

Analysis of the Defra – “Government Buying Standards (formerly known as Buy Sustainable Quick Wins) furniture stakeholder review 2010

1. Government procurement specifications for furniture currently only cover the UK Timber Procurement Policy. Therefore with a view to make them more environmentally sustainable and better aligned with the EU Green Public Procurement and EU Ecolabel specifications they have been completely reviewed.
2. Whilst the full draft proposals may be found in Annex ,1 the main changes focussed on limiting certain chemicals (used in coatings, panels, glues and adhesives) and increasing durability and the ability to repair the furniture, whilst also considering packaging and the labelling of certain sized plastic parts. There were also two options suggested that aimed to increase the level of furniture remanufacture and reuse.
3. On the 1st April 2010 the draft proposed new Government Buying Standards for furniture were sent out within an Impact Assessment, and accompanied by some outline questions, for stakeholder review. These proposals were circulated to 151 external organisations (including central government procurers, furniture producers and suppliers) and separately to two trade bodies, the Furniture Industry Research Association (FIRA) and the Trade Association of British Furniture Manufacturers (BFM) - asking them to canvas responses on behalf of their members. Stakeholders were given 6 weeks to reply (extended from 4 weeks due to Easter).
4. We received responses to the questions set out in Annex 2 from 22 parties, FIRA and BFM consolidated their member’s replies. It is not known how many organisations inputted into these consolidated responses.

Summary

5. Just over 75% of the replies approved of the proposal.
6. All five of those that objected to the proposals appeared to assume that both Option C and Option B required 5% of furniture provided by suppliers to be remanufactured. The intention was that only Option C required suppliers to provide 5% of furniture as remanufactured.
7. Option B was aimed at encouraging good procurement practice by requiring procurers to meet 5% of their procurement needs through the reuse/refurbish/re-upholster of 5% of their current furniture stock rather than requiring manufacturers to supply re-manufactured/re-used furniture’.

8. Option B was the most popular option, and there was a split in opinion between counting the 5% through number of items and by value to buy new.
9. Four out of the five of those that objected to the proposals also opposed the limit on surface coatings to contain no more than 5% by weight of Volatile Organic Compounds (VOCs). These coatings are usually used on hard wood and veneers. It was considered that whilst the market has started to move away from UV curable lacquers, the majority of which contain traces of VOC, there was currently insufficient market capacity to allow this change in the short term.
10. There were no major objections to the proposals relating to plastic parts, formaldehyde in panels, provision of spare parts, eco-design to enable easier repair or for packaging.


Defra Proposal

11. Defra agrees that more consideration of the industrial landscape in the area is required to effectively introduce the requirement that 5% of furniture bought is remanufactured. However, it is believed that good procurement practice should be encouraged by requiring procurers to meet 5% of their procurement needs through the reuse/refurbish/re-upholster of 5% of their current furniture stock.
12. The specifications for eco-design and availability of spare parts will assist in the ability of firms to remanufacture in the short to medium term, and Defra will work with industry to try and establish ways to develop this market.
13. There was concern over the market capacity to meet the limit on surface coatings to contain no more than 5% by weight of VOCs, it is therefore intended to move this requirement from a Minimum Mandatory specification to the Award Criteria (with the view to making this specification mandatory in 3 years time).
14. Discussion will take place with government procurers on whether to establish the 5% requirement should be by value or the number of items purchased.
15. Defra will therefore pursue the proposals in the Stakeholder Review based on Option B, except for moving the VOC criteria for coatings to the Award Criteria.

