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NATUR VÅRDS VERKET

Sweden's textile and furniture sectors in transition

An analysis of market structure, trade dynamics, and policy impacts from new EU legislation

ivl
Swedish Environmental Research Institute

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[Textile, furniture, clothes, Ecodesign, sustainability, regulation, waste framework, European legislation, Swedish market, espr, epr, wfd]

Preface

The Ecodesign for Sustainable Products Regulation (ESPR) and extended producer responsibility for textiles, textile-related products and footwear are being introduced at EU and national levels for the textile and footwear sectors. Similar ecodesign requirements are also planned for the furniture sector. The purpose of these regulations is to promote the circular economy and support the green transition.

Against this background, the Swedish Agency for Economic and Regional Growth (Tillväxtverket) and the Swedish Environmental Protection Agency (Naturvårdsverket) have identified a need to map and analyse the textile and furniture sectors in Sweden. The agencies require a deeper understanding of company size, business orientation, market structure, trade flows, and the extent of direct imports from third countries by households.

IVL Swedish Environmental Research Institute (IVL Svenska Miljöinstitutet) has been commissioned to carry out this study. The purpose is to map the companies operating within each sector and to examine the opportunities and challenges that companies identify in relation to the forthcoming regulations. The study aims to provide knowledge that strengthens the authorities' ability to develop support measures and guidance for small and medium-sized enterprises. In doing so, it can help facilitate companies' transition and strengthen Sweden's long-term competitiveness.

The study has been funded by Tillväxtverket. IVL Svenska Miljöinstitutet is solely responsible for the content of the report, including its analyses and conclusions.

Stockholm, 18 August 2026

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Summary

The Swedish textile and furniture sectors are currently undergoing a period of substantial transition. This is due to regulatory developments, evolving trade patterns, and increasing demands for sustainability. This report examines how these changes influence market structure and business conditions, with particular emphasis on the implications of emerging European Union legislation.

At the centre of this transition are the Ecodesign for Sustainable Products Regulation (ESPR) and the revised Waste Framework Directive (WFD), which introduces Extended Producer Responsibility (EPR) for textiles. Together, these frameworks mark a shift from voluntary sustainability ambitions towards mandatory requirements that span the full lifecycle of products. Companies will increasingly be required to demonstrate characteristics such as product durability, material composition, reparability, and recyclability, as well as to manage and communicate product-related data more systematically

The purpose of this study is to provide a comprehensive overview of the Swedish textile and furniture markets in this evolving regulatory context. It identifies the actors that are placing products on the Swedish market, analyses their distribution across company sizes, and assesses how forthcoming legislation may affect different segments. The report also examines international trade flows, mapping imports and exports in terms of volume, value, and origin, to better understand Sweden's reliance on global supply chains.

In addition, the study addresses the growing importance of direct-to-consumer imports through e-commerce platforms based outside the European Union. These flows have increased significantly in recent years and are perceived as influencing both competition and regulatory effectiveness. At EU level, low-value consignments increased from 4.6 billion parcels in 2024 to 5.8 billion in 2025. In Sweden, international parcel flows increased from 43.31 million parcels in 2024 to 57.56 million parcels in 2025. Based on data from Svensk Handel, purchases from Shein and Temu alone are estimated to correspond to approximately 9.6–12.7 million parcels per year. Using assumptions about product mix and average product weight, the potential annual inflow from these two platforms is estimated at around 3,500–11,500 tonnes of textiles and 5,000–14,500 tonnes of furniture. Since these estimates cover only two platforms, the total volume of direct imports from third countries is likely to be higher.

The analysis combines quantitative data and qualitative insights. Market structures are assessed using official statistics, while interviews with companies provide a deeper understanding of how the ongoing regulatory transition is perceived in practice. The interviews explore challenges, opportunities, and the adjustments firms expect to make in response to new requirements.

The findings show that both sectors are dominated by micro and small enterprises, many of which have limited resources to manage complex regulatory obligations. The mapping identifies approximately 15,433 companies in the Swedish textile sector and 6,397 companies in the furnishing sector that may be affected by forthcoming requirements. In both sectors, around 99 percent of companies are micro or small enterprises. In the textile sector, the estimate includes 11,500 micro enterprises, 3,743 small enterprises, 176 medium-sized enterprises and 14 large enterprises. In the furnishing sector, the corresponding figures are 4,095 micro enterprises, 2,210 small enterprises, 86 medium-sized enterprises and 6 large enterprises.

At the same time, there are important differences between sectors. The textile sector is highly import-dependent and already subject to more advanced regulatory developments, including forthcoming EPR systems. The furniture sector, while also affected by ESPR, faces greater uncertainty due to the lack of detailed product-specific requirements at this stage.

Trade statistics confirm the different market profiles of the two sectors. For textile products, imports amounted to approximately 198,000 tonnes and SEK 56 billion in 2025, while exports amounted to around 100,000 tonnes and SEK 34 billion. The main import countries by value were China, Bangladesh, Germany, Denmark and Poland, with China accounting for 28 percent of import value. For furniture products including mattresses, imports amounted to approximately 483,000 tonnes and SEK 21.4 billion in 2025, while exports amounted to around 481,000 tonnes and SEK 18.1 billion. The largest import countries by value were China, Poland, Lithuania, Germany and Denmark, with China accounting for 21 percent of import value. Mattress imports declined over the period studied, from around 71,700 tonnes in 2020 to around 47,700 tonnes in 2025.

Overall, the report places the Swedish textile and furniture markets in the context of a broader shift towards more resource-efficient, transparent, and circular product systems. While companies broadly support the direction of policy, the study highlights that successful implementation will depend on the clarity, predictability, and proportionality of the regulatory framework.

A key finding is the significant need for support from public authorities during the transition. Companies consistently emphasise the importance of clear and timely guidance, particularly regarding the interpretation and practical application of new requirements. There is also a demand for concrete implementation support, including examples, tools, and structured approaches to compliance. Furthermore,

companies highlight the need for guidance related to data management and digital systems, especially in relation to digital product passports, where uncertainty remains high.

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1 Introduction

This study is produced for the Swedish Agency for Economic and Regional Growth (Tillväxtverket) and the Swedish Environmental Protection Agency (Naturvårdsverket). The purpose is to highlight characteristics of the Swedish market for textiles and furniture (with mattresses as a subgroup) based on the Ecodesign for Sustainable Products Regulation [1] (ESPR) as well as on the Extended Producer Responsibility[2] (EPR) in the Waste Framework Directive[3] (WFD) for textiles, textile-related products and footwear.

The aim is to identify what the Swedish textile and furniture markets looks like, which actors put these products on the Swedish market and how they are distributed within the size ranges that define the requirements of the Ecodesign Regulation, including the destruction of unsold consumer products and the requirements for producer responsibility for textiles. Import and export flows of textiles and furniture are mapped to gain knowledge about the countries from which they are imported, and exported to, as well as the volumes and values involved.

This study also includes a potential quantification of private imports (online shopping) of products from third countries including low-price parcels, as well as a summary of how interviewed companies experience how the private imports affect the competitiveness and profitability of Swedish companies.

During the interviews questions have been asked to gain knowledge of the companies´ views on the need for support from the authorities during the transition period of understanding and implementing new requirements related to the ESPR and the WFD.

The study was conducted between February and April 2026.

[1] Regulation - EU - 2024/1781 - EN - EUR-Lex
[2] Revised Waste Framework Directive enters into force - Environment
[3] Directive - EU - 2025/1892 - EN - EUR-Lex

2 Svensk sammanfattning (utökad)

Denna rapport analyserar utvecklingen inom de svenska textil- och möbelmarknaderna mot bakgrund av kommande EU-regelverk. Fokus ligger på **Förordningen om ekodesign för hållbara produkter** (Ecodesign for Sustainable Products Regulation (ESPR)) samt den reviderade **Ramdirektivet för avfall** (Waste Framework Directive (WFD) med tillhörande producentansvar (Extended Producer Responsibility, EPR) för textilier och skor. Syftet är att belysa marknadsstruktur, handelsflöden och företagens förutsättningar att integrera och anpassa sig till dessa förändringar samt att identifiera centrala utmaningar och möjligheter i omställningen.

Studien visar att både textil- och möbelsektorerna befinner sig i en tydlig omställningsfas där hållbarhetskrav successivt konkretiseras och omsätts i bindande regelverk. De kommande regelverken innebär att krav på produkter ställs ur ett livscykelperspektiv, vilket omfattar allt från design och materialval till användning, återanvändning och avfallshantering.

Omställningen berör därmed inte enbart enskilda produktled utan påverkar företagens verksamhet i sin helhet, inklusive affärsmodeller, leverantörsrelationer, informationshantering och strategisk planering. Samtidigt präglas sektorerna av en stor andel små och medelstora företag, vilket ställer särskilda krav på hur regelverken utformas och implementeras.

2.1 Marknadsstruktur och näringslivets sammansättning

Den svenska textilsektorn omfattar cirka 15 400 företag och möbelsektorn cirka 6 400 företag. I båda fallen utgör mikro- och småföretag en överväldigande majoritet, omkring 99 procent av det totala antalet företag.

Denna struktur innebär att många aktörer har begränsade resurser för att hantera nya krav, särskilt vad gäller datainsamling, rapportering och juridisk tolkning. Även om många krav anpassas särskilt för mikro och små företag framkommer det i denna studie att även de mindre företagen kommer att påverkas eftersom de ofta är leverantörer till större bolag som ställer kraven på sina leverantörer för att själva kunna leva upp till de nya kraven. Samtidigt är produktkrav i regel oberoende av

företagsstorlek, vilket innebär att även mindre företag påverkas i betydande omfattning.

Resultaten visar också att traditionella mått på företagsstorlek, såsom antal anställda, inte alltid ger en fullständig bild av företagens ekonomiska kapacitet, då vissa företag har relativt få anställda men hög omsättning.

2.2 Regelverksutveckling inom EU

Två centrala regelverk driver utvecklingen:

ESPR etablerar ett ramverk för produktkrav kopplade till hållbarhet. Detta inkluderar krav på bland annat hållbarhet, reparerbarhet och återvinningsbarhet, samt införandet av digitala produktpass (DPP). Regelverket omfattar även begränsningar av destruktion av osålda produkter och krav på rapportering.

WFD, i sin reviderade form, innebär att medlemsstater ska införa producentansvar för textilier. Producenter ska bära kostnader för insamling, sortering och behandling av produkter efter användning. Avgifter ska differentieras utifrån produkternas miljöprestanda genom så kallad ekomodulering.

För textilsektorn innebär detta att företag påverkas av regelverk som spänner över hela produktens livscykel. För möbelsektorn är regelutvecklingen mindre konkret i nuläget, men ESPR förväntas få stor betydelse även där och delegerad akt för möbler förväntas tas fram senast 2028.

2.3 Handelsflöden och internationella beroenden

Textilsektorn i Sverige är tydligt importberoende. Importvolymerna är betydligt större än exportvolymerna och domineras av leveranser från länder som Kina, Bangladesh och flera europeiska länder. Detta innebär att svenska företag i stor utsträckning är beroende av globala leverantörskedjor och tillgång till produktdata från externa aktörer.

Möbelsektorn uppvisar en mer balanserad handelsbild, där import och export ligger på mer jämförbara nivåer. Samtidigt finns en betydande importandel, särskilt från EU-länder och i viss mån från Asien.

För båda sektorerna innebär detta att framtida regelkrav, särskilt kopplade till produktinformation och spårbarhet, i hög grad kommer att vara beroende av funktionella internationella informationsflöden.

2.4 Direktimport via e-handel

En betydande förändring i marknadens struktur är den snabba ökningen av direktimport via e-handelsplattformar från länder utanför EU. Dessa flöden, ofta bestående av lågprisprodukter, uppskattas omfatta miljontals försändelser per år.

Denna utveckling medför flera utmaningar. Produkterna riskerar att inte uppfylla EU:s krav på exempelvis kemikalieinnehåll och produktsäkerhet. Samtidigt skapas snedvridna konkurrensförhållanden, där företag etablerade inom EU omfattas av mer långtgående krav än aktörer som säljer direkt till konsumenter från tredjeland.

Utvecklingen har uppmärksammats på EU-nivå, där åtgärder vidtas för att stärka kontrollen av lågprisimporter och säkerställa mer likvärdiga konkurrensvillkor.

2.5 Företagens perspektiv i textilsektorn

Intervjuer med företag inom textilsektorn visar att det finns en bred acceptans för inriktningen i de nya regelverken. Många företag uppfattar att lagstiftningen formaliserar ett hållbarhetsarbete som redan pågår, särskilt vad gäller kvalitet, livslängd och resurseffektivitet.

