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To: European Commission, TRIS website and to the attention of DG GROW B/2, DG GROW B/1, DG GROW C/2

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Subject: EFIC comments to the decree on the labelling of furniture products regarding their emissions of volatile pollutants notified to the EU under Directive (EU) 2015/1535

Notification Number: 2017/22/F (France)

Date received: 19/01/2017

End of standstill: 20/04/2017

Draft text notified: *Décret à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils*

And

Notification Number: 2017/23/F (France)

Date received: 19/01/2017

End of Standstill: 20/04/2017

Draft text notified: *Arrêté relatif à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils*

EFIC – the European Furniture Industries Confederation – represents the voice of the jointly united European furniture industries and its registered representative towards the European Institutions. EFIC members are the National federations of European furniture producers in 12 member States. EFIC represents more than the 70% of the total turnover of the furniture industries in Europe.

Recognizing the objectives of the envisaged legislation concerning the interior emissions of furniture in France, EFIC welcomes the possibility to comment on the legislative package.

Facts:

Furniture products are not subject to harmonised European legislation, and currently there is not European legislation on emission levels of formaldehyde for furniture products.

In the lack of European common rules, eight countries in Europe have adopted National regulations aimed at regulating the levels of formaldehyde emissions from wood based panels. In particular, Austria, Czech Republic, Denmark¹, Germany, Greece, Italy, the Netherlands and Sweden - have already approved a National regulation generally imposing a maximum

¹Denmark has recently notified a new draft formaldehyde regulation for furniture products: [Order](#) concerning restrictions on the use of wood-based materials, that release formaldehyde, in the making of furniture, etc., and restrictions on the sale of furniture made of wood-based materials that release formaldehyde (notification number 2017/89/DK).

formaldehyde emission level of 0.1 ppm (equivalent to 124 µg/m³) for wood-based panels and products there made of. This level corresponds to the E1 level².

On 19th January 2017, France has notified to the EU an incomplete legislative package on the labelling of furniture products regarding their emissions of volatile pollutants (VOCs). The legislative package is composed by a decree, an order and a technical guide. Only the decree and the order have been regularly notified to the EU and published in the TRIS database. The technical guide is still missing.

In particular, with the legislation France aims at imposing a mandatory labelling on VOCs emissions from furniture into indoor air by a classification system based on 4 classes each corresponding to different threshold values. This regulation shall apply to all furniture products to be sold on the French market. Producers and importers shall declare the emission classification of the product based on emission testing of furniture containing wood and wood-based panels. The emission testing is measuring the formaldehyde emission level.

While the eight existing National regulations are following a common approach - establishing a limit on the formaldehyde emission level for wood-based panels in these countries - the French draft decree is establishing *ad hoc* demands and testing requirements for the French market only. No maximum emission level is imposed.

European furniture producers are highly concerned about the barrier to trade created by the draft French decree and about the approach chosen in regulating this issue.

EFIC members are convinced that the notified French regulation has the effect of hindering the freedom of circulation of goods in the Single Market, creating a barrier to trade for producers exporting to France, together with imposing unproportionate financial and administrative burdens, without reaching a justified goal.

Legal framework:

The free movements of goods in the internal market according to the EU Treaties
Furniture products are currently not subject to harmonised European legislation, and in the absence of European rules Articles 34–36 TFEU can be relied on measuring the compatibility of National measures with European internal market rules.

Article 34 of the Treaty on the Functioning of the European Union (TFEU) establishes the right of free movement of goods within the Single Market and that *quantitative restrictions on imports and all measures having equivalent effect shall be prohibited between Member States*.

According to the Court of Justice case-law on article 34 TFEU, the following principles apply:

- Rules apply in the same way to quantitative restrictions as to measures of equivalent effect, meaning “all trading rules enacted by Member States which are capable of hindering, directly or indirectly, actually or potentially, intra-community trade”³.
- There is no need for any discriminatory element in order for a National measure laying down requirements to be met by goods to fall under Article 34 TFEU. Indeed, same rules apply to National measures discriminating against imported goods and to those in which the law applies equally to both domestic and imported goods⁴.
- Technical regulations containing requirements as to the presentation of goods (e.g. weight, composition, presentation, labelling, form, size, packaging) are typical trade barriers. As these requirements are directly interlinked with the product itself they are considered as measures having equivalent effect according to article 34 TFEU.

