# Ecodesign for Sustainable Products Regulation

Guidance document for furniture companies - version 2 (**October 2025)**

EFIC
European Furniture Industries Confederation

***Disclaimer: This briefing is addressed to furniture companies and serves merely as guidance based on the interpretation of EFIC of the Ecodesign for Sustainable Products Regulation. The briefing will be updated regularly in subsequent versions, as the legislation process advances.***

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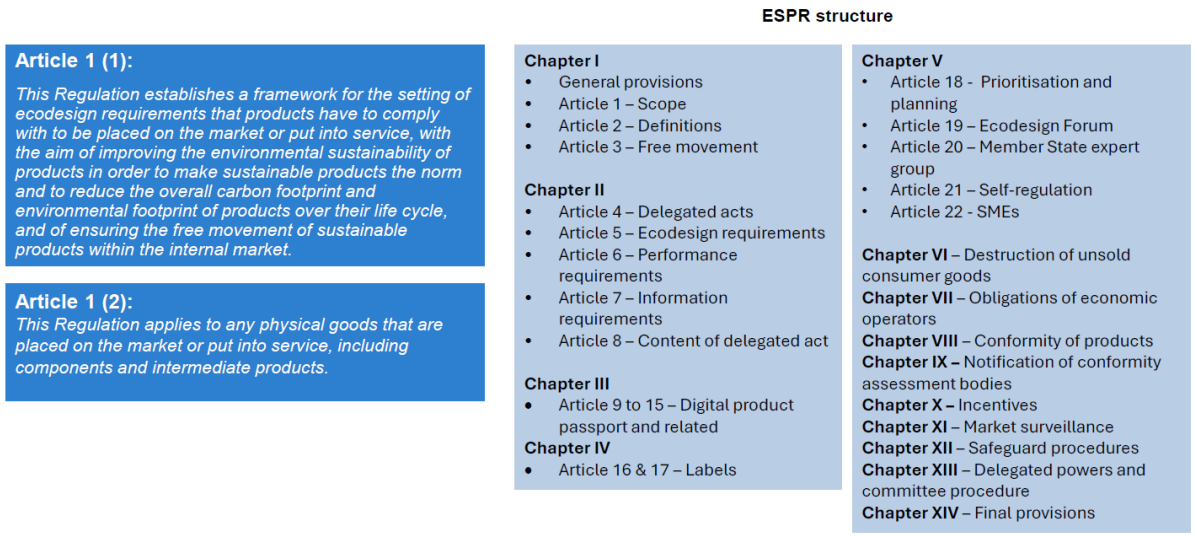
# 1. What is the Ecodesign for Sustainable Products Regulation (ESPR) and what is its scope?

**The Ecodesign for Sustainable Products Regulation (ESPR**) is a framework legislation that **aims to improve the environmental sustainability of products to make sustainable products the norm** and to **reduce their overall carbon and environmental footprint over their lifecycle**, as well as to **ensure their free movement within the internal market. Product-specific requirements will be developed through complementary delegated acts.**

On 28 June 2024, the **ESPR was published in the Official Journal of the EU (OJ)** (available in all EU languages). The Regulation entered into force 20 days after the publication in the OJ, on 18 July 2024.

**The main goal of the ESPR is to establish mandatory ecodesign criteria for products** (see Figure 1). The ESPR builds on the experience of the EU ecodesign and energy labelling legislation which applies since 2009 to energy related products. This legislation led to ecodesign and labelling requirements for energy related products that drove the customer purchasing behaviour and the performance improvement of those products. **The ESPR extends the scope of the 2009 Ecodesign Directive (2009/125/EC) to non-energy related products and to further criteria to address the sustainability performance of products beyond energy efficiency.**

**Figure 1: Scope and main chapters of the ESPR**

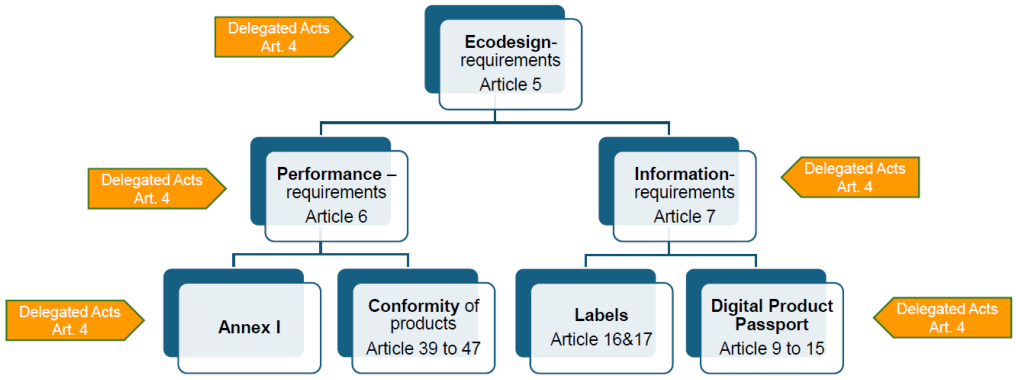



**The ESPR will enable the setting of ecodesign performance and information requirements progressively for almost all categories of physical goods placed on the EU market** (with the exception of food, feed, pharmaceuticals and living organisms), regardless of whether they are manufactured inside or outside the EU, including components and intermediate products.

**The ESPR also establishes a digital product passport and labels providing a link to the digital information. It also provides for the setting of mandatory green public procurement requirements and creates a framework to prevent unsold consumer products from being destroyed**.

In accordance with Article 4, the **European Commission has the right to adopt delegated acts** (see figure 3) and to select and specify – after a thorough assessment - detailed requirements for specific product groups from the contents of the articles in Figure 2.

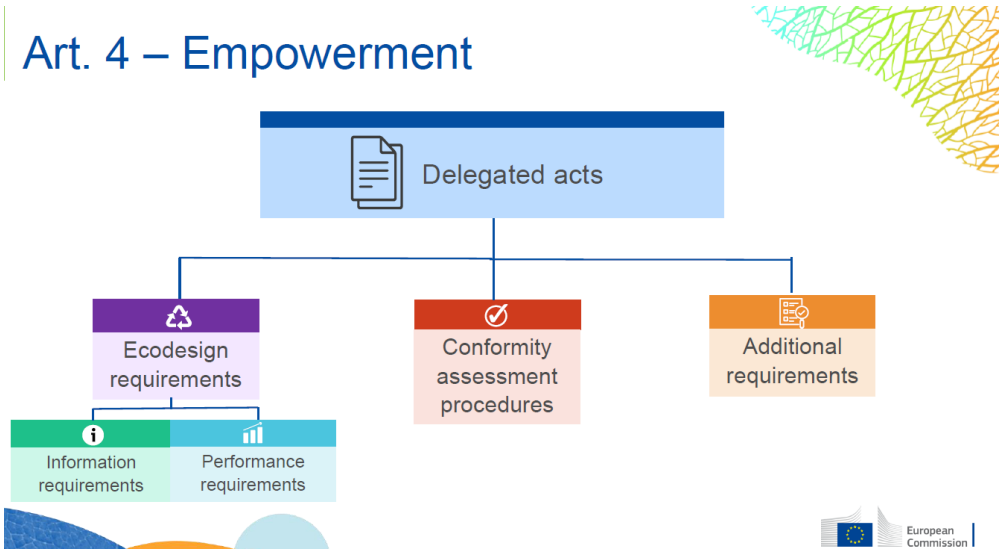
**Figure 2. Extract on the ecodesign requirements structure of the ESPR**




Source: European Commission

**Delegated acts are adopted by the European Commission (following consultation with stakeholders) and requirements are directly applicable to companies after the set transition period.** These delegated acts are drawn up after publication of the ESPR for the product groups specified in a work programme with product priorities for a given period.

**Figure 3. Commission empowerment to adopt delegated acts**




Source: European Commission

In next chapters you will find a more detailed explanation of potential requirements for furniture and mattresses.

## 2. Does the ESPR have any immediate effect on furniture companies? For example, with what concerns reporting on unsold goods?

**The ESPR's immediate effect on furniture companies is limited.** However, as it provides the generic framework from which product specific legislation will be derived soon, **companies should familiarize themselves with the ESPR concepts and potential ecodesign and information requirements** in order to be ahead and ready for when product specific requirements start to apply.

However, it is to be noted that **requirements regarding the disclosure of unsold goods (based on article 24 of the ESPR) started applying to large companies** in the first full financial year after the ESPR entry into force (18 July 2024). Micro and small enterprises are exempt from these obligations, while **for medium-sized enterprises these obligations will apply from 19 July 2030**. In addition, these requirements concerning unsold (consumer) products are mainly targeted at business-to-consumers (B2C) markets and not business-to-business.

