

Etiquetage des produits d'ameublement sur leurs émissions en polluants volatils - Consultation publique

Décret à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils

And

Arrêté à l'étiquetage des produits d'ameublement vis-à-vis de leurs émissions en polluants volatils

EFIC reply to the French public consultation, 10th February 2017:

EFIC – the European Furniture Industries Confederation - is 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.

European furniture producers are highly concerned about the barrier to trade created by the draft French decree.

In the lack of European regulation on the issue, the draft decree is establishing ad hoc demands and testing requirements for the French market only. Such regulation hinders the freedom of circulation of goods in the Single Market and creates a barrier to trade for producers exporting to France, together with imposing financial and administrative burdens.

A preliminary estimation calculates a cost for testing 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. The lack of chambers' capacity for running the tests is also a relevant problem.

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

At the same time, EFIC is aware of the notification of the decree on the labelling of furniture products regarding their emissions of volatile pollutants to the European Institutions, to which EFIC will submit its detailed opinion.

Finally, EFIC would like to stress that some essential information are missing due to the lack of availability of the guidelines "Technical protocol for characterising emissions of volatile pollutants by furniture products" announced in the draft decree.

EFIC stands ready to provide further comments in reply to any request from the French authorities.