²According to definition provided in Annex B to EN 13986.

³ Case 8/74 *Dassonville* [1974] ECR 837

⁴ Case 120/78 *Rewe-Zentral* (Cassis de Dijon) [1979] ECR 649

Article 36 of the TFEU regulates the possibilities for exception to the free movement of goods and the condition under which a Member State may exceptionally refuse market access to a product lawfully marketed in another Member State or have it withdrawn from the market.

Pursuant to Article 36 TFEU, such prohibitions or restrictions on the free movement of goods have to be justified on grounds of public morality, public policy or public security; the protection of health and life of humans, animals or plants; the protection of National treasures possessing artistic, historic or archaeological value; or the protection of industrial and commercial property.

Such prohibitions or restrictions shall not, however, constitute a means of arbitrary discrimination or a disguised restriction on trade between Member States. To be accepted under Article 36 TFEU the measure needs to be a) justified on the grounds of overriding public interest, and b) respect the principle of proportionality.

The Court of Justice has also recognised the existence of a number of overriding requirements of general public importance which can justify a restriction on the free movement of goods. Still these measures have to be proportionate to the aim pursued.

The French notified regulation

The French notified regulation is composed by a) a decree b) an order c) a technical guide.

a) Legal obligations under the draft decree are:

- I. Labelling furniture products giving details of the volatile pollutants emitted by the product. This obligation applies to furniture products containing wood-based panels and should be displayed on the product or close to its packaging (included in its description for distance selling). A punishment is set by fine.⁵
- II. The natural or legal person responsible for making the product available on the market shall provide inspectors with: 1. General description of the product ; 2. Related methods used 3. Documents supporting the performance declared.⁶
- III. Labelling furniture products giving details of the precautions to be taken due to their emissions of volatile pollutants (label might be substituted by technical identification sheet).⁷

b) Specifications by the order include:

- An obligation limited to the formaldehyde class emission, with the establishment of 4 classes : A+, A, B, C (article 2);
- The content of the information on precautions to be taken (article 5);
- Annexes (1-3) including specifications on emission scenarios, reference furniture, definition of label model.

For what the determination of the exposure concentration for formaldehyde is concerned, ANNEX 1 refers to two methods: method 1 or method 2.

Method one “Method for characterising formaldehyde emissions from furniture products in indoor air” indicates as reference method either a) the emission test chamber method NF EN ISO 16000-9 or b) the sampling and preparation of test specimens regulated by the technical guide ‘Test protocol for characterising emissions of volatile pollutants by furniture products’. Method two “Method for measuring exposure concentration” indicates as a parameter for

⁵ Article R221-40

⁶ Article R221-42

⁷ Article R221-43

sampling and analysis the method NF EN ISO 16000-3.

- c) The technical guide 'Test protocol for characterising emissions of volatile pollutants by furniture products' is still missing.

The planned entry into force of the French regulation is on 1st January 2020 or 1st January 2021 for products already put on the market at this date.

Detailed comments – explanatory statements

When assessing the compliance of the French notified regulation with EU law, it is fundamental to check its compliance to a number of criteria, and in particular:

- 1) Creation of a barrier to trade
- 2) Justification of the imposed measure
- 3) Proportionality of the chosen measure
- 4) Suitability and effectiveness of the chosen measure as a consequence of its restriction to trade

The reasons explicated in the following explanatory statements support the arguments that the draft French regulation is able to create a barrier to trade, it does not respect the principle of proportionality and it is not effective or suitable for the proposed goal, therefore lacking in justification.

Creation of a barrier to trade to the French Market

The notified French regulation on the labelling of furniture products regarding their emissions of volatile pollutants have the effect of creating a barrier to trade and consequently restricting trade of furniture products to the French market for European producers willing to export in France.

This is mainly due to the requirements establishing obligations for testing and labelling under the notified French decree and order. A preliminary estimation calculates a cost for emission testing of furniture products according to the French draft decree of around 2000-3000 euro per single product. Every European furniture producer should bear this cost and multiply it for each product sold in the market, including every differentiation in size, shape and products' specificities. The overall cost for the industry would be unbearable and disproportionate and it would impact thousands of different products put on the French market by European producers.

Additionally, the lack of emission chambers' capacity and the set requirements for testing, as explained below, will make concretely impossible to run the tests for all concerned products.