Disclosure requirements include:

- The number and weight of discarded unsold products, by type or category.
- The reasons for discarding them, including any applicable exemptions.
- The proportion of discarded products delivered to undergo each of the following activities: reuse, recycling, energy recovery, disposal, in accordance with the EU waste hierarchy.
- Measures taken or planned to prevent the destruction of unsold goods.

**The European Commission is expected to adopt an implementing act by 19 July 2025 to define the format, product categories, and verification methods for disclosure**. At the time of writing this guidance document, the delegated act has not been adopted yet.

## 3. Will furniture be prioritised under the ESPR? Are sector-specific rules expected?

**Yes, furniture will be impacted by the ESPR as product specific rules will be adopted through delegated acts. Furniture and mattresses are confirmed as priority product groups in the ESPR and Energy Labelling Working Plan 2025-2030 alongside textiles (apparel) and tyres. This means that delegated acts for these products will be among the first to be developed and adopted under the ESPR framework.**

**Before the publication of the ESPR Working Plan 2025-2030, the Joint Research Centre (JRC) had also identified in its report on product priorities[1] that furniture and mattresses should be prioritised for first action.** According to the JRC, for furniture, the potential lies in lifetime extension and reduction of waste. For mattresses, the potential lies in reducing the percentage of bed mattresses that end their useful life in landfills and promoting the design for disassembling and recovery of materials. **The Joint Research Centre provides the following definitions** in its draft report on product priorities for furniture and mattresses:

- **FURNITURE:** Free-standing or built-in units whose primary function is to be used for the storage, placement or hanging of items and/or to provide surfaces where users can rest, sit, eat, study or work, whether for indoor or outdoor use.

[1] Joint Research Centre final report on new product priorities under the ESPR

- **BED MATTRESSES:** Products consisting of a cloth cover that is filled with materials and that can be placed on an existing supporting bed structure or designed for free standing in order to provide a surface to sleep or rest upon for indoor use.

**The ESPR text itself also prioritises furniture and mattresses (article 18).**

**In addition to these final products, iron, steel and aluminium are prioritised as intermediate products. The Working Plan also foresees horizontal requirements**—such as for repairability, recycled content and recyclability—being developed initially for electrical and electronic equipment. These will not affect furniture at this stage, unless such horizontal requirements are later extended to other product groups.

## 4. When can we expect furniture-specific requirements to be developed and what is the process? By when would they need to be applied in the industry? Will there be a transition period? Will mattresses be tackled at the same time?

**According to the Ecodesign and Energy Labelling Working Plan 2025-2030, the delegated act on furniture is expected to be adopted in 2028. A general transition period of 18 months is expected to apply, which can however also be shorter or longer** depending on the requirement (to be defined in the delegated act). This means that **the requirements would generally be applicable in the industry towards 2030.**

**Figure 4. Indicative timeline for adoption of delegated act on furniture under ESPR**

Indicative timeline for adoption of delegated act for Furniture under ESPR

For mattresses, the delegated act is planned for adoption in 2029, with requirements expected to apply from around 2031. The process will follow the same procedural steps as for furniture.

**Adopting delegated acts can take between 2 to 2.5 years. Several steps are expected (non-exhaustive):**

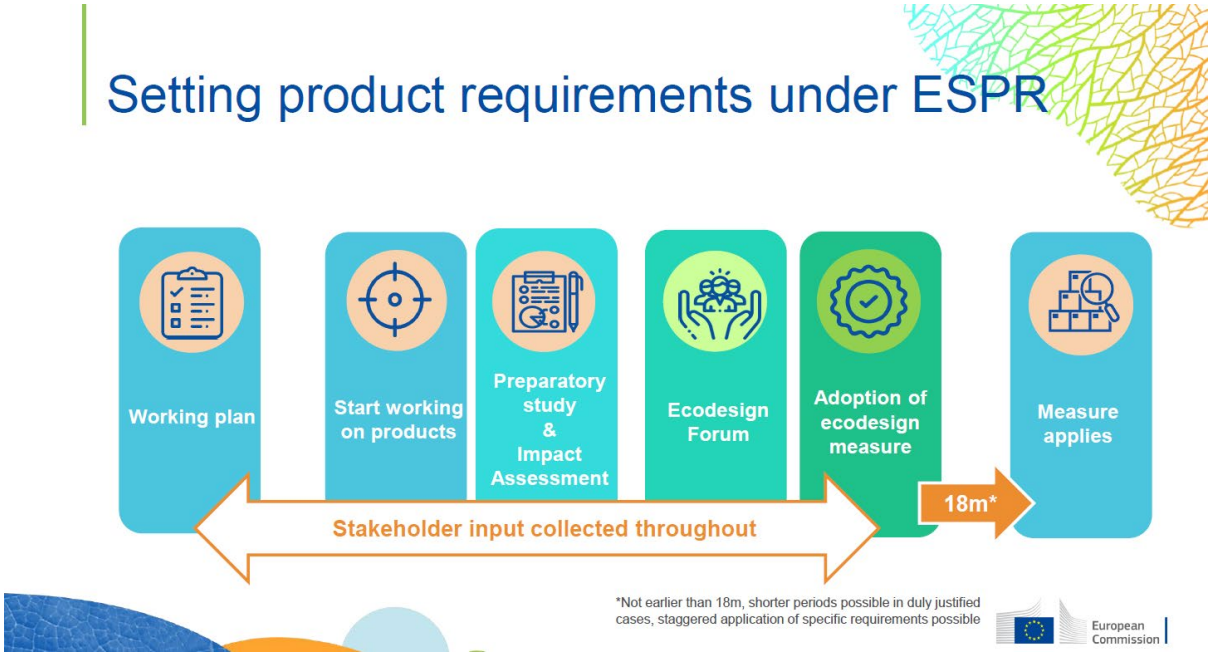
- **A comprehensive preparatory study is expected to be carried out**, addressing definitions, the scope, terminology, market analysis, existing schemes such as EU Ecolabel, Green Public Procurement criteria, and finally proposals for both ecodesign and/or information requirements for the product group. The preparatory study on furniture is expected to be published early 2026 at the latest.

- **An impact assessment** will be carried out following the preparatory study, taking into account the specific needs and challenges of SMEs.

- **Consultation with stakeholders is carried out in parallel via the Ecodesign Forum (EDF).** The Ecodesign Forum is an expert group that assists the Commission in the development of product specific legislation and provides advice on ecodesign requirements, priorities, market surveillance and others. It includes a wide range of stakeholders, including industry associations, standardization bodies, NGOs and others. **EFIC is a member of the Ecodesign Forum with 3 main representatives.**

**Once the Commission has adopted the act, Parliament and Council generally have two months to formulate any objections.** If they do not, the delegated act enters into force.

**Figure 5: Overview of the process of setting product requirements under the ESPR**




Source: European Commission

## 5. Do we know if specific furniture products will be targeted or rather all furniture as one group? How many delegated acts will there be?

**The granularity (level of detail) of the products to be targeted and product similarities will be determined with a scoping study as part of the preparatory study.** According to article 5: '*Ecodesign requirements shall be established for a specific product group. They may be differentiated for any specific product that belongs to that product group.'*

In the final version of the JRC report on product priorities, published in November 2024, **a preliminary analysis of granularity of furniture** was presented. The report suggested a **function-based approach**, with a division of furniture into 3 categories: Seats, Surfaces, Storage. The JRC also proposed a **second categorisation** based on **materials**. These are analytical suggestions and do not represent any formal decision by the Commission (see figure 6).

**Figure 6: JRC proposed furniture granularity**

**Annex 6. Analysis of granularity**

FURNITURE PRODUCT GROUP GRANULARITY

In order to address the concept of **granularity** within the **furniture** product group, different approaches have been analysed to assess the most suitable aspects for dividing such a large group.

Inspiration has been taken from the classification adopted by ECOLABEL (1)and consumption footprint (2) as well as from those established by CEN (3) and Taxation and Customs Union (4) proposed by the industry, through the Open Public Consultation.

The analysis of the different instruments mentioned above shows that the most relevant aspects to consider when subdividing this category are:

The **location** of the furniture, which makes it possible to differentiate between indoor and outdoor furniture.

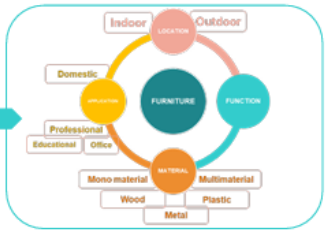
The **application**, which distinguishes between domestic and professional, and within the latter category we can find educational or office use, among others.

