



European Furniture Industries Confederation



The FURNITURE SECTOR and CIRCULAR ECONOMY 2.0

About

EFIC is the voice of the furniture industries in Europe. Founded in 2006 by seven national federations representing furniture producers, EFIC now represents more than the 70% of the total turnover of the industry. Our members come from national federations and single companies. We collaborate with many partners.

EFIC members strongly support the European project and values. We believe in the importance of working united for promoting a Furniture Grow Agenda. Most of the companies we represent are small, but with a big vision. We support a well-functioning EU Single Market, improved trade opportunities and sustainable & circular business models.

EU furniture industry in a snapshot



1 MILLION
EMPLOYEES



120 THOUSAND
ENTERPRISES,
MAINLY SMEs



96 BILLION
TURNOVER



25% OF WORLD
FURNITURE
PRODUCTION



40% OF TOTAL
WORLD TRADE



25% OF WORLD
FURNITURE
CONSUMPTION

Circularity enables EU climate & environmental goals

The European Green Deal sets ambitious commitments to tackle climate and environmental-related challenges and to achieve a climate-neutral economy by 2050. A circular economy is a key enabler of these goals. To this end, markets must be stimulated for circular products and services and for resource optimisation, aiming at reducing the environmental footprint of the EU economy and the generation of waste.

The European furniture industry welcomes the new Circular Economy Action Plan of the European Commission, strongly supports the transition to a circular economy and is ready to be involved in making it a reality. A true circular economy can only be achieved through collaboration and requires the involvement of many actors, including policy makers, industry, experts, academia and consumers. There is currently no roadmap to the transition to a circular economy. The furniture industry is however adapting gradually and changing business models, considering also the fact that consumers are becoming more demanding with regard to the products they purchase. Circularity is in its early days and changes will be seen in the medium/long-term.

From a “circularity” point of view, the wide range of products that are considered ‘furniture’ and the diverse use of materials in their production (e.g. wood, plastics, textile, steel, glass, composites, foam) makes this a complex area to address. EFIC, the European Furniture Industries Confederation, has identified a number of challenges and opportunities linked to the transition to a circular economy, covering the different phases of furniture manufacturing, from the supply of materials to the end of life phase, and is hereby providing sector specific expertise for EU Circular Economy policies. The European furniture industries are ready to collaborate with EU institutions to create suitable tools for the sector, enabling the industry to move into the right direction.



Getting started...



1

Harmonisation of circular economy rules at EU level is key

EU-wide rules and initiatives driving circularity are most welcome and are especially needed for parameters measuring circularity (definitions), to name an example. However, the European Commission must ensure that EU-wide rules are implemented in a harmonised way by EU Member States. Harmonised circular economy rules, including harmonised and streamlined ways of reporting, are crucial to ensure a level playing field, to avoid the fragmentation of the Single Market and national measures hampering circular economy objectives. EU ambitions on circularity address needs that go beyond borders and have the potential to lay the groundwork for how other markets around the globe address threats to our environment. A like-minded and aligned approach to circularity will yield the strongest results. To ensure that the EU future regulatory framework meets its full potential, we urge EU policymakers to take a long-term view from the very beginning to ensure that requirements can be ambitiously and efficiently replicated in other parts of the globe. To this end, European standards related to Circular Economy should be translated into ISO standards, building on the work already carried out in Europe, contributing to safer products and helping at the same time the European industry to stay competitive. Imported goods from all over the world should be subject to the same rules as EU products, including those purchased online, and compliance for both EU and non-EU products needs to be enforceable and controllable by market surveillance authorities. The approach of the announced sustainable product policy framework to enhance market surveillance is therefore more than welcome.



2

Simple and smart circular economy rules are key

Simple and smart circular economy rules are needed to set a common framework to this transition. Potential EU-level regulatory action could support the furniture sector in defining goals, for instance promoting lower emissions or less waste generation, but should entrust the industry with the technical solutions to best achieve specific goals.