The French regulation would have the effect to restrict trade to France and raise disproportionately the costs for those operating in the market. SMEs will be particularly affected.

Extensive costs for companies, especially for SME

Small and Medium enterprises (SMEs) will be particularly affected by the economic impact of the French notified regulation. The furniture industry is dominated by SMEs and France is one of the most relevant European export markets for many companies operating in the sector.

A SME in the furniture sector, producing e.g. chairs, tables and upholstery furniture have an average production of several hundreds of product variations by design, construction, materials used, colors, finishings (lacquer or oil), different fabrics, leathers, artificial leathers, table tops etc. Final products often differ from order to order and depending on the consumers' and buyers' requests. For example, this can be also assumed to be valid for producers of domestic, non-domestic and kitchen storage units, worktops and others where it is common and expected by consumers to offer a great variety of core-board covering such as foil,

melamine, wood veneer, powder and other coatings, high-gloss finishing and many more to respect the markets' needs of individuality in a series production.

As far as the industry understands the notified legislation, product testing has to be performed for each product to be put in the French market. Taking into consideration the expected costs for testing, the sum will be tremendous and exceed companies' capabilities. For this reason, many SMEs might decide not to deliver into the French market anymore.

Additional unnecessary burden is created by the fact that already existing documentation and test results from suppliers cannot be used, imposing to all furniture manufacturers to repeat tests.

Effect on functioning of EU internal market

The European furniture industry is highly concerned by the effect that different regulations imposed at the National level on formaldehyde emissions of wood-based panel would have on the functioning of the EU internal market. Eight countries members of the EU have already approved a National regulation imposing limits to formaldehyde emissions at the E1 level.

The French regulation is imposing different rules and a completely new approach while regulating the same subject and replying to equal concerns related to the protection of consumers from formaldehyde emissions in the indoor environment.

This different approach leads to a growing risk of unilateral restrictions and labelling obligations on VOCs. Introducing different approaches, testing methods and legal requirements in regulating this subject at the National level would negatively impact the functioning of the EU internal market and create a regulatory framework impossible to comply with for companies operating on intra-EU trade.

At the same time, the approach and requirements chosen by France are not able *ex se* to increase consumers' safety, while having the potential to mislead consumers, as further explained below.

Additionally, the French regulation is imposing an obligation to test and label only for furniture containing wood based panels. Other materials do not have to comply. The implementation of the French decree may have the effect to distort competition for furniture containing wood-based panels, as only a certain category of furniture products would have to bear the costs for additional testing, resulting in increased costs for industries and for final consumers.

In this regard, it is also worth to mention the legal obligation on the labeling on precautions to be taken (Article R221-43) constitute a technical rule that should rather be included in general public health recommendations. This limited rationale constitutes a burden for companies producing wood-based panels only, while the range of products potentially emitting is much broader and the public recommendation should be related to the indoor environment not to the single product.

Lack of test chamber availability

ANNEX 1 of the Order establishes that: "Exposure concentrations are calculated in a standard reference room with a total volume (V) of 30 m³ and an air renewal rate (n) of 0.5 h⁻¹, with the furniture product placed inside" and that:

"Emission classes are determined on the basis of measurements taken after 28 days in the emission test chamber, or sooner if the emissions meet the requirements for the lowest emission class (A+)."

Such requirements have the effect of hampering access to the French market due to non-availability of capacities neither in France nor in the EU and to the high amount of products that would need to be tested under the French notified regulation.

This is due to the fact that in Europe there are only few large chambers available that would be able to perform the needed test. Additionally, the required 28 days for testing means that

each chamber can run only 13 tests per year (estimation that could be lower considering the needed time for cleaning the chamber and setting up the furniture for its testing). Thirdly, the costs of testing in a 30 m³ chamber are so high that it will be impossible for the industry to cover the costs.

For the time being it is not clear if there are precise parameters (e.g. in the missing technical guide) that allow the forming of product groups or whether small 0,225 m³ chambers can be used and under which conditions.

In view of the test duration (28 days), the amount of furniture on the market and the limited number of facilities for testing, it will take many years to test all concerned furniture on the French market and industry will be facing tremendous cost for product testing.

This also undermines the concrete possibilities for implementation of the notified regulation. Neither the French nor the European capacity for test chambers is sufficient for the estimated number of products that would need to be tested and surely the planned entry into force of the French regulation is not sufficient to perform all required tests.

