

November 2025

European Furniture Industries
Confederation response to
The European Commission's public
consultation on the Circular
Economy Act

1. BACKGROUND

The European Furniture sector follows closely and contributes to several initiatives under the European Green Deal, including the Ecodesign for Sustainable Products Regulation (ESPR) or the Waste Framework Directive, to name a few. In this context, we welcome the opportunity to provide comments to the Commission’s public consultation on the [Circular Economy Act](#).

The European furniture industry is in line with the Green Deal’s ambitions, including making sustainable products the norm in the EU. Furniture products can be designed for longevity and one of the most prominent raw materials for the industry is wood, which is renewable. Some best practices in the sector already exist and many more are to come as we transition to a more circular economy, our main expected contribution to climate neutrality objectives.

For the circular economy to work, harmonised rules will be needed at EU level, preventing a patchwork of national divergent requirements. While the ESPR can drive a circular economy forward, it focuses on products. Hence, a holistic approach is recommended, and a combination of tools allowing scalability of solutions to fully close the loop and enable a real transition to the circular economy. Innovation and investment needs, as well as sufficient time for their deployment, should also be considered.

We welcome the ambition of the Circular Economy Act to facilitate the free movement of circular products, secondary raw materials and waste, while increasing the supply of high-quality recycled materials and stimulate demand for these materials in the EU. We urge the Commission to ensure the Act is both transformative and workable, laying the groundwork for a harmonised, innovation-friendly circular economy and Extended Producer Responsibility (EPR) schemes that sustain EU competitiveness and deliver practical results on the ground.

Kindly find below our recommendations.

2. OUR RECOMMENDATIONS

1. Foster the Single Market for waste and secondary raw materials

a) Support to SMEs and regulatory practicability

The European furniture industry is a creative, versatile and dynamic sector, composed mainly by SMEs and microenterprises. Our industry is part of a complex value chain, with a broad range of designs, products and materials. Some companies produce customised furniture; are project based or produce in small quantities. In this context, it is important to reduce administrative burden to allow companies to focus on innovation, new product development and new business models uptake. Equally important is to ensure that legislation can be effectively implemented on the ground and that is harmonised at EU level.

What is needed:

- **Adequate transition periods** and realistic timelines for the implementation of new requirements.
- **Clear guidance and capacity-building tools** to help SMEs understand and comply with new rules.
- **Access to financial support** for circular business model innovation, digital tools (e.g. for product passports and lifecycle analysis), and eco-design adaptation.
- **Avoidance of overregulation and administrative complexity** that may prevent smaller firms from engaging fully in the circular transition.

b) A strong EU market for secondary raw materials

EFIC highlights the need to ensure the availability of raw materials that are needed for the circular transition and their efficient use, and that valuable secondary materials that can be reused in products are not wasted or end up in incineration, landfill or energy recovery. In a context where the extraction of new raw materials has a high impact for the environment, we need to increase the use of secondary raw materials. Today, we don't have the capabilities in Europe yet (e.g. infrastructure, quality of recycled material at a competitive price) to reach the ambitious goals of the Green Deal.

What is needed:

- **Revise uniformly the definition of waste.** This would remove regulatory barriers to waste ownership due to the current definition - which results in expenses or restrictions for its transport or storage – and would in turn enable more repair or refurbishing and a higher material recycling (or material recovery) of secondary raw materials. This would also lead to more commercial actors to make use of what is today called waste, but which is actually a resource. A new status for used products that travel back to the original producer or reuse/repair/refurbish facilities should be created in order to avoid the status of traditional waste manager for companies that are willing to invest in prolonging the life of products.