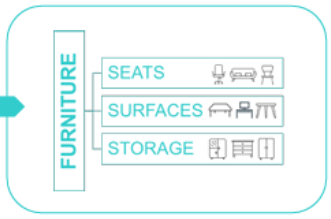
The **material** from which the furniture is made, which is mostly grouped into wood (or wooden based), plastic, textile, metal and glass.

Moreover, the **function** for which the furniture is designed, which establishes three main groups: seating, surfaces and storage.

In this preliminary study on granularity, the **furniture function approach** will be adopted for the subdivision of this product group. Classifying according to the function of the furniture allows to establish more effective requirements to **extend the life** of the furniture, as well as to fight against **planned obsolescence**, in an industry where the throwaway culture is gaining ground.

As a result, furniture is suggested to be divided into:




If we consider the requirements proposed in Annex 5 for furniture products, we observe that all of them are potentially applicable to the three categories adopted. This can be achieved either via three category specific Delegated Acts, as well as via one furniture Delegated Act which would have different threshold for each category.

Once the granularity according to the function has been set, a second level of analysis by material can be made, which makes it possible to work with provisions that are more focused on circularity.

Material column shows the applicability of the requirement according to the composition of the product *(G for glass, M for metals, P for plastic, T for textiles and W for wood )*

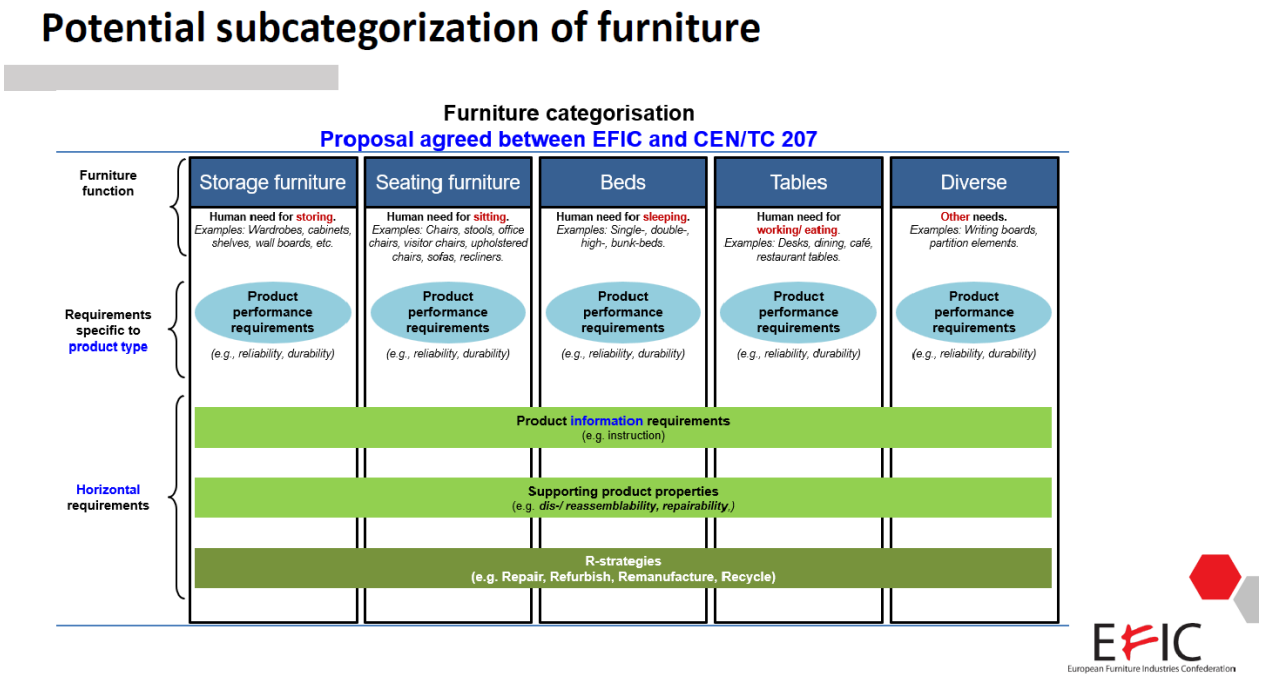
| Requirement | Category |
|---|---|
| safe, easy and non-destructive access to recyclable components | |
| ease of upgrading, re-use, remanufacturing and refurbishment | |
| minimum recycled content | |
| minimum content of raw material with sustainability certification | |
| use of easily recyclable materials or combination of materials | |
| minimum reliability | |
| compatibility with commonly available tools and spare parts | |
| availability and affordability of spare parts | |
| minimum share of energy consumption from low carbon sources | |
| condition for use and maintenance of the product | |
| expected lifetime of the product, and/or on how to substitute/replace the product or i component | |

(1) EU Ecolabel; (2) EU Consumption Footprint; (3) CEN/TC207Furniture; (4) Taxation and Customs Union

EFIC provided input ahead of the prioritization work and will continue to engage with the Commission throughout the process. **EFIC agrees in principle with the function-based approach and the categories of Seating and Storage suggested by JRC, but has raised concerns regarding the Surfaces category,** as this term is very misleading because ultimately all furniture has a surface. The EU Commission has responded verbally that 'surfaces' refers to tables and desks. EFIC has also commented on the omission of certain product types, such as the 'lying' function and thus, for example, bed frames.

EFIC has instead **recommended a categorisation based on existing standardisation under CEN TC 207** (see Figure 7), which better reflects established product groupings within the furniture industry.

**Figure 7: EFIC proposed subcategorization of furniture**




In addition, **EFIC raised that a 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**. **Manufacturers should have the flexibility to select the most suitable solutions for each product**.

At these preliminary stages, EFIC believes that one delegated act could in principle encompass all furniture types.

## 6. What requirements could be laid down for furniture (and mattresses)?

**The ESPR represents a 'pool of requirements' from which the most relevant will be selected for the targeted products based on their characteristics and market.** This also means that not all requirements are equally relevant/ important for all products.

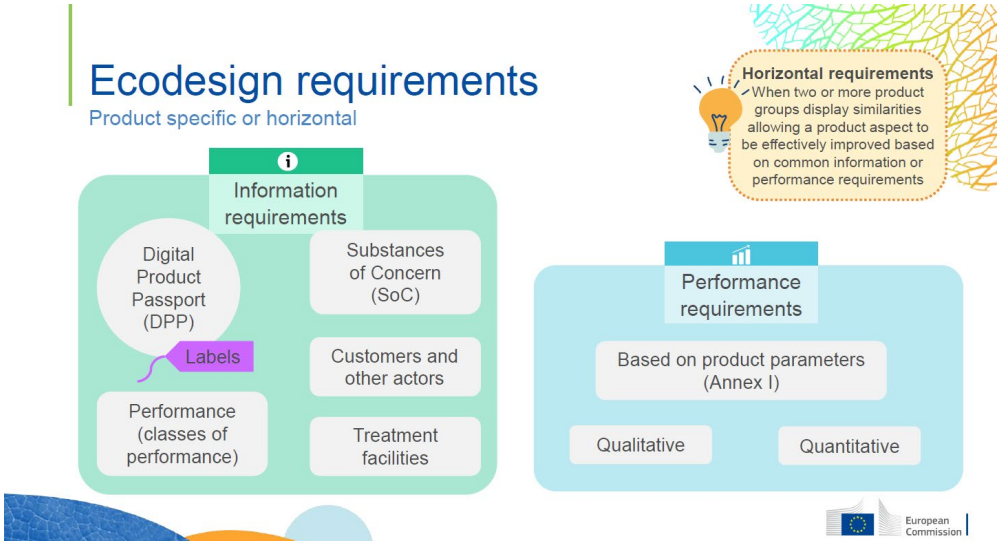
Article 5 of the ESPR establishes that based on product parameters in Annex I of the ESPR, the **Commission shall establish ecodesign requirements to improve the following product aspects when relevant to the product group concerned (see Figure 8 and 9).**

**Ecodesign requirements will, as appropriate, include performance and/or information requirements.**

**Figure 8: Potential ecodesign requirements according to Article 5 ESPR**

Source: European Commission

**Figure 9: Potential information and performance requirements under the ESPR**




Source: European Commission

**The ESPR also makes it possible to set horizontal requirements** – that is, rules that apply across different product groups where technical similarities exist, such as for textiles and potentially furniture. Article 5.7 of the ESPR provides the legal basis for such cross-cutting requirements. Durability and repairability are among the aspects commonly considered for horizontal rules. In principle, horizontal requirements such as for durability and reparability are only suitable as information requirements for 'horizontal application'. EFIC expressed this view to the European Commission.

