

## **The Swedish Federation of Wood and Furniture Industry response on Simplification of administrative burden in environmental legislation**

*The Swedish Federation of Wood and Furniture Industry - Trä- och Möbelföretagen (TMF) - is the national trade and employers' association of the wood processing and furniture industry in Sweden and represents approximately 700 member companies who jointly have around 30 000 employees*

The Swedish Federation of Wood and Furniture Industry welcomes the Commissions screening of environmental laws to identify legislative acts with significant potential for simplifying administrative tasks without affecting environmental protection. We suggest several legislations/legislative concepts for revision:

### **Regulation (EU) 2023/1115 on Deforestation-Free Products (EUDR)**

The purpose of the EUDR is to guarantee that only products free from deforestation are placed on or exported from the EU market. As currently designed, the regulation obliges every actor in complex supply chains to fulfil extensive traceability and due diligence requirements. This results in substantial administrative burdens and repeated verification of the same data. We recommend that these obligations should rest solely with the operator who first places the product on the EU market. Such an adjustment would reduce unnecessary duplication for downstream operators while fully safeguarding the legislation's environmental objectives.

The Swedish Federation of Wood and Furniture Industry emphasises that the current design of the EUDR represents a serious threat to the competitiveness of Swedish industry and poses a major challenge for our member companies. We therefore believe that a thorough review of the regulation is necessary to ensure that it can be complied with. TMF and our members fully support the regulation's overall aim of preventing trade in commodities that contribute to deforestation and forest degradation worldwide. However, we consider that the extensive reporting obligations and resulting administrative burdens risk constraining Sweden's wood-processing and furniture industries, without effectively addressing the underlying drivers of deforestation.

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#### **Extended Producer Responsibility (EPR)**

Producer responsibility schemes are included in several pieces of legislation to ensure that businesses remain accountable for products and packaging at their end of life. However, EPR systems are currently fragmented across member states, forcing companies to provide different datasets, to different platforms, at different times and in different formats. A harmonised and centralised reporting framework is therefore needed. This would significantly ease the administrative workload, lower barriers for SMEs expanding into new markets, and accelerate the transition towards a circular economy in a more efficient manner.

#### **SCIP Database**

The Swedish Federation of Wood and Furniture Industry recommends discontinuing the obligation to report to the SCIP database. Companies already submit equivalent information under REACH, which is sufficient to achieve the regulatory aims. The duplication of reporting requirements imposes unnecessary costs and resource demands, particularly in supply chains where data collection is highly complex. Moreover, the SCIP database has so far seen limited use by waste and recycling operators, raising doubts about its added value.

Furniture manufacturers in particular face numerous reporting obligations related to chemicals in their products. The SCIP database is one prominent example, requiring information on Substances of Very High Concern (SVHCs). New obligations are also emerging in product legislation, especially under the Ecodesign for Sustainable Products Regulation (ESPR), including the Digital Product Passport, where the proposed definition of "Substances of Concern" may cover a much wider range of chemicals than SVHCs under REACH. While TMF shares the ambition to increase transparency, we stress the need for a cautious approach: information should only be required if it is clearly relevant and effectively used by the intended recipients, whether customers or recyclers.

The experience of furniture companies with SCIP illustrates the significant compliance costs involved and the unclear practical use of the information reported. To truly support the circular economy, restrictions on problematic substances should be prioritised over extensive traceability rules. What is needed is the discontinuation of the SCIP database under the Waste Framework Directive, to rationalise and streamline reporting obligations.

#### **Nature Restoration**

The Swedish Federation of Wood and Furniture Industry strongly supports the European Commission's efforts to restore degraded habitats and strengthen biodiversity. Our sector is directly dependent on healthy and resilient forests. Forest ecosystems are therefore not only a cornerstone of biodiversity but also the very foundation of our industry. At the same time, ensuring Europe's competitiveness and long-term economic resilience requires a regulatory framework that is ambitious yet also clearly defined, economically viable, coherent, and implementable in practice.



While the objective of nature restoration is legitimate, the regulation as currently drafted raises serious concerns. Its requirements risk undermining affordable housing and property rights while limiting economic activity and creating disproportionate administrative burdens for Member States and businesses alike. Without a better balance between ecological, social, and economic considerations, the regulation could jeopardize Europe's attractiveness as a business location.

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