Samtidigt lyfts flera centrala utmaningar:

- **Osäkerhet kring regelverkens utformning**, särskilt vad gäller detaljer i krav, tidsplaner och ansvarsfördelning.
- **Begränsade resurser**, framför allt i små och medelstora företag.
- **Svårigheter att hantera produktdata**, särskilt längre upp i leverantörskedjan.
- **Ojämlik konkurrens**, relaterad till direktimport från tredjeland.

Trots dessa utmaningar identifierar företagen även möjligheter. Gemensamma regler inom EU kan bidra till att stärka konkurrenskraften för företag som satsar på kvalitet och hållbarhet, samt möjliggöra en förskjutning från prisbaserad till värdebaserad konkurrens.

2.6 Företagens perspektiv i möbelsektorn

Möbelsektorn kännetecknas av en hög grad av segmentering, där konkurrensförutsättningarna skiljer sig mellan exempelvis premium- och lågprissegment.

Intervjuerna visar att även möbelföretagen upplever betydande osäkerhet kring kommande krav, särskilt kopplat till ESPR och digitala produktpass. Samtidigt lyfts utmaningar kopplade till komplexa leverantörskedjor, produktstruktur och administrativ belastning.

Sektorn identifierar samtidigt möjligheter i form av stärkt marknadstransparens och förbättrade konkurrensvillkor för företag som arbetar med hållbar design och lång livslängd.

2.7 Centrala frågor från båda sektorerna

Rapporten identifierar ett antal frågor som är gemensamma för båda sektorerna:

- **Produktdata och spårbarhet** framstår som avgörande. Företag behöver system för att hantera omfattande och dynamisk produktinformation.
- **Proportionalitet i regelverkens utformning** är central, eftersom små företag annars riskerar att drabbas oproportionerligt hårt.
- **Tydlig och praktiskt inriktad vägledning** från myndigheter efterfrågas i hög grad.
- **Effektiv marknadskontroll** är nödvändig för att säkerställa likvärdiga konkurrensvillkor och regelverkens legitimitet.

2.8 Företagens behov av myndighetsstöd

Rapporten visar att företagens behov av myndighetsstöd kan sammanfattas i fyra övergripande dimensioner:

1. Tydlighet: klara regler, definitioner och tidslinjer.
2. Praktisk tillämpbarhet: konkreta verktyg, mallar och vägledning.
3. Tillgänglighet: dialog och stöd under hela implementeringsprocessen.
4. Rättvisa villkor: effektiv tillsyn och likvärdig regeluppföljning.

Stödet behöver således utformas som en kombination av regulatorisk tydliggörande, operativt stöd och aktiv myndighetsnärvaro, snarare än enbart informationsspridning.

2.9 Sammanfattning

Sammanfattningsvis visar rapporten att den pågående regelutvecklingen innebär en genomgripande förändring av förutsättningarna för svenska textil- och möbelföretag.

Företagen är i stor utsträckning positiva till den övergripande inriktningen, men pekar på behovet av tydliga, förutsägbara och proportionerliga regelverk. Implementeringen kommer att vara avgörande för om lagstiftningen leder till faktiska miljöförbättringar eller främst resulterar i ökad administrativ belastning.

En väl avvägd utformning, kombinerad med effektiv tillsyn och stöd till näringslivet, bedöms vara avgörande för att åstadkomma en hållbar och konkurrenskraftig omställning av sektorerna.

3 Methodology

In this section the methods used in this study are specified and explained.

3.1 Number and size of companies within textiles and furnishing

The mapping identifies the number of companies placing textile and furnishing products on the Swedish market and classifies them by size, based on relevant industry groupings.

Relevant product scope was derived from Regulation (EU) 2024/1781 (ESPR) and Directive 2008/98/EC (WFD), using CN codes (Combined Nomenclature used to classify customs declarations to ensure uniform application of prohibitions across

all Member States) Annex VII and Annex IVc respectively[4]. These were translated to CPA (Classification of Products by Activity) and subsequently linked to industry level using CPA–NACE (**N**omenclature statistique des **a**ctivités économiques dans la **C**ommunauté **e**uropéenne) correspondence tables. For the Swedish context, industries were mapped to SNI 2007 (and cross-checked against SNI 2025). SNI is the Swedish Standard Industrial Classification System, aligning national industry codes with the EU´s NACE.

As product classifications (CN/CPA) do not directly identify market actors, the SNI mapping was used to approximate the sectors in which relevant actors are typically found. The resulting SNI codes were subject to a qualitative relevance screening to exclude clearly non-relevant activities. This assessment was also validated through consultation with the Swedish Agency for Economic and Regional Growth (Tillväxtverket) and the Swedish Environmental Protection Agency (Naturvårdsverket) to ensure relevance.

The number of companies was estimated using data from Statistics Sweden's Business Register *(Statistics Sweden, no date)*, limited to active enterprises within the selected SNI codes and where the relevant SNI code was registered as the company's primary activity (main SNI code). This means that companies where textiles or furnishing are only a secondary activity are not included. For each size category, separate searches were carried out based on the thresholds in the EU definition of micro, small and medium-sized enterprises[5]. These thresholds were translated into the employee and turnover intervals available in the Statistics Sweden Business Register, as shown in Table 1 below.

[4] Because the delegated acts for furniture have not yet been finalised for ESPR, as well as there not being a clear definition provided for what furniture entails, the CN codes used in this analysis are not linked to a specific regulatory framework. Therefore, all CN codes that can reasonably be considered furniture or mattresses have been included.

[5] EUR-Lex - 32003H0361 - EN - EUR-Lex

Table 1. Enterprise size categories based on the EU definition of micro, small and medium-sized enterprises in European Commission. "Translation used" refers to the employee and turnover intervals available in the business statistics of Statistics Sweden.

Enterprise category	EU definition	Translation used
Micro	<10 employees and ≤ EUR 2 million turnover	0-9 employees and <20,000 kSEK turnover
Small	<50 employees and ≤ EUR 10 million turnover	10–49 employees and <100,000 kSEK turnover
Medium	<250 employees and ≤ EUR 50 million turnover	50–249 employees and <500,000 kSEK turnover
Large	≥250 employees and > EUR 50 million turnover	≥250 employees or >500,000 kSEK turnover

For the company size analysis, the categories were adjusted to be mutually exclusive, which means that small companies include only companies that meet the criteria for small enterprises but not micro enterprises. Medium-sized companies include only companies that meet the criteria for medium-sized enterprises but not micro or small enterprises. This means that each company is counted only once, in the smallest applicable size category.

Some overlap may remain, since the estimate is based on separate employee and turnover thresholds rather than full company-level data. In addition, the EU definition includes a balance sheet criterion, which is not available in the Statistics Sweden Business Register.

3.2 Volumes and values of imported and exported textile and furniture products

Official trade statistics of textiles and furniture including mattresses was gathered through SCB's database (Statistiska centralbyrån, n.d-a). Data on total import and export (in ton and kSEK), based on only CN codes are non-response adjusted. Data regarding import and export countries is not adjusted for non-response. When data regarding export and import countries were collected, both countries in the EU and outside the EU have been included. CN-codes that have been incorporated can be viewed in table 2. For a more detailed list including cross-referencing to which CN-codes will fall under certain regulations, please see Annex 1.

Some furniture statistics were also derived from The Swedish Federation of Wood and Furniture Industry (referred to as TMF). The data from TMF are as of June

2025[6] as they only release reports on exports and imports twice per year. The data collected from TMF are mainly regarding country specific imports and exports.

Table 2. CN-codes included in this study. For a more detailed list including cross-referencing to which CN-codes will fall under certain regulation, please see annex 1.

CN codes for furniture	CN codes for textiles
9401 9402 9403 940421 940429 940490 94041000	4203 61 62 6504 6505 6301 6302 6303 6304 6309

3.3 Direct imports via e-commerce

As no data source was identified for the total volume of consumer goods directly imported to Sweden from third countries, nor on their distribution across product categories, the potential inflow of directly imported textiles and furniture's through e-commerce was derived using estimates. These estimates are based on data from Swedish Commerce (Svensk Handel), which provides two possible starting points for estimating the number of purchases made to Sweden from the Chinese e-commerce platforms Shein and Temu.

The first on is based on a figure from a survey by Swedish Commerce, derived from actual purchase transactions. The survey concludes that 18% of Swedes in the age between 20–69 purchased from Temu or Shein during an average month in 2024[7]. This suggests that each person, in Sweden, made approximately two purchases per year. Based on Sweden's population aged 20–69 in 2025[8], this corresponds to an estimated 12.7 million parcels in 2024.

[6] TMF_i_siffror_2_2025_FINAL-10_dec.pdf
[7] E-handelsindikatorn helår 2024 | Svensk Handel
[8] Population statistics

The second figure communicated by Swedish Commerce on the direct import of goods into Sweden, from foreign e-commerce platforms, states that approximately 800,000 Swedish consumers purchase from low-price platforms such as Temu and Shein during an average month[9]. Over a full year, this would correspond to around 9.6 million parcels being directly imported into Sweden in 2024. However, as the original figure represents an average month purchasing levels vary throughout the year, the actual annual total may differ. In summary, the two figure gives an estimate number of purchases from these e-commerce platforms, ranging between 9.6 and 12.7 million parcels per year.

Subsequently, quantitative assumptions were used in this study to estimate the share of textiles versus furniture based on the number of parcels. Shein's product range consists primarily of textiles, whereas Temu offers a broader assortment that includes additional product categories. The final estimate therefore assumes that 60% of the total product volume consists of textiles (excluding footwear), while 10% consists of furniture. To calculate the quantity of these purchases in ton, it was assumed that each parcels containing textiles included three garments or other textile products with an average weight ranging from 0.2-0.5 kg each. For furniture, it was assumed that each parcel contained one item of furniture weighing between 5-15 kg.

As these estimates are based only on data from two Chinese e-commerce platforms, they are not representative of all direct e-commerce imports from third countries. The total volume of direct imports from third countries to Sweden is therefore likely to be higher.

3.4 Interviews

The purpose of the interviews was to complement the analysis of the Swedish market for textiles and furniture and to provide a better understanding of companies' perspectives on key challenges and opportunities, of forthcoming legislations, and the ways in which support from public authorities could be designed to assist these companies (Table 3).

For textiles, where legislative developments are somewhat more advanced, respondents were asked about the Ecodesign for Sustainable Products Regulation (ESPR), including Digital Product Passports (DPP) and the destruction of unsold

[9] E-handelsindikatorn helår 2024 | Svensk Handel

goods, as well as how companies are affected by direct imports from third countries (i.e. countries outside the EU). The interviews also include questions on the Extended Producer Responsibility (EPR) for textiles under the Waste Framework Directive. In total, 10 semi-structured interviews were conducted with companies of different number of employees and annual turnover[10] and with different types of market actors, including both Business to business (B2B) and Business to consumer (B2C) companies. Several of the micro sized companies that was contacted did not have the possibility to participate in the interviews. The questions asked during the interviews can be seen in appendix 2.

Table 3. Interviewed textile companies.

Company name	B2B/ B2C	Products of relevance for the interviews
Nudie Jeans Retail	B2C	Clothing
Bubbleroom Sweden AB	B2C	Clothing
Eton AB	B2C	Clothing
Residus AB	B2C	Clothing
Ivanhoe AB	B2C	Clothing
Jumperfabriken Sweden AB	B2C	Clothing
Woolpower Östersund AB	B2C/ B2B	Clothing
Taiga AB	B2C/ B2B	Workwear
AB Ludvig Svensson	B2B	Interior textiles and workwear
TEKO	B2B	The Swedish trade and employers' association for companies working in the textile and fashion industry with about 340 member companies with a combined work force of 7,000 employees.

[10] EUR-Lex - 32003H0361 - EN - EUR-Lex

Legislation for furniture is isolated to ESPR and DPP at the time of the interviews. Even though furniture is a prioritised product in the *Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030*[11], there are still no further specifics that can give clarity to which furniture companies will be affected. The respondents have therefore been chosen to incorporate furniture companies that have the highest probability of having one or more product groups that might be affected by the regulation.

Due to varying response rates among companies, the list may not fully correspond with the estimated number of companies by segment according to the results presented in section 5.1.6. In total 10 semi-structures interviews were conducted with Swedish furniture, kitchen, bathroom and bed companies, as well as one trade association. The companies interviewed are presented in table 4 and include companies of various sizes in regard to number of employees and annual turnover[12] and with different types of market actors, including both B2B and B2C. The questions asked during the interviews can be seen in appendix 3.