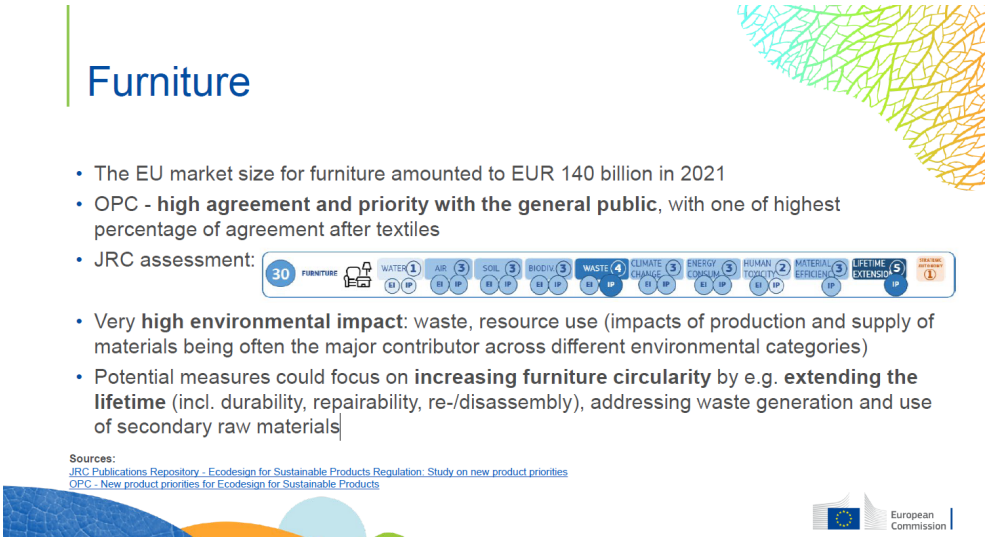
**It has not yet been decided whether such horizontal requirements will apply to furniture.** This will depend on future decisions made via delegated acts.

In its final report with priorities for the first work plan under the ESPR, **the Joint Research Centre identified a list of potential measures to reduce the environmental impact of furniture, focusing mainly on lifetime extension and waste reduction.**

**In the Ecodesign Forum of February 2025 the Commission stated that potential measures could focus on increasing furniture circularity by e.g. extending the lifetime (incl. durability, repairability, re-/disassembly), addressing waste generation and use of secondary raw materials (see Figure 10).**

According to Article 5.1 g of the ESPR, ecodesign requirements may include provisions on the **presence of substances of concern**, where relevant for the product group. Whether such requirements will apply to furniture will be assessed during the preparatory phase and defined in the delegated act.

**Figure 10: Potential measures for furniture (Ecodesign Forum February 2025)**




Source: European Commission

**→ In Appendix I, II, III and IV of this guidance document you can dive deeper into what could be expected in terms of performance and information requirements:**

| | |
|---|---|
| **Appendix I:** | **More details on performance and information requirements from the final version of the ESPR text itself** |
| **Appendix II:** | **Potential functioning of the Digital product passport** under the ESPR |
| **Appendix III:** | **Potential requirements for furniture and mattresses that the Joint Research Centre identified as being relevant** |
| **Appendix IV:** | A **list elaborated by EFIC with the most relevant requirements** based on our interpretation, to be used indicatively. |

## 7. Can we expect a digital product passport for furniture?

The **digital product passport (DPP) is a key instrument under the ESPR and is intended to support the traceability and availability of product-related information throughout a product's entire lifecycle**. According to the European Commission, the DPP has **two main purposes**:

a. first, to **provide consumers with relevant and reliable information at the point of purchase** in order to enable more sustainable choices; and second,
b. to **ensure that critical information is passed along the value chain** to support actors involved in activities such as repair, refurbishment, reuse, and recycling.

**Furniture will be required to have a digital product passport** once it is covered by a delegated act under the ESPR, as this is a mandatory element for all regulated product groups according to **Article 7** of the regulation. **The specific information to be included in each product passport, as well as access rights, will be defined per product group in the delegated acts.**

**Article 7 of the ESPR lists a number of data elements that may be required in a DPP, such as:**

- Scores for repairability and durability
- Carbon and environmental footprint
- Handling instructions
- Information for treatment facilities on disassembly, reuse, refurbishment, recycling, or disposal at end of life
- Presence of substances of concern

Further details on what will be required specifically for furniture will only become clear with the adoption of the relevant delegated act.

EFIC has underlined the importance of **applying a 'need-to-know' principle** when deciding which information must be included, **and stressed that requirements should be proportionate, justified, and must not compromise business-sensitive information**.

In addition, **Article 10 of the ESPR** sets out technical requirements for the digital product passport. It must be **supported by a unique and durable data carrier**, and be **based on open standards** in a machine-readable, searchable, and interoperable format. It should **enable structured data exchange over digital networks**, without vendor lock-in.

See Appendix II for further details.

## 8. Can furniture companies expect mandatory requirements on carbon/environmental footprint?

**It is currently too early to say with certainty whether mandatory requirements on carbon or environmental footprint will apply to furniture, and in what form.**

According to Article 5.1(o) of the ESPR, **ecodesign requirements may address environmental impacts, including carbon and environmental footprint**, **where relevant for the product group concerned**. Such requirements **may also be included in the digital product passport**, as listed in Article 7.2.

**If such rules are introduced for furniture, the European Commission is expected to provide the necessary methodologies and supporting tools.** This could include the Product Environmental Footprint (PEF), but the ESPR also allows for the use of other scientific methods developed by international organisations, as clarified in Article 2.24.

## 9. How can or should the conformity of the products with the ESPR be documented and what will be the role of standards and standardisation committee CEN TC 207?

According to **Article 44 of the ESPR**, manufacturers will be required to draw up an **EU Declaration of Conformity** for products that are subject to ecodesign requirements under the ESPR. This declaration confirms that the product meets the requirements set out in the relevant delegated act.

### Harmonised standards for the purposes of compliance and verification
### EU Ecolabel

**Articles 39 and 41 of the ESPR provide that products which conform to harmonised standards published in the Official Journal of the EU, or which meet the criteria of the EU Ecolabel, shall be presumed to comply with the applicable requirements.** This presumption of conformity facilitates both market access and enforcement. In the absence of harmonised standards, other reliable, accurate and reproducible methods that take into account the generally recognised state-of-the-art may also be used to demonstrate compliance.

### Standardisation committee CEN TC 207

**Standardisation committee CEN TC 207 (Furniture) and its WG 10 (Requirements and tools for furniture circularity) started developing standards for product aspects under article 5 of the ESPR.** Standard EN 17902 Furniture — Circularity — Evaluation method for dis/re-assembly capability was published in 2023. It will be followed by further and more far-reaching initiatives such as standards for repair-refurbishment and reliability aimed at supporting a circular approach in the furniture industry, as well as evaluation methodologies.

**EFIC recommends that these standards be used as a reference in the development of the delegated act for furniture, and that – where appropriate – they be harmonised to provide presumption of conformity under the ESPR framework**.

Furniture companies, particularly SMEs, are encouraged to actively participate in the work of CEN/TC 207 to ensure that the resulting standards are practical, industry-driven, and supportive of circular product design.

## 10. How is EFIC involved in the work leading to the delegated act?

- **EFIC has been advocating on the ESPR since its very early stages, including the Sustainable Products Initiative**. Recommendations have been coordinated together with EFIC members – and other stakeholders - throughout the legislative process of the ESPR as framework legislation.
- **EFIC will take part in the discussions related to future ecodesign requirements for furniture. EFIC is a member of the Ecodesign Forum,** the expert group assisting the Commission in the development of product-specific legislation. **EFIC will engage heavily in the preparatory study and impact assessment as well.**
- **EFIC issued its recommendations in view of the work plan with product priorities,** providing strategic recommendations in view of the future delegated act (link), providing also an analysis of the JRC report and proposed categorisation and requirements for furniture.
- **EFIC has held several meetings with the responsible services of the European Commission** (DG Environment, DG GROW – Industry & SMEs) and has engaged with the external consultants responsible for stakeholder consultations in preparation for the delegated act.
- **EFIC works closely with other industry stakeholders**, such as EBIA, Europur, EPF and other supplier organisations.
- **EFIC is monitoring closely the work of CEN TC 207** (in which several members are involved), which will feed into the delegated act work.

## 11. Will Member States still be able to set requirements for products regulated by a delegated act?

**Once a delegated act setting ecodesign requirements is adopted by the Commission, Member States will, no longer be allowed to set national performance and information requirements based on product parameters covered by such requirements laid down in that delegated act.** This ensures the proper functioning of the internal market.

As such, according to article 3 of the ESPR, **Member States shall not prohibit, restrict or impede the placing on the market or putting into service of products that comply with the performance and/or information requirements set out in delegated acts for reasons of non-compliance with national requirements** or of products for which a delegated act establishes that no performance and/or no information or neither are to be set.