Under European rules on the free circulation of goods, the procedure for compliance to National regulations should be accessible and able to be completed within a reasonable time. These *ad hoc* demands breach European rules and would concretely create a barrier to trade and retail in the French market.

Emission classes

The French regulation (Order) is establishing emission classes in contradiction with existing regulations in France and at the European level, with parameters that may have the effect to mislead consumers.

French regulation and label for construction products

In France there is another regulation for emissions into indoor air deriving from construction products in force since September 1st, 2013. The regulation for construction products, while applying the same label and emission classes as the notified regulation for furniture products, is setting completely different limits for formaldehyde emission. As a matter of example, for construction products the best emission class A+ has a formaldehyde limit value of < 10 µg/m³, while the same level corresponds to the threshold for being categorized into class B in the system for furniture. When it comes to class B and C the limit values for furniture products are more than 10 times lower than those for construction products. [see table below].

European Ecolabel for furniture products

The European Commission has recently published the revised EU Ecolabel for furniture products.⁸ The aim of the EU Ecolabel is to award the best environmental performing products in the market. Its requirements are meant to be covered by approximately 20% of products in the market.

With regard to formaldehyde emission, the new Ecolabel for furniture demands a limit value of 50% E1, corresponding about 62 µg/m³ for particleboards and even higher for Medium Density Fiberboards (MDF).

Under the rules of the notified French regulation, even products awarded with the EU Ecolabel for furniture might fall under lowest classes.

⁸Commission decision establishing the ecologic criteria for the award of the EU Ecolabel for furniture, published on 4.08.2016 in the OJEU

Comparison as follows⁹:

Compound and Use	CAS no.	Classe C [µg/m ³]	Classe B [µg/m ³]	Classe A [µg/m ³]	Classe A+ [µg/m ³]
France: Formaldéhyde Construction	50-00-0	> 120	< 120	< 60	< 10
France: Formaldéhyde furniture	50-00-0	> 10	< 10	< 5	< 3
EU Ecolabel for furniture: Formaldéhyde	50-00-0	Particle Board < 62 (50% E1) MDF Board < 81 (65% E1) EU Ecolabel claims (20% of the best products available on the market)			

It must be also highlighted that a clear assessment cannot be performed due to the lack of full information on the parameters for testing.

So far, a lack of comparability and reliable results is clearly present:

- Disproportionate emission limits for furniture products
When looking at requirements related to levels, the levels set for furniture products are significantly lower than the corresponding ones for building materials. This is neither reasonable nor justifiable. First of all, the amount of wood based panels in the building can be significantly higher than then the amount in furniture. Secondly, the requirements have no relation to the recently agreed Ecolabel.
- Lack of comparability and robustness of testing
Depending on the testing method selected, results could be different. Moreover, the proposed test method is different than the standard method approved for classifying wood based panels as E1 (EN717-1). See technical explanations in the footnote¹⁰.
- Questionable proof of compliance
Even with the limit values of classes C (<10 µg/m³) considerable and costly actions must be taken in order to achieve the necessary test conditions. Moreover, the values for the classes A + (<3 µg/m³) and A (<5 µg/m³) lie within the range of detection and determination limits as well as the test chamber blind-value. An accurate and reproducible proof of compliance with the limit values as well as the measurement results at this extremely low level is therefore in principle to be questioned. The measurement inaccuracies inherent in the test chamber method in combination with the blind-values of the test chambers and unavoidable contamination are this relevant that even in the level around 10 µg/m³, a measurement result would mean the assignment into a better, sometimes into a poorer class. The experience of different test laboratories in Europe, even

⁹ It has to be highlighted that while the units are the same, test method applied are different.

¹⁰ France mainly requires testing according to ISO 16000. The difference between both test methods are the measuring conditions. The robustness of ISO 16000 is much lower as it gives a higher variability than EN717 because of the tolerances in the test parameters, e.g. temperature/relative humidity for EN 717-1 (23 ± 0.5 °C / 45 ± 3 %) and ISO 16000-9 (23 ± 2 °C / 50 ± 5 %). As the emission behaviour strongly relies on these two parameters, EN 717-1 can be seen as the most stringent and reliable, also according to comparability of results, especially in the light of measuring inconsistencies.

within France, shows that deviations in the test results are possible though securing the same samples and the same requirements for robust boundary conditions.