Table 4. Interviewed furniture companies.

Company name	B2B/ B2C	Products of relevance for the interviews
Källemo AB	B2B	Furniture
Maze Interior AB	B2C/B2B	Furniture
Lanab Group AB	B2B	Furniture
Vilax	B2C/B2B	Furniture/beds
Ekdahls	B2C/B2B	Furniture
Mio	B2C	Furniture
Nobia	B2B/B2C	Kitchen
Mattsons	B2C	Bed manufacturing

[11] EUR-Lex - 52025DC0187 - EN - EUR-Lex
[12] https://eur-lex.europa.eu/legal-content/SV/TXT/PDF/?uri=CELEX:32003H0361

Vedum	B2B/B2C	Kitchen and bathroom
Trä- och Möbelföretagen (TMF)	B2B	The Swedish Federation of Wood and Furniture Industry- Trä- och Möbelföretagen (TMF) - is the national trade and employers' association of the wood processing and furniture industry in Sweden and represents approximately 700 member companies who jointly have around 30,000 employees.

4 Introduction to new EU legislation relevant for textiles and furniture

The EU regulatory agenda for textiles as well as for furniture (but at a lesser extent) is moving from strategy to binding implementation. Two frameworks are the most important for companies: the Ecodesign for Sustainable Products Regulation[13] (ESPR) and the revised Waste Framework Directive[14] (WFD) introducing Extended Producer Responsibility (EPR) for textiles and footwear. The ESPR entered into force in July 2024 and creates the legal basis for future product-specific ecodesign rules, digital product passports (DPP), mandatory disclosure on discarded unsold products, and restrictions on the destruction of unsold goods. In April 2025, the European Commission adopted the 2025–2030 ESPR working plan[15], which identifies textiles (with a focus on apparel), furniture, and mattresses among the priority product groups for upcoming ecodesign requirements.

For the textile sector, the regulatory direction is now clear: companies should prepare for stricter requirements on aspects such as durability, repairability, recycled content, recyclability, and product information, likely delivered through future delegated acts under the ESPR. The Commission has also confirmed that product information will increasingly be carried through the Digital Product

[13] Regulation - EU - 2024/1781 - EN - EUR-Lex
[14] Revised Waste Framework Directive enters into force - Environment
[15] 5f7ff5e2-ebe9-4bd4-a139-db881bd6398f_en

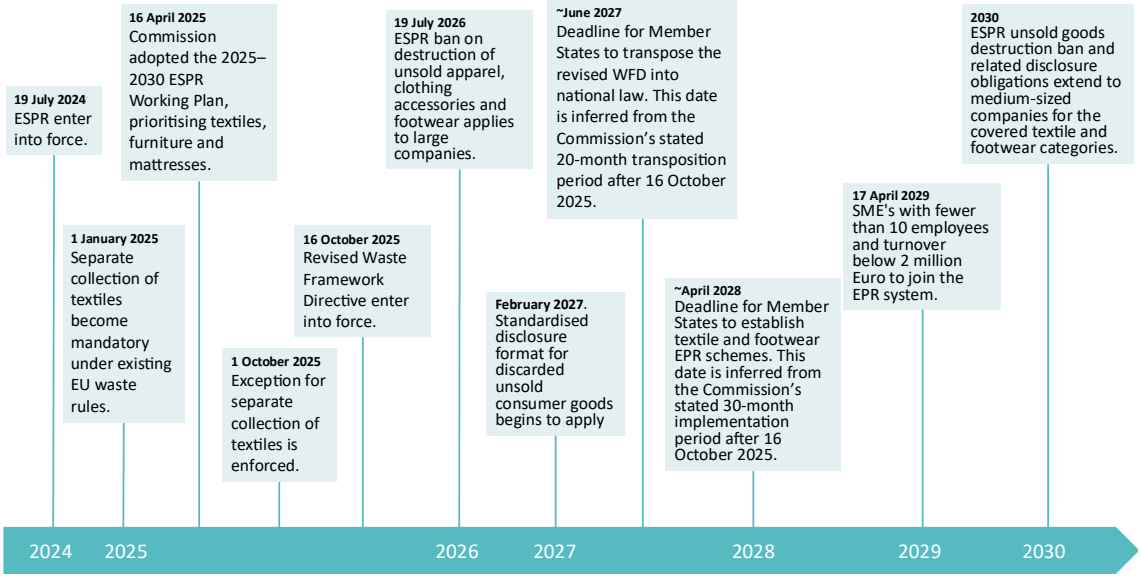
Passport (DPP) framework[16]. At the same time, the ESPR is already affecting commercial practices through the new rules on unsold clothing and footwear. In February 2026, the Commission adopted measures supporting the ESPR ban on the destruction of unsold apparel, clothing accessories and footwear[17], with application to large companies from 19 July 2026. Micro and small enterprises are exempt from this regulation, while medium-sized enterprises will become subject to the rules from 19 July 2030. Standardized disclosure on discarded unsold consumer goods applies from February 2027[18].

On the waste side, the revised Waste Framework Directive entered into force on 16 October 2025 and requires all EU Member States to establish EPR schemes for textiles and footwear under common EU rules[19]. Producers will cover the costs for collection, sorting, reuse, recycling and disposal through national systems. Fees are expected to be eco-modulated, meaning better-performing products should face lower fees. The Directive also clarifies that separately collected textiles are to be treated as waste and sorted before possible shipment, which will tighten controls around exports and claims of reusability. Member States have 20 months to transpose the Directive and 30 months to establish textile and footwear EPR schemes, which points to national transposition by about June 2027 and EPR schemes being in place by about April 2028. Micro-sized companies will have another year to join the EPR system (latest by April 2029)[20].

In Sweden, the government has tasked the Swedish Environmental Protection Agency with developing proposals for how the revised textile EPR requirements should be implemented in national legislation, including collection, producer responsibility and financing arrangements. The Swedish Environmental Protection Agency is required to report the assignment to the Government Offices (Ministry of Climate and Enterprise) no later than 13 November 2026.

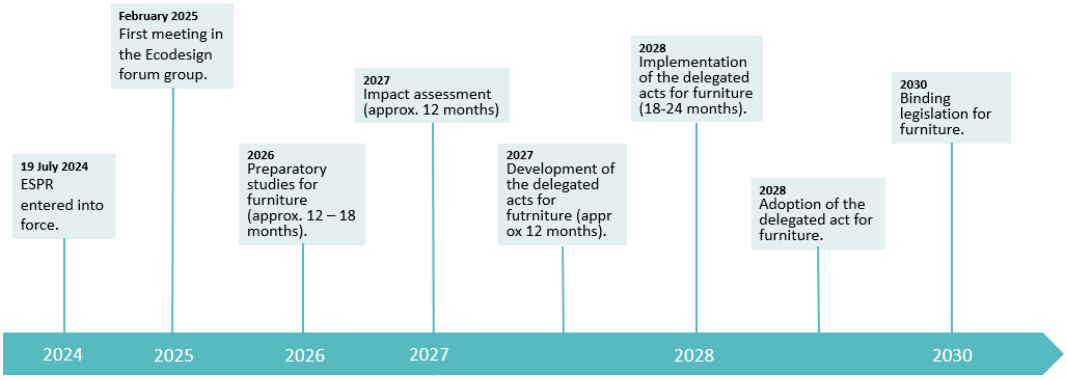
[16] EU's Digital Product Passport: Advancing transparency and sustainability | data.europa.eu
[17] New EU rules to stop destruction of unsold clothes and shoes - Environment
[18] New EU rules to stop destruction of unsold clothes and shoes - Environment
[19] Revised Waste Framework Directive enters into force - Environment
[20] Directive - EU - 2025/1892 - EN - EUR-Lex

Illustration 1. Indicative timeline for the textile sector from year 2024 to 2030.



For the furniture sector, the picture is different. Furniture, including mattresses, is now a priority ESPR product group, so product-design and product-information requirements are clearly coming into scope at EU level. However, the revised EU Waste Framework Directive does not introduce an EU-wide EPR obligation for furniture in this package; its harmonised EPR provisions are limited to textiles and footwear. This means furniture companies should primarily focus on upcoming ESPR ecodesign requirements, while also tracking any national waste or producer-responsibility measures that may emerge separately.

Illustration 2. Preliminary timeline for the furniture sector from year 2024 to 2030.



4.1 EU and measures regarding the rapid growth of low-value imports

The rapid growth in low-value direct-to-consumer imports has become an increasingly important policy issue for the European Union, not only from a customs perspective but also in terms of product safety, environmental standards and fair competition. The EU's response has developed in stages. Since 2021, imported goods have no longer benefited from VAT relief below EUR 22, and from 1 July 2026 a further step will be taken when the long-standing customs duty exemption for parcels with an intrinsic value not exceeding EUR 150 is abolished under Regulation (EU) 2026/382[21]. During the transitional period from 1 July 2026 to 1 July 2028, a flat customs duty of EUR 3 per item, defined by tariff classification, will apply to most low-value parcels. In other cases, falling outside that scope, the ordinary customs tariff will apply instead (fully from July 2028)[22]. This is not an isolated technical adjustment, but part of a broader shift in the EU's approach to e-commerce imports. The underlying concern is the sheer scale of the trade flow.

According to the Commission, around 4.6 billion low-value consignments entered the EU in 2024, equivalent to roughly 12 million parcels per day, with 91 percent of such shipments reportedly originating in China[23]. The Commission and the Council have both linked this development to the risk of undervaluation, circumvention of customs obligations, and distortions of competition for EU-based businesses, while also noting the environmental impact created when consignments are split into multiple small parcels. In parallel, the EU has launched a wider policy agenda on safe and sustainable e-commerce[24], combining customs reform with stronger market surveillance, tighter enforcement of consumer protection rules, closer scrutiny of online marketplaces and increased use of digital tools, including the future Digital Product Passport and AI-supported oversight. These measures are particularly relevant for sectors such as textiles and certain categories of furniture and home furnishings, where low-value direct imports are common and where sustainability, traceability and compliance with product requirements are growing policy priorities.

For Sweden, the practical effect is likely to be most visible in the import of lower-priced textile goods and smaller furniture or interior products shipped directly

[21] Council gives final green light to new customs duty rules for small parcels - Consilium
[22] EU introduces customs duties on low-value e-commerce packages
[23] EU targets low-value imports via e-commerce platforms | Topics | European Parliament
[24] Commission announces actions for safe and sustainable e-commerce imports | Shaping Europe's digital future

from third countries to consumers. Such products will, from mid-2026, face either the new flat-rate duty or the ordinary customs tariff where applicable, in addition to import VAT. This is likely to narrow at least part of the price advantage currently enjoyed by very low-cost direct imports, especially where goods are shipped as separate items rather than consolidated consignments.

Larger furniture products, which often already exceed the EUR 150 threshold, are less affected by the removal of the low-value exemption as such, but smaller items, components and flat-pack household goods may see a more noticeable cost impact. Overall, the direction of travel is clear; the EU is moving towards a more controlled and compliance-driven system intended to strengthen customs enforcement, improve market oversight and create more equal conditions for businesses operating within the internal market as well as for those outside the internal market.

5 Results

In this section the results of the study is presented.

5.1 Potentially affected companies in the textile and furnishing sectors

Within the scope of the selected sectors and SNI codes, the estimates presented in Table 5 indicate that around 15,400 companies in the textile sector and around 6,400 in the furnishing sector may be affected by the upcoming legislation. In both sectors, most companies are micro and small enterprises, while only a limited share is medium-sized or large.

Table 5. Estimated number of companies by size class within the selected textile and furnishing sectors and SNI codes, based on the EU company size definition in Commission Recommendation 2003/361/EC.

Sector	Micro	Small	Medium	Large	SUM
Textile	11,500	3,743	176	14	15,433
Furnishing	4,095	2,210	86	6	6,397
	15,595	5,953	262	20	**21,830**

There are more companies in the textile sector than in the furnishing sector. 99 percent of the companies in the textile sector are micro or small companies. The situation is the same in the furnishing sector with 99 percent of micro and small companies. The ESPR regulation contains specific provisions for micro, small and medium-sized enterprises, including exemptions and phased application of certain obligations, reflecting proportionality considerations.

5.1.1 Note on enterprises exceeding relevant size thresholds

The results should be interpreted with caution, as the applied size classification requires companies to meet both the employee and turnover criteria simultaneously. In several retail and wholesale SNI codes, a notable number of companies have employee levels consistent with micro, small or medium-sized enterprises, while their turnover exceeds the corresponding thresholds. In the applied method, such companies are classified in a higher size category based on turnover. This pattern is particularly relevant in these sectors, as it indicates that employee-based size alone would systematically underestimate the economic scale

of companies. Consequently, the combined threshold approach leads to a different size distribution than an employee-only classification, which is important to consider when interpreting the results. Table 6 illustrates the extent of this pattern across selected SNI codes.