- Applying an **obligation for the cascade use of materials** (material recovery before energy recovery), to ensure there is no competition for wood waste, residues and industrial grade wood and that these are not diverted from material use (e.g. in particleboards) to energy use. Deter Member States from providing financial and other incentives which could divert the use of wood from the furniture industry to be used as biomass for energy. Financial incentives and tax breaks artificially skew the market towards biomass for energy, reducing the availability of precious raw material for the wood-based panels industry and thus for the furniture industry.
- **Harmonise the definition of recycling as material recovery** and prioritise of material recovery in the EU: today the definition of recycling in the WFD is ambiguous and leaves room for interpretation at Member States level. There is potential to harmonise the definition and align it with the waste hierarchy. Harmonisation would allow for more comparable monitoring across the EU. It is very important to harmonise also:
 - the detailed definitions of various types of reuse (reuse of products, reuse of materials from waste) and various types of recycling processes (mechanical/thermomechanical, physical, chemical).
 - the related «end of waste» rules and status in each case.
 - the related recognition of each case to calculate recycled content.
- Implement **mandatory Green Public Procurement criteria**, to stimulate circular business models and secondary raw material markets. Voluntary uptake often leads to fragmented demand, while mandatory procurement ensures harmonised application across Member States.

c) Harmonised and effective Extended Producer Responsibility Schemes

A mature EPR system may establish relationships between producers and their customers, which may in turn support and accelerate transformation towards a circular economy. It may incentivise producers and industry to develop more recyclable products and materials, leading to longer product lifetime and to higher awareness and participation among consumers concerning recycling. A scattered approach to Extended Producer Responsibility (EPR) rules creates uncertainties and inconsistencies, undermining efforts for incentivizing better, circular practices, and creates barriers to the single market in EU. Even when common EPR rules exist in the EU, such as under the EU Packaging and Packaging Waste Directive, reporting requirements still vary across Member States. Legislation often sets only general obligations, while organizations responsible for collection and sorting define the detailed requirements. For companies, this leads to disproportionate administrative burdens, duplicated supply chain adjustments, and uneven environmental outcomes.

What is needed:

- **When developing EU rules under the Waste Framework Directive**, ensure that requirements can be replicated in all Member States efficiently and equally. To support compliance, obligations must be put in place for online platforms.
- **When EPR schemes are developed at national level for a certain product group**, they must be established based on harmonised rules at EU level (the Waste Framework Directive).



- **Under EPR schemes, ensure:**
 - a) a harmonised scope of products based on the CN code and a common definition of producers;
 - b) that registration requirements are harmonised and that a centralised registration is created via a Union-wide register, or other solutions that ensure that each company register in one national register only, to avoid multiple registrations and double payment of fees;
 - c) harmonised reporting obligations and consistent measurement indicators (what to report and how often), as today for products subject to EPR schemes, there is a multitude of requirements on reporting and periodicity, leading to administrative burden;
 - d) harmonised fee modulation across Member States;
 - e) uniform labelling requirements for materials/separation instructions.
- **Consider the work of CEN TC 473 – Circular Economy, WG 3** that is in the early stages of developing an EN ISO Standard for Extended Producer Responsibility and potentially a guiding document for Producer Responsibility Organizations that will help create more harmonisation.
- Eliminate the obligation for producers to **appoint an authorised representative in every Member State**—this should be replaced with a harmonised, EU-wide recognition system or other solution that involve the national distributors, so that companies are not required to navigate 27 different national systems
- **Ban state-run PROs and remove all references to state-run systems from EU legislation.** A basic principle of EPR is that the payment of a fee is linked to the delivery of a service, shifting responsibility for waste management away from the public sector to the producers. Contrary to this, state-run models might entail that the fees collected from different producers will be used to finance the general state budget, rather than being reinvested in waste management operations for different waste streams.
- **Reduce regulatory fragmentation** by ensuring Member States cannot deviate from key obligations, such as separate collection and labelling requirements under the Waste Framework Directive. Regular reporting on coverage and performance of collection systems should be implemented to ensure accountability.
- Ensure **coherence and streamlining of the rules with parallel legislative initiatives**, such as **PPWR, Waste Shipment Regulation, Ecodesign for Sustainable Product Regulation, Renewable Energy Directive**, ensuring that roles are clearly defined and not duplicated.



d) Investment in collection and refurbishment infrastructures

We believe that Europe lacks the infrastructure needed to fully close the material loop in the furniture sector.

