

# Position Paper

## UEAPME<sup>1</sup> answers on the public consultation on information provided to consumers about characteristics of furniture products

### The Questionnaire

#### Part A

1. Are you aware of any past or ongoing initiative(s) or existing scheme(s) which would require providing certain information on furniture products characteristics (e.g. on materials used, origin, and weight) to consumers?

Yes.

2. Please identify each initiative or scheme name and country (or region) of applicability, according to its status:

*A mandatory scheme in force: Italy and France.*

3. In the last 5 years, have you (or your members) experienced any advantages due to a specific scheme(s) requiring the provision of information to consumers on furniture product characteristics?

*No. There are no commercial advantages for any mandatory schemes. They tend to be too burdensome and too complex for SMEs. Voluntary schemes in Member States sometimes attract SMEs in specific sectors, e.g. the UK's market oriented approach allows manufacturers and retailers to give as much information as they wish, over and above required standard and quality marking for the sector. In Italy, in some specialised wood manufacturing sectors, voluntary based certifications are gaining interest of SMEs (on raw material origin information, eco-sustainability, traceability for consumer's health) and contributing to better balance existing business relations among producer and single SMEs (product user, distributor, retailer) and the latter with the final consumer (e.g. EU legislation on wood such as EU Regulation on wood "due diligence", Forest Saving Certifications, wood packaging for human food transportation).*

*The currently market requirements are more than adequate.*

4. Please provide an estimate of the related benefits (as a percentage of annual turnover), if there are any:

*There are none.*

5. Are you impacted by any differences in mandatory schemes applicable in countries you (or your members) trade with, which require providing information on certain characteristics of furniture products to consumers (e.g. on materials used, origin, weight)?

*Yes, for small and medium-sized companies, the impact will be huge and will lead to higher costs (organisation, administration).*

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<sup>1</sup> UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

6. What is the impact on your (or your members' ) willingness to trade cross-border within the EU, with different requirements in some EU countries on providing information to consumers on specific characteristics of furniture products?

*Low impact. National agents provide requirements for labelling and product information. Current systems in place appear adequate for SMEs.*

7. In the last 5 years, have you (or your members) experienced any problems due to different national requirements, in some EU countries, on providing information to consumers on furniture products characteristics?

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8. *It is difficult to establish a link. Not of major impact when established in new member state market. However, better information (online preferred) in multiple languages from national authorities (guidance notes) would be appreciated, especially for micro-enterprise first time exporters. Please explain which problems have you (or your members) experienced as a result of such different requirements [multiple answers are possible]*

*Higher administration, sales and marketing costs (including costs of familiarisation with such different requirements).*

9. Please provide an estimate of the related costs or foregone revenues (as a percentage of annual turnover):

*According to one of our members it is about 2-4% depending on type / market usage of furniture.*

10. In the last 5 years, have you (or your members) experienced any problems with competitors that have not respected the national requirements on providing information to consumers on furniture products characteristics within the EU?

*It is difficult to establish a link. Current trading standards and competition rules are adequate; however, national and EU competition authorities need to make their complaints / reporting regimes more accessible, quicker and cheaper for SMEs.*

11. Which problems have you (or your members) faced as a result of such competitors noncompliance? [multiple answers are possible]

*See answer 10.*

12. Please provide an estimate of the related costs or foregone revenues (as a percentage of annual turnover):

*Don't know.*

13. In the last 5 years, have you (or your members) experienced any problems with the actor(s) within your supply chain in providing information to consumers on furniture products characteristics within the EU?

*Yes.*

14. What type of problems have you (or your members) faced with the actor(s) within your supply chain in providing such information? [multiple answers are possible]

- *Difficulties in obtaining information from the manufacturer*
- *Difficulties in obtaining information from the importer*
- *Communications challenges with agents / competition*
- *Late payments / information of payment terms*
- *Cultural differences in the industry, particularly from southern Europe.*

15. Please explain the main consequences of the problem(s): [multiple answers are possible]

*Change of the value chain partner(s).*

*Higher administration, sales and marketing costs.*

*Higher litigation costs. Need for more and cheaper arbitration facilities in other EU countries.*

16. Do you display information on certain furniture products characteristics (e.g. on materials used, origin, weight) to consumers (before the purchase)?