Table 6. Number of companies by SNI code that exceed the turnover thresholds for micro, small and medium-sized enterprises while remaining within the corresponding employee category.

SNI code	> Micro turnover threshold	> Small turnover threshold	> Medium turnover threshold
47711 Retail sales of clothing	31	6	2
47551 Retail sales of furniture	48	7	2
47712 Retail sales of clothing via e-commerce	22	9	3
46420 Wholesales of clothing and footwear	80	45	16
46472 Wholesales of office furniture	30	11	3
46471 Wholesales of furniture, carpets and lighting equipment	33	22	2
46491 Wholesales of sporting and recreational goods	57	32	6
46410 Wholesales of textiles	24	15	1

More than 300 of the micro-sized enterprises presented in Table 5 could actually be small-sized companies when the turnover is included. 147 small-sized enterprises presented in Table 5 could actually be medium-sized companies when the turnover is included and 35 medium-sized enterprises presented in Table 5 could actually be large-sized companies when the turnover is included.

In this study, the number of enterprises in each size-category should be understood as an indication of the approximate distribution between the categories of the companies affected in the textile and furnishing sectors. Most of the enterprises are still micro and small-sized enterprises that will have specific provisions, including exemptions and phased application of certain obligations. Requirements related to products do not rely on the size of the enterprise and will apply to all relevant products.

5.1.2 Estimate of number of companies in the textile sector affected by ESPR and WFD

This section provides an estimate of the number of companies in the Swedish textile sector that may be affected by ESPR requirements related to unsold

consumer products and the prohibition on destruction, as well as by the forthcoming textile EPR under WFD.

5.1.3 Preventing and reporting on discarded consumer products

Articles 23 and 24 of ESPR introduce requirements for unsold textile consumer products discarded before reaching the end user. They are particularly relevant for actors with high product turnover, seasonal collections, broad assortments, short lead times, and significant return flows. Table 7 provides an estimate of the number of actors that may be affected.

Table 7. Estimated number of companies by size class according to the EU definition in Commission Recommendation 2003/361/EC.

Actor	Relevant SNI	Micro	Small	Medium	Large
Retail	47711 Clothing	3083	139	72	14
	47510 Textiles	739	3266	1	0
	47532 Home textiles	181	18	1	0
E-commerce	47712 Clothing	3,117	68	20	0
	47533 Rugs, carpets and home textiles	26	4	1	0
Wholesale	46420 Clothing and footwear	1,845	166	64	0
	46410 Textiles	534	45	16	0
Manufacturing	14290 Wearing apparel and accessories	462	3	1	0
	14210 Outwear	890	3	0	0
	13920 Household textiles	289	19	0	0
	14240 Leather clothes, fur	90	1	0	0
	14100 Knitted and crocheted apparel	119	6	0	0
	14220 Underwear, shirts and blouses	49	1	0	0
	15200 Footwear	76	3	0	0
	Sum of companies by size	**11,500**	**3,743**	**176**	**14**

Total sum of all companies: 15,433

As shown in Table 7, approximately 75 percent of the companies are micro enterprises, most of which are active in retail. While this indicates a highly

fragmented market structure, the figures should be interpreted with caution, particularly for the e-commerce segment (SNI 47712), which captures the sales channel rather than the actor's role in the value chain. This implies that the category may include a range of business models, including small-scale drop shipping actors with limited or no physical handling of products. In the context of Articles 23 and 24 of ESPR, which require measures to prevent and report on discarded unsold consumer products, this creates a potential mismatch: a large share of actors formally in scope may have limited practical control over product flows, returns and quality assessment.

Consequently, while the table provides an estimate of the number of actors potentially affected, the actual ability to influence and report on discarded unsold products is likely to be concentrated among a smaller subset of actors with operational control over inventory and logistics.

5.1.4 Prohibition on destruction of unsold consumer products

Article 25 of ESPR prohibits the destruction of unsold consumer products covered by the CN codes listed in Annex VII. Table 8 below estimates the number of enterprises affected.

Table 8. Estimated number of enterprises potentially affected by the prohibition on destruction of unsold consumer products under Article 25 of ESPR for the CN codes listed in Annex VII. SNI codes beginning with 46–47 refer to wholesale, retail and e-commerce, while SNI codes beginning with 14–15 refer to manufacturing. Only medium-sized and large enterprises are subject to the prohibition.

CN code	Relevant SNI	Medium	Large
4203 Leather apparel and accessories. 61-62 Knitted and woven apparel and accessories. 6504-6505 Hats and headgear. 6401-6405 Footwear.	47711 Clothing retail	72	14
	47712 Clothing e-commerce	68	0
	46420 Clothing and footwear wholesale	64	0
	14240 Leather clothes and fur manufacturing	1	0
	14290 Apparel, accessories manufacturing	462	0
	14100 Knitted, crocheted manufacturing	0	0
	14210 Outwear manufacturing	0	0
	14220 Underwear, shirts and blouses manufacturing	0	0
	15200 Footwear manufacturing	0	0
	Sum of enterprises by size	**667**	**14**

Total sum of enterprises: 681

Article 25(5) of ESPR allows the Commission to specify derogations where destruction is justified and proportionate. A delegated act has clarified that derogations may apply where products pose health or safety risks, are non-compliant with law, infringe intellectual property rights, are counterfeit, are subject to contractual restrictions, or are unsuitable for reuse, remanufacturing, or donation. Recital 3 of that delegated act further clarifies that, even where destruction is permitted, products must still be managed in accordance with the waste hierarchy in Article 4 of the Waste Framework Directive, meaning that companies cannot move directly to incineration where material recycling is possible[25].

This may increase the importance of actors involved in reuse, repair, collection and waste management, as product flows are redirected away from destruction. While these actors are not directly subject to the prohibition on destruction of unsold consumer products, they may be indirectly affected through increased volumes of goods entering secondary markets and treatment systems. Graph 1 below

[25] https://environment.ec.europa.eu/publications/commission-delegated-regulation-setting-out-derogations-prohibition-destruction-unsold-consumer_en

illustrates the number of establishments in selected industry classifications that may become increasingly relevant in this broader system context.

Graph 1. Number of establishments in selected industry classifications that may become increasingly relevant under the ESPR prohibition on destruction of unsold consumer products, by employee size category.

5.1.5 Extended producer responsibility

Under the Waste Framework Directive, a textile producer is the economic actor that first places the product on the market in a Member State, whether through manufacturing under its own brand, import from another country, resale under its own brand or distance selling directly to the end user. The definition therefore includes not only manufacturers, but also importers, certain retailers and cross-border e-commerce actors.

The obligations apply to all producers placing relevant products on the market, regardless of whether the company is micro, small, medium-sized or large. The determining factor is therefore the producer's role, not company size. However, it should be noted that the implementation of EPR for textiles introduces a phased approach, where micro-enterprises are expected to be included from 2029. Until then, national implementation may apply simplified or deferred requirements for smaller actors.

The table below provides an estimate of the number of companies that may be affected within different producer roles. However, not all companies within the relevant SNI codes will necessarily have the market role required to be considered a producer under the directive.

Repair and reuse actors are also included, since they may become increasingly important in relation to collection, sorting, preparation for reuse and extending product lifetime, even if they are not always considered producers under the directive.

Table 9. Estimated number of companies by producer role and size class potentially affected by extended producer responsibility (EPR) for textiles.

Producer role	Relevant SNI	Micro	Small	Medium	Large
Retail	47532, 47711, 47721, 47510, 47722	4,385	3,455	81	16
E-commerce	47123, 47712, 47533, 47723	16,192	188	56	4
Brokerage	47920	376	48	7	1
Wholesale and import	46420, 46410, 46160	3,313	1,293	89	0
Repair and reuse	47792, 95240	408	1,839	8	0
Manufacturing	13960, 14230, 14290, 14210, 13920, 14240, 15200, 14100, 14220	2,396	71	4	0
Total		27,070	6,894	245	21

99 percent of the companies affected by the EPR are micro- and small-sized companies, and a very large portion of them are in e-commerce. The degree of direct imports cannot be deduced from this type of statistics, but it is reasonable to assume that a significant proportion of e-commerce players, especially in certain

business models (e.g. drop shipping and third-party sales), are in practice linked to direct imports.

5.1.6 Estimate of number of companies in the furniture sector

At the time of writing this report, there are no known information on which product groups in the furniture sector will become affected by ESPR and in what way, the below result should therefore be interpreted as an overview of how many furniture and mattresses companies that might be affected by the regulation.

A large proportion of companies are included in SNI 31009. This includes largely the manufacturing of diverse furniture and mattresses that are not defined as furniture for offices or kitchens. However, SNI 31009 also includes different furniture finishings, such as painting and spraying. SNI codes 31001, 31003 and 31009 also include the manufacturing of components and intermediate products for furniture (e.g. parts and sub-assemblies). This implies that not all companies captured under these SNI codes necessarily place finished products on the market and therefore may not all qualify as 'producers' in the sense of ESPR/EPR, which should be taken into consideration when interpreting Table 10. Most companies are micro-sized and operate in furniture and mattress manufacturing.

Table 10. Estimated number of companies potentially affected by ESPR for furniture including mattresses.

Actor	Relevant SNI	Micro	Small	Medium	Large
Retail	47551 Furniture	742	84	16	2
	47792 Other second-hand goods in stores	289	1,064	8	0
E-commerce	47553 Furniture, lighting equipment, tableware and other household goods	26	4	1	0
Wholesale	46471 Household furniture, carpets and lighting equipment	592	59	17	1
	46472 Office and shop furniture	310	57	21	1
Manufacturing	31001 Office and shop furniture	244	44	8	1
	31003 Kitchen furniture	314	4	0	0
	31009 Other furniture and mattresses	1,083	71	8	0
Repair and maintenance	95240 Furniture and home furnishings	119	775	0	0
Intermediation service	47920 Specialised retail sale	376	48	7	1
	Sum of companies by size	**4,095**	**2,210**	**86**	**6**

Total sum of all companies: 6,397

5.2 Import and export of textile products as well as of furniture

No in-depth analysis has been conducted in this study, to fully understand the fluctuations in the data. Some causes could be linked to the economic situation (inflation and smaller economic margins for the consumers), post-pandemic effects (such as unsold textile and furniture products accumulated in stock), trade disturbance due to war or other crises, or that international ultrafast-consumer platforms entered the Swedish market around this time.

5.2.1 Textile products

The Swedish textile sector is clearly more import-oriented than export-oriented, with imports accounting for almost twice the volume of exports (see table 11). Following the pandemic, textile imports increased. However, this escalation in

imports was interrupted by a sharp decline between 2022 and 2023, marking the largest drop since the pandemic period. According to the Swedish Environmental Protection Agency, this decline is likely linked to the economic situation, particularly higher interest rates and inflation[26]. After 2023, however, imports in tonne rose again while imported value was more stable (see Table 11). In contrast, exports have remained relatively stable over time with a higher increase during the period of 2020-2025 regarding value vs tonne (see Figure 1 and 2). Overall, the sector is characterised by a much heavier reliance on imports than export (see table 11).

