



European Furniture Industries Confederation



ECODESIGN FOR **S**USTAINABLE **P**RODUCTS **R**EGULATION

Upcoming Delegated Act on Furniture EFIC input in view of preparatory study

Making future furniture specific rules a success while ensuring proportionate requirements and fair competition

April 2026

The European furniture industry, represented by EFIC, the European Furniture Industries Confederation, welcomes the goals of the Ecodesign for Sustainable Products Regulation (ESPR). The lack of harmonised rules, combined with emerging national sustainability requirements, risks market fragmentation and increased burden on businesses. Setting EU-wide ecodesign requirements for furniture can ensure legal certainty, improve resource efficiency, and support circular design.

Going forward, EFIC wishes to be a close partner to EU institutions and consultants carrying out the preparatory study for our sector, to share sector-specific expertise and work together towards rules that are implementable on the ground and ensure a level playing field. A 360° assessment is needed to address furniture circularity - where ecodesign plays an important role - and the European furniture industry's specificities.



EFIC represents around 80% of the total turnover of the European Furniture Industries. In the EU, the sector employs 1 million people in about 130.000 enterprises and generates a turnover of over 100 billion Euros. The EFIC membership is composed of 18 national associations, one individual company member and several clusters. Further information can be found on our website: <https://www.efic.eu/>

1 GENERAL AND GLOBAL ISSUES TO CONSIDER ON THE NEEDS AND SPECIFICITIES OF OUR INDUSTRY

1A. Size of the companies in the European furniture industry: the furniture industry is largely made up of microenterprises and SMEs. Out of around 130.000 companies operating in the EU - employing around 1 million people - 85% are microenterprises with less than 10 employees, 12% small companies, 2% medium sized and less than 1% large companies (source: Eurostat). **Future rules should reflect the sector's SME profile** by keeping compliance practical and proportionate in terms of administrative effort, while ensuring the same obligations and enforcement apply across the value chain. **A dedicated impact assessment for SMEs is necessary.**

1B. Transition periods: The generic 18-month transition period may be insufficient across the industry – with challenges differing based on company size - and particularly for SMEs, which often have limited resources. However, the likelihood of a smooth transition to the delegated act and Digital Product Passport requirements depends heavily on the requirements themselves: whether they are information or performance requirements, whether production processes are affected, and whether certain data and information will be readily available in the supply chain at the time of the application of the rules.

- For example, 18 months is not sufficient time for companies to adapt - to performance requirements - every product they already sell to new rules. Adapting a product is a difficult task that sometimes requires changes in materials, others in design, production processes or supply chains. Adaptations in sales networks (relationship to dealers who showcase products to customers before orders for production are made) and investment needs should be considered as well. Depending on the requirement, on the company size, on its catalogue and the sales networks adaptations, more than 18 months may be required.
- Furthermore, 18 months may also be insufficient for many potential information requirements (e.g. carbon/environmental footprint) given complex (often global) supply chains, the lack of harmonised standards for data calculation, limited data availability and the lack of established systems to collect, verify and manage the required data at scale.

These aspects should be thoroughly considered when defining a transition time and in the impact assessment. We hence recommend a step-wise approach. Before setting any information or performance requirements, a thorough impact assessment based on reliable data should be carried out. More details in section **3D**.



1C. Ecodesign is only part of the toolbox to address furniture circularity. Other tools and legislation must be considered to complement ecodesign requirements, to 1) close the loop, to 2) ensure that valuable materials come back for further uses before they become waste and that companies have access to secondary raw materials. The preparatory study should therefore assess the entire policy mix and system conditions needed for furniture circularity to work in practice. This means: collection, sorting, value preservation and secondary material markets, financial incentives for service model adaptations, as examples. Product regulations must be designed to be effective and enforceable in the real economy.

- **Concentrating mainly on the design phase risks not addressing existing gaps in system conditions and lack of waste infrastructure.**
 - For example, there are no widespread collection schemes and facilities across Member States to ensure that furniture does not end up incinerated or in landfills, nor systems for sorting and recycling of furniture at the end of its lifecycle. A furniture piece that complies with the future ecodesign rules should not end up landfilled or incinerated because of lacking waste infrastructure. This underlines that ecodesign requirements must be complemented by measures that build the necessary downstream capacity and remove regulatory bottlenecks, otherwise compliance may not translate into circular outcomes.
 - There is also no functioning market for secondary raw materials. The market needs to adapt accordingly and it will take time. The furniture specific rules must be proportionate in this context.

