Proposal for Legal Inspection Requirements for Wooden Knock-Down Furniture

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Background:

In response to concerns regarding the quality of wooden knock-down furniture and the risks associated with excessive formaldehyde emissions, the Bureau of Standards, Metrology and Inspection (BSMI) proposes to require that wooden knock-down furniture be subject to mandatory inspection before being placed on the market. Applicants may choose either of the following two conformity assessment procedures: Registration of Product Certification (RPC) or Type-Approved Batch Inspection (TABI).

Proposed date of implementation: 1 January 2028

Products (HS/CCCN codes) covered and their applicable inspection standards:

Description of Goods	Inspection Standards	Conformity Assessment Procedure	Reference C.C.C. Code (the first 6 digits are the same as HS Code)
Wooden Knock-Down Furniture (limited to furniture made of wood materials intended for indoor use, composed of multiple components designed for self-assembly by the user, with a total surface area of 1,800 cm² or more per set, excluding furniture fixed to buildings or walls, suspended furniture, furniture made of solid logs, non-knock-down furniture, and furniture without any coating.)	CNS 11677: 2019	Type Approved Batch Inspection or Registration of Product Certification (Modules II+IV, II+V, or II+VII)	9403.40.90.00-8 9403.50.90.00-5 9403.60.90.00-3

Description of the two kinds of conformity assessment procedures

1. **<u>Type Approved Batch Inspection (TABI) Scheme</u>**
   Under this scheme, manufacturers or importers are required to have their products undergo type testing by the BSMI or by designated testing laboratories recognized by the BSMI, and to submit an application for Type Approval to the BSMI or its branches.

   After obtaining a Type Approval Certificate, manufacturers or importers are required to apply to the BSMI for batch inspection each time before the products are released from the production premises or arrive at the port of entry. The BSMI will then review the application and supporting documents, and may require additional samples for further testing where necessary.

   Once the products have passed inspection, they will be allowed to use the Commodity Inspection Mark, which is comprised of a graphic symbol with an identification number. The identification number shall consist of the Roman letter ‘T’ and a designated code (five digits) given by the BSMI. The application fee for a Type Approval

is NT$3,500, and the certificate remains valid for three years. The fees for type testing vary by products and are determined in accordance with the fee schedule of the relevant testing laboratories.

2. **Registration of Product Certification (RPC) Scheme: Modules II+IV, II+V, or II+VII**

   Under the RPC scheme, a combination of modules is applied to ensure that products comply with the applicable inspection standards at both the design and product stages. Module II requires products to undergo type testing by testing laboratories designated by the BSMI. In addition, the production premises must undergo assessment to ensure that products manufactured at those premises conform to the type-tested prototypes submitted under Module II. Depending on the applicable procedure, the assessment may cover the full quality management system under Module IV, the production quality management system under Module V, or factory inspection under Module VII.

   For Module IV and Module V, a registration certificate issued in accordance with CNS 12681, which is equivalent to ISO 9001, must be obtained from a certification body recognized by the BSMI. For Module VII, a factory inspection report issued by the BSMI or a BSMI-recognized factory inspection body is required.

   In addition, a declaration of conformity-to-type is also required to ensure that mass-produced commodities conform to the types specified in the type-test report.

   Once a product has been certified and registered by the BSMI, it will be allowed to use the Commodity Inspection Mark, which is comprised of a graphic symbol with an identification number. The identification number shall consist of the Roman letter 'R' and a designated code (five digits) given by the BSMI. Unless selected by RPC border checks, such products can clear customs directly without any further inspection. The application fee and annual fee for RPC are both NT$5,000 per product type, and an RPC certificate is valid for three years. If there are any serial products, an extra NT$3,000 is charged for each type in a series. The fees for type testing vary by products and are determined in accordance with the fee schedule of the relevant testing laboratories.

Locations to apply for type testing:

The BSMI, Keelung Branch, Taichung Branch, Kaohsiung Branch, or BSMI-designated testing laboratories.

Locations to apply for Type Approval or Registration of Product Certification:
The BSMI or its branches.

Time required for Registration of Product Certification:
Fourteen working days (The period pending submission of supplementary documents or samples shall not be included in the calculation. In cases where samples are selected for testing, an additional seven working days shall be added after the samples are delivered.)
Related requirements:

1. The inspection standards of the listed products shall be based on the version specified in this announcement. Where a new or updated version is issued, the BSMI shall announce its implementation date in a separate notice.

2. The C.C.C. Codes listed in the table are for reference only. Where a listed product is determined by the Customs Administration of the Ministry of Finance or the International Trade Administration of the Ministry of Economic Affairs not to fall within the listed reference C.C.C. Code, the product shall nevertheless complete the applicable inspection procedures before being placed on the market.

Others:
Relevant administrative requirements shall be carried out in accordance with the "Operation Directions Governing the Inspection of Wooden Knock-Down Furniture."