3

Need for clear definitions at EU level and a common language

EU legislation should provide clear definitions for many parameters, such as 'long lifetime', 'durability', 'reparability', 'reuse', 'recyclability' and others. Setting definitions cannot be left at the discretion of Member States, as this may hamper circularity objectives and the Single Market. Definitions need to be set at EU level, allowing all stakeholders to operate under the same understanding and to provide harmonised and measurable information to consumers.



4

Need for a realistic transition

A step-by-step approach is needed to grant a realistic transition to circular economy principles, which should not bring any disproportionate costs, additional burdens and an undesired competitive disadvantage to EU companies. A realistic time for compliance is also crucial when it comes to reporting obligations.



5

Support for innovation and R&D that is fairly distributed among Member States

Our companies, and especially SMEs, need innovation and investment opportunities to develop and deploy new technologies, infrastructure and circular business models. Producers also need incentives to consider environmental considerations along the lifetime of products, from the design phase to the end-of-life.



6

Dialogue with stakeholders & collaboration with academia

Best practices can be the foundation for the development of new regulations. Ongoing dialogue with stakeholders must take place to learn from experiences of companies that are already moving into circular business. The Circular Economy Stakeholder Platform is a valuable tool for this purpose. Tight collaboration between industry and the academic sector (R&D institutes, universities, etc.) is also key, as research will be needed on many aspects related to circularity.



7

Digitalisation

Increased digitalisation has the potential to enable the transition to a circular economy and to reinforce the EU Single Market and the harmonisation of rules and practices. The announced creation of a European Circular Dataspace could lead towards this objective. However, the proliferation of multiple databases with the same purpose should be avoided. Digitalisation must not place additional burdens on companies and initiatives must be proportionate to the goals to be achieved.



8

Skills

The transition to a circular economy will not only impact production processes and business models, but also the workforce. It is imperative to address the challenges and changes in occupations that circular economy will bring to the furniture sector to ensure that employees can smoothly adapt their knowledge and skills and that no one is left behind. EFIC participates in an EU-funded project addressing how circularity will affect existing jobs, workers health, safety risks and new training needs in the furniture sector by 2030. (<https://circularfurniture-sawyer.eu/>).



9

Value chain approach

A true value chain approach is needed when addressing circularity, starting from the upstream and the supply of raw materials up to the end of life of products. Main challenges are obtaining information on substances of concern and legacy chemicals from suppliers, potentially bringing reuse, remanufacturing and recycling into question, but also mixing at the end of life furniture with other products (such as construction products) or not separating them completely, hampering the reusability of materials due to the increased presence of substances of concern. Another challenge is the proliferation of different interpretations of circularity or different Extended Producer Responsibility Schemes.

1. Circularity during Furniture Production

1.1 In a nutshell

The transition from traditional to lifecycle design is a key factor to enhance the circularity of products. As such, circular product design must be a key element in sustainable product policies, as it provides the opportunity to prepare products for all opportunities of the circular economy – reuse, refurbishment, remanufacturing, and recycling, prolonging the life of products and materials. An efficient use of materials, designing products to allow separating materials and parts, and the responsible use of chemicals are core elements of circular product design. However, circular design is complex and brings some challenges to the industry, such as limited choice for material substitution, increased costs, lack of information on chemicals from suppliers or stringent Regulations requiring the use of certain substances for compliance. Ecodesign is certainly a powerful tool for promoting circularity. However, industry should be involved in creating the criteria and Ecodesign rules should not be too aggressive, as criteria cannot be applied in the same way to all products. Also, they may be difficult to implement in certain domains, e.g. due to the lack of tenders. Green Public Procurement is therefore an important tool to drive Ecodesign principles. All in all, it is imperative to address the differences in materials, to enhance the market for secondary materials and to promote the reduction of toxic substances. Support and promotion of business models based on upgraded, redesigned and remanufactured products is key, too, to achieve circularity in the sector.