- **Effect on consumers**
Using the same labels as for construction products with different thresholds for the emission classes can mislead the consumer. The consumer is not aware of the details behind such regulation nor he has an expertise on this special field. The lowest emitting construction products class is the same as the high emitting furniture class. Additionally, there is also a conflict with the Ecolabel. Furniture granted an EU Ecolabel is supposed to be low emitting while according to the notified regulation it would be high emitting. For this reason, the proposed approach confuses the consumer instead of advising him.
- **Lack of justification**
It is common that wood based panels certified as E1 are safe to use. However, in the French regulation due to the choice for a large testing room of 30 m³ it could be that still higher emitting panels, as E2 panels, could be used for reaching higher classes, while the use of E1 would have a larger reduction of the emissions. This directly impact the goal of reducing the use of low-emitting panels and protect consumers.
- **Lack of clear distinction among classes**
In addition, there is no evidence for significant differences in the effects of formaldehyde emissions attributable to furniture alone of between 3, 5 and 10 µg/m³. Such a strict limit value determination is unprecedented, not necessary and inappropriate. Even with voluntary labels, such as the Blue Angel or the EU Ecolabel, such narrow differentiation among limits cannot be found.

Not fit-for-purpose regulation

These listed inconsistencies (emissions levels and test results) have the effect of undermining the reliability of the results, prevent comparability of results and finally misleading consumers, while imposing disproportionate burdens on companies.

It has to be taken into consideration that indoor environment emissions depends on different factors (e.g. size of the product, number of pieces, other elements in the room, room temperature, relative humidity, air exchange rate). The emission classes for a single product are not ensuring *ex se* a lower level of emission in a specific indoor environment.

The decree is not imposing any maximum limit in the level of emissions of formaldehyde, but simply leaving to the consumer the choice between a lower-emitting product (more expensive due to *ad hoc* testing and very stringent values) and a higher emitting one. Without imposing a limit at a level considered safe, class C could include any formaldehyde emission level, even well above the limit considered adequate for furniture regarding emission levels in indoor environment.

Finally, the existence of a similar label but with different classes and testing for construction products in France, together with the inconsistency with the EU Ecolabel, would make more difficult for the consumer to make a correctly informed choice.

Lack of essential information and unclear definitions

France has notified to the TRIS database under the notification procedure established by Directive (EU) 2015/1535 the *Décret à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils* (Decree).

The order - *Arrêté à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils* - has been notified under a subsequent and separate number, although both pieces of legislation are closely related.

Both decree and order were included in the French public consultation open from 18/01/2017 to 10/02/2017.¹¹

However, the legislation is composed by 1) the decree 2) the order 3) a technical guide.

Technical guidelines were missing during the French public consultation and are still missing in the notification procedure. For this reason, decisive parameters are still not defined.

For example, in Annex I, Method B, fourth paragraph, reference is made to a guide on the basis of which the aforementioned calculations are to be carried out.

“If the panel has a coating, the emission factor of the untreated panel may be multiplied by a factor dependent on the type of coating used, in accordance with a technical guide published on the website of the minister responsible for the environment.”

This guide, however, is not accessible so far. The same applies to the “Guide technique <<Protocole d’essai pour la caractérisation des émissions de polluants volatils par les produits d’ameublement>>” mentioned in Annex A, table 1 for further specification of the emission chamber measurements. EFIC has received not-official information that these guides will be made available only after the adoption of the law. This prevents the possibility to provide a full assessment.

Together with missing information, the notified legislation contains unclear definitions.

The definition of wood based panel¹² as stated in Article 5 is unclear. For example, an open question is whether this definition apply to all wood based panels or only to those that has been added formaldehyde. Also the application with regard to Phenolformaldehyde (PF)-resins, Melaminformaldehyde (MF)-resins is unclear.

Furthermore it is not clear in this context if panels glued with PVAc and other glues that has no added formaldehyde (NAF) or are regarded as ultra-low-emitting-formaldehyde resins (ULEF) are exempt from the provisions.

The presence of unclear definitions undermines a proper understanding of the scope of the legislation and its application.

Incomplete notification under Directive 2015/1535

The draft regulation notified by France is lacking of any impact assessment nor risk analysis.

Furthermore, the co-signature by the Ministry of Economy is missing, while this body is internally in charge of a) the furniture sector in which regards the impact assessment should be run and b) the controls and the assessment on the feasibility and the requirements of the regulation.

