

Brussels, 8 June 2022

Position paper on the proposal for a REACH Restriction on Formaldehyde

The European Panel Federation (EPF), the European Furniture Industries Confederation (EFIC), the European Confederation of Woodworking Industries (CEI-Bois), the European Federation of the Parquet Industry (FEP), the European Timber Trade Federation (ETTF) and the European Products of Laminate Flooring (EPLF®) generally welcome the European Commission's draft proposal for a REACH restriction on Formaldehyde following the opinions of RAC and SEAC on the original proposal of the Dossier Submitter (ECHA). The Restriction proposal will certainly contribute to enhanced harmonisation across the EU and protection of consumers against high-emitting products. The signatories of this position paper:

- support the limit proposed at 0.05 ppm (0.062 mg/m³) for wood-based panels (WBP) and furniture.
- support the methodology reference method as it is in line with ISO 12460-1 (EN 717-1) which is recognised to be the most accurate, and comes with historical data.

However, the signatories have two comments on the proposal.

A. Delete the following paragraph:

1.1 (i) Final Paragraph: "Formaldehyde released from articles referred to in paragraph 1, first subparagraph, of entry xx] may also be measured in the air of a test chamber under the reference conditions that are more stringent than the ones listed in the first paragraph of this point; higher temperature and/or higher relative humidity and/or higher loading factor and/or lower air exchange rate shall be considered to be more stringent conditions."

EPF, EFIC, CEI-Bois, FEP, ETTF and EPLF propose to delete the above paragraph:

~~Formaldehyde released from articles referred to in paragraph 1, first subparagraph, of entry xx] may also be measured in the air of a test chamber under the reference conditions that are more stringent than the ones listed in the first paragraph of this point; higher temperature and/or higher relative humidity and/or higher loading factor and/or lower air exchange rate shall be considered to be more stringent conditions.~~

Justification

This paragraph will lead to Member State fragmentation, not European harmonisation. The single test method for the reference condition is satisfactorily defined earlier in this section (1.1). It is not possible to change it in the same document as this would lead to different limit values.

And

B. Amend the following paragraph:

(c) the loading factor, expressed as the ratio of the total surface area of the test piece to the volume of the test chamber, shall be $(1 \pm 0,02) \text{ m}^2/\text{m}^3$; in cases where such a loading factor is clearly not realistic under

reasonably foreseeable conditions of use, loading factors in accordance with Section 4.2.2 of EN 16516[1] may be used;

EPF, EFIC, CEI-Bois, FEP, ETTF and EPLF proposal:

(c) the loading factor, expressed as the ratio of the total surface area of the test piece to the volume of the test chamber, shall be $(1 \pm 0,02) \text{ m}^2/\text{m}^3$ **with edge sealing**; in cases where such a loading factor is clearly not realistic under reasonably foreseeable conditions of use **of articles other than wood-based panels**, loading factors in accordance with Section 4.2.2 of EN 16516 [1] may be used **could be adjusted**.

Justification

Different test methods should be allowed via correlation to the reference limit value and test method. These should not be limited to EN 16516.

To conclude, EPF, EFIC, CEI-Bois, FEP, ETTF and EPLF support the proposed REACH restriction for formaldehyde provided that the 2 above comments are taken into account.

[1] EN 16516: Construction products – Assessment of release of dangerous substances – Determination of emissions into indoor air.

EPF represents the manufacturers of wood-based panels being particleboard, dry process fibreboard (MDF), oriented strand board (OSB), hardboard, softboard and plywood. EPF has members in 32 European countries. The EU wood panel industry has a turnover of about 22 billion euro every year, provides over 100,000 jobs directly and counts more than 5,000 enterprises in Europe. The production of wood-based panels in the EU-27 (+EFTA) in 2020 was an estimated 58 million m³. www.europanel.org

EFIC is the European Furniture Industries Confederation, representing over 70% of the total turnover of the European Furniture Industries, a sector employing 1 million people in about 120.000 enterprises across the EU and generating a turnover of 96 billion Euros. The EFIC membership is composed of 16 national federations, one individual company member and several clusters. Further information: www.efic.eu

The European Confederation of Woodworking Industries (CEI-Bois) represents 20 European and National organisations from 15 countries and is the body backing the interests of the whole industrial European wood sector: more than 180.000 companies generating an annual turnover of 152 billion euros and employing 1 million workers in the EU. www.cei-bois.org

The European Federation of the Parquet industry (FEP) reunites more than 50 European manufacturers of parquet, 8 national associations and more than 20 suppliers to the industry. FEP has members in 20 countries. The EU parquet industry has an annual turnover of about 2.5 billion EUR, provides 16,000 direct jobs and counts more than 1,000 enterprises. The production of parquet in European FEP countries is estimated at 76 million m² in 2020. www.parquet.net

The European Timber Trade Federation (ETTF) is the European umbrella federation for the timber trade. ETTF represents 10 national federations as direct members and several organizations such as ATIBT as associated members. As such, ETTF is the voice of more than 2000 individual traders and importers throughout. <https://ettf.info/>

Established in 1994, the Association of European Producers of Laminate Flooring (EPLF) represents the leading producers of laminate flooring in Europe and their suppliers. The focus of its work revolves around research, development, standardisation and representation at international trade fairs. www.eplf.com