## 12. Will SMEs be provided with guidance for the implementation of the future delegated act?

According to **Article 22 of the ESPR**, **the European Commission shall ensure the availability of initiatives to help SMEs** integrate environmental sustainability, including energy efficiency, into their value chains. When adopting delegated acts, the Commission shall, where appropriate, accompany those acts with digital tools, such as for life cycle assessment calculation, and specific guidelines that take into account the needs of SMEs. The Commission shall consult SMEs representative organisations in the drafting of the guidelines.

**Member States shall take appropriate measures to help SMEs**, in particular micro- enterprises, apply ecodesign requirements set out in delegated acts. Member States shall consult organisations that represent SMEs on the kind of measures SMEs consider useful. Those measures shall at least include ensuring the availability of one-stop shops or similar mechanisms to raise awareness and create networking opportunities for SMEs, to adapt to requirements.

**Figure 11: Article 22 ESPR – Supporting measures for SMEs**

Source: European Commission

## 13. Will imported products need to abide by the same rules?

**Yes. The ESPR will apply to products that are regulated whether they are produced in the EU or outside.** According to recital 63 of the ESPR, in order to safeguard the functioning of the internal market, it is necessary to ensure that products from third countries entering the Union market comply with this Regulation and the delegated acts adopted pursuant to it, whether imported as products, components, or intermediate products.

In particular, it is necessary to ensure that appropriate conformity assessment procedures have been carried out by manufacturers with regard to those products. Provision should therefore be made for importers to ensure that the products they place on the market comply with those requirements and that the CE marking and documentation drawn up by manufacturers are available for inspection by the competent national authorities. Provision should also be made for importers to ensure, where applicable, that a product passport is available for those products.

**EFIC will continue advocating for a level-playing field between imported products and those produced in the EU.**

## 14. How is the ESPR related to the Construction Products Regulation and to the Ecodesign Directive covering energy related products?

According to the ESPR, **when it comes to construction products**, **ecodesign requirements should only be set under the ESPR if the obligations created by the Construction Products Regulation (CPR) and its implementation are not expected to sufficiently meet the environmental sustainability objectives of the ESPR**. Furthermore, when establishing future working plans, the Commission should consider that – in line with current practice – the CPR will continue to apply to construction products, but priority will be given to sustainability requirements defined under the ESPR.

While both the ESPR and the CPR address sustainability and introduce requirements for digital product passports, **the development of requirements under the two regulations differs significantly**:

- Under the **ESPR**, **requirements are introduced through delegated acts** developed by the European Commission, in consultation with stakeholders via the Ecodesign Forum.
- Under the **CPR, requirements are primarily developed through harmonised standards within technical committees**, and only in exceptional cases through delegated acts – for instance, when a harmonised standard is deemed inadequate or if standardisation fails.

**The CPR is a sector-specific regulation targeting products permanently incorporated into construction works, while the ESPR is a horizontal regulation that applies broadly to almost all physical goods on the EU market**, with a few exclusions. ESPR requirements only apply once a delegated act has been adopted for a specific product group.

Importantly, Article 1(3) of **the ESPR clarifies that sector-specific legislation, such as the CPR, takes precedence in the case of overlapping requirements**. This safeguard is essential to avoid conflicting rules. Moreover, **furniture is not listed among the product areas covered by Article 7 of the CPR**, which sets out the scope for standardisation. Therefore, furniture products are not expected to fall within the scope of the CPR, and relevant sustainability requirements for furniture should be developed under the ESPR framework.

**The ESPR repeals the Ecodesign Directive (Directive 2009/125/EC).** In order to ensure legal certainty and continuity for products placed on the market or put into service in conformity with implementing measures adopted pursuant to Directive 2009/125/EC, in its version applicable on the date of application of this Regulation, those measures should remain in force beyond that date, and until repealed by a delegated act adopted pursuant to the ESPR. For the same reasons, a number of provisions of Directive 2009/125/EC should continue to have full effect in the context of applying these implementing measures.

## 15. How can furniture companies start preparing for the upcoming requirements under the future delegated act?

**Furniture companies can already begin preparing by understanding the general design principles and sustainability goals outlined in the ESPR**, even though the specific delegated act for furniture will not apply before 2030 at the earliest. **EFIC recommends reviewing the core concepts and potential ecodesign requirements now, as these will serve as the foundation for the final rules**.

**Once the delegated act is published, companies will need to adapt both their existing product portfolio and newly developed products to meet the new ESPR requirements during the transition period**. This adaptation process **may be particularly challenging within the expected 18-month timeframe** currently indicated by the Commission. For this reason, early preparation can be of great value.

**With regard to ecodesign requirements, we recommend:**

- **Mapping your product portfolio to identify which products can conceivably meet design requirements and which are likely to have difficulty demonstrating compliance.**

- **Starting to prepare an action plan accordingly:**

    - **Integrate likely requirements into new product development and also in the revision of existing product lines to be better prepared for future product-specific rules.** A useful guiding principle is to "think the product from the end" – meaning that sustainability aspects such as durability, reparability, refurbishability, separability of materials, and recyclability should be considered throughout the product's entire lifecycle, starting already at the design stage. Embedding these principles early on helps ensure that new developments are aligned with the expected requirements under the ESPR.
    - **When designing new products, pay attention to product requirements in terms of "reliability", ease of maintenance and reparability.** The latter requires the availability of spare parts in a period of at least 5 years after the product is discontinued (probably over approx. 10 years > based on existing ecodesign requirements for e.g. washing machines).

**When it comes to the Product Passport, most likely, traceability requirements will be applicable in the supply chain to ensure that the right information and data is collected and shared.** The ESPR describes a so-called "3rd party service provider" which could constitute an important actor that helps and assists manufacturing companies with services for handling product passports.

**When it comes to the digital product passport, we recommend:**

- **Being prepared when creating the necessary data structures in your Enterprise Resource Planning (ERP) systems and obtaining the relevant data in your company or supply chain**.
- **Checking whether the granularity of the data is sufficient** (is there data at component level and, if necessary, at material level).
- **Checking if there is a classification of the existing data.**
- **Internal routines for our own handling of information should be reviewed** and a methodology for determining relevant data, administration, reviewing the data structures to determine the extent to which the data which could be required in future (e.g. recycled content; proportion of renewable raw materials; CO2 footprint...) can be stored, updated and made available.

**In general, we recommend following and being informed of the process of developing product specific legislation, as well as standardization activities that will be relevant for conformity.**

The growing EFIC collection of best practices contains information on companies adopting circular principles and can serve as a reference: **https://www.efic.eu/efic-best-practices**

## 16. Parallel EU legislation that is related to the ESPR – non-exhaustive

### Right to Repair

On 10 July 2024, the Directive on Common rules promoting the repair of goods was published in the Official Journal of the European Union (link). It entered into force on 30th July 2024. Member States have 24 months from the entry into force to transpose the Directive into national law. This Directive shall apply to the repair of goods purchased by consumers in the event of a defect of the goods that occurs or becomes apparent outside the liability of the seller pursuant to Article 10 of Directive (EU) 2019/771.

**As soon as repairability requirements are established in Union law for furniture products via Delegated Acts under the ESPR, this legislation may be amended to also cover furniture,** as the Commission is entitled to adopt delegated acts to Amend Annex II of the Right to Repair Directive by updating the list of Union legal acts laying down repairability requirements in light of regulatory developments.

### Empowering consumers to the green transition

Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information was published in the Official Journal of the EU on 6 March and entered into force on 26 March 2024. The Directive sets the 27 September 2026 as the date on which Member States must apply the new rules.

This Directive complements existing directives on consumer protection and competition law. In view of the ecological transition, it aims to combat unfair commercial practices that prevent consumers from making the right choice in favour of more environmentally friendly or circular products and services.

### Green Claims Directive – not yet adopted at the time of writing

This proposal for a directive complements the EU's ban on greenwashing and introduces a verification system for companies that want to make environmental-related claims. The proposal on green claims aims to:

- make green claims reliable, comparable and verifiable across the EU
- protect consumers from greenwashing
- contribute to creating a circular and green EU economy by enabling consumers to make informed purchasing decisions
- help establish a level playing field when it comes to environmental performance of products

The Directive is going through the decision-making process at the time of writing this briefing.

### EU Ecolabel & GPP criteria for Furniture

**An update of the criteria can be expected in coordination with the development of requirements under ESPR. The EU Ecolabel for furniture may be merged with EU Ecolabel for mattresses.**

A vote on the revision of the EU Ecolabel criteria for textiles, furniture and bed/mattresses took place on 23 June 2025 and will be adopted by the end of the year. It will align with the first ESPR Work Plan, and **the criteria are prolonged to 2028 for textiles, and 31/12/2029 for furniture and bed mattresses.** The intention is to allow the EU Ecolabel team to take into account the work that is being done under the ESPR.

