



# ESPR for Furniture

*Implications of ESPR for furniture design, material transparency, repairability, recyclability and Digital Product Passport readiness*

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| Version     | 2026 white paper edition                                                                                                                                            |
| Scope       | ESPR Working Plan 2025-2030, Digital Product Passport, substances of concern, data readiness and business impact for furniture                                      |
| Audience    | Manufacturers, importers, brand owners, regulatory affairs, product stewardship, sustainability, R&D, procurement, quality, IT/data and board-level decision-makers |

### Core thesis

Furniture is a priority final product group under the ESPR Working Plan. The future compliance challenge will be to prove that furniture products are durable, repairable, recyclable, traceable and supported by reliable material and component data.

**Legal note:** This white paper provides strategic orientation and does not constitute legal advice. Concrete obligations will depend on future delegated acts, harmonised standards, guidance, product scope, market role and company-specific facts.

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## 1. Executive Summary

Furniture is one of the priority final product groups identified in the first ESPR and Energy Labelling Working Plan 2025-2030. The Working Plan does not yet create final product-specific obligations, but it signals where the Commission will consider future ecodesign and information requirements through delegated acts.

Furniture products combine wood, metal, plastics, textiles, foams, adhesives, coatings, hardware and packaging. This makes ESPR readiness a cross-material and multi-supplier challenge.

The Working Plan prioritises furniture because of its circular-economy potential and the ability to improve durability, repair, recyclability and material efficiency.

### Executive insight

For furniture, ESPR readiness should start before the delegated act is finalised. The hardest work is usually not interpreting the legal text, but building reliable product, material, supplier, sustainability and end-of-life data.

## 2. Regulatory Background and Working Plan Status

ESPR is a framework regulation. Concrete requirements are developed product group by product group through preparatory studies, impact assessments, stakeholder consultation, Ecodesign Forum discussions and delegated acts.

The first Working Plan identifies priority products for the 2025-2030 period and also announces horizontal measures on repairability and recyclability. Product information will mainly be made available through the Digital Product Passport or, for energy-labelled products, through EPREL where relevant.

## 3. Why This Product Group Matters

Furniture products combine wood, metal, plastics, textiles, foams, adhesives, coatings, hardware and packaging. This makes ESPR readiness a cross-material and multi-supplier challenge.

The business impact is therefore broader than regulatory compliance. It affects product design, material choices, supplier qualification, sustainability claims, data systems, customer transparency and end-of-life strategy.

## 4. Expected Requirement Areas

| Requirement area              | Likely direction                                                                         | Evidence companies should start building                              |
|-------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Durability and reliability    | Product life, structural integrity, use-cycle performance and quality claims.            | Test protocols, design validation and warranty data.                  |
| Repairability and spare parts | Access to components, fasteners, covers, legs, hinges, glides and repair information.    | Spare-parts policy, repair manuals and design-for-disassembly review. |
| Material transparency         | Wood, metal, plastics, textile, foam, coating and adhesive data.                         | Component BOM and supplier declarations.                              |
| Recyclability and disassembly | Design for separation of materials and recycling-compatible construction.                | Disassembly map, joining-method review and recyclability assessment.  |
| Substances of concern         | SoCs in treated wood, flame retardants, adhesives, coatings, foams and textiles.         | Chemical review and supplier substance declarations.                  |
| Digital Product Passport      | Structured product record for materials, repair, end-of-life and compliance information. | DPP data model and access rights.                                     |

## 5. Substances of Concern and Materials Governance

For furniture, substances of concern are a strategic ESPR issue because they can affect product safety, circularity, recycling, reuse, durability and DPP disclosure. Companies should connect REACH, CLP, SCIP, supplier declarations and product BOM data into one evidence model.

- Map substances and materials by component and supplier.
- Identify substances that may affect recycling, reuse or recovered-material quality.
- Establish supplier update obligations for regulatory changes.
- Define public, customer, authority and confidential data layers for future DPP disclosure.