➤ **These gaps and possible tools (together with regulatory barriers to waste ownership) could be considered in e.g. the upcoming Circular Economy Act.**

➤ **The preparatory study should also identify where EU-level harmonisation is needed** (e.g. collection and sorting approaches, definitions and guidance) to avoid fragmentation across Member States.

- **Mandatory Green Public Procurement (GPP) for contract furniture can significantly accelerate circularity by shifting large-scale public demand toward sustainable, repairable, and low-carbon products.** When governments make sustainability criteria mandatory for furniture contracts (schools, offices, hospitals), suppliers must adapt to stay competitive. Mandatory GPP can also encourage new business models, such as furniture-as-a-service (leasing) or refurbishment contracts.
- **Future product specific legislation should better and in a more direct way recognise and reward companies that already implement circular business models.** Take-back schemes, leasing models, refurbishment operations, remanufacturing loops could achieve equal or greater outcomes than prescriptive product requirements.



1D. Company practices that already contribute to the goals of the ESPR should be recognised in the underlying future regulatory system. Additional requirements that do not yield additional environmental benefit to the effect goals of the Regulation or that are superfluous considering the already attained objective should be avoided and **trade-offs between future requirements should be considered.**

1E. European industry should not be disadvantaged compared to imports: the EU is a net importer of furniture, with imports worth 69 billion EUR (the figures include intra-EU trade - source: CSIL, including UK, NO, CH, IS). The EU produces around 103.5 billion EUR worth furniture (source: CSIL, including UK, NO, CH, IS). The share of imports is hence significant.

- **In a context of low market surveillance and customs controls, new world trade dynamics and expected increasing imports from third countries, also from e-commerce platforms, the upcoming rules should be proportionate and not penalise European companies compared to third country imports.**
- **A level playing field is needed, increasing market surveillance and preventing potential uncompliant imports from third countries.** Without effective market surveillance, ambitious product rules risk becoming a competitive disadvantage for compliant companies rather than a driver of circularity. To this end, the requirements under market surveillance shall be easy to verify, using mechanisms that ensure the data is up to date, complete, accurate and, consequently, verifiable (in accordance with the ESPR requirements set out in Article 5(12) and Article 9(1)).



2 SCOPE, STRUCTURE AND FUNCTIONAL SUB-CATEGORIES IN THE FURNITURE DELEGATED ACT

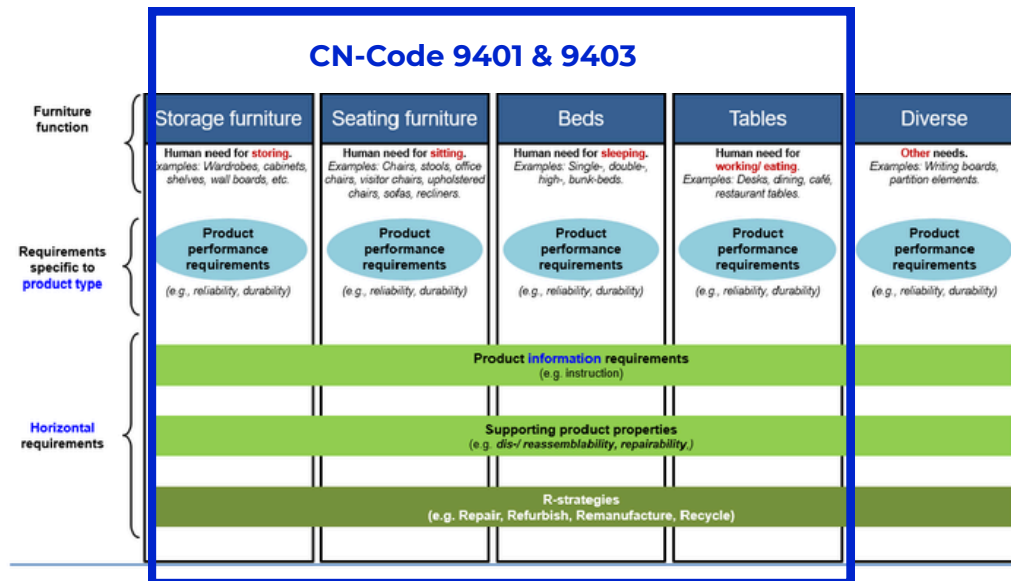
2A. One single Delegated Act covering the core categories of furniture based on function could be both practical and effective. A single delegated act can, in principle, and based on a preliminary assessment, encompass all furniture types listed in the scope based on a functional approach - but only if it applies flexible, differentiated and functionally adapted criteria. This results-oriented approach focused on the main ESPR's impact targets supports practical, verifiable and targeted sustainability improvements across the sector.