Defra 25-05-2010

Annex 1: Proposed specifications for furniture products

Proposed MINIMUM MANDATORY Specification(s)	
Technical Specification	
<p>Wood and wood-based materials</p> <p>1. Timber must be purchased in accordance with UK timber procurement policy. Only timber and timber products originating either from independently verified legal and sustainable sources or from a licensed Forest Law Enforcement Governance and Trade (FLEGT) partner can be purchased (from April 2015, only sustainably produced timber will be purchased). As an alternative, contracting authorities can demand recycled timber.</p> <p>Verification: Evidence that the products supplied comply with the UK government's timber procurement policy. This evidence should cover both the source of the timber (chain of custody) and proof that it is legally and sustainably managed or FLEGT-licensed. This evidence can come in two forms: Category A or Category B⁽ⁱ⁾.</p>	<p><i>This differs to the EU GPP core criteria which only demand legally sourced timber as a mandatory technical specification, demonstrated by chain-of-custody certificates such as FSC and PEFC, or some environmental management tracking system such as ISO14001. Although FSC and PEFC do include sustainability in their schemes' criteria, thus making the EU GPP criterion cover sustainability in practicality, it (sustainably sourced timber and sustainable forest management) are however only explicitly expressed in the Award criteria of the EU GPP⁽ⁱⁱ⁾. It is imperative therefore for the Government Buying Standards criteria to be made in line with UK government Timber Procurement policy.</i></p>
<p>Plastic parts</p> <p>2. Plastic parts ≥ 50g shall be marked for recycling according to ISO 11469 or equivalent and must not contain additions of other materials that may hinder their recycling. <u>Parts greater than 50g in weight that would be adversely affected by a marking, such as for consumer acceptance and aesthetic reasons, may place the necessary recycling information in the user manual or similar literature.</u></p> <p>Verification: Bidders must provide a description of the plastic materials that are present and the quantities used, the way in which they are labelled and how they are attached to one another or to other materials. Products carrying a type I ecolabel fulfilling the selected criteria will be deemed to comply.</p>	<p><i>A paragraph that describes how plastic parts that may be adversely affected by labelling (see underlined text) has been included in Point 2, based on comments made by UK industry representatives.</i></p>
<p>Surface coating of wood, plastic and/or metal parts</p> <p>3. The products used for surface coating shall:</p> <ul style="list-style-type: none"> • Not contain hazardous substances (in the final furniture product) that are classified according to Directive 1999/45/EC as carcinogenic (R40, R45, R49), harmful to the reproductive system (R60, R61, R62, R63), mutagenic (R46, R68), toxic (R23, R24, R25, R26, R27, R28, R51), allergenic when inhaled (R42) or harmful to the environment (R50, R50/53, R51/53, R52, R52/53, R53), cause heritable genetic damage (R46), danger of serious damage to health by prolonged exposure (R48), possible risks of irreversible effects (R68); • Formaldehyde emissions from agents for surface treatment liberating formaldehyde must be less than 0.1ppm formaldehyde in the final product; • For phthalates: no use is allowed of phthalates that at the time of 	<p><i>The original source for these criteria, the Nordic Swan (NS) label for furniture, has been referred to for additional clarity. From discussions with industry representatives it is understood that these criteria cover surface treatments such as paints and varnishes, but also include melamine and laminates. These latter two use formaldehyde (HCHO) in their application. HCHO carries R26-28, R40, so would be excluded under the first bullet of criterion 3. However, the NS criteria also include the additional phrase</i></p>

<p>application fulfil the classification criteria of any of the following risk phrases (or combinations thereof): R60, R61, R62, in accordance with Directive 67/548/EEC and its amendments;</p> <ul style="list-style-type: none"> • Not contain aziridine; and • Not contain Chromium (VI) compounds. <p>Verification: Bidders must present a list with all surface treatment substances used for each material present in the furniture and their Material Safety Data Sheet or equivalent documentation demonstrating compliance with the above criteria. Furniture carrying a type I ecolabel will be deemed to comply.</p>	<p><i>about HCHO emissions being limited to 0.1ppm – see the second bullet above. This phrase refers to the final product as it is on the furniture, ie after the formaldehyde has been driven off (evaporated) in the surface treatment’s curing process. In other words, the criterion here on hazardous substances applies to the final surface treatment product on the furniture and its chemical characteristics.</i></p>
<p>Adhesives and glues</p> <p>4. The VOC content of adhesives used in the assembly of furniture shall not exceed 10% by weight.</p> <p>Verification: Bidders must present a list with all adhesives used in the assembly of furniture and their Material Safety Data Sheets or equivalent documentation where the amount of VOCs is displayed demonstrating compliance with the above criteria. Furniture carrying a type I ecolabel fulfilling will be deemed to comply.</p>	
<p>Formaldehyde in panels</p> <p>5. The emissions of free formaldehyde from wood-based panels shall not exceed the E1 emissions limit as described in standard BS EN 13986: 2004 Wood-based panels for use in construction (referring to BS EN 312: 2003 Particleboards Specifications and BS EN 622-1 2003 Fibreboards Specifications for MDF).</p> <p>Verification: Suitable evidence, such as test reports, shall be supplied demonstrating compliance with this criterion and the standards quoted.</p>	<p><i>This criterion has been included based on comments made by UK industry representatives.</i></p>
<p>Textile materials</p> <p>6. The products shall comply with the Government Buying Standards mandatory criteria for textiles.</p> <p>Verification: All products carrying the EU Ecolabel for textiles or a national or private label fulfilling the listed criteria will be deemed to comply. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.</p>	
<p>Durability, reparability, fitness for use and ergonomics</p> <p>7. Furniture must meet the relevant UK technical and quality standards, or equivalent, for serviceability (e.g. safety, abrasion resistance, tensile strength, light fastness, rub fastness, deformation by compression, ergonomics), as given in FIRA’s “Technical Requirements for Furniture” document, August 2009. This covers both material-specific and furniture item-specific requirements and testing methods.</p> <p>8. Components and spare parts will be made available by the supplier for at least 5 years after sale to extend the product’s lifetime through repair, as far as reasonably practical.</p> <p>Verification: Bidders must provide appropriate documentation to demonstrate compliance with these standards.</p> <p>9. The tenderer should demonstrate that their product has been eco-designed to enable easy repair: plus disassembly for recycling and,</p>	<p><i>Point 7 has been amended to make relevant to UK quality standards.</i></p> <p> FIRA Furniture Technical Requiremer</p>

