

5. Packaging

- In addition to the proposals made for packaging the EEB would like to add the following aspect:
 - i. Packaging used for labelled furniture should be multi use systems or been made out of 100% recycled materials with a take back opportunity for recycling.
 - ii. As for the materials used in furniture, halogenated plastics should be excluded for the use as packaging materials.

For questions and comments please contact R. Buschmann or the EEB office.

28 January 2003

Dr. Rolf Buschmann

Email: Buschmann@katalyse.de

Phone: +49-30-79746506

Fax: +49-30-79746508