Table 11. Import and export by CN codes by value and volume (non-response adjusted). This table includes all CN-codes that have been used in the report

Total per year 2020-2025	2020	2021	2022	2023	2024	2025
Import, kSEK	46,806,312	52,520,559	66,451,808	57,435,502	58,958,534	59,700,543
Export, kSEK	25,084,634	28,135,420	33,706,535	33,411,970	32,836,682	35,170,590
Import, ton	186,046	216,098	228,026	187,389	207,370	236,670
Export, ton	91,308	97,051	100,828	96,996	98,119	108,636

Textile Products (CN 4203, 61, 62, 6301, 6302, 6303, 6304, 6309, 6504, 6505)

[26] Textilkonsumtion, kilo per person i Sverige

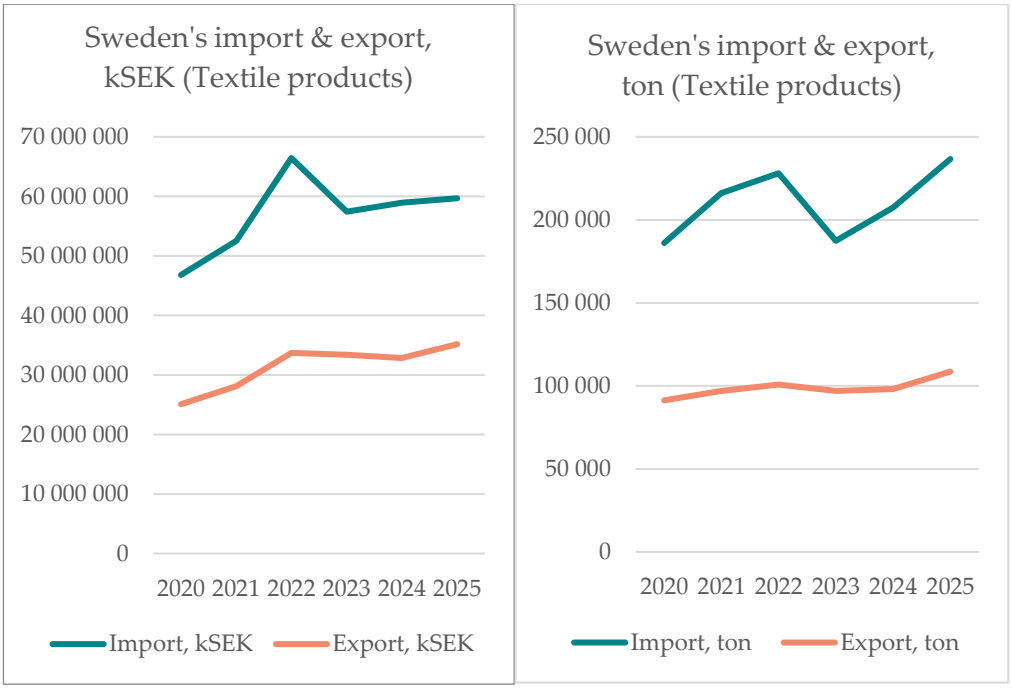


Figure 1. Import to Sweden and export from Sweden of textile products in kSEK. Figure 2. Import to Sweden and and export from Sweden of textile products in ton.

Top 5 import countries for textile products in 2025 are China (28%), Bangladesh (17%), Germany (14%), Denmark (12%) and Poland (9%) with China being the top country for imports both in terms of weight and value[27]. Out of the top 5 import countries, China and Bangladesh have been the most volatile during 2020-2025, with a sharp increase during 2022. Poland is the only country of the European countries that have increased their exports to Sweden since 2023.

[27] Note that the percentage value is for imported value

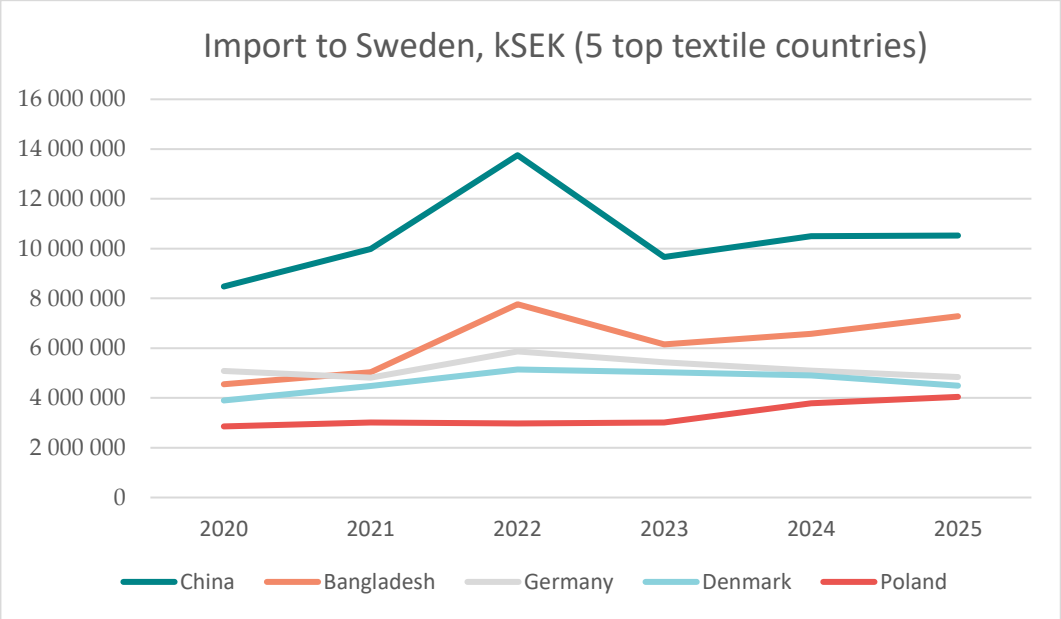


Figure 3. Import of textile to Sweden from top five countries in kSEK (not adjusted for non-response).

5.2.2 Ecodesign for Sustainable Products Regulation

The import and export patterns of textile products likely to be affected by the ESPR closely resemble those outlined in the previous section for all textile products, as several of the main product categories, including CN 61 and 62, are expected to be covered by the regulation.

Table 12. Import and export in value and volume for CN codes affected by ESPR (non-response adjusted).

Total per year 2020-2025	2020	2021	2022	2023	2024	2025
Import, kSEK	43,470,981	48,407,895	61,961,460	53,667,521	54,971,347	55,796,730
Export, kSEK	23,812,589	26,738,754	32,218,538	31,939,558	31,285,036	33,652,830
Import, ton	136,597	158,111	173,798	139,962	156,734	183,808
Export, ton	45,824	49,428	53,575	49,254	49,022	60,583

Ecodesign for Sustainable Products Regulation (annex VII – Apparel & clothing accessories) (CN 4203, 61, 62, 6504, 6505)

The numbers in table 12 illustrate volumes and values. However, as ESPR aims to regulate product specific performance and aspects, no conclusions can be drawn regarding market effects of forthcoming EPSR regulation for textiles. Within the included CN codes, the diversity of textile product types, manufacturing techniques, and surface treatments is such that the ESPR will affect products differently, preventing uniform conclusions from being drawn at the CN-category level.

5.2.3 Waste Framework Directive

As for the Waste Framework Directive, all textile product categories will be affected by the directive, creating the same pattern regarding exports and import data as section 5.2.1.

Table 13. Import and export in value and volume for CN codes affected by WFD (non-response adjusted)

Total per year 2020-2025	2020	2021	2022	2023	2024	2025
Import, kSEK	46,806,312	52,520,559	66,451,808	57,435,502	58,958,534	59,700,543
Export, kSEK	25,084,634	28,135,420	33,706,535	33,411,970	32,836,682	35,170,590
Import, ton	186,046	216,098	228,026	187,389	207,370	236,670
Export, ton	91,308	97,051	100,828	96,996	98,119	108,636

Waste Framework Directive (annex IVc) (CN 4203, 61, 62, 6301, 6302, 6303, 6304, 6309, 6504, 6505)

The EPR will regulate the textiles products put on the Swedish textile market. As shown in Table 13, the volume of imported textiles amounts to approximately 236,000 tons. However, these figures do not indicate whether, or to what extent, the imported goods are re-exported and subsequently placed on markets outside Sweden. Consequently, the scope of the forthcoming Swedish EPR scheme may be somewhat smaller than the import figures presented in the table.

5.2.4 Furniture products, including mattresses

The Swedish furniture sector is more balanced than the textile sector in terms of imports and exports, and it has a relatively stronger export position. At the same time, the data does not show how much of the traded furniture consists of re-

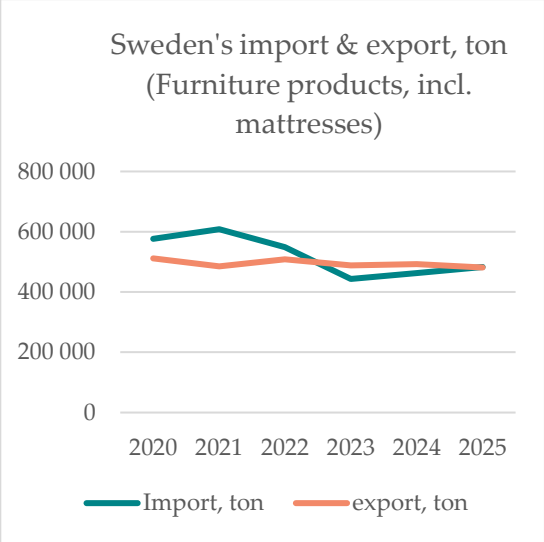
exported goods. This creates some uncertainty regarding how many of these products that are actually manufactured in Sweden (and then exported) versus imported and later exported again.

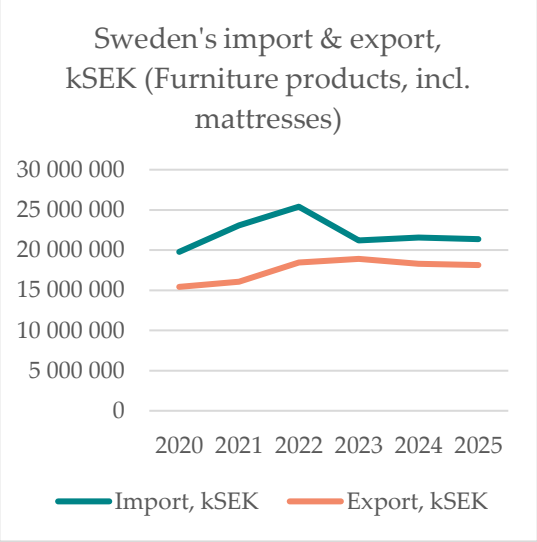
Table 114. Import and export in value and volume of furniture products, incl. mattresses (non-response adjusted).

Total per year 2020-2025	2020	2021	2022	2023	2024	2025
Import, kSEK	19,773,067	23,064,134	25,394,710	21,203,273	21,548,281	21,368,207
Export, kSEK	15,417,808	16,061,381	18,438,262	18,902,615	18,295,666	18,115,460
Import, ton	576,388	608,318	549,199	443,387	463,132	483,468
Export, ton	511,586	484,729	508,046	488,490	492,395	481,286

Furniture products, incl. mattresses

Figure 4. Sweden's import and export of furniture products in kSEK from year 2020-2025. Figure 5. Import and export of furniture products in ton from year 2020-2025.





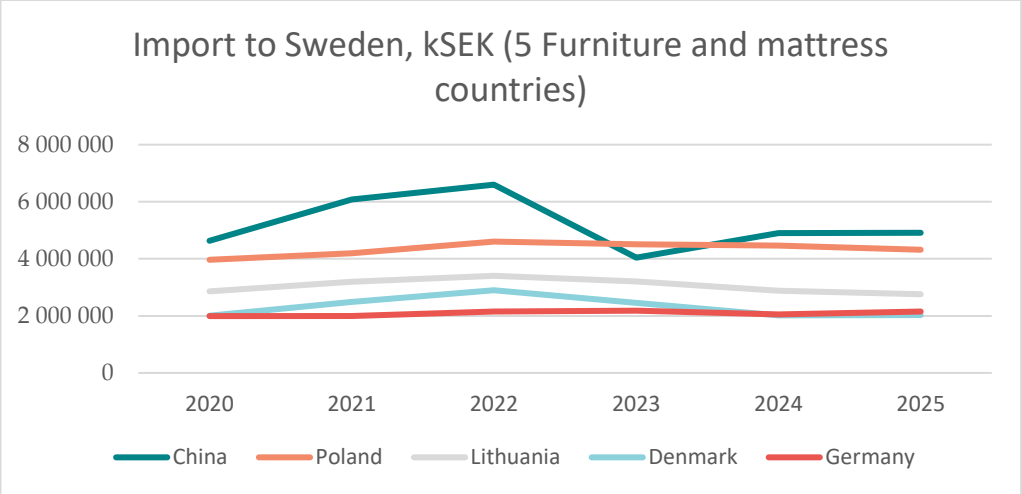
Top 5 import countries for furniture and mattress products in 2025 are China (21%), Poland (18%), Lithuania (12%), Denmark (8%) and Germany (9%) with China being the top country for imports both in terms of weight and value[28] (see figure 6 below). Out of the top 5 import countries, China have been the most volatile during 2020-2025, with a sharp decrease from 2022 and as of 2025 is now

[28] Note that the percentage value is for imported value

on similar level as it was in 2020. Poland, Germany, Denmark and Lithuania are approximately at a similar level when comparing 2020 to 2025, with a slight increase during 2022.

According to TMF (2025a), as of June 2025, 64 percent of all imported furniture (incl mattresses) came from the EU, while a further 6 percent came from the rest of Europe. Imports from Asia accounted for 29 percent of the total. TMF[29] also states that office furniture is the largest export product group within the Swedish furniture sector, representing an estimated 17 percent of total furniture production in Sweden as of June 2025.