2B. Pending an assessment within the preparatory study, the Delegated Act should apply to furniture products classified under CN Chapter 94, specifically headings 9401 and 9403, in accordance with Regulation 2658/87, as amended by Regulation 2024/2522. EFIC recommends a clear scope, with the definition of the product group(s) including product descriptions and relevant commodity codes in the Combined Nomenclature (CN), as required under Article 8(a) of the ESPR. All possible exceptions should also be addressed within the preparatory study.

2C. To ensure coherence with CEN/TC 207 and facilitate implementation, furniture should be categorised into the functional groups (aligned with standardisation) storing, seating, sleeping, working/eating:

- Storage furniture (e.g. cabinets, wardrobes, bookshelves)
- Seating furniture (e.g. chairs, sofas)
- Bed frames (excluding mattresses)
- Tables and work surfaces (e.g. dining tables, desks)



Nota bene 1: in CEN TC 207 a category 'Diverse' exists for furniture products that do not necessarily fall under CN code 94.

Nota bene 2: If, during the preparatory phase, specific furniture types are identified that do not clearly fit into the listed sub-categories, the Commission may define targeted requirements for those products in a future revision of this act or through annexes.

Why such an approach?

- **This will ensure continuity, legal clarity, and cost-effective implementation.** It will also avoid market fragmentation and duplication of conformity assessments, particularly for SMEs, by building on existing test standards and functional classifications.
- **This categorization is in line with industry practices, existing CEN standardisation committee structures, and the EN standards developed there,** and thus supports regulation. It also provides the structural basis for differentiated performance and information requirements in the future delegated act.

3

DEVELOPING WORKABLE ECODESIGN CRITERIA

3A. The development of the delegated legal act for furniture should take place in parallel with the standardisation work of CEN/TC 207 (Furniture).

- This technical committee is actively developing standards to support the implementation of the ESPR. A standard for evaluating the ability of furniture to be disassembled and reassembled was published in 2023, and a new guideline standard on reliability and the evaluation of maintainability, repairability, and refurbishability, as well as an evaluation standard on upgrading, are currently being developed in parallel.
- For decades, CEN/TC 207 has been developing standards for reliability^[1], which in themselves contribute to improved product life and sustainability.



3B. Refrain from prescribing (or limiting) specific materials or design solutions. The delegated act should define outcome-based requirements, allowing manufacturers to determine the most effective means of compliance, based on their product designs and supply chains. Companies need flexibility in the composition of materials and design configurations.

3C. Ecodesign requirements should follow a step-by-step development pathway. This means starting from practices already used in the industry or feasible to scale up, while delivering measurable environmental improvements. This is particularly important where evaluation methods are not yet available – thus no harmonised, comparable data and no robust basis for benchmarks or thresholds – and relevant standards are still under development. Rules should be progressively refined as technologies mature and new methods become available. Complementing waste policies should in parallel address waste infrastructure loopholes.

[1] Note: Although the term ‘durability’ has been used in standards in the past, like this, it refers to ‘reliability’.

3D. Comprehensive impact assessments are essential

- **Before setting any information or performance requirements, a thorough impact assessment based on reliable data should be carried out.** This analysis should examine the impact of each proposed requirement on environmental outcomes, consumer benefits, and industry - such as administrative burden, compliance costs, and effects on long-term competitiveness. It must also confirm the availability of reliable data, appropriate harmonised evaluation methods, and relevant standards to ensure comparability and legal certainty.
- **The assessment should also determine whether information, performance, or a combination of both types of requirements are appropriate and justified.**
 - Where data, methodologies, or standards are not yet sufficiently developed, a stepwise approach may be considered - potentially starting with information requirements and introducing performance requirements once methods and data have matured and where it becomes apparent that the transparency provided by the information requirement does not achieve the effect goals for our sector. This is essential to ensure that any performance thresholds applied are then feasible, robust, verifiable, and enforceable.
 - At the same time, it is important to recognise that information requirements are not inherently less burdensome and may, in some cases, demand more resources from companies than performance requirements, especially where extensive upstream data collection is required. E.g. a proportionate performance requirement on a lifetime legal guarantee could be less burdensome than carbon or environmental footprint information requirement. Therefore, here too, the step-by-step approach should be considered in terms of the effort involved and the added value that can be achieved starting with what is feasible and verifiable within the available timeframe.

