

ESPR for Mattresses

Implications of ESPR for mattress durability, material transparency, dismantling, recycling, substances of concern and DPP readiness

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SCOPE	ESPR Working Plan 2025–2030, Digital Product Passport, substances of concern, data readiness and business impact for mattresses
AUDIENCE	Manufacturers, importers, brand owners, regulatory affairs, product stewardship, sustainability, R&D, procurement, quality, IT/data and board-level decision-makers

CORE THESIS

Mattresses are a priority final product group under the ESPR Working Plan. Areas currently discussed in policy development and preparatory activities include material composition, durability, substances of concern, dismantling and recyclability

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

Mattresses 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.

Mattresses are complex products made from foams, textiles, springs, adhesives, flame retardants, latex, covers and packaging. Their circularity challenge is driven by material diversity, hygiene considerations, bulky waste handling and dismantling economics.

The Working Plan includes mattresses among the priority products selected for circular-economy potential under the first ESPR cycle.

EXECUTIVE INSIGHT

For mattresses, 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

Mattresses are complex products made from foams, textiles, springs, adhesives, flame retardants, latex, covers and packaging. Their circularity challenge is driven by material diversity, hygiene considerations, bulky waste handling and dismantling economics.

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

subject to future delegated acts

Requirement Area	Likely Direction	Evidence Companies Should Start Building
Durability and performance	Product lifetime, compression performance, cover durability and warranty basis.	Test data, product specifications and quality records.
Material composition	Foams, textiles, latex, springs, adhesives, covers and fire-safety materials.	Component BOM and supplier declarations.
Dismantling and recyclability	Ability to separate materials and route components into recycling or recovery streams.	Disassembly map and recycling feasibility assessment.

REQUIREMENT AREA	LIKELY DIRECTION	EVIDENCE COMPANIES SHOULD START BUILDING
Substances of concern	Flame retardants, adhesives, treatments, coatings and foam additives.	SoC screening and supplier substance declarations.
End-of-life information	Guidance for collection, dismantling, recycling and recovery systems.	Waste-chain data and consumer/professional instructions.
Digital Product Passport	Product-level information on materials, durability, circularity and compliance.	DPP data model and evidence repository.

5. Substances of Concern and Materials Governance

For mattresses, 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

Incomplete data on foam additives, adhesives and textile treatments.

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Circularity claims unsupported by real recycling infrastructure.

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Dismantling costs greater than recovered-material value.

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Complex product variants and private-label supply chains.

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Difficulty connecting product, packaging, logistics and end-of-life 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 mattress 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 mattresses, 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
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