<p>preferably, for reuse, in part or whole. Verification: Bidders must provide technical documentation that demonstrates that their product can be disassembled, thereby allowing for recycling and for some or all of the components to be reused in other applications.</p>	
<p>Packaging materials 10. Packaging must consist of readily recyclable material, and/or materials taken from renewable resources, or be a multi-use system, i.e. reusable. All packaging materials shall be easily separable by hand into recyclable parts consisting of one material (e.g. cardboard, paper, plastic, textile). Verification: A description of the product packaging shall be provided together with a corresponding declaration of compliance with these criteria. Proof should be provided in compliance with BS EN 13430 on recyclability or BS EN 13429 on reusability, or equivalent.</p>	<p><i>Point 10 Adjusted text to say 'readily recyclable material' rather than 'readily recycled material' and emphasise what a multi-use system means. However, this is practically mandatory anyway under the Packaging Essential Requirements Regulations (part of the Waste Framework Directive), albeit the criterion doesn't include incineration with energy recovery.</i> <i>Verification for Point 10 adjusted text to include BS EN Standards.</i></p>
<p>Award Criteria. Additional points⁽ⁱⁱⁱ⁾ will be awarded for:</p>	
<p>Product materials 1. The tenderer should indicate the percentage by weight of recycled content and/or remanufactured and reused components of wood-based materials, plastics and/or metals in the final piece of furniture. Verification: Bidders must provide appropriate documentation where the recycled content percentage by weight is stated. 2. The tenderer should demonstrate that they have a take-back scheme for repairing and re-manufacturing products or recycling for products that have reached the end of their useful lives. Verification: Bidders must provide appropriate documentation to demonstrate compliance with these standards. Note, for mattresses this only applies in terms of recycling, not repairing or remanufacturing.</p>	<p>Text to Point 1. adjusted to include 'reused components' as well as recycled content.</p>
<p>Padding materials and mattresses 3. Products that contain padding materials shall comply with the EU Ecolabel criteria available at http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:203:0065:0080:EN:PDF However, for Flame retardants (FR) used in foams and mattresses, both additive and reactive FR are permissible for use in Government Buying Standards. Verification: All products carrying the EU Ecolabel or a national or private label fulfilling the listed criteria will be deemed to comply. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted. Suppliers shall ensure compliance with UK flammability legislation.</p>	<p><i>This has been amended to make reference to the more up to date version of the Ecolabel Mattresses criteria, 2009. The EU GPP refers to the older, 2002 version. However, they both ultimately deal with the issues in a similar fashion.</i></p>
<p>Packaging materials 4. The tenderer should indicate the percentage by weight of recycled content in the packaging materials (plastics and cardboard). Verification: Bidders must provide a list of the different packaging materials, their weight and a declaration by the packaging producer/s</p>	<p><i>Point 4 reflects criteria already covered by the EU GPP comprehensive criteria. We propose moving it to here as well to more clearly promote and reward those using packaging materials with a recycled</i></p>