1.2 Deep dive into circularity during the production phase

The upcoming 'sustainable product policy framework' which will be complemented by sustainability principles to regulate aspects such as improving product durability, reusability, upgradability and reparability, addressing the presence of hazardous chemicals, increasing recycled content in products, enabling remanufacturing and high-quality recycling, among others, has an enormous potential to enhance the circularity of products placed on the EU market. Given that that 80% of the environmental impact of a product is determined by its design, the impact of products can be significantly reduced at the production stage if principles of circular design are applied.

α. MAIN PRINCIPLES OF ECODSIGN OR CIRCULAR DESIGN

1



An efficient use of materials, including renewable and recycled materials, and according to their environmental performance;

2



The possibility to separate different materials and parts, boosting reparability, reuse, refurbishment and remanufacturing possibilities, prioritising these circular loops over recycling and increasing the lifetime and durability of furniture products;

3



The responsible use of chemicals, avoiding chemicals of concern such as hazardous substances (for example toxic flame retardants).

b. CHALLENGES TO CIRCULAR DESIGN AND PRODUCTION

1

Limited availability of substitution materials & parts: When the principles listed above are applied, material choice may become more limited, as substitutions do not always exist or are widely present in the market. The same applies to the availability of spare parts.

2

Increased costs: When the above criteria are applied, production costs rise and furniture products may become more expensive.

3

Lack of information on chemicals from suppliers & stringent Regulations, impacting the traceability of chemicals in products and undermining the future treatment of the material and its waste disposal. Today, it is difficult to run an ex-post assessment as there is no availability of the full list of substances contained in products. Many chemicals pose serious problems for the material flow, including heavy metals, phthalates, soil repellent chemicals or toxic flame retardants, needed in many cases to comply with stringent flammability standards applicable in some European countries. It is imperative to develop intelligent and innovative methodologies to minimise the presence of substances posing problems to health or the environment in recycled materials and to develop practical systems to track information on substances throughout the value chain. The announced Chemicals Strategy for Sustainability addressing the interface between chemicals products and waste legislation will be crucial. Also, recycling targets and SVHCs Regulations need to be tackled in a way that they do not hamper each other. If not, a risk-based Regulation product by product should be developed, which would avoid that one approach eventually takes over the other. The aim is to avoid that every step taken at substance level can potentially threaten the recycling sector.

4

Complex interaction between circular design, the use of materials and different business models.

c. CONSIDERATIONS ON POTENTIAL INTRODUCTION OF ECODESIGN RULES FOR FURNITURE

1

Potential Ecodesign rules must not drive the market extensively and must not be too aggressive, as they may be difficult to implement due to the lack of tenders. For this reason, Green Public Procurement is an important tool that can drive Ecodesign principles and demand circular solutions. The development of Ecodesign principles should therefore be driven by demand for circular products on the market rather than by regulations.

2

Ecodesign criteria will not work for all products the same way. The furniture range is very differentiated and must be assessed against product-applicable design principles that will create circular products.

3

Developing criteria for spare parts is important, providing specific indications to producers on the applicable requirements, to avoid large storage of spare parts.

4

Industry must be involved in developing Ecodesign criteria for furniture.

Materials

The differences in the potential of materials for circularity and climate impact, such as end-of-life potential, climate footprint, functionality, availability and cost, must be considered as a whole and research should focus on these needs.

The focus on materials and commodities is important and should lead to an increased focus on secondary raw materials, too, given the many business opportunities of these materials.

Enhancing the EU market for secondary raw materials is key to increase the competitiveness of recycled materials and their safety, tackling the insufficient information on the presence of substances of concern in products and waste, which hampers recycling and uptake, as well as the imbalance in price, performance and quality between primary and secondary materials.

Toxic substances

It is imperative that toxic substances are removed from the manufacturing cycle from the production phase. This will help to support a cleaner circular economy by allowing to increase the quality and durability of furniture materials and by enabling more material to be safely reused or recycled. Harmonisation of requirements at European level could in certain cases constitute a viable solution to remove technical and legal obstacles which lead to the use of chemicals in production when they are not necessarily needed, as the “Case for Flame Retardant Free Furniture” demonstrates (see page 8). In addition to this, clear rules are needed on substances that can be used, including evaluating the possibility to formulate a list of chemicals which undermine recyclability to forbid their use in the production phase – when possible – or at least to limit concentrations to adequate levels.

d. OTHER CONSIDERATIONS ON CIRCULARITY IN THE PRODUCTION PHASE

1

The production phase is a broad area that needs to be approached from three angles: combining circular design and production with business models; engaging designers, technicians, architects; close interaction with suppliers.

