European Furniture Industries Confederation

European Furniture Industries Confederation (EFIC) written input following the Ecodesign Forum meeting of 19&20 February 2025

Focus: work plan

5 March 2025

Following the first Ecodesign Forum meeting of 19&20 February 2025, the European Furniture Industries Confederation (EFIC) is pleased to share written input in view of the publication of the work plan under the Ecodesign for Sustainable Products Regulation (ESPR), expected mid-April.

Prioritisation of furniture

- The European furniture industry, represented by EFIC, welcomes the goals of the ESPR and agrees with being prioritised in the first work plan. This will lead to 1) harmonisation and closing regulatory gaps; 2) increased circularity and material efficiency.

- The industry is mainly composed by SMEs (out of over 120.000 companies operating in the EU, around 85% are microenterprises), which are part of a complex value chain that uses many materials and creates many different types of products due to the wide variety of furniture design.

- Regulatory requirements must be practical and feasible, ensuring they do not disproportionately burden SMEs, which constitute the majority of the industry. The envisaged adoption of the delegated act in 2028 (later than initially planned) would indeed allow more time for preparing the industry to the future requirements. A dedicated impact assessment for SMEs is necessary, along with clear guidance and a realistic transition period. The generic 18-month transition period is likely insufficient, as compliance with future requirements will require not only modifications to individual products but also significant adjustments to production processes, supply chains and product ranges. For SMEs, which often have limited resources, this transition will be particularly challenging.

- The regulatory framework should be built upon broad and consistent sustainability objectives and effect goals - such as durability, recyclability and resource efficiency - aligned with the overarching goals of waste reduction and product longevity. These sustainability objectives are universally applicable across all types of furniture, regardless of intended usage and material use. This unified approach ensures that requirements address the core goals of sustainability while recognising the overlap and versatility of many furniture products between domestic and non-domestic contexts.

- Industry must be given the flexibility to innovate and develop new technologies to achieve these objectives without prescriptive limitations on material choices or design configurations. A performance-based approach should be prioritised, meaning that regulations should focus on the achieved sustainability outcomes (effect goals) rather than prescribing specific methods, materials or technical solutions.

- A product approach (regardless of whether it is information or performance requirements), is therefore needed, to ensure flexibility for the industry in the composition of materials and design configurations. Information requirements could be in principle horizontal, whereas performance requirements would need to be set at furniture subcategory level (seating, storage, etc.), considering that also within the subcategories the requirements may need to differ (e.g. different disassembly requirements for furniture in schools, due to safety reasons). For these reasons, the suggestion of the final JRC report that all 'requirements proposed are applicable to all furniture' should be revised. Subcategorisation and granularity will be useful to define requirements and to adapt them as needed. One delegated act could in principle encompass furniture as whole. However, this is a preliminary assessment and once the ecodesign requirements will be discussed, we will be able to have a more complete assessment.

- When developing the digital product passport, a product-centered approach is also required because the current data structures are based on a product structure that takes into account the individual parts and their materials.

- With regard to furniture categorisation, we recommend using as a basis a categorisation based on the functional need for 1) storing (Storage furniture), 2) sitting (Seating furniture), 3) sleeping (Beds – bed frames), and 4) working/eating (Tables). This categorisation would work well with current widely adopted standards, used by multiple industry stakeholders. It will be familiar and practical for manufacturers, trade, and policymakers alike, ensuring continuity and reducing confusion or administrative burdens caused by diverging categorization frameworks. Maintaining a practically adaptable categorisation with CEN/TC207 reduces the risk of market fragmentation, which could otherwise lead to increased administrative costs and complexity for manufacturers and other stakeholders. Using a well-known set-up creates a solid foundation for identifying horizontal requirements as well as product-specific requirements.

- With regard to the proposed categorisation by JRC, we agree with the function-based approach proposed. The JRC categories of Seating and Storage would correspond to the categorisation mentioned in the above paragraph. However, it is unclear especially where 'Beds' (bed frames) would fall in the JRC approach. Furthermore, the proposed category of 'Surfaces' does not seem to be reasonable, as it is a very horizontal aspect that applies to many categories (tables, beds). It is unclear if the JRC have only the flat, horizontal surfaces (table or worktop surfaces) in mind or rather the flat horizontal and vertical (e.g. fronts) surfaces. If only 'surfaces of tables and worktops' are meant, these would fall under the functional approach of eating/working. Likewise, it should be noted that in the functional clustering approach, the surface is part of the furniture. Furthermore, the influence of 'psychological obsolescence' is particularly high for surfaces and it will be very difficult to define objective criteria or requirements to determine when furniture can no longer be used due to surface related issues.

- The JRC proposes a second categorisation based on materials. Furniture is made of a wide variety of materials, which are combined under functional and design-related approaches. Material-specific focus risks limiting innovation and overlooking the broader sustainability objectives of Ecodesign. Instead, requirements should target effect goals such as extending product lifetimes and reducing waste generation, regardless of material type. Manufacturers

should have the flexibility to select the most suitable solutions for each product. Furniture often combines multiple materials, and standards already test final products rather than individual components. A consolidated set of standards with durability requirements and evaluation methods is already available and widely used by the industry. It constitutes a first contribution that we can already offer today as a tool to bring the fulfilment of the first two requirements (a and b) set out in general terms in art. 5 of the ESPR into the concrete realm of furniture products, using a performance-based approach, independent of the materials and technologies used.

- The delegated act work should be carried out in parallel with standardization activities in CEN TC 207. Please consider that CEN TC 207 (Furniture) is developing several standards to accompany the ESPR. A standard on dis/reassembly was published in 2024 and standards on reliability, repairability, refurbishment and remanufacturing are underway as next work items. For decades, CEN/TC 207 has been creating and developing standards that address durability (reliability) as a basis for the safety of furniture, which in this respect already contributes to durability in the sense of sustainability. These will be useful for the purposes of the ESPR.

- All in all, a level playing field should be ensured, also with regard to imported products which should abide by the same rules as products produced in the EU. Market surveillance should be strengthened.

Potential exclusion of mattresses

- Any product group deserves a proper assessment, including via stakeholder input, before taking a decision on whether it should be prioritised or not and the corresponding industry stakeholders should be fully involved in the process.
- There are overlaps between furniture (bed frames) and mattresses, as well as the manufacturers of these products. The interface between them needs to be clarified and it should be defined what is considered a mattress compared to other upholstered furniture and how hybrid products such as beds (e.g. divan bases) - where mattresses are an integral part of the bed - should be evaluated.

We look forward to a continuous dialogue with policymakers in the next steps of the development of furniture-specific ecodesign measures.

***

EFIC is the European Furniture Industries Confederation, representing over 70% of the total turnover of the European Furniture Industries, a sector employing 1 million people in about 120.000 enterprises across the EU and generating 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/

For further information, please contact:

European Furniture Industries Confederation
info@efic.eu | +32 02 270 85 46