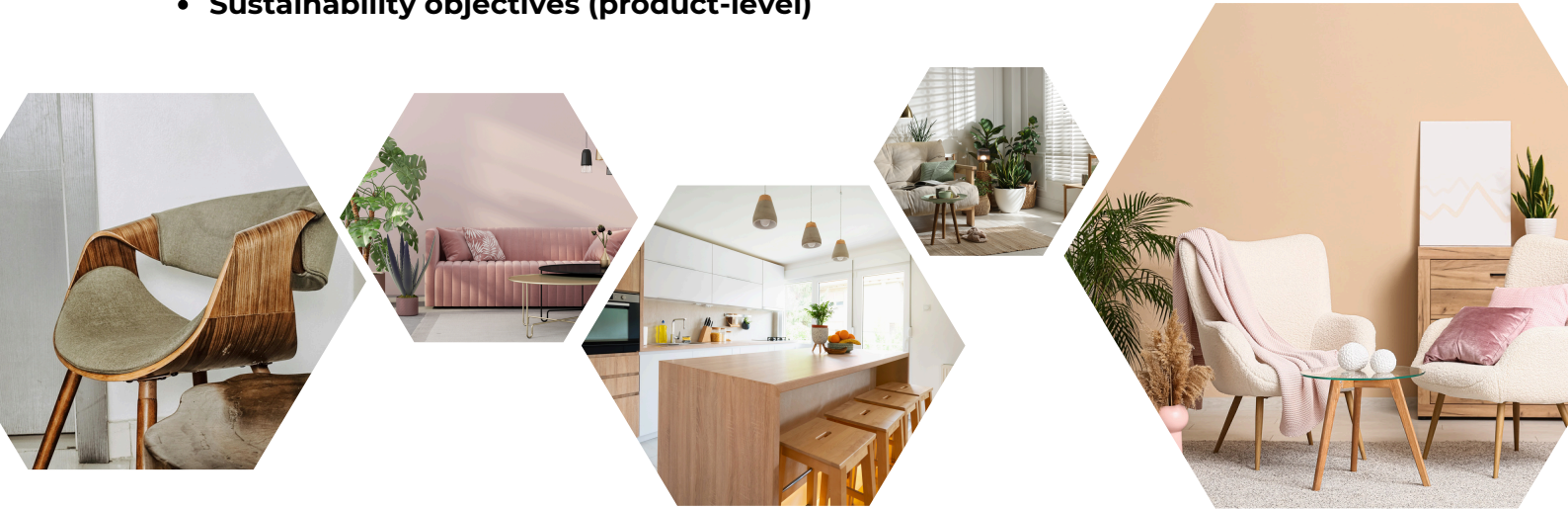


3E. A product/function-specific approach is needed. This approach recognises the diversity of materials, functions and design configurations found across the furniture sector and supports industry flexibility and design freedom.

- **Information obligations**, such as those included in the Digital Product Passport (DPP), **may be horizontal across the furniture sector.**
- However, **performance thresholds – should they be deemed necessary – must be differentiated by functional sub-category** (e.g. seating, storage, tables/work surfaces, bed frames). Even within a sub-category, granularity may be necessary (for example office chair versus dining chair).

3F. The delegated act for furniture should be guided by a clear hierarchy of sustainability objectives (product level) and effect goals (system level), in line with the priorities identified in the Commission's Work Plan 2025-2030 and supporting technical analysis from JRC.

- **Effect goals (desired outcomes for the sector):** 1) Reduced waste generation by increasing lifetime; 2) Improved resource efficiency leading to lower greenhouse-gas, acidification and eutrophication emissions associated with material extraction and processing.
- **Sustainability objectives (product-level)**



3G. To deliver on the effect goals, as a first step, the ecodesign framework could prioritise at product level requirements for:

- **Product lifetime**
 - **Reliability** (the probability that a product functions as required under given conditions for a given duration without an occurrence which results in a primary or secondary function of the product no longer being performed, according to Art. 2(23) of the ESPR). **Expressed through technical lifetime** (according to Annex I paragraph 1 lit.a), or,
 - **Durability** (the ability of a product to maintain over time its function and performance under specified conditions of use, maintenance and repair, according to Art. 2(22) of the ESPR). **Expressed through guaranteed lifetime** (according to Annex I paragraph 1 lit.a).