2

A different approach will be needed for products that have already been manufactured (today's waste) and products that will be manufactured in the future (tomorrow's waste).

3

Efficacy and safety of chemicals and products should be evaluated throughout the whole lifecycle of products, from the crucial design phase to the end-of-life.

e. The Case for Flame Retardant Free Furniture

Many fire safety standards exist in the EU/European countries for furniture, as part of more general product safety efforts. As a result, furniture and bedding manufacturers often need to use materials such as foam or textiles which are treated with (or contain) toxic flame retardants to comply with old fashioned and stringent flammability requirements and standards applicable in some EU/European countries.



Different flammability requirements and standards across Europe impose barriers on the internal market, decreasing the competitiveness of furniture producers. However, this is only one of the concerns related to the use of toxic flame retardants. As documented by the Alliance for Flame Retardant Free Furniture (safefurniture.eu), flame retardants are not proven to save lives and are usually toxic to humans, animals and the environment, as they migrate out of products. Flame retardants are a historical, potentially hazardous and ineffective solution to fire safety, increasing fire toxicity and endangering citizens' and firefighters' lives.

Toxic flame retardants are also hampering a true circular economy, posing a problem at the end-of-life of products and in view of recycling, as once added, chemicals are almost impossible to separate from many materials. When this is possible, the required processes are very inefficient. The unnecessary use of toxic flame retardants is also hampering the European Commission's announced goals with regard to Green Public Procurement.

Therefore, an EU wide ban on toxic flame retardants is a must. At the same time, outdated flammability requirements and standards need to be revised to take into account circularity and the new scientific evidence related to flame retardant use. The removal of toxic flame retardants from products a) helps support a cleaner and more efficient circular economy by increasing the quality and durability of furniture materials and by enabling more material to be safely reused or recycled, and b) enhances the competitiveness of the furniture industry. EU legislation from 2019 on electronic displays under the Ecodesign Directive supported this approach, banning the use of certain flame retardants, and would be welcomed in the furniture sector.

f. Circular production & new business models

Circularity is already bringing new business models to the furniture sector. Business models based on remanufactured, upgraded, redesigned and refurbished products are expected to have a growing role in the near future and to positively contribute to a more conscious use of resources and to the creation of jobs and to alleviating unemployment in many European countries. Some of the business models supporting circularity that will be more and more prominent:

Development of disownership models

- **Renting**, involving renting furniture over a certain contract period. Renting as a business model often reinforces the circular approach in two ways: it becomes less profitable with (unnecessary) replacement sales of new furniture when a single piece of furniture breaks down, and durable furniture and simple reparability become more attractive.
- **Leasing**, including platforms offering leased furniture for private use for a certain amount of years.

Enabling care, repair and refurbishment

- **Continuous restoration and renovation**, offering performance sales, repair and replacement of wear parts, repainting, changing textiles.
- **Centralised renovation and restoration service**, where a large amount of furniture is handled by individuals with a large business activity, ensuring that entire rooms or office furnishings can be renovated in a short time, often during weekends or a holiday period.

Affordability and second-hand markets

- **Repurchases and second-hand sales**, where the manufacturer or reseller buys furniture back from the customer and then resells it to new customers. The manufacturer or retailer thus enters the already existing secondary market of furniture.
- **Repurchases and renovations**, similar to the above model, with the difference that the manufacturer or retailer renovates the furniture which was bought back from the customer before selling it.
- **Functional and performance sales**, where the reseller provides a service that is based on fulfilling one function per unit of time, such as "a seat" or "a workplace" rather than selling actual pieces of furniture. Functional sales can also be taken a step further with performance sales, where the supplier provides a service based on qualities demanded by the customer, encouraging creativity.

