

**From: The European Social Dialogue Committee for Furniture
To the attention of: The European Chemicals Agency**

Brussels, 20 June 2019

JOINT LETTER – TCEP, TCPP and TDCP chemicals in furniture

The European Social Dialogue Committee for Furniture has included the issue of flame retardants in furniture in its work and action program since 2017.

EFIC and EFBWW are part of a broader coalition of industries, trade unions, environmental NGOs and health organizations advocating for the Case for Flame Retardants Free Furniture. The coalition has published a policy paper in September 2016. Among other activities, the alliance publishes a regular newsletter with the most recent scientific and policy updates.

With this joint letter, Social Partners would like to welcome the ECHA restriction process on TCEP, TCPP and TDCP, and to stress some main points.

When it comes to the impact of restricting TCEP, TCPP and TDCP, a key issue to take into account concerns different markets. So far, ECHA has considered residential upholstered furniture only, while flame retardants are mainly used in the office/public and contract market.

Social Partners would like to highlight that, for the restriction to be fully effective, ECHA should not limit the restriction process to residential furniture only. The following distinction should be carefully considered in this regard:

- **Residential/domestic furniture market:** the UK and Irish regulations are driving the use of flame retardants due to the very high flammability requirements imposed by law. This means that in other EU countries the use of flame retardants is limited, but does not exclude that they can be present, because e.g. foam producers may sell FR-treated foam also in other markets.
- **Office/public/contract furniture market:** in this part of the market, the use of flame retardants is much higher and spread across the EU, due to the existence of a multitude



of stringent flammability standards, which are significantly applied. The use of TCPP, in particular, is very common in these parts of the market¹.

Chemical flame retardants can cause a range of dangers to our health, including cancer, hormonal disruption, decreased fertility, neurological impairments, lower birth weight and increased chance of autism and reduced IQ in children. They migrate out of products and accumulate in the environment.

Social partners call on ECHA to extend the TCEP, TCPP and TDCP restriction process to office furniture, in order to have an effective protection from the health risks deriving from hazardous flame retardants at the EU level.

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¹ BROMMER, S. and HARRAD, S., Sources and human exposure implications of concentrations of organophosphate flame retardants in dust from UK cars, classrooms, living rooms, and offices, Environment International 83 (2015), 202-207.