Figure 6. Import to Sweden from top five countries for furniture and mattress products, in kSEK (not adjusted for non-response).



5.2.5 Mattresses

Imports declined and then stabilised between 2023 and 2025 (see table below). Exports did not follow the same pattern. Instead, export levels in tons remained relatively stable over the period 2020–2025, showing a gradual year-on-year decline until 2024, when they recorded a slight increase. These trends are based on CN codes 940410, 940421, 940429, and 940490.

[29] TMF_i_siffror_2_2024_high.pdf

Table 15. Import and export in value and volume of chosen CN codes (non-response adjusted).

Total per year 2020-2025	2020	2021	2022	2023	2024	2025
Import, kSEK	3,349,028	3,431,597	3,276,625	2,680,304	2,777,065	2,730,880
Export, kSEK	1,754,152	1,639,818	1,541,938	1,491,376	1,155,205	1,143,987
Import, ton	71,739	68,026	55,364	45,241	47,275	47,683
Export, ton	21,935	19,053	16,414	14,813	12,930	14,571

Mattresses

Figure 7. Sweden's import and export of mattresses in kSEK

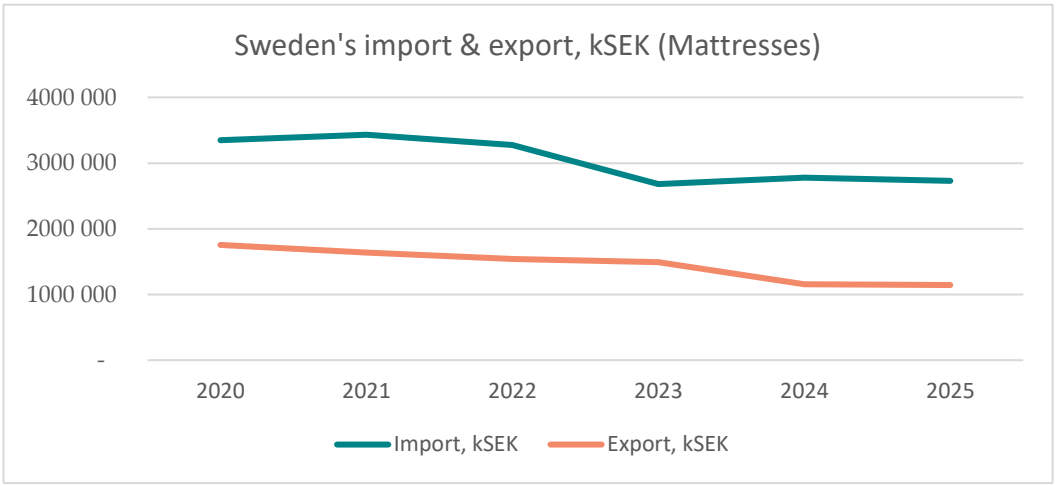


Figure 8. Sweden's import and export of mattresses in ton.

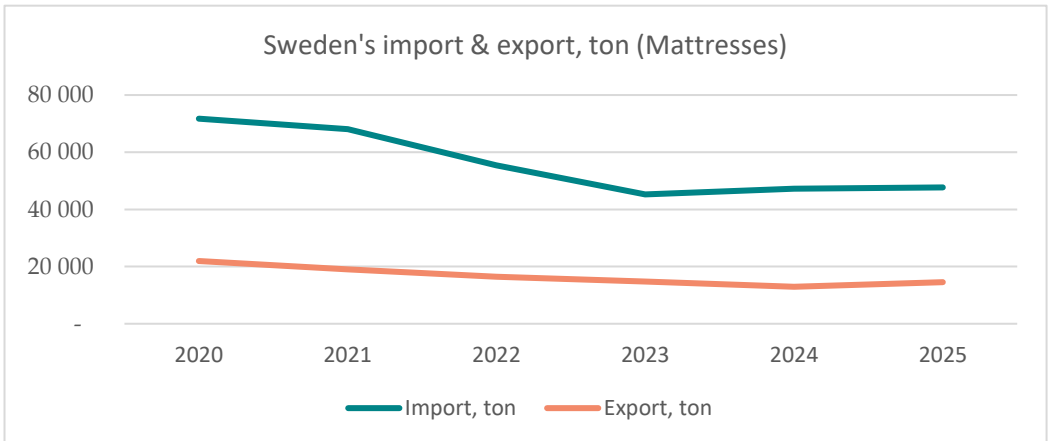


Figure 9. Import of mattresses to Sweden from top five countries (ton).

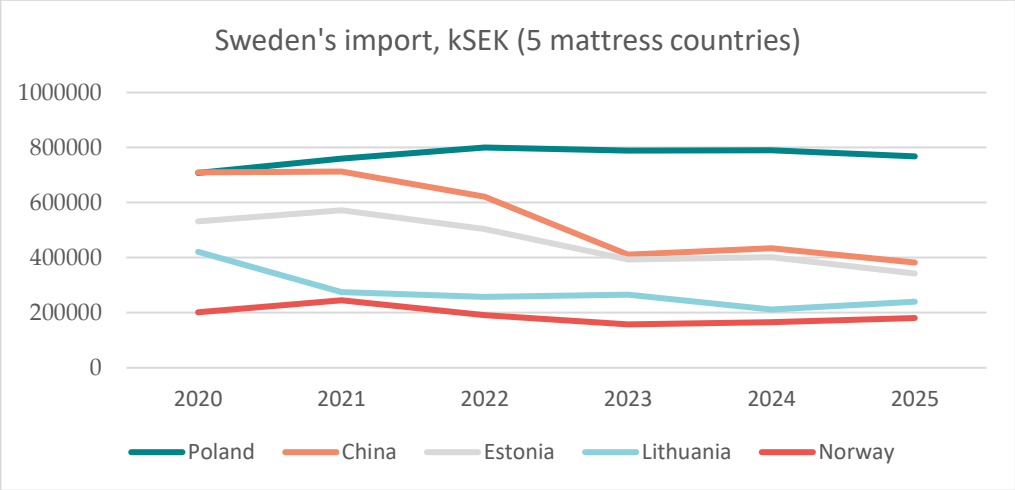
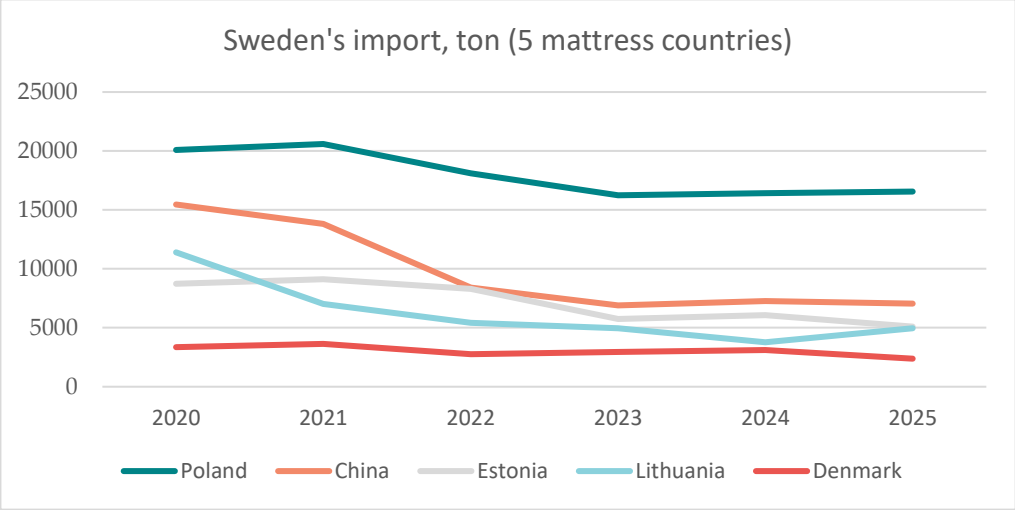


Figure 10. Import of mattresses to Sweden from top five countries (kSEK).



Top 5 import countries for mattress products in 2025 are Poland (30%), China (15%), Estonia (13%), Lithuania (9%) and Norway (7%)[30]. Viewing data regarding import in tons and kSEK for mattresses, it's certain that the import has decreased from 2021 in various degrees from Poland, China, Estonia, and Lithuania, whilst Denmark has been relatively stable during the period of 2020-2025 (see figure 7 and 8). Looking at imports as per value, Poland has had a steady increase as seen in figure 9. Both Poland and Norway are at a similar level when looking at import value post pandemic year (2020) versus 2025 (see figure 10).

[30] Note that the percentage value is for imported value

5.3 Direct imports via e-commerce

The direct imports to the EU from third countries have increased drastically during the last years[31]. Direct imports refer to products purchased from foreign e-commerce platforms where the seller or retailer is located outside the EU (so-called third countries). These products risk bypassing EU product safety and chemicals compliance requirements[32] [33]. Product testing has shown that these products may contain harmful chemicals that are not approved for use within the EU. Furthermore, this trade creates uneven competitive conditions within the EU internal market[34].

New reports from the EU also show that the number of low-value consignments (items under €150) entering the Union increased again in 2025, from 4.6 billion in 2024 to 5.8 billion, pointing to a growing problem. For 2025, the Commission has not yet stated the country of origin of these parcels, but in 2024 it noted that 91% of all e-commerce shipments valued under €150 came from China[35].

Likewise has the Swedish trade with foreign countries increased during 2024–2025, rising from 43.31 million in 2024 to 57.56 million parcels in 2025[36]. China is identified as one of the leading markets, and among Swedish consumers who shop online from foreign countries, China is the most common country of purchase. The share reporting China as their country of purchase increased from 25 percent to 27 percent[37].

For direct imports of textiles and related textile products as well as furniture, there are several platforms on the market, but a few stand out as having established a particularly strong market position. These include Shein and Temu, both of which sell textiles but also other consumer goods. In general, these platforms are characterised by low prices, rapid delivery, and poor product quality[38].

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[31] https://www.europarl.europa.eu/topics/en/article/20250708STO29516/eu-targets-low-value-imports-via-e-commerce-platforms
[32] https://www.europarl.europa.eu/topics/en/article/20250708STO29516/eu-targets-low-value-imports-via-e-commerce-platforms
[33] https://handelsradet.se/app/uploads/2025/05/HER_Rapport_2025.pdf
[34] https://handelsradet.se/app/uploads/2025/05/HER_Rapport_2025.pdf
[35] https://www.europarl.europa.eu/topics/en/article/20250708STO29516/eu-targets-low-value-imports-via-e-commerce-platforms
[36] https://www.transportforetagen.se/prioriterade-fragor/transportfakta/paketindex/
[37] sites.postnord.se/l/862341/2026-02-16/4vrzb8/862341/1771230064yl70Hj6W/E_barometern_arsrapport_2025.pdf
[38] https://handelsradet.se/app/uploads/2025/05/HER_Rapport_2025.pdf

Estimates

At present, data is only available at an aggregated level covering trade between the EU and third countries, or between Sweden and foreign countries (including third countries), and is therefore not representative. Furthermore, low-value consignments are not covered by official customs statistics, as they are not subject to customs duties[39] . Due to this, two complementary estimates have therefore been derived to illustrate the potential inflow of these product groups, based on data presented by Svensk Handel[40] [41]. The data have been recalculated into an estimated annual range of parcels, from Shein and Temu, corresponding to 9.6–12.7 million parcels per year.

The potential inflow of direct import of textiles including home textiles and fashion, are estimated to be within a range between 3 500-11 500 ton. Whereas for furniture's, this range is estimated to be 5 000-14 500 ton. Since these are estimates and only cover two e-commerce platforms, the figures are not representative of all direct imports to Sweden from third countries, and the total is potential in a higher range.

5.4 Interviews with textile companies

The interviewed textile companies operate with different business models. Most are characterized by developing and producing clothing and home textiles of high quality and with a long lifespan. Some of the companies have all or part of their production based in Sweden, but the majority rely on a global value chain. Many companies work in B2C and some are combining B2C and B2B. The people interviewed are CEO, sustainability and/or circular business responsible.