<p>where it states the % of recycled content in their packaging material.</p> <p>5. The tenderer should demonstrate that their packaging system is designed to be reused for its original purpose Verification: Bidders must provide evidence in accordance with BS EN 13429, or equivalent. This states that the packaging should be able to do a number of trips under normal conditions of use without suffering significant damage upon loading and unloading and a system supporting packaging reuse is available. The packaging can be cleaned, washed and repaired as necessary and still be able to perform its intended function without any risk to the health or safety of those doing so.</p> <p>6. The tenderer should demonstrate that the packaging material is clearly marked to aid recycling and disposal. Verification: Bidders must provide evidence that they subscribe to The On-Pack Recycling Label Scheme and that they use to appropriate sanctioned logos on their packaging.</p>	<p><i>content.</i></p> <p><i>Point 5 is a new criterion that has been added to reward those companies who have truly reusable packaging systems, to reward companies who are moving up the waste hierarchy from recycling.</i></p> <p><i>Point 5 is a new criterion that has been added to reward those companies who are part of the scheme supported by WRAP and the BRC, this scheme aims to standardise disposal and recycling information on packaging by providing an easily recognised set of logos that provide information on the material type and the most appropriate commercially available disposal route.</i></p>
<p>Surface coating of wood, plastic and/or metal parts The products used for surface coating shall:</p> <ul style="list-style-type: none"> • Not contain more than 5% by weight of volatile organic compounds (VOCs); 	
<p>‘EXPLANATORY NOTE’</p>	
<p>It is proposed that from 1 April 2011 government departments and their agencies are encouraged to meet at least 5% of the office furniture and 10% of the domestic/residential items through reuse/refurbish/re-upholster of their current furniture stock. The intention is to increase this level over time (for example; 5% by 2011, 10% by 2015, etc).</p>	<p><i>The proposed explanatory note requires government departments and their Agencies to meet at least 5% by weight of their furniture needs through reuse/refurbish/re-upholster of their current furniture stock.</i></p>

Annex 2: Question and Answer Pro-Forma

Question and Answer Pro-Forma

PART ONE – About you

Name:

Address:

Postcode:

E-mail:

Company name or organisation:

Confidentiality: If you would like your response or personal details to be treated confidentially, please explain why:

PART TWO – Your comments

1. Do you think the proposed revised specifications are:

- sufficiently ambitious?
- too ambitious?
- not ambitious enough?

Please justify your answer:

2. Do you believe the market for furniture has the capacity to adjust to the proposed changes? Please make reference to specific aspects such as changes in surface coating chemicals, formaldehyde in panels and VOC content of adhesives and glues in your response.

Yes No

Please elaborate:

3. Are there any other technological trends or factors that should be taken into account when revising specifications for this product group, both now or in the future e.g. specific planned legislation; anticipated changes in consumer demand such as product eco-design and durability; anticipated supply constraints such as material shortages / production cost increases; expected change in market competition?

Yes No

If 'yes', please elaborate:

4. We would like to gather your views on the proposed approaches to reusing and remanufacturing furniture for further use, as outlined in Options B and C. These should be viewed as separate from the rest of the technical and award criteria, which are relevant to new furniture, focusing on materials and product durability. In particular, we are keen to hear your views on:
- a. What are the issues around the implementation timescales?
 - b. How and what measure should we use to ensure that reuse is occurring at the desired level? (for example items, tonnes or value)
 - c. Which of the two options (B or C) is the most likely to work and why?
 - d. Are the levels proposed and the incremental increase in reuse reasonable and achievable?
 - e. What changes to the procurement system might be necessary?

Please elaborate with reference to the letters above:

5. Do you have any information you can provide that can help illustrate the potential financial impact of these proposals on suppliers or procurers set out in section 10 of the Impact Assessment?
- How will proposals affect the relative price of products? If so, by how much (for example 1-2%, 3-5%, 5%-10%, etc)?
 - If you are a supplier, will you incur significant costs that you will be unable to pass on to the consumer / supply chain as a result of these proposals?
 - How will small to medium sized enterprises in the sector be affected?

Please describe your evidence with reference to the points highlighted and any assumptions or sources used:

6. Are the Government standards presented in a clear and accessible way in this stakeholder review document and Annexes?

Yes No

If 'no', please explain why:

7. Please detail below any further comments you may have in relation to the proposed revised specifications for furniture products.