Yes.

17. How important is it to provide consumers with the following information about furniture products characteristics? (please indicate the level of importance, from 1 not important to 5 very important)

	1	2	3	4	5
Dimensions			X		
Weight			X		
Weight bearing capacity			X		
Materials used				X	
Hazardous substance contained in the product	X				
Durability of use and resistance to "wear and tear"					X
Production process applied				X	
Safety information and/or precautions on use					X
Instructions on cleaning and maintenance				X	
Instructions on disposal or recycling					X
Origin of the product					X
Origin of the product's component materials					X
Name and/or address of the producer and/or importer					X
Identification of design protection					X
Environmental friendliness					X
Conformity to fair labour conditions					X
Other					X

If you replied "Other", please specify:....*information could be given orally....*

18. Would it be preferable that such information be displayed in shops in a standardised format in order to allow for better comparison between furniture products?

No.

19. Which type of information on furniture products characteristics do you display to consumers? [multiple answers are possible]

*The look and feel is very important, together with a good after sales policy and a good warranty.*

20. Please, briefly explain if the information content differs according to the destination market:

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21. What are the advantages that you have experienced as a result of displaying such information? (multiple answers are possible)

*Not really.*

22. Please provide an estimate of these benefits (as a percentage of annual turnover):

*Don't know.*

23. What are the related costs you incur in order to provide consumers with such information?

*One of our members estimated that up to 2% of the manufactured cost is spent on the information process, plus warranty costs / claims of around 10% average per annum.*

### Part B Impact Assessment

Effectiveness and impacts of information, provided to consumers on characteristics of furniture products, on their informed decision making

24. To what extent do you agree with the following statements?

	fully agree	somewhat agree	somewhat disagree	fully disagree	don't know/ don't have an opinion
Information displayed in shops to consumers on furniture products characteristics is sufficient to make informed choices.		X			
Information displayed in shops allows consumers to compare between different furniture products.		X			
Consumers are confident of the quality of the furniture products they are buying.	X				
Consumers rely on information displayed in the shops on characteristics of furniture products in their purchasing decisions.			X		

25. Please assess the following impacts on consumers of information displayed in the shop about furniture products characteristics (e.g. materials used, origin, weight) (0 don't know/have no opinion ; from 1-very low/no impact to 5-very high impact ;).

	0	1	2	3	4	5
Decreasing the number of consumers' complaints on purchased furniture products.		X				
Decreasing the frequency of inadvertently purchased furniture products (i.e. with properties different from what consumers were really looking for).		X				
An overall increase in price of furniture products to consumers.			X			
Increasing consumers' awareness about intrinsic values of furniture products (e.g. not visible at the			X			

purchase but apparent during use)						
Increasing the sales of high-quality furniture products.		X				
Decreasing the intellectual property rights infringements of furniture products.	X					

### Part C: Policy options

Possible policy options concerning the needs relating to information provided to consumers on characteristics of furniture products:

26. To what extent do you agree with the following statements?

	fully agree	somewhat agree	somewhat disagree	fully disagree	don't know/ don't have an opinion
The existing practices/situation in different EU countries on providing to consumers information on characteristics of furniture products should remain unchanged.		X			
Industry together with relevant stakeholders should take an initiative to improve information provided to consumers on characteristics of furniture products.			X		
Guidance and/or recommendations should be developed at the European level to national authorities and/or industry on improving information provided to consumers on characteristics of furniture products across the EU, which would apply on a voluntary basis.			X		
The requirements on information to be provided/ displayed to consumers on characteristics of furniture products should be defined at the European level and apply on a mandatory basis.				X	

## Part D: Comments and final remarks

27. Please let us know if you would like to add something

*When a consumer enters a furniture shop, he/she is already very well informed by looking and finding information on the internet.*

*Market forces and free trade principles should apply, and the sales team at both the retail end and manufacturing / marketing side should try to provide all information that an individual consumer requests. Voluntary basis is paramount. No Mandatory regime at EU level is required.*

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