

ESPR for Furniture

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

PREPARED BY	Regulatory Strategy Consulting Kunz Dr. Erika Kunz
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. Future policy developments and delegated acts may increasingly require evidence relating to durability, repairability, recyclability and material transparency

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.

Table of Contents

1. Executive Summary
2. Regulatory Background and Working Plan Status
3. Why This Product Group Matters
4. Expected Requirement Areas
5. Substances of Concern and Materials Governance
6. Digital Product Passport Readiness
7. Business Impact and Risk Areas
8. Enterprise Readiness Roadmap
9. Advocacy and Stakeholder Engagement
10. Board-Level Priorities
11. Outlook and Conclusion

References

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 reparability 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. Potential areas currently being considered within policy and preparatory processes

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.

Requirement Area	Likely Direction	Evidence Companies Should Start Building
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

where required by future delegated acts or other applicable Union legislation.

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.

Component-level material data not available from suppliers.

Design choices that prevent disassembly or repair

Design choices that prevent disassembly or repair.

Conflicting claims around sustainable wood, recycled content and recyclability.

Conflicting claims around sustainable wood, recycled content and recyclability.

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

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

Packaging and PPWR obligations managed separately from furniture product data.

Packaging and PPWR obligations managed separately from furniture product data.

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
- [3] European Commission, Implementing the Ecodesign for Sustainable Products Regulation https://green-forum.ec.europa.eu/implementing-ecodesign-sustainable-products-regulation_en
- [4] European Commission, Digital Product Passport https://single-market-economy.ec.europa.eu/single-market/digital-product-passport_en

About Regulatory Strategy Consulting Kunz

Regulatory Strategy Consulting Kunz supports organizations in navigating complex regulatory landscapes and transforming compliance into a source of strategic value. The practice provides independent strategic advice, expert assessments and project-based support for organizations facing regulatory change, sustainability transformation and complex compliance challenges.

Smart Regulatory Compliance. Strategy with Integrity.

Disclaimer: This article provides general regulatory information and does not constitute legal advice. Regulatory obligations depend on applicable legislation, delegated acts, standards and individual business circumstances.

AI-assisted content generation was used during drafting. All technical, regulatory and strategic conclusions were reviewed and approved prior to publication