## 17. EU funded projects in which EFIC is involved which can also help to provide guidance to the furniture industry in the transition to a circular economy

EFIC is part of several EU funded projects which aim to provide guidance for the furniture industry:

- **FurnCIRCLE (2023-2025)**: this project will develop Circular Economy Guidelines and Tools for Application in the EU Furniture Sector to promote, strengthen, develop social dialogue at regional, national and EU level within the furniture sector.

- **CirCLER (2024-2027)**: the CirCLER project will guide companies of the furniture value chain to deploy their transition strategy for a more circular economy, and aims to define the professional figure of the Circular Economy Transition Manager for the wood and furniture industry and the necessary training, i.e. the set of skills expected by companies for this emerging role.

- **FLIER (2023-2025)**: the purpose of the FLIER project is to properly train Sustainable Furniture Designers for making sustainable furniture the norm in the EU market or in other words, getting the professionals of the furniture industry in charge of product design & development to know and understand in advance the legal requirements and challenges of environmental legislation.

- **R-evolve (2024-2028)**: this project supports the European furniture industry's transition to circularity by developing and testing Product-System Innovations, including CE-oriented business models, circular design strategies, and Digital Product Passports (DPP).

Check them out on our website: https://www.efic.eu/funded-eu-projects

## 18. Official guidance from the European Commission

In September 2024, the European Commission released Frequently Asked Questions (FAQs). The document can be found here.

# Appendix I – Detailed extract on performance and information requirements in the final ESPR text

Article 5 of the ESPR establishes that based on product parameters in Annex I of the ESPR, the **Commission shall establish ecodesign requirements to improve a number of product aspects** when relevant to the product group concerned. In case of interest, Annex I is available on pages 79-80 in the final text of the ESPR.

**What does that mean more precisely? Based on the text of the ESPR (framework legislation, both articles and recitals), performance and information requirements could include:**

**a. Performance requirements**

i. **minimum or maximum levels of performance in relation to the product parameter or a combination thereof; OR**

- (that may for example take the form of a limit on energy consumption in the use phase or on the quantities of a given material incorporated in a product, a requirement for minimum quantities of recycled content, or a limit on a specific environmental impact category or on an aggregation of all relevant environmental impacts);

ii. **non-quantitative requirements**, **that aim to improve performance in relation to the product parameter, OR BOTH.**

- (that may take the form of a prohibition of a specific technical solution that is detrimental to product repairability)

iii. **or requirements related to a product's functional performance,** to ensure that the selected performance requirements do not negatively impact the ability of the product to perform the function for which it was designed and marketed.

Performance requirements will be used to ensure the removal of the worst performing products from the market and to **gradually move to the best performing products**. **They could also concern resource use**, including requirements related to **usage of renewable resources or materials with bio-based content** in the product and address the release of nano- and micro-plastics.

**b. Information requirements**

Information requirements shall:

i. Include, **as a minimum**, requirements related to the **product passport**

ii. as appropriate, also require products to be accompanied by (among others):

- information on the performance of the product, including a **scoring of reparability or durability, carbon footprint or environmental footprint**
- Information for customers and other actors on **how to install, use, maintain and repair the product**, on how to install third-party operating systems where relevant, as well as on **collection for refurbishment or remanufacture**, and on how to **return or handle** the product **at the end of its life**;
- information for **treatment facilities** on disassembly, reuse, refurbishment, recycling, or disposal at end-of-life;
- information on **substances of concern**[2]
- **a label**, when established by a delegated act

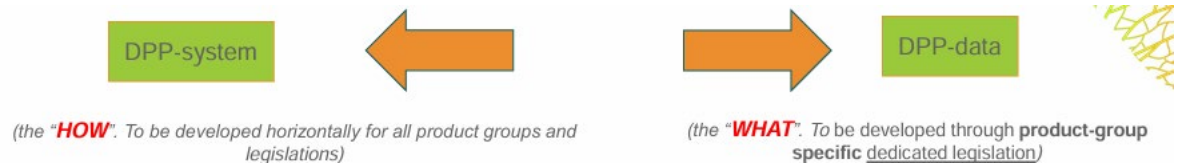
[2] SOC/Substance of concern is a collection of chemical substances with a certain classification specified in the ESPR as well as substances that can hinder the re-use and recycling of materials. According to the definition that appears in the ESPR, it can amount to about 4,000 chemical substances.

# Appendix II – Potential functioning of the Digital Product Passport (DPP) based on the ESPR text

**Two work streams can be distinguished when it comes to the DPP**:

- **1) Developing the DPP system itself** (the HOW, data architecture of the DPP, developed horizontally for all product groups and legislations);
- **2) DPP-data** (the WHAT, to be developed per product group via dedicated legislation).

See below:




Source: European Commission

## Work stream 2) DPP data

**Product specific legislation will determine**, among others:

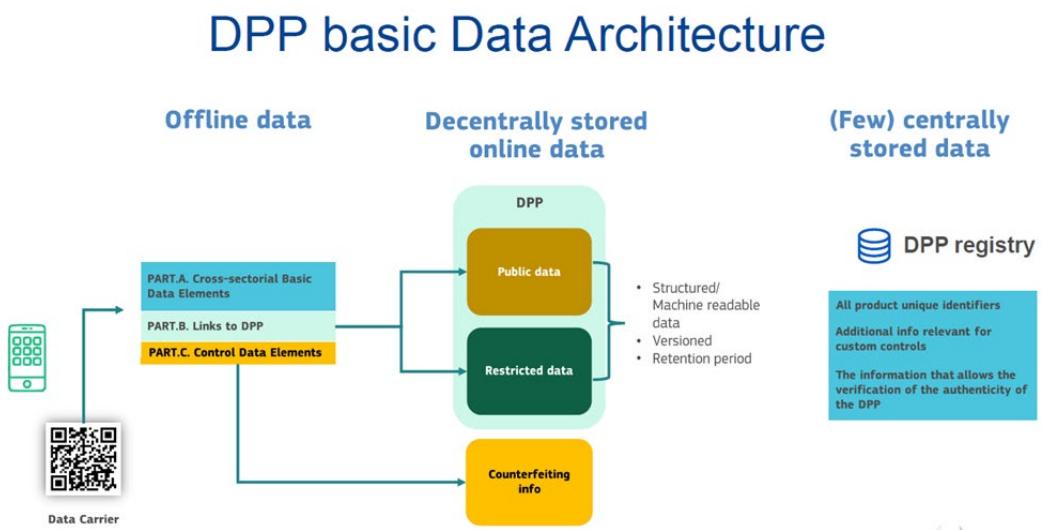
1. **the information to be included** in the product passport,
2. **whether the product passport is to correspond to the model, batch, or item leve**l,
3. the **manner** in which the product passport is **to be made accessible to customers**,
4. **the actors that are to have access to information** in the product passport and to what information they are to have access,
5. **the actors that are to introduce or update the information** in the product passport, including where needed the creation of a new product passport,
6. **the period** for which the product passport **should remain available**, among others.

**In principle, requirements on DPP will have the same entry into force as the corresponding product specific Delegated Acts.**

## Work stream 1) DPP system

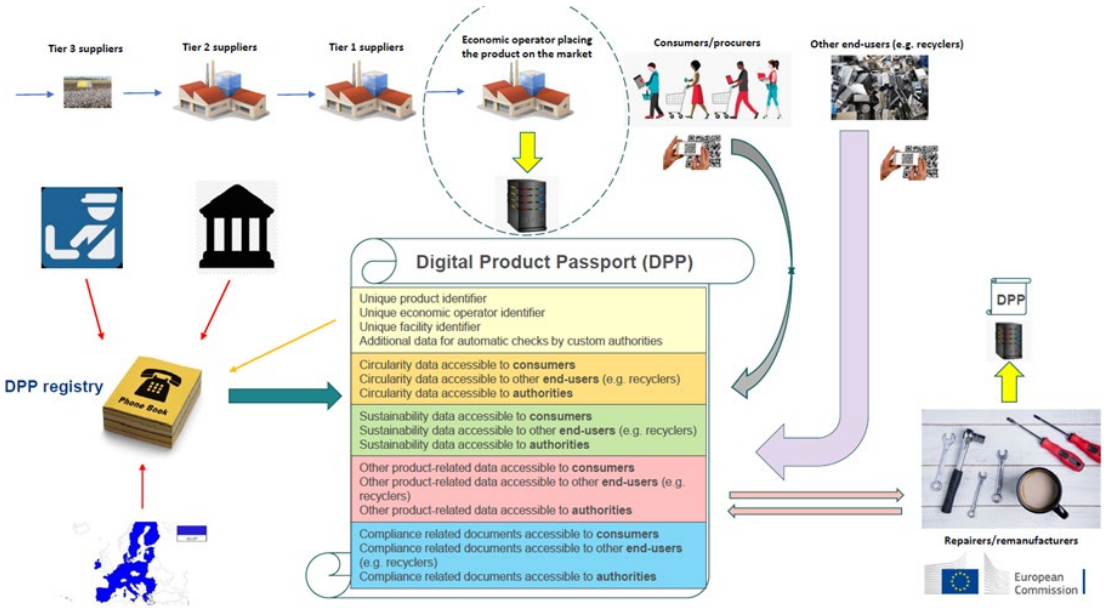
**The requirements for data technology implementation were submitted by the Commission via a standardisation request to CEN/CLC, which are to develop corresponding standards on this basis**. A Joint TC 24 "Digital Product Passport" exists at CEN/CLC level for this purpose. CEN/CENELEC is carrying out the work related to the development of harmonised standards for the DPP system. The harmonized standards on DPP-system should be available by end of 2025.