5.4.1 Existing and upcoming legislation for textiles

Across the interviews, companies generally describe the direction of upcoming textile legislation as reasonable and, broadly necessary. There is clear support for the aims behind the ESPR, DPP, and EPR scheme for textiles. Most respondents welcome rules that reward durability, traceability, repairability, quality and more

[39] https://www.europarl.europa.eu/topics/en/article/20250708STO29516/eu-targets-low-value-imports-via-e-commerce-platforms
[40] https://www.svenskhandel.se/contentassets/eed745e4e1ec425d8b78e957e8ff0fa2/e-handelsindikatorn-helar-2024.pdf
[41] https://www.svenskhandel.se/globalassets/svensk-handel/rapporter/laget-i-handeln/laget-i-handeln-2025.pdf

responsible resource use. For many companies, especially those that already focus on quality and longevity, the new legislation is therefore not seen as introducing a completely new way of thinking, but rather as providing formal structure to principles they are already trying to apply in practice. According to TEKO, the Swedish trade and employers' association for textile and fashion companies, broadly accept that the legislation is forthcoming and want to contribute to making it work well. The design and implementation of the regulatory framework will be decisive, and that harmonisation within the EU, along with a level playing field vis-à-vis actors outside the EU, is raised as very important. In that sense, the legislation is viewed less as a disruptive shift and more as a codification of practices that responsible firms are already trying to develop.

At the same time, the respondents indicate that companies do not experience this legislation as one single, coherent package. Instead, they are trying to respond to several overlapping policy processes at once. ESPR is often discussed alongside DPP, the ban on destroying unsold goods, textile EPR, chemical rules, waste legislation, climate reporting and procurement criteria. As a result, even when companies understand and support the general direction, they are often less certain about the practical implications of the various measures. This gap between policy ambition and operational clarity comes through strongly in the interviews. TEKO reinforces this picture, particularly in relation to EPR. They note that, while companies understand that the EPR is coming, they are still seeking clarity on where responsibility begins and ends, what exactly the system will cover, and how fees and reporting obligations will be designed. This uncertainty makes the textile companies confused, and they are asking for clear information.

Eco-modulation refers to the adjustment of producer fees based on the environmental performance of products, to incentivise more sustainable design and production. Many of the respondents express that the eco-modulation fees are an important tool but that they must consider the trade-offs between circularity and environmental performance, that can arise. For example, can circular design measures, such as incorporating recycled content, results in higher environmental footprint and reduced durability and lifespan of the textile products. Further respondents stress that the relevance of specific durability requirements for textile products will depend heavily on the type of product concerned. Technical garments and outdoor products, interior textiles, wool products and textiles for professional, have very different product categories thus requirements, and cannot be assessed in the same way.

Further, the interviews emphasise that, for textile companies to plan for long-term adaptation, any forthcoming EPR scheme must be simple to implement, and that eco-modulated fees should be introduced gradually. TEKO also underlines that the requirements in the EPR and the eco-modulation fees must be relevant and lead to real improvements rather than becoming a paper exercise. The organisation also points to the risk that public and private procurers begin imposing product specific requirements based on legislation that is not yet in force, which can create lock-in around criteria that do not reflect the final EU framework. In summary, the outcome of forthcoming regulations is widely accepted but its effectiveness will depend on whether the rules are clear, predictable, and sufficiently adapted to different segments of the textile sector.

5.4.2 Challenges

The clearest challenge across the interviews is the current uncertainty. Companies repeatedly describe the current policy landscape as difficult to navigate because many important details are still unresolved. This applies particularly to textile EPR and DPP, but also to the future design requirements under ESPR. In practical terms, the companies are unsure what they should already be preparing for, what can wait, and how much time and money it is reasonable to invest before the rules are more clearly defined. That uncertainty affects planning, budgeting, internal priorities, supplier dialogue and the development of systems. It is not only a matter of incomplete legal detail, but also of moving timelines, fragmented implementation and insufficiently clear guidance. Clarity, simplicity and harmonisation are recurring priorities across the entire policy agenda.

The uncertainty is not only strategic but also operational since it affects how information is structured, which systems are prioritised, how products are categorised and how internal resources are allocated. Even a company that follows the issues closely and already reports significant product and supplier data describes spending large amounts of time trying to understand exactly what different countries or rules require in practice.

A second challenge is proportionality. Smaller and medium-sized companies, in particular, point out that they may support the purpose of the legislation while still lacking the staff, time and specialist competence needed to deal with several new compliance processes at once. Sustainability and regulatory work are often described as something added on top of already demanding roles. The issue, then, is not necessarily opposition to new requirements, but rather limited capacity to deal with them. Several respondents worry that the combined burden may end up

favouring larger firms with dedicated compliance teams and more advanced support systems. In relation to EPR, the interviews show a need for reasonable fees and administratively manageable systems, especially for smaller firms with limited resources, and that eco-modulation fees should reward companies that make real efforts to improve their products. Responsible firms should not bear additional costs without having a recognition of their performance. A new policy framework may encourage more systematic thinking across the value chain and create systems that, for example, give companies financial incentives to offer repair and other services to keep textiles in the use phase for a longer period.

Sustainability and compliance work are often handled by people with broad operational roles rather than by large specialist teams. Capacity constraints are not limited to micro firms. Even companies that are relatively advanced in their sustainability work can find it difficult to absorb multiple new obligations at the same time if the rules are not translated into manageable, practical routines.

Data is another recurring issue. Many companies have reasonably good visibility over direct suppliers and product composition, but much less so upstream the value chain. Even where internal systems are well developed, product data is not fixed: it can vary between batches and change over time depending on chemistry, inputs, subcontracting or production conditions. This makes the idea of a complete, accurate and constantly updated product record more complicated than it might first seem. Several companies also warn against criteria that are too blunt. Requirements focused too narrowly on mono-materials or recycled content, for example, may fail to reflect durability, function, safety or real use. Ecodesign requirements need to be meaningful and grounded in sector knowledge, and TEKO warns that current work in some areas risks being too detached from industrial realities. The organisation also highlights chemicals legislation as an area where greater coherence is needed, arguing that product-related chemicals requirements should be concentrated in REACH to avoid duplication and conflicting obligations.

A further challenge concerns fair competition and enforcement. Several respondents express concern that stricter sustainability obligations for established companies within Europe may have limited effect if low-cost imports and direct sales from third-country platforms are not subject to equivalent requirements in practice. TEKO expresses this concern particularly strongly, describing direct imports from third-country platforms as one of the most significant competitive challenges facing Swedish textile companies. From this perspective, both EPR and ESPR risk becoming less effective if market surveillance is weak and if non-EU

actors are not held to the same standards. Taken together, the interviews suggest that the main challenge is not resistance to regulation as such, but uncertainty about how it will be implemented, whether it will reflect how textile products actually work, and whether it will be enforced consistently across the market.

Direct imports from third-country platforms are not only perceived as unfair competition, but as a consumer safety concern because products may contain inappropriate chemicals or otherwise fall short of expected standards. Stronger market surveillance will not be enough on its own unless non-compliance also leads to meaningful consequences, such as financial penalties or trade restrictions that will actually influence business behaviour.

5.4.3 Opportunities

Despite these concerns, the interviews also point to opportunities. The most significant is that common European rules could help shift competition away from short-term price pressure and towards longer-term product value. Many respondents express the hope that regulation will strengthen the position of companies already investing in quality, transparency, longevity and more responsible production. In that sense, legislation is often seen not mainly as a threat, but as something that could help correct market conditions that currently favour cheap, short-lived products. The interviews show that the companies see well-designed ecodesign requirements as a tool to highlight the good work already being done by responsible companies, provided the rules are relevant, workable and harmonised across the EU.

This is particularly evident among companies whose business models already rely on durability and timelessness. Several describe products that are designed to last both physically and aesthetically, with less emphasis on seasonal turnover and more focus on care, maintenance and, in some cases, repair. These firms see real potential in rules that recognise and reward those characteristics more clearly. The opportunity is therefore not only commercial. It is also about reinforcing a different understanding of sustainability, where long use, repair and continued value are taken seriously. If the fees are eco-modulated in a meaningful way, it could further reinforce this direction by lowering costs for products with better environmental performance and longer lifetimes. That, in turn, could support a more credible link between product quality and regulatory incentives.

DPP are also often described in positive terms. While companies see many unresolved questions, such as lack of information about data requirements of the

DPP, several also view DPP as a tool that could improve the structure of product information, strengthen supplier dialogue and make communication with customers and other actors more consistent. Better organised product data could support compliance, sourcing, traceability, procurement, resale and repair at the same time. For the passport to become meaningful, it must provide something concrete and understandable, particularly for users further down the chain. In one of the interviews a parallel to appliance energy labelling is drawn. This could be effective because it is simple, recognisable and useful for decision-making. This suggests that DPP should not only function as a compliance mechanism, but also as a practical information tool. Some of the interviewed companies have already tested QR-based product passports and for exampled linked them to a resale solution, which shows how DPP-type systems could support second-hand flows and help connect customers back to the product after the first sale. At the same time, the pilots generated almost no customer feedback, which suggests that consumer uptake may still be limited. This points to a gap between regulatory and businesses interest in DPP and current customer behaviour and suggests that the passport's first value may be greatest in internal data structure, traceability and operational learning rather than in immediate consumer pull.

Preparing for DPP or EPR is already pushing some firms to map product flows more carefully, clarify responsibilities and connect sustainability more directly to product development and sourcing. Overall, the interviews indicates that well-designed regulation could help reward more substantive sustainability efforts and create stronger incentives for credible, long-term improvement across the textile sector. Companies are not looking to avoid responsibility; rather, they want policy tools that are clear enough and fair enough to support better decisions across design, sourcing and market practice.

5.4.4 Need for support from national authorities

5.4.4.1 Clarity and timelines

Through the interviews, companies emphasise the need for concrete and actionable implementation guidance. This includes practical examples, sector-specific interpretations and support in prioritising compliance efforts. Respondents stress that guidance should be available well in advance of legislative entry into force, allowing companies to prepare in a structured and realistic manner. Authorities are also expected to be accessible for dialogue, particularly when new guidance is published, and to clarify boundary issues with significant legal implications, such as who is legally

considered to place a product on the market when external brands are sold across borders through an intermediary retailer. Examples of support include opportunities to schedule implementation guidance meetings with national authorities.

5.4.4.2 Implementation guidance

Beyond general information, companies call for concrete and actionable implementation guidance. This includes practical examples, sector-specific interpretations and support in prioritising what to address first. Respondents stress the importance of guidance being available well before legislation enters into force, enabling companies to prepare in a structured and realistic way. Authorities are also expected to be accessible for dialogue, especially when new guidance is released, and to clarify boundary questions with significant legal consequences, such as responsibility in cross-border and intermediary-based sales models. Examples of support is opportunities to schedule implementation guidance meetings with national authorities.

5.4.4.3 Proportionality

Proportionality emerges as a recurring concern. Companies do not seek exemptions from responsibility but stress that compliance systems designed primarily for large organisations risk becoming unmanageable for smaller companies. Respondents point to the need for lighter reporting requirements, phased implementation or other forms of simplification that make compliance feasible across different company sizes. Adequate public resources during key implementation phases are also highlighted, as these periods are often when companies' need for support is greatest. Support is therefore understood not only as producing guidance documents, but as ensuring that guidance can be applied in practice.

5.4.4.4 Data and data systems

There is a clear demand for guidance related to data and data systems, particularly in relation to the development of the DPP. Respondents seek clearer expectations regarding data requirements, formats, interoperability, update responsibilities, and what constitutes a reasonable level of preparedness at different stages. Several respondents further stress the need for authorities to help distinguish between what actions are urgent and what remains premature, to avoid poorly timed investments driven by market pressure rather than regulatory maturity. Predictability, consistent enforcement, and effective market control are seen as integral parts of credible support, ensuring fair competition and confidence that rules will be applied uniformly across the market.

5.5 Interviews with furniture companies

The interviews were conducted with several Swedish furniture, beds, bathroom and kitchen companies from different areas of the market. This included manufacturers with their own factories, brands that focus on design and use contract manufacturing, companies that supply products for public projects, building projects and companies that work in custom or premium segments. We also interviewed a consumer-oriented company (B2C) and the national industry association for furniture and timber, which gave us a wider perspective on the sector.

The interviews collectively encompassed a range of companies reflecting the diverse types that characterise the sector, including small and medium-sized enterprises with varied business models, levels of market exposure, and differing degrees of control over production and sourcing.

Sweden's furniture sector is defined by intense price competition, driven largely by imports from outside the EU, other European producers, and local companies employing contract manufacturing. This competitive landscape is particularly challenging in segments where affordability is critical, placing pressure on businesses committed to sustainability and quality. Imports from countries with comparatively lower sustainability standards and labour costs, such as Poland and China, have a notable influence on cost-sensitive categories within the private and public market.

Distinct market segments shape the sector, with premium brands less affected by low-cost imports due to their controlled value chains, strong supplier relationships, and robust product data management. In contrast, companies serving price-sensitive segments must constantly adapt their production and marketing strategies to withstand fierce competition. Ecodesign principles that focus on durability, modularity, and simplified material usage are increasingly adopted, though recognition for these efforts comes mainly from public procurement, not private consumers.