B2B procurement

- **Furniture hotels**, where furniture surplus of existing customers is taken over and pieces of furniture in stock are managed. A flexibility is achieved that can meet customers' needs by moving, replacing or changing furniture as needed. The customer does not have to store inventory locally.
- **Interior decoration with reuse**, where the customer assigns the task of furnishing an environment with a certain proportion of recycled furniture. This requirement can be combined with others such as good working environment, creative environment etc.

The above is a non-exhaustive list, as more business models addressing consumers' needs are expected to be seen in the near future. In this context, it is important to address how to best promote new business models which include using products as a service, as well as how to address ownership of the product during renting or reusing. These aspects can be defined within the sustainable product policy announced in the new Circular Economy Action Plan. Aspects related to liability in the case of second-hand products need to be addressed as well (see section 2 on furniture consumption).



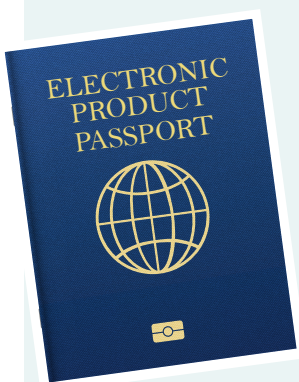
2. Circularity during Furniture Consumption

2.1 In a nutshell

Improving consumer awareness is key to support circularity. To help consumers in comparing products and making informed choices, adequate information tools need to be put at their disposal. An EU-level information scheme on the main characteristics of furniture products would allow consumers to compare different products on the market. Information to consumers must be useful, measurable, truly reliable, based on comparable parameters and harmonised on the basis of international/EU definitions. Tools must have a pragmatic approach and only provide information that is important for a conscious consumer choice or to satisfy the needs of waste operators. The proliferation of too many tools providing information to consumers will be counterproductive and lead to confusion. Green Public Procurement is a powerful tool to boost circular economy principles in practice and public authorities should be encouraged to promote circular products and solutions. Lastly, legal requirements and compliance loopholes must be addressed in relation to second hand and repaired products, as well as packaging of reused/refurbished products.

2.2 Deep dive into circularity during the consumption phase

Choices of furniture consumers are driven by different factors, such as purchasing power, interest in style/design and use perspectives. Such dynamics may apply differently in the consumer market than in the office, contract or public market. Without the involvement of consumers, who are becoming more and more demanding, closing the loop will not be possible. Announced initiatives to empower consumers, including the revision of EU consumer law to ensure that consumers receive trustworthy information on products at the point of sale are therefore most welcome and the furniture industries are interested in contributing to the discussion.



a. ADEQUATE AND HARMONISED INFORMATION TOOLS ARE A MUST

An EU-level information scheme on the main characteristics of furniture products would allow consumers to compare different products on the market, make environment-oriented decisions by choosing the most durable and resource-efficient ones, and reward manufacturers who invest in the quality and sustainability of their products. However, information to consumers must not be provided by labelling only, should not affect every furniture component and should be provided in various ways to reflect consumers' needs.

The information provided must be useful to consumers and contain details such as materials used, health and safety aspects, as well as circular criteria (e.g. repairability, recyclability, separability of materials). The announced introduction of electronic product passports, tagging and watermarks under the sustainable product policy could serve the purpose of providing relevant information to consumers and the digital component will certainly bring benefits. However, it is imperative that definitions of parameters measuring circularity are harmonised at EU/international level, to avoid a proliferation of different definitions at country level. Information must be measurable, truly reliable and based on comparable parameters. It is important to harmonise marking at least in the EU, with the use, when possible, of symbols on products/packaging, as opposed to the use of text, which is country-specific and which would restrict the free movement of goods. The replacement of some existing labels with an international one would be welcomed as well.

The European Commission should ensure dialogue with sectors to identify what parameters the announced electronic product passports and other initiatives must include. All in all, these tools must have a pragmatic approach and only provide information that is important for a conscious consumer choice or for waste operators. These tools must be straight-forward to develop and must by no means pose administrative burdens to companies.

Lastly, while consumers must obtain trustworthy information on the products they purchase, the Product and Organisation Environmental Footprint (PEF and OEF) methods are not the right tool to use for substantiating environmental claims. These methods are not suited to assess the quality of furniture products as they do not provide relevant information to consumers. It is also important that the Ecolabel is not limited to PEF or OEF.

It is needless to reiterate that all rules need to apply to products imported to the EU as well.

b. PROMOTION OF GREEN PUBLIC PROCUREMENT



Public authorities must promote products that have been manufactured according to circular principles and Green Public Procurement has an enormous potential to drive circularity, to contribute to the decarbonisation of the EU economy and to the EU's overall climate and environmental objectives. When furnishing public spaces, the final choice should not be primarily based on economic-driven criteria as this would not encourage investments in green and circular products. In this context, initiatives under the new Circular Economy Action Plan proposing minimum mandatory green criteria for Green Public Procurement, targets in sectoral legislation and compulsory reporting are most welcome.

When it comes to supporting a real start of circular tendering, there are already some good practices to consider which include the reuse of materials, the recycling of waste and the use of new business models, such as leasing of interiors and furniture.

c. CHALLENGES TO CIRCULAR CONSUMPTION

1

Consumers, including public authorities, will be pivotal in driving circular solutions. For this purpose, there must be a societal and behavioural change and EU authorities must promote it.

2

Circular products are many times more expensive to produce, however consumers expect reused, refurbished and remanufactured products to be more economic than first-hand products.

3

Many concerns related to the legal requirements and compliance for second hand and repaired products must be addressed, such as those related to obligations under the General Product Safety Directive, product liability, REACH and restricted substances. These concerns apply to packaging of reused/refurbished products as well.

4

Many voluntary tools to promote product quality exist today and a lack of harmonisation in this respect leads to the use of local labels which are not the best option for exporting industries, such as the furniture sector. The number of environmental labels must be lowered to avoid confusing consumers. Applicable labels must have the widest application possible. Tools such as the EU Ecolabel could in principle be useful for international businesses, provided it is possible for them to fulfil the applicable criteria. However, the Ecolabel for furniture has proven to have a rather low uptake, which may be connected to many challenges, including that the Ecolabel is state-run, it involves high costs and it is not promoted by certifiers. All in all, industry should have a more prominent role in the future review of the criteria and standardisation bodies such as CEN should be given the chance to contribute and provide technical expertise as well.

3. Circularity during Waste management phase

3.1 In a nutshell

Waste rules across the EU must be harmonised with the aim to close loops in an efficient way. To this end, waste management and recycling infrastructures and facilities in the Member States must be enhanced, empowering the waste management sector all in all. The use of waste as a resource must be accelerated. Higher levels of the Waste hierarchy, such as preparation for reuse, refurbishment - including repair - and remanufacturing should be strongly supported and challenges surrounding these must be addressed. A harmonised Extended Producer Responsibility (EPR) Scheme for furniture at EU level could have a major impact in addressing those challenges, preventing the fragmentation of the Internal Market that could be caused by a proliferation of EPR schemes at national level. A harmonised EPR scheme should establish harmonised requirements only, with clear rules and responsibilities for the players involved, covering online trade, definitions of scope, reporting times and obligations, among others, taking a realistic long-term approach and a step by step view and promoting incentives for producers to take into account environmental considerations along the lifetime of products.

3.2 Deep dive into circularity during the waste management phase

Harmonisation of waste rules across the EU are a prerequisite to close loops in an efficient way and to encourage greater cooperation between Member States in waste generation, collection, sorting and treatment. The waste management sector should be empowered all in all, providing investments for enhanced waste treatment infrastructure. In this context, the announced initiatives to support Member States in upgrading their waste and recycling infrastructures are most welcome. In addition to the above, waste should be made a (harmonised) resource. As such, accelerating the use of waste as a resource is another priority, including the modernisation of certain waste streams.