**Figure 12. DPP basic data architecture**




Source: European Commission

**Figure 13. Overview of responsible actors**




Source: European Commission

**The DPP is based on a decentralised approach. Data shall be stored by the economic operator responsible for its creation or by certified independent third-party product passport service providers.**

**The product passport shall be connected through a data carrier to a persistent unique product identifier. The data carrier shall be physically present on the product, its packaging or on documentation accompanying the product.**

**In order to ensure that the data in a DPP remains after the producer,** for example, goes bankrupt or ceases to operate, a **back-up copy of the product passport must also be made available** through a certified independent third-party DPP service provider.

**Product passport registry and web portal**

- ➔ **The Commission will establish the product passport registry**, storing in a secure manner at least the unique product identifier, the unique operator identifier, the unique facility identifiers. (…). The economic operator placing the product on the market or putting it into service shall upload, the information in the registry.

- ➔ **The Commission will also set up and manage a publicly accessible user-friendly web portal** allowing stakeholders such as customers, economic operators and other relevant actors to search and compare information included in product passports in line with their respective access rights. The web portal should link to information already stored by the economic operator in its decentralised product passport.

## DPP – Single Market Strategy

**On 21 May 2025, the European Commission published its new Single Market Strategy** (link). A key pillar is digitalisation, with the Digital Product Passport (DPP) playing a central role. **Introduced under the ESPR, the DPP is set to become the main tool for sharing product data in the EU.**

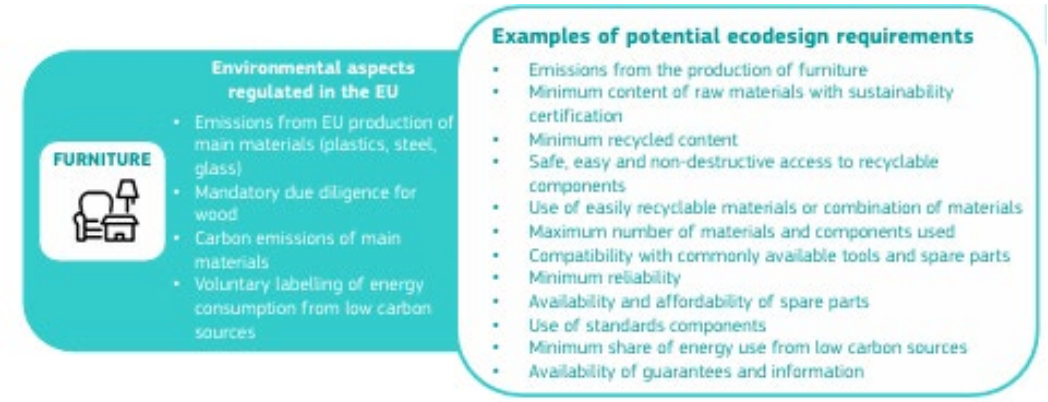
Its rollout will begin with batteries in 2027, but legislative efforts are already underway to expand its scope. The aim is to make the DPP a single digital hub for all mandatory product information under EU law—helping reduce fragmentation and support compliance on sustainability, safety, and circularity.

# Appendix III – Potential ecodesign requirements for furniture and mattresses according to Joint Research Centre

- Based on the 2024 **JRC Final Study**, which was the basis for a Commission public consultation on product priorities, **the following requirements could apply to furniture (and mattresses).**

## FURNITURE

**Figure 14. Summary of potential ecodesign requirements for furniture**




**Summary of potential measures to reduce environmental impacts**

| PERFORMANCE REQUIREMENTS | ENVIRONMENTAL AREA | Related Union law | What could be addressed by ESPR |
|---|---|---|---|
| maximum level of life cycle emissions to air | AIR | Industrial Emission Directive | IED covers the production of main materials used in furniture (plastics, steel, glass...), but not other life cycle stages or production outside the EU |
| minimum content of raw material with sustainability certification | SOIL, BIODIVERSITY, CLIMATE CHANGE | Regulation on deforestation-free products | The Deforestation-free Regulation focuses on wood. Sets mandatory due diligence rules, but not sustainability certification |
| maximum amount of life cycle waste generated | WASTE | Waste Framework Directive | WFD incentivises waste prevention but does not have a product-specific approach |
| maximum amount of life cycle hazardous waste generated | WASTE | Waste Framework Directive | WFD incentivises waste prevention but does not have a product-specific approach |
| safe, easy and non-destructive access to recyclable components | WASTE | - | Full potential of the requirement |
| use of easily recyclable materials or combination of materials | AIR, SOIL, BIODIVERSITY, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENTION | Waste Framework Directive | WFD sets recycling targets for materials in the EU but does not have a design approach in and outside the EU |
| ease of upgrading, re-use, remanufacturing and refurbishment | WASTE | - | Full potential of the requirement |
| minimum recycled content | AIR, SOIL, BIODIVERSITY, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENTION | - | Full potential of the requirement |
| maximum number of materials and components used | WASTE | - | Full potential of the requirement |
| maximum level of carbon footprint | BIODIVERSITY, CLIMATE CHANGE, ENERGY USE | Emission Trading System | EU ETS covers the production of main materials used in furniture, but |

| PERFORMANCE REQUIREMENTS | ENVIRONMENTAL AREA | Related Union law | What could be addressed by ESPR |
|---|---|---|---|
| | BIODIVERSITY; CLIMATE CHANGE | | not other life cycle stages, nor production in non-EU countries |
| minimum share of energy consumption from low carbon sources | BIODIVERSITY; CLIMATE CHANGE | Renewable Energy Directive II | REDII is not product-specific and does not address production outside the EU. It includes voluntary labelling but not mandatory requirements |
| minimum content of sustainable renewable materials | AIR; CLIMATE CHANGE | Renewable Energy Directive II | REDII is not product-specific and does not address production outside the EU. It includes voluntary labelling but not mandatory requirements |
| maximum level of life cycle energy consumption | CLIMATE CHANGE; ENERGY USE | - | Full potential of the requirement |
| maximum product to packaging ratio | WASTE; CLIMATE CHANGE; MATERIAL EFFICIENCY | - | Full potential of the requirement |
| minimum amount of by-products/process residues/off-specs recovered | WASTE; MATERIAL EFFICIENCY | - | Full potential of the requirement |
| minimum reliability (e.g. resistance to weathering, strength stress, etc.) | AIR; SOIL; BIODIVERSITY; WASTE; CLIMATE CHANGE; ENERGY USE; LIFETIME EXTENTION | - | Full potential of the requirement |
| availability and affordability of spare parts | WASTE; LIFETIME EXTENTION | - | Full potential of the requirement |
| compatibility with commonly available tools and spare parts | WASTE; LIFETIME EXTENTION | - | Full potential of the requirement |
| use of standard components | WASTE; LIFETIME EXTENTION | - | Full potential of the requirement |

| PERFORMANCE REQUIREMENTS | ENVIRONMENTAL AREA | Related Union law | What could be addressed by ESPR |
|---|---|---|---|
| maximum number of materials and components used | LIFETIME EXTENTION | - | Full potential of the requirement |
| availability of information long after the product is sold | LIFETIME EXTENTION | - | Full potential of the requirement |
| availability of guarantees specific to remanufactured or refurbished products | LIFETIME EXTENTION | - | Full potential of the requirement |

