

SBS comments to ESPR Preparatory Study and Impact Assessment support study on furniture

July 2026

KEY POINTS

- Recognise custom-made and built-in furniture under Recital 13
- Leverage the direct manufacturer–customer relationship to simplify information obligations
- Calibrate DPP data requirements to the fragmented, non-digitised reality of the sector
- Ensure clarity and alignment of all relevant definitions, also considering the interplay with the upcoming European Product Act

BACKGROUND

The proposal for a new Ecodesign for Sustainable Products Regulation (ESPR) extends the scope of the existing Ecodesign Directive to non-energy related products, establishing a framework to set Ecodesign requirements for specific product groups to significantly improve their circularity, energy performance and other environmental sustainability aspects. The new Regulation will enable the setting of performance and information requirements for almost all categories of physical goods placed on the EU market.

The European Commission then launched a preparatory study under The Ecodesign for Sustainable Products Regulation (ESPR) and an EU Ecolabel criteria revision to properly understand how furniture is made, sold and used across Europe. This study aims at gathering stakeholder input on key aspects relevant to the development of future EU policy measures, including Ecodesign requirements and updated EU Ecolabel criteria revision for furniture.

Any Ecodesign requirements developed for furniture should be grounded in the **Think Small First** principle, which requires that legislation be designed with SME realities in mind from the outset rather than adapted for them after the fact, a principle that runs through the ESPR itself (Recital 13, Article 5(11)) and that SME representative bodies have consistently called for in the DPP and product-regulation context more broadly.

Recognise custom-made and built-in furniture under Recital 13

Recital 13 of the ESPR foresees exemptions or adjustments for products intended for a specific use or manufactured in very small quantities. This describes most SME-furniture production: items designed and built to the individual specifications of one customer, frequently as built-in furniture that must be fitted on site to a specific space. The 20 product parameters listed in Annex I ESPR should be simplified in number and level of detail for this category, reflecting that many parameters (e.g. those aimed at standardised, mass-market products) are not meaningfully applicable to one-off, made-to-order items.

Leverage the direct manufacturer–customer relationship to simplify information obligations

SME furniture is typically designed, manufactured and installed on site by the same business. This creates a direct line of communication with the customer, unlike furniture sold via retail or online platforms, where manufacturer and end user rarely interact directly. This should be reflected in how product information and DPP-type obligations are designed: SMEs should be able to convey required information directly to the customer through existing channels (e.g. order documentation, on-site handover), without being forced into third-party cloud-based data storage or DPP infrastructure that adds cost and complexity without a clear traceability benefit in a direct sales model. This is also where the **Once Only** principle should apply: where a furniture SME has already provided information directly to its customer at the point of sale, it should not be required to re-submit or duplicate that same data into separate DPP infrastructure or to multiple

Calibrate DPP data requirements to the fragmented, non-digitised reality of the sector

Data across the SME furniture value chain is largely non-standardised and non-digital: industry associations of furniture manufacturers reported no common data standards in use with product data dominated by PDF or paper-based documentation. Environmental and footprint data are typically available only at company level, not per product or model, since production is project specific. Any DPP framework should build in interoperability with these existing tools and formats and allow simplified documentation or derogations where product-specific historical data cannot reasonably be obtained.

Ensure clarity and alignment of all relevant definitions, also considering the interplay with the upcoming European Product Act

Reliability, Repairability and Refurbishment would be most important aspects to extend product lifetime. Environmental and other footprint information are very difficult to calculate for each individual designed furniture due to the customers' requirements. And the necessary information is not available from the value chain of our suppliers. The existing information interfaces are currently used for construction dates and product prices, and IDs. New interface models are discussed but are not available for our members.

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