Sustainable waste management in circular economy is more than just recycling targets. Higher levels of the Waste hierarchy, such as preparation for reuse, refurbishment - including repair - and remanufacturing, are strongly supported by the European furniture sector. Today, around 10 million tonnes of furniture are discarded by businesses and consumers in EU Member States every year, a major part of which is either incinerated or destined to landfill. Recycling rates in the EU have improved¹, however collection and reverse logistics infrastructure is limited and there are weak drivers for the collection and logistics for furniture takeback. Additionally, costs of repair, refurbishment, transport and labour are high in many areas of the EU. Last but not least, demand for second-hand furniture and recycled materials is poor, as the price between new furniture and second-life furniture is not significant enough to drive more sustainable purchasing behaviours.



¹European Environmental Bureau, Circular Economy opportunities in the furniture sector, 2017

a. HARMONISED EXTENDED PRODUCER RESPONSIBILITY SCHEME AT EU LEVEL FOR FURNITURE

To tackle these challenges, empowering consumers is a must, as stated above. Another tool that can have a major impact in addressing these challenges is a harmonised Extended Producer Responsibility Scheme (EPR) at EU level. A harmonised scheme can bring benefits, avoiding the fragmentation of the internal market, obstacles to circularity and the proliferation of rules at national level, with different reporting obligations.

A harmonised EPR scheme for furniture at EU level should in general:

- 1. Establish harmonised requirements only, with clear rules and responsibilities for the players involved, equally applicable to all operators on the market.
- 2. Harmonise reporting obligations, such as what information needs to be reported, who should comply with the reporting, and when (including how often) reporting should occur.
- 3. Take a realistic long-term approach and a step-by-step view, to ensure that a) the system and requirements can be replicated in all Member States (MS) efficiently and equally, b) the measures are not prohibitive and c) stakeholders are given the flexibility to explore, innovate and improve.
- 4. Promote incentives for producers to consider environmental considerations along the lifetime of products, from the design phase to the end-of-life.
- 5. Cover online trade, definitions of scope, reporting times, categorisation of products, data needs, costs.
- 6. Set an EU-wide approach for eco-modulation of fees within the existing and upcoming EPR schemes.

Additionally:

- 1. As stated in other sections, EU legislation must enclose clear definitions for certain parameters, such as 'recycling', 'recyclability', 'reparability', 'reusability/upcycling', 'durability', 'presence of hazardous substances'.
- 2. Reflection is needed on best practices for reverse collection infrastructure, in such a way that at the beginning of the recycling process proper separation of recyclable materials (e.g. furniture, wood) is considered, taking into account the different waste & recycling infrastructures in the EU Member States and considering tasking municipalities with this activity rather than producers.
- 3. Establishing by law ex ante criteria (e.g for bonus/malus) on product categories could serve to improve legal certainty and predictability, as well as homogenous treatment of waste by the different eco-organisms.
- 4. Risks are different depending on the materials used. Materials have different potential when it comes to circularity and climate impact. These differences, such as end-of life potential, climate footprint, functionality, availability and cost, should be taken under consideration as a whole to ensure that balanced decisions are taken.
- 5. Research at EU level will be needed on certain materials, such as plastics, particleboards or MDFs.

The European Furniture Industries Confederation is ready to work closely with the EU institutions to achieve this goal by providing sector-specific expertise. EFIC calls on the European Commission to develop different scenarios for a harmonised EPR scheme for furniture at EU level, in cooperation with the industry. EFIC also welcomes measures to improve the performance of EPR schemes, in particular ecomodulating fees, and to examine how EPR can be applied to a wider range of products and be included in producer ownership models.



Creativity



Innovation



Design

EFIC - European Furniture Industries Confederation

EU Transparency register: 95910795422-52

Rue Montoyer 24, 1000 Brussels, PO Box 2

T: 0032 (0)2 287 08 86

M: 0032 (0)477 28 71 34

info@efic.eu

www.efic.eu



www.twitter.com/efic_bxl



www.linkedin.com/company/european-furniture-industries-confederation-efic/