| INFORMATION REQUIREMENTS | ENVIRONMENTAL AREA | Related Union Law | What could be addressed by ESPR |
|---|---|---|---|
| possible release of non-biodegradable microplastics | AIR; SOIL | - | Full potential for the requirement |
| level of life cycle emissions to air | AIR | - | Full potential for the requirement |
| content of sustainable renewable materials | AIR; CLIMATE CHANGE | - | Full potential for the requirement |
| condition for use and maintenance of the product to reduce release of non-biodegradable microplastics | AIR; SOIL; BIODIVERSITY; WASTE; CLIMATE CHANGE; ENERGY USE; LIFETIME EXTENSION | - | Full potential for the requirement |
| sourcing of raw materials from certified sustainable practices | SOIL; BIODIVERSITY | - | Full potential for the requirement |
| recycled content | WASTE | Packaging and Packaging Waste Regulation | PPWR sets minimum recycling content obligations for plastic packaging only. No obligations for the product information requirements |

| INFORMATION REQUIREMENTS | ENVIRONMENTAL AREA | Related Union Law | What could be addressed by ESPR |
|---|---|---|---|
| how to disassemble, recycle and return or dispose the product (for users and/or treatment facilities.) | AIR, SOIL, BIODIVERSITY, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENSION | - | Full potential for the requirement |
| amount of waste sent to landfill | WASTE | - | Full potential for the requirement |
| carbon footprint | BIODIVERSITY, CLIMATE CHANGE, ENERGY USE | - | Full potential for the requirement |
| share of energy consumption from low carbon sources | BIODIVERSITY, CLIMATE CHANGE | Renewable Energy Directive II | RED II includes voluntary labelling, but not mandatory requirements |
| life cycle energy consumption | ENERGY USE | - | Full potential for the requirement |
| product to packaging ratio | MATERIAL EFFICIENCY | - | Full potential for the requirement |
| amount of by-products/process residues/off-specs recovered | MATERIAL EFFICIENCY | - | Full potential for the requirement |
| condition for use and maintenance of the product | AIR, SOIL, BIODIVERSITY, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENSION | - | Full potential for the requirement |
| expected lifetime of the product, and/or on how to substitute/replace the product or its component | LIFETIME EXTENSION | - | Full potential for the requirement |
| resistance to stresses or ageing mechanisms | LIFETIME EXTENSION | - | Full potential for the requirement |
| whether specialised tools are needed for repair | LIFETIME EXTENSION | - | Full potential for the requirement |

## BED MATTRESSES

**Figure 15. Summary of potential ecodesign requirements for bed mattresses**

| PERFORMANCE REQUIREMENTS | ENVIRONMENTAL AREA | Related Union law | What could be addressed by ESPR |
|---|---|---|---|
| maximum level of life cycle emissions to air | AIR | Industrial Emission Directive | IED covers the production of main materials (steel, plastics), but not other life cycle stages or production outside the EU |
| minimum content of raw material with sustainability certification | CLIMATE CHANGE | Regulation on deforestation-free products | The Deforestation-free Regulation focuses on wood. Sets mandatory due diligence rules, but not sustainability certification |
| maximum amount of life cycle waste generated | WASTE | Waste Framework Directive | WFD incentivises waste prevention but does not have a product-specific approach |
| maximum amount of life cycle hazardous waste generated | WASTE | Waste Framework Directive | WFD incentivises waste prevention but does not have a product-specific approach |
| safe, easy and non-destructive access to recyclable components | WASTE | - | Full potential of the requirement |
| use of easily recyclable materials or combination of materials | AIR, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENTION | Waste Framework Directive | WFD sets recycling targets in the EU but does not have a design approach in and outside the EU |
| minimum recycled content | AIR, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENTION | - | Full potential of the requirement |
| maximum level of carbon footprint | CLIMATE CHANGE, ENERGY USE | EU Emission Trading System | EU ETS covers the production of main materials, but not other life cycle stages nor production in non-EU countries |
| minimum share of energy consumption from low carbon sources | CLIMATE CHANGE | Renewable Energy Directive II | REDII is not product-specific and does not address production outside the EU. It includes voluntary |

| PERFORMANCE REQUIREMENTS | ENVIRONMENTAL AREA | Related Union law | What could be addressed by ESPR |
|---|---|---|---|
| | CLIMATE CHANGE | | labelling but not mandatory requirements |
| minimum content of sustainable renewable materials | AIR, CLIMATE CHANGE | Renewable Energy Directive II | REDII is not product-specific and does not address production outside the EU. It includes voluntary labelling but not mandatory requirements |
| maximum level of life cycle energy consumption | ENERGY USE | - | Full potential of the requirement |
| maximum product to packaging ratio | WASTE, CLIMATE CHANGE, MATERIAL EFFICIENCY | - | Full potential of the requirement |
| minimum amount of by-products/process residues/off-specs recovered | WASTE, MATERIAL EFFICIENCY | - | Full potential of the requirement |
| minimum reliability (e.g. resistance to stresses) | AIR, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENTION | - | Full potential of the requirement |
| availability of information long after the product is sold | LIFETIME EXTENTION | - | Full potential of the requirement |

| INFORMATION REQUIREMENTS | ENVIRONMENTAL AREA | Related Union Law | What could be addressed by ESPR |
|---|---|---|---|
| recycled content | WASTE | Packaging and Packaging Waste Regulation | PPWR sets minimum recycling content obligations for plastic packaging only. No obligations for the product information requirements |
| how to disassemble, recycle and return or dispose the product (for users and/or treatment facilities.) | AIR, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENSION | - | Full potential for the requirement |
| amount of waste sent to landfill | WASTE | - | Full potential for the requirement |
| carbon footprint | CLIMATE CHANGE, ENERGY USE | - | Full potential for the requirement |
| share of energy consumption from low carbon sources | CLIMATE CHANGE | Renewable Energy Directive II | RED II includes voluntary labelling, but not mandatory requirements |
| life cycle energy consumption | ENERGY USE | - | Full potential for the requirement |
| product to packaging ratio | MATERIAL EFFICIENCY | - | Full potential for the requirement |
| amount of by-products/process residues/off-specs recovered | MATERIAL EFFICIENCY | - | Full potential for the requirement |
| condition for use and maintenance of the product | AIR, WASTE, CLIMATE CHANGE, ENERGY USE, LIFETIME EXTENSION | - | Full potential for the requirement |
| expected lifetime of the product, and/or on how to substitute/replace the product or its component | LIFETIME EXTENSION | - | Full potential for the requirement |
| resistance to stresses or ageing mechanisms (reliability) | LIFETIME EXTENSION | - | Full potential for the requirement |

| INFORMATION REQUIREMENTS | ENVIRONMENTAL AREA | Related Union Law | What could be addressed by ESPR |
|---|---|---|---|
| level of life cycle emissions to air | AIR | - | Full potential for the requirement |
| content of sustainable renewable materials | AIR, CLIMATE CHANGE | - | Full potential for the requirement |
| sourcing of raw materials from certified sustainable practices | CLIMATE CHANGE | - | Full potential for the requirement |

# Appendix IV - List elaborated by EFIC with the most relevant requirements based on our interpretation

## Figure 16. Overview (not exhaustive) of important requirements of the ESPR and the fields of action for companies

| Non-exhaustive selection of important requirements based on the ESPR | Performance*1 and/ or Information*1 requirement *1: potential predictions based on EFIC views | Field of action for companies |
|---|---|---|
| Product $CO_2$ – Footstep or Environmental Footstep | I | ▪ Design/ construction<br>▪ Data determination |
| reliability - durability – lifetime of the product | P/ I | ▪ Design/ construction |
| ease of non-destructive disassembly and re-assembly of the product an/ or specific components<br>Note: DIN EN 17902 "Furniture - Circularity - Requirements and evaluation methodology for disassembly/reassembly" has been published, which provides valuable information on design/construction. | P/ I | ▪ Design/ construction |
| Maintainability | P/ I | ▪ Design/ construction |
| Repairability<br>• In place<br>• exchangeability | P/ I | ▪ Design/ construction |
| Upgradeability | P | ▪ Design/ construction |
| Spare parts > technical aspects<br>• compatibility with commonly available spare parts | P | ▪ Design/ construction |
| Spare parts > availability of<br>• free access, limited access<br>• Delivering time to the customer & period (after end of production of the product) | P/ I | ▪ Availability of spare parts |
| recycled content per piece of furniture<br>• requires a corresponding data structure for materials and parts | P/ I | ▪ Design/ construction<br>▪ Data determination |
| separation of recyclable materials<br>• separability of materials that have a negative impact on the subsequent recycling process or the quality of the recyclate | P | ▪ Design/ construction |
| use of component and material coding standards for the identification of components and materials | I | ▪ Design/ construction |
| Substances of concern | P/ I | ▪ Design/ construction<br>▪ Data determination |

***

**Do you need more information?**

- Reach out to your national association
- Follow EFIC on social media for updates: EFIC LinkedIn account
- Visit EFIC website for updates: EFIC I European Furniture Industries Confederation | Belgium

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*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/*