Conclusions

The notified French regulation has the concrete effect of creating a barrier to trade and hinder the free movement of goods in the European internal market protected by article 34 TFEU.

¹¹ <http://www.consultations-publiques.developpement-durable.gouv.fr/etiquetage-des-produits-d-ameublement-sur-leurs-a1648.html>

¹² Questions raised by EFIC members highlight the uncertainty on what is included in the term “wood based panels” and falling into the scope of the legislation. Is it only “real raw panel materials” such as Particle Board (PB), Medium Density Fibre Board (MDF), High Density Fibre Board (HDF), cross-banded lumber veneered board (CLV) and Plywood (flat or/and curved) or does it also include a) laminated veneer parts, such as chair shells, arms and legs or b) glued solid wood components (solid wood glued together for e.g. kitchen worktops)? Does it e.g. apply to 3 dimensional chair shells made from laminated veneers? Does it apply to panels made from components of solid wood that are glued together? Does it apply to wet process or only to dry process fiberboard? Additional materials can be mentioned.

A justification under article 36 TFEU is missing due to the unproportionate measure imposed which has not a proven evidence in reaching its goal. Conversely, the chosen approach has the potential effect of misleading consumers while not setting any limit to the formaldehyde emissions from wood-based panels. The protection of consumers is not increased, while access to the French market is strongly undermined for industries.

The French notified regulation imposes *ad hoc* requirements without ensuring capacity for enforcement of the law in the given timeline for adoption nor in the near future.

The French notified regulation contradicts existing regulations at the European and National level aiming at reaching the same goal. Requirements set undermine reliable results.

The French regulation is not accompanied by an impact assessment and by the signature of a competent Ministry is missing. Key technical information are also missing due to the notification of an incomplete legislative package.

EFIC is highly concerned by the approach in regulating this subject adopted by the French authorities as it creates a barrier to trade without even potentially reaching its ultimate goal, the protection of consumers.

For this reason, EFIC urges the European Commission to evaluate the trade distortions introduced by the draft regulation due to the creation of a National non-tariff trade barrier.

EFIC stands ready to provide further comments in reply to any request from the European and National authorities.

EFIC proposal

EFIC welcomes an approach aimed at regulating emission of formaldehyde at a level that provides the needed safety for consumers and a degree of certainty for the industry.

The European furniture industry believes that the best approach in regulating this issue is imposing a general requirement for wood-based panel with a maximum level of emissions allowed to be equally applied throughout Europe. This approach has been already introduced at the National level by legislation in eight countries in the EU.

For this reason, since September 2015, EFIC and EPF, the European Panel Federation, are jointly calling for mandatory E1 in Europe¹³, through a common legislation throughout Europe for the production, import and marketing of wood-based panels, and of products made from them at an emission level not higher than E1.

The E1 level is a level assessed safe and imposing mandatory E1 in the EU would:

- Guarantee an equal level of protection to all consumers at a level deemed safe;
- Starting from a safe level, leave to the consumer the choice of going further (e.g. Ecolabel and other environmental labels);
- Guarantee a level-playing-field in the EU, imposing equal requirements to all European producers and all international importers;
- Provide certain and clear regulation to furniture producers and their suppliers;
- Eliminate costs for testing complex article as furniture, and not raise unbearable costs for the furniture and panel industry: European panel producers will be supplying furniture

¹³Read more: <http://www.efic.eu/public/documents/E1%20project.pdf>

manufacturers with products complying with E1 standards only and will provide related certification.

EFIC shares the need for regulating formaldehyde emissions from wood-based panels, and of products made from them and calls France to follow this approach. EFIC also call for a European-wide regulation on this issue. National initiatives resulting in the multiplication of different schemes (potentially 27 in the EU internal market) would significantly distort intra-EU trade and the functioning of the European internal market.

Brussels, 4th April 2017

For EFIC – The European Furniture Industries Confederation

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About EFIC

EFIC – the European Furniture Industries Confederation - is the voice of the jointly united European Furniture industries.

EFIC was founded in 2006 by seven National federations representing the furniture industries in Belgium, Denmark, Germany, Italy, Slovakia, Spain and Turkey and it was later joined by Portugal, Sweden, Austria, Russia and Norway. Furthermore, Hungary, the Netherlands and France joined EFIC in 2015.

EFIC now represents more than the 70% of the total turnover of the furniture industries in Europe. Follow us  

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