Within the business-to-consumer market, sustainable product providers face unique challenges as e-commerce and low-cost imports increase competition. Not all categories are equally impacted; beds and mattresses stand out as a distinct subcategory, characterized by their emphasis on comfort, health, hygiene, and material choices. Premium brands in this segment prioritize quality and longevity, appealing to consumers who view purchases as long-term investments, while mass-market buyers are driven by price and volume.

The kitchen furniture sector operates as a complex, project-driven segment, with a significant share of business-to-business sales. Major clients, such as contractors, demand compliance with environmental labels and certifications, and exert varying levels of influence over suppliers. Sustainability concerns are increasingly centred on climate impact, with companies prioritising reductions in greenhouse gas emissions through material efficiency, increased use of recycled content, and design strategies that extend product life and enable upgrades rather than full replacement.

Overall, Sweden's furniture sector is shaped by segmentation between premium and price-sensitive markets, competition from imports, and evolving sustainability practices. The sector demonstrates complexity through its diverse product categories, varying consumer expectations, and the interplay between public procurement requirements and private market dynamics.

Public procurement plays a particularly important role as a driver of sustainability, setting structured requirements for environmental performance, certification and verified product data. These requirements influence suppliers' offerings and accelerate the adoption of standards across the broader market, particularly in the project and B2B segments, where compliance with labels and life cycle-based information is often a prerequisite.

There are also indications from the interviews that public procurement requirements shape competitive dynamics within the sector. By demanding verified environmental data, certification and alignment with building-related sustainability schemes, procurement can favour suppliers with established systems, traceability and greater control over their value chains. While not explicitly linked to production location across all interviews, this may contribute to maintaining the competitiveness of regional and Nordic-based producers relative to low-cost imports.

5.5.1 Existing and upcoming legislation for furniture

Regulations in the furniture sector focus on product safety and environmental performance, requiring companies to use safe materials and restrict harmful chemicals. Alongside these rules, public procurement adds further demands, as government buyers often promote stricter sustainability criteria and recognised certifications like Möbelfakta and the Nordic Swan Ecolabel.

Ecodesign for Sustainable Products Regulation (ESPR) is expected to significantly impact the furniture sector, although many specifics remain uncertain. Companies are preparing for changes in technical standards, increased administrative tasks, new investment needs, and stricter compliance requirements. These are challenges that are especially tough for smaller businesses. Industry groups support requirements that are neutral regarding materials and technology, focusing on major European concerns such as raw materials, waste, and climate effects, rather than imposing excessive reporting obligations.

Digital Product Passports (DPPs) are widely discussed but not yet broadly adopted. Companies are getting ready for DPPs by collaborating with other organisations, auditing their product data, experimenting with QR-code access to information, and figuring out how DPP solutions might fit into their current business systems. However, there is ongoing uncertainty about exactly what will be required in terms of scope, format, and detail which as a result is creating a situation where companies want to be prepared but are unable to due to lack of information. This challenge has been seen in all product segments but are specially challenging for kitchen producers as their product contains a larger number of components.

Interviews highlight several Nordic initiatives, including competence programs, research and innovation projects, infrastructure projects, and company pilots backed by schemes.[42] Collectively, these suggest the market is evolving from general awareness to practical trials involving product data, QR-code access, traceability, and circularity-related information.

Despite this momentum, few initiatives have led to established digital information exchange across the sector. The current situation is best described as exploratory and focused on pilot projects, with most activities occurring in limited-scale projects instead of widespread methods throughout the furniture value chain.

[42] Examples of initiatives involve Propare (https://gs1.se/en/digital-product-passports/propare-digital-product-passport-solution-guide/), Append (https://lnu.se/en/research/research-projects/project-append-digital-product-passport-to-revolutionize-the-furniture-industry) and SILEO (https://www.clustercollaboration.eu/content/european-furniture-group-ab-sme-beneficiary-sileo-2nd-call-business-digital)

5.5.2 Challenges

Interviews revealed that uncertainty is the primary challenge for furniture companies, especially regarding ESPR and future DPP requirements. This uncertainty risks delaying action or leading to wasted investments, which is especially problematic for small and medium-sized businesses with limited resources. Administrative and information management burdens are also significant, as firms struggle with collecting and communicating sustainability data in a consistent manner. The trade association highlights over-administration and unclear requirements as major risks.

Supply chain transparency remains a key challenge for the sector. Companies generally express clear ambitions to increase transparency and improve control over suppliers, but they also emphasise the practical difficulties involved. The number of subcontractors, varying levels of supplier maturity and inconsistent access to information make full transparency difficult to achieve. Several companies therefore describe a more proportionate approach, focusing on the most relevant suppliers, materials and risks rather than attempting to map every part of the value chain in detail.

For established Swedish manufacturers, transparency is often more direct where business models rely on locally sourced materials, nearby production services and long-term supplier relationships. In these cases, shorter and more stable supply chains can support better insight into materials, production and working conditions. At the same time, the sector repeatedly highlights that companies with broader supplier networks face significantly greater challenges, particularly when sourcing involves many tiers, imported components or less transparent markets. Having a supply chain that includes suppliers from other European countries creates uncertainty about how quickly the legislation will be implemented and how it is interpretated across Europe. Since Sweden often moves quickly in enforcing new legislation, there is concern that suppliers in other European countries may fall behind. This could leave Swedish companies several steps ahead, required to comply with new rules before their suppliers are subject to the same requirements.

In addition, companies face acute price pressure in the current market, particularly in segments where cost is the dominant factor for buyers. The interviews indicate that this pressure has increased significantly over the past five years for B2C companies, driven by rapid growth in e-commerce and a high level of low-cost imports. Consumers are described as highly price-sensitive, which makes it

difficult for companies to pass on the costs of higher quality, transparency or sustainability performance.

One regulatory challenge is defining "product" within a component-based sector and keeping up with shifting EU digital passport requirements. Harmonizing regulations and gradually rolling them out can help ease administration. Examples of component-based industries include kitchens, where many different products and materials, such as cabinets, metal components, and worktops, are combined to create a solution tailored to a specific need rather than a single product, such as a chair or table. Distinguishing beds, mattresses, bathroom and kitchen furniture as separate categories is crucial, and market incentives should reflect the complexity of each segment.

5.5.3 Opportunities

The interviews highlight opportunities alongside challenges. Companies focused on durability, repairability, quality, and supplier relationships may benefit from future requirements, as ESPR and DPP can showcase their sustainability efforts. The industry association noted Swedish firms could strengthen their position if policy implementation clearly addresses raw materials, climate, and waste.

Preparing for new requirements can enhance internal structure, product data management, and organisational clarity. Even though compliance can be demanding, better control of product information supports systematic development, communication, and value chain follow-up.

Legislation may increase market transparency, making it easier for buyers to assess products based on lifecycle value rather than price. This benefits companies emphasizing longevity, local production, or sustainability, and could foster fairer competition if regulation is well and balanced enforced in the EU and Sweden.

5.5.4 Need for support from authorities

5.5.4.1 Support and guidance

Throughout the interviews, a clear and urgent call for robust support and guidance from national authorities emerged. Companies and the industry association are not simply requesting basic assistance, but demanding comprehensive, proactive, and binding guidance on the practical implications of the new requirements for the

furniture sector. Respondents insist on unambiguous explanations detailing applicable rules, mandatory documentation, precise interpretation of requirements, and explicit standards for reasonable action, particularly for smaller firms. The sector's appeal is not for abstract policy direction, but for concrete, actionable instructions that companies are required to implement operationally and with accountability.

5.5.4.2 Authoritative tools, templates and systems

There is a pronounced need for authoritative tools, standardised templates, and system-based directives. Companies expect strong support in structuring product information, managing supplier data, and making prudent investments in digital solutions that meet strict regulatory standards. The sector highlights that the main challenge of DPP implementation is not the availability of technical solutions, but the rigorous requirements for information content, standardised structuring, and consistent data management. Authorities must provide enforceable frameworks, not more suggestions, that compel companies to meet these requirements in full.

5.5.4.3 Enforcement and market control

Market control is identified as a critical issue. The industry association emphasises that stringent enforcement by authorities is essential for maintaining fair competition, especially concerning imports from third countries. Support from authorities must extend beyond guidance and information to include strict oversight and uniform rule application across the entire market. The implementation phase of the EU Deforestation Regulation was given as a good example the importance of proactive and well-prepared authorities that could give necessary support to the market. The industry association emphasise that authorities must be provided with adequate funding and resources to effectively support companies and ensure consistent enforcement. Similar levels of capacity and preparedness will be critical in the rollout of ESPR by Swedish authorities.

6 Analysis

6.1 Cross-sector findings: textiles and furniture

The Swedish textile and furniture sectors are entering a period of significant regulatory and market transition. The Ecodesign for Sustainable Products Regulation and, for textiles, the revised Waste Framework Directive and the forthcoming EPR system are moving sustainability requirements from general ambition towards more concrete obligations. Companies will increasingly need to demonstrate how products are designed, what they contain, how long they last, whether they can be repaired, reused or recycled, and what information can follow the product through the value chain.

Both sectors are largely made up of micro and small enterprises, and many of the companies likely to be affected do not have large sustainability, legal or compliance departments. For them, the challenge is not necessarily resistance to regulation, but limited capacity to interpret new rules, collect product data, adapt systems and respond to several policy processes at the same time. Proportionality, clear guidance and manageable reporting systems will therefore be crucial.

Product data is one of the most important cross-cutting issues. Companies may know their direct suppliers and product composition reasonably well, but often have less visibility further upstream. Materials, chemicals and production processes can also vary between batches or suppliers. Future requirements may therefore push companies towards stronger product control, more structured supplier agreements and better internal data systems. This is in line with the purpose of the legislation, but it will require practical guidance on what information is required, how it should be verified, and how updates should be handled.

There is also a risk that the ability to document sustainability performance becomes almost as important as the performance itself. Some companies already produce durable and high-quality products but may lack the systems needed to document this in standardised formats. If implementation is not carefully designed, regulation could favour companies with stronger administrative capacity rather than those with the most sustainable products in practice.

Across both sectors, implementation will determine whether the legislation becomes a driver of real sustainability improvements or mainly an administrative burden. Companies need early and practical guidance, including examples, templates, clear timelines and explanations of how requirements apply in real business situations. Authorities will also need to help companies distinguish between what they should prepare for now and what remains too uncertain.

The overall analysis is therefore that Swedish textile and furniture companies are moving into a regulatory environment where competitiveness will increasingly depend on a combination of product quality, traceability, data management and documented compliance. For companies already working with durability and responsible sourcing, the transition may create opportunities. For companies with limited resources, fragmented supply chains or weak data systems, it may be demanding. The policy challenge is to ensure that regulation rewards real improvements, remains workable for smaller actors and is enforced consistently across the whole market, including imports and direct e-commerce flows.

6.2 Analysis of textile sector

The textile sector is especially exposed to the regulatory transition. It is highly import-oriented, with import volumes substantially exceeding export volumes during the period studied. Major import countries include China, Bangladesh, Germany, Denmark and Poland. This means that Swedish textile companies are dependent on international supply chains and on access to reliable product and supplier data from outside Sweden, and often outside the EU. Future compliance with requirements on durability, fibre composition, recycled content, chemical content, recyclability and DPP will depend heavily on the quality and availability of such data.

Textile companies are also affected by several regulatory developments at the same time. ESPR will introduce product-related requirements, including future ecodesign criteria and DPP. The prohibition on the destruction of unsold apparel, clothing accessories and footwear will affect medium-sized and large companies first; while reporting on discarded unsold consumer products will create further transparency requirements. In parallel, the revised Waste Framework Directive will require Member States to establish EPR schemes for textiles and footwear. This means that textile companies will be affected across the full product lifecycle: from design and sourcing to sales, returns, unsold stock, collection, sorting, reuse, recycling and disposal.

The interviews indicate that textile companies generally support the direction of the legislation. Many already work with quality, durability, repair, traceability and responsible production, and see the legislation as a possible way to reward more serious sustainability work. However, support for the objectives does not mean that companies feel prepared. They describe uncertainty around the final design of DPP, textile EPR, eco-modulated fees, reporting obligations, producer definitions and the practical implications of the ban on destroying unsold goods. This uncertainty affects planning, investment, supplier dialogue and internal priorities.

Direct imports from third-country e-commerce platforms are another central issue, especially for textiles. The study's estimates suggest that platforms such as Shein and Temu may account for substantial flows of directly imported textile products into Sweden, although the figures are uncertain and do not cover all platforms. Respondