

ESPR preparatory study on Furniture – Initial questionnaire (launched in May 2026)

European Furniture Industries Confederation (EFIC) input **Summary accompanying questionnaire**

July 2026

Please note that the input does not follow the structure of the questionnaire and it is rather divided by topic area.

1. Initial considerations

- **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 17 national associations, one individual company member and several clusters. Further information can be found on our website: <https://www.efic.eu/>
- 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.
- **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.
- **In April 2026 EFIC published a position paper** in view of the launch of the preparatory study for furniture under the ESPR (accessible [here](#)), providing input to make future furniture specific rules a success while ensuring proportionate requirements and fair competition.

2. Implementation and market surveillance control

- **The European furniture sector is dominated by micro-enterprises and SMEs** (>85% of the companies in the sector are microenterprises). Transition periods, guidance and administrative obligations therefore need to remain realistic and manageable.
- **Requirements should be introduced gradually, following a step-wise approach** and supported by thorough impact assessments, reliable evidence and harmonised standards before becoming legally enforceable.
- **Effective market surveillance and customs controls are essential** to ensure that ambitious EU requirements do not disadvantage compliant European manufacturers vis-a-vis imported products. Rules should therefore be straightforward to verify and enforce, including for imports and online sales channels.
- **Maintaining a level playing field is considered increasingly important given growing imports** driven by global trade and e-commerce, especially from Asia. 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

3. Scope, product definition and regulatory approach

- **EFIC represents the European furniture industry across functional categories** (furniture CN codes 9401 and 9403 mainly) including storage, seating, sleeping and working/eating furniture, used in domestic, non-domestic (office and contract furniture), indoor and outdoor settings and manufactured from a wide range of materials.
- **Furniture should be categorised primarily according to its function** and aligned with the work of CEN/TC 207 (storage, seating, sleeping, working/eating). The ESPR scope should build on the CEN furniture definition, currently under development, and any grey areas around circular definitions should be addressed in the upcoming EU Product Act.
- **A single Delegated Act covering the core functional furniture categories is considered the most practical approach**, reducing fragmentation, duplicated conformity assessments and disproportionate compliance costs.

4. Product requirements for circularity – Overall approach to closing the loop

- The **Ecodesign for Sustainable Products Regulation (ESPR)** should focus on those **areas where it can deliver the greatest environmental impact** while ensuring reasonable costs, legal certainty and technical feasibility. For furniture, the Commission's Working Plan and JRC analysis identify reducing waste and improving material efficiency as the areas with the greatest potential gains, and these are also the aspects where product design can have the strongest influence.
- A fundamental principle is that **ecodesign requirements must be based on harmonised definitions, measurable and verifiable criteria, and existing European standards**. Terms such as durability, reliability, maintenance, repair, refurbishment, reuse and upgrading should be clearly defined at product-group level, as they are currently interpreted inconsistently and often overlap.
- **Before introducing information or performance requirements, a robust impact assessment** – including on costs - **should confirm environmental benefits**, proportionality, availability of reliable data, harmonised methodologies and standards, while also considering impacts on competitiveness, **particularly for SMEs**.
- The **furniture sector is highly diverse and circularity aspects cannot be assessed in isolation**. Their relevance depends on the specific product, its function and intended use, and there are often trade-offs between different sustainability objectives. Consequently, **a one-size-fits-all approach is not appropriate** and **requirements should remain tailored to different product types**.
- **Circularity requirements should establish environmental objectives while leaving manufacturers the flexibility to determine the most appropriate design solutions, materials and technologies**. Regulatory intervention should focus on effect goals - such as longer product lifetime, reduced waste generation and improved recyclability - rather than prescribing specific technical solutions.



- **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.
- The **main priorities for future requirements** to be deployed should therefore be the following, considering differences in products and the need to address the products with the most suitable strategy for each:
 - **extending product lifetime** through reliability, maintenance and repair;
 - **improving material efficiency**, including the use of recycled content where appropriate and technically feasible; and
 - **designing for recyclability that supports effective end-of-life treatment.**
- **Reliability and repairability – and thus the resulting durability – should be given the highest priority**, as they form the basis for extending the product's service life. The ability to maintain and repair products should be determined in conjunction with reliability, using a harmonised methodology, in order to assess durability. **Existing work within CEN/TC 207** on Furniture on evaluation methodology for repairability, maintainability, refurbishability and upgradeability **should form the basis for future approaches.**
- **The recycled content** – like many other circularity indicators – **must always be assessed in conjunction with other circularity aspects.** Evaluating it in isolation can lead to misleading conclusions. From a resource conservation perspective, recycled content is often considered a high-priority indicator, as increasing the use of recycled materials can reduce the consumption of virgin resources. However, technical and manufacturing considerations must also be considered. In many applications, higher recycled content can affect material processability, limit performance, or reduce the reliability and durability of the final product.
- There is a strong **commitment to increasing the use of recycled content.** However, **significant challenges remain** and need to be carefully considered when developing requirements to avoid unintended consequences. It is essential to ensure that any requirements are proportionate, verifiable and harmonised.
- 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.
- **Regarding recyclability, requirements should focus on design for recycling, while recognising that established mechanical and technical separation processes already exist.** Simplified assumptions such as "detachable is better than glued" or "mono-material is better than multi-material" do not reflect the technical realities of furniture design and may not improve durability, circularity or recyclability.



- The furniture sector has already developed tools and methodologies to support circular product design. **CEN/TC 207 WG 10 has already published a standard on dis/re-assembly** (EN 17902 Furniture - Circularity - Evaluation method for dis/re-assembly capability), and **work is ongoing on other two standards**: “Furniture - Circularity - Evaluation method for maintenance, repair and refurbishing capability” and ‘Furniture – Circularity – Evaluation method for upgrade capability’.
- Moreover, it is important to recognise that **the furniture manufacturer represents only one part of a much larger circular ecosystem**. Achieving **circular material flows requires contributions from multiple actors**, including material suppliers, recyclers, waste management operators, collection systems, Extended Producer Responsibility (EPR) schemes and consumers. **Efforts should therefore be directed at the actors that are best placed to influence** the relevant outcomes. For example, increasing the use of recycled content depends not only on furniture manufacturers, but also on the availability of suitable recycled materials and components, effective collection systems and well-functioning recycling infrastructure.
- The **ESPR should therefore be aligned with waste collection systems, EPR schemes and recycling infrastructure, all of which require further development**. Similarly, **circular business models and services** such as repair and refurbishment shall be funded through **appropriate incentives** and favourable framework conditions to encourage reuse. Without these complementary measures, even well-designed product requirements may fail to deliver meaningful circular outcomes in practice.
- The **ESPR and future delegated act for furniture represents a major opportunity to address the use - because of fragmented flammability requirements across Member States - of unwanted flame retardants in furniture production. A harmonised approach is needed**, having the cigarette test (EN1021-1), a smoulder ignition test, as a basis for harmonisation. In most Member States flame retardants are necessary to meet flammability standards for certain products on the furniture office, contract and public market. **Reducing the use of unwanted toxic flame retardants in furniture would support the industry in complying with potential product aspects like presence of substances of concern, design for recyclability**, among others. The [ECHA 2023 regulatory framework on flame retardants](#) (page 8) identified that if product specific requirements will be set via the ESPR, harmonisation of national flammability standards will be needed as a consequence, to avoid contradicting frameworks.
- Finally, **all design characteristics should be evaluated holistically, recognising the trade-offs between recyclability, reliability, safety, functionality, costs and design freedom**. **Prescriptive detailed requirements risk limiting innovation**, competitiveness and the creative freedom necessary to develop attractive, durable furniture that consumers choose to keep for longer. A performance-based framework built around reliability, durability, material efficiency and recyclability is therefore more likely to achieve the objectives of the ESPR while preserving innovation and proportionality.



5. Life Cycle Assessment and environmental metrics

- EFIC considers that **lifecycle assessment methods are not a suitable tool to address furniture circularity**, as they are not relevant to measure performance related to prolonging lifetime and reducing waste generation, the two goals identified by the Joint Research Centre in relation to the furniture industry. On the contrary, lifecycle assessment methods are used to measure direct effects on climate, whereas impacts on climate change have not been identified as a major area to address when it comes to the furniture industry.
- In the furniture sector many materials are used, there is broad range of designs, and a **single environmental footprint value will not be useful to measure performance**.
- **Calculating environmental and carbon footprints at product level currently faces several obstacles**, such as no harmonised calculation method at EU level, the workload and costs associated to calculating footprints for companies, complexity of global supply chains, for example.
- Therefore, we believe that for the furniture sector, **the focus should be placed on criteria related to lifetime extension**, instead of lifecycle assessment methods. Legislation focusing on resource efficiency and circular resources flows (to cut waste generation), will already lead to a large decrease in climate impact.

6. Digital Product Passport - DPP

- **The DPP should be introduced step-by-step with realistic timelines** and in accordance with the **“need-to-know” principle** (when defining data points and methodology for formalised data) to ensure that implementation remains feasible for all economic operators.
- **The DPP should be based on existing international identification and classification standards** (e.g. GTIN, GLN, ECLASS) and ensure interoperability between IT systems. It should also clearly define responsibilities for data provision;
- Consideration should be given particularly to **the large number of SMEs and micro-enterprises** in the furniture sector and to the **complexity and fragmentation of many supply chains**. **Tracking and traceability obligations should be proportionate** to their intended objectives and should not create excessive administrative burdens. In this context, we encourage the Commission to consider the challenges encountered during the implementation of the EUDR, particularly regarding the implementation of the traceability requirements, and to draw appropriate lessons from these experiences when designing the DPP requirements.
- **Commercially sensitive information must be protected**, and reporting obligations should remain proportionate, particularly for SMEs and fragmented supply chains. Excessive complexity should be avoided.

7. End-of-life requirements and recycling, recyclability and design for recycling, synergies with EPRs

- **Ecodesign is only one part of the toolbox needed to achieve furniture circularity**. It must be complemented by measures that close the loop, ensure valuable materials



return to the economy, and strengthen collection, sorting, recycling infrastructure and secondary material markets.

- **Ecodesign requirements alone cannot achieve circularity if compliant furniture continues to be collected as mixed bulky waste and sent to landfill or incineration because downstream infrastructure is absent or economically unviable.** Without these system conditions, products designed for circularity may still end up landfilled or incinerated. 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.
- **Reliable EU-wide waste data by furniture category remain largely unavailable** because waste is generally classified by material streams and waste codes rather than furniture products.
- **Recyclability requirements under the ESPR should focus on design for recycling** (see point 4) , as this is what manufacturers can influence, while maintaining flexibility and avoiding prescribed materials. Achieving circularity also requires investment in recycling capacity and sorting infrastructure, which should be addressed through broader EU circular economy policies.
- **The Delegated Act on furniture could play an important role in harmonising EPR schemes across the EU.** Today's fragmented systems create administrative burdens, legal uncertainty and inefficiencies, while the lack of harmonised eco-modulation criteria limits incentives for sustainable product design. Product-specific, harmonised rules on scope, traceability and verification would improve the functioning of the Single Market and support circularity. The work on the Delegated Act should therefore seize the opportunity to support EPR harmonisation through product-specific criteria, underpinned by clear and consistent rules on scope, traceability and verification. The Delegated Act should support harmonisation of EPR scope, eco-modulation criteria, traceability and verification, while broader reforms relating to waste systems and infrastructure investment should be addressed through wider legislative instruments such as the Circular Economy Act.

8. Existing labelling landscape

Existing environmental labels and certification schemes remain fragmented across Member States and furniture sectors. Uptake of the EU Ecolabel is relatively low, while national labels, sector-specific schemes and procurement criteria continue to play important roles within certain markets.

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