What is needed:

- Create **Trans-Regional Circularity Hubs**, as proposed in the EU Commission's **Clean Industrial Deal**. As a complementary measure to the development of national sorting and recycling infrastructure, these hubs will maximise the potential of the Union market and promote economies of scale in recycling. Trans-Regional Circularity Hubs should be established as soon as possible to allow Member States lacking sufficient sorting or recycling infrastructure to send their (packaging) waste to neighbouring countries, ensuring that (packaging) waste is effectively recycled. The establishment of Trans-Regional Circularity Hubs holds significant potential to modernise the application of the proximity principle, as enshrined in the WFD and the Waste Shipment Regulation (WSR). These hubs could help align the principle with 21st-century realities, ensuring its implementation supports both the integrity of the Single Market and the EU's ambition to foster a well-functioning market for secondary raw materials.
- Explore the **establishment of a 28th legal regime**, already introduced in the **EU Competitiveness Compass**, to streamline and fast-track registration or authorisation procedures under different EU waste-related legislations, reducing unnecessary burden for businesses operating in the Union and fully implementing a principle of mutual recognition.
- Enable and incentivise the **creation of take-back and refurbishment schemes**, including return logistics systems and reuse markets, by making it more lucrative to conduct that type of business. This could be achieved by changing and revising uniformly the definition of waste (see point 1b).

e) Advancing the development of Circular Lead Markets

The discussion and relevance of **lead markets** is increasing in the context of the circular economy, as major challenges remain with the low demand for circular end products. At the European level, the basis for lead markets is already being created in various regulations (such as the ESPR, the PPWR, among others). Nevertheless, these challenges need to be addressed within the framework of the Circular Economy Act.

There is a **multitude of regulations, labels, and requirements**, making it difficult to gain an overview of the processes, lead to uncertainty, and inhibit investment decisions. At the development stage, difficulties arise due to differences in the basis for the database used to report relevant product information. The databases used to report environmental data/life cycle assessments (LCA) differ between, for instance, ESPR, Construction Products Regulation and the Battery Regulation.

- ESPR could possibly use, among other methods, the Product Environmental Footprint (PEF / Product Environmental Footprint Category Rules, PEFCR) for LCA values in addition to requirements from delegated acts.
- CPR uses Environmental Product Declarations (EPD) in accordance with EN 15804 and recognised Life Cycle Inventory Databases (LCI Databases).



- Battery Regulation: A delegated act specifies the method for the carbon footprint.

What is needed:

- **Harmonisation is necessary** to ensure **interoperability** between product categories and legal acts.

2. Ensuring effective recycling of electronic and electrical equipment

a) Revision of WEEE2 Directive

In principle **as furniture is already included in other circular/recycling tracks** (e.g. wood), **it is not under the scope of WEEE2**. However, **electrical components installed in furniture are in the scope** of the WEEE2 Directive. We also understand that there may be special cases where furniture or furniture parts with electrical components as a whole are also considered electrical appliances and in the scope of WEEE2. This is the case mostly for certain beds, seating furniture and other pieces of furniture with specific electrical features.

The **recent evaluation of the WEEE2 Directive** highlighted the need for a new approach to improve collection, treatment, and market incentives. In particular, the evaluation highlighted challenges related to consumer perception for specific **open scope products like furniture** that have integrated electronic components and need electricity to fulfil their basic function. Such products may not be disposed of as WEEE because consumers do not recognise them as such.

The **practicality of disassembly of the electrical components in the furniture is the key**. The end consumer is expected to comply with the law with self-responsibility. If dismantling of electrical components installed in furniture is reasonable it is the duty of the producer or owner of waste to separate them in accordance with the manufacturer's instructions and to forward them to the designated recycling circuits by transfer to public waste disposal companies.

What is needed:

- **Consultation with industry experts to address the boundaries between a piece of furniture and an electrical appliance.** In Member States represented by EFIC, this classification is stricter and more complicated ('functional unit' approach) and means that disassembly is a necessary but not sufficient criterion. As a result, manufacturers are less keen to ensure easy disassembly because the furniture is considered a 'functional unit' and therefore an electrical appliance, and must be registered as such (with the corresponding weight). In addition to the resulting problems with 'non-standard materials' (e.g. foams, wood) in the respective waste streams, this then leads to the collection rates listed in statistics being distorted accordingly, because the weight of the actual electrical appliance is only a small fraction of the weight of the furniture.



EFIC is the European Furniture Industries Confederation representing 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 19 national associations, one individual company member and several clusters. Further information can be found on our website: <https://www.efic.eu/>

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