Considering that there is no established methodology for determining product lifetime, and that how long a product lasts in practice depends on subjective factors such as user behaviour that are outside manufacturers' control, the preparatory study could consider addressing reliability via legal guarantee (and where applicable commercial guarantee) periods. Since durability can be understood as reliability plus maintenance and repair (acc. to the definition in Art. 2 (22) ESPR), the preparatory study could also explore an approach that includes both guarantee periods and parameters for ease of repair and maintenance (Annex I paragraph 1 lit.b). This could potentially be supported by classes of performance differentiating levels or reparability or durability, where appropriate, as suggested in the ESPR recitals (29) and (30)).

- **Use of recycled content for suitable material inputs – considering that requirements regarding recycled content must be differentiated with respect to different materials and designed as part of an integrated set of ecodesign measures**, so that the highest improvement potential in environmental performance, lifetime and resource efficiency are reached without disproportionate costs.
 - Any requirements for recycled content must consider differences in the availability and quality of materials, varying definitions of what qualifies as recycled for different material types, lack of methodologies to calculate and verify recycled content, and possible impacts on other product aspects, including durability and lifespan.
 - The preparatory study may identify the need to require different levels of recycled content for different materials; however, the granularity of such requirements must remain manageable and verifiable, including for market surveillance authorities. Where appropriate, differentiation should therefore be implemented at a functional product level (or within functional product groups), while still being material-aware, to allow manufacturers the flexibility to select suitable material combinations themselves.
 - The delegated act should prioritise requirements on materials with the highest impacts but avoid prescribing the use of specific materials, and should allow for batch variation and multi-material products. It should also recognise the role of sustainably sourced renewable materials (e.g. wood) alongside recycled inputs.

➤ **These priorities under 3G are proposed as a first step. The preparatory study should define the appropriate methods, definitions, verification approach and potential thresholds, building on relevant standardisation work.**

➤ **These objectives at product level should contribute to achieving the effect goals at system level by enabling lifetime extension in use (longer technical lifetime together with ease of maintenance and repair), thereby waste reduction and lower virgin-material demand.**

➤ **The objectives are applicable across all furniture sub-categories and can be adapted to different product functions and material compositions.** Indeed, in line with Article 18 ESPR and the Working Plan methodology, measures should be prioritised where they offer the highest improvement potential in environmental performance and resource efficiency without disproportionate costs.



3H. Substances of concern (SoC) – a targeted, coherent and workable approach is essential.

- EFIC supports addressing substances of concern in furniture, but requirements must be risk-based, proportionate and fully coherent with existing EU chemicals legislation (notably REACH, POPs and CLP) to avoid duplication, conflicting obligations, and legal uncertainty.
- Any SoC-related information in the Digital Product Passport should therefore be targeted and evidence-based, focusing first on substances already identified under EU law (e.g. SVHC/authorisation/restriction, POPs) and on uses relevant for furniture (such as specific surface treatments, coatings, adhesives, foams and textiles).
- EFIC suggests a staggered implementation, by requiring one or two groups (hazard classes) of SoC to be implemented at the time and with enough time to collect reliable data.
- Disclosing SoC in complex articles and their reporting threshold should align with the EU REACH Regulation and the SVHC 0.1% limit. It is also argumentative that the requirement to inform about SoC must first apply to chemical products before technical documentation and supply-chain declarations, and should not trigger new testing or analytical burdens unless clearly justified and feasible for SMEs.
- SoC information should be made available through different access levels (public / professional users / competent authorities) on a strict need-to-know basis, with legally binding confidentiality safeguards for non-public data and protection of trade secrets. This approach strengthens consumer and worker protection while keeping requirements practical, enforceable and applicable to all products placed on the EU market, including imports.



4 DIGITAL PRODUCT PASSPORT & ESPR LABEL

4A. The Digital Product Passport is a key element to provide relevant information to different actors across the lifetime of a product. Data requirements must be proportionate, on a need-to-know basis, no requirement should result in mandatory public disclosure of commercially sensitive information and no duplication of documentation should exist. The specificities of the DPP should be carefully assessed within the preparatory work, to ensure that the tool will not bring disproportionate administrative burden to companies and that it delivers to the goals of the ESPR.

4B. The possible usefulness of an accompanying ESPR label should be assessed during the preparatory work.





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