## 6. Digital Product Passport Readiness

The Digital Product Passport should be treated as a data governance system, not as a QR-code project. The visible passport is only the front end of a controlled evidence architecture.

| DPP data domain         | Typical content                                                                | Source systems                      | Risk                               |
|-------------------------|--------------------------------------------------------------------------------|-------------------------------------|------------------------------------|
| Product identity        | Model, SKU, product category, manufacturer, economic operator.                 | ERP, PLM, PIM.                      | Inconsistent product master data.  |
| Material composition    | Main materials, components, additives, coatings and trims.                     | BOM, supplier declarations.         | Incomplete supplier data.          |
| Sustainability data     | Environmental footprint, recycled content, durability and circularity metrics. | LCA, ESG, quality systems.          | Unsupported claims.                |
| End-of-life information | Repair, reuse, disassembly, sorting, recycling and collection guidance.        | Service, recyclers, waste partners. | Mismatch with real infrastructure. |
| Compliance evidence     | DoC, technical file, test reports, SoC and standards references.               | Regulatory and quality systems.     | Weak audit trail.                  |

## 7. Business Impact and Risk Areas

### Component-level material data not available from suppliers.

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### Design choices that prevent disassembly or repair

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### Conflicting claims around sustainable wood, recycled content and recyclability.

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### SoC uncertainty in coatings, adhesives, foams and textile components.

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## Packaging and PPWR obligations managed separately from furniture product data.

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## 8. Enterprise Readiness Roadmap

| Phase             | Objective                                          | Key activities                                                                 | Outputs                       |
|-------------------|----------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------|
| 1. Discover       | Map exposure and current data maturity.            | Product portfolio, suppliers, materials, variants and claims scan.             | Readiness heat map.           |
| 2. Prioritize     | Focus on high-volume and high-risk products.       | Rank by material complexity, SoC risk, supply-chain opacity and DPP relevance. | Priority roadmap.             |
| 3. Build evidence | Create reliable data foundations.                  | BOM enrichment, supplier templates, test evidence and sustainability metrics.  | Evidence repository.          |
| 4. Engage         | Influence requirements while still in development. | Ecodesign Forum input, industry associations and technical papers.             | Advocacy package.             |
| 5. Implement      | Prepare for delegated acts and DPP.                | Design changes, data workflows, technical files and DPP pilot.                 | Operational compliance model. |
| 6. Operate        | Maintain continuous readiness.                     | Regulatory monitoring, supplier updates, audits and executive reporting.       | Compliance dashboard.         |

## 9. Advocacy and Stakeholder Engagement

Advocacy opportunities are strongest before delegated acts are finalised. Companies should provide evidence on technical feasibility, environmental benefit, testing methods, costs, market structure, SME impacts and realistic transition periods.

- Participate in relevant preparatory studies and stakeholder meetings where available.
- Coordinate technical positions through industry associations.
- Develop evidence-based position papers on feasibility, thresholds and transition periods.
- Engage suppliers and recyclers to validate practical circularity claims.
- Monitor Ecodesign Forum outputs and delegated-act drafts.

## 10. Board-Level Priorities

- Treat ESPR as a product-strategy and data-governance transformation.
- Map affected products and suppliers against the ESPR Working Plan.
- Start DPP and material-data readiness before delegated acts are final.
- Build a substances-of-concern control framework.

- Integrate sustainability and circularity criteria into product development stage gates.
- Prepare evidence-based advocacy positions during consultation windows.
- Create an executive ESPR timeline and risk dashboard.

## 11. Outlook and Conclusion

ESPR will progressively change how furniture products are designed, documented, sold, repaired, reused and recycled in the EU market. Companies that prepare early can reduce compliance disruption and strengthen their sustainability position with verified evidence.

### Final message

For furniture, ESPR readiness is data readiness, supplier readiness and product-design readiness. The delegated act will define the legal obligation, but the capability must be built before then.

## References

- [1] Regulation (EU) 2024/1781 establishing a framework for ecodesign requirements for sustainable products <https://eur-lex.europa.eu/eli/reg/2024/1781/oj/eng>
- [2] European Commission, ESPR and Energy Labelling Working Plan 2025-2030 [https://green-forum.ec.europa.eu/news/2025-2030-working-plan-2025-07-11\\_en](https://green-forum.ec.europa.eu/news/2025-2030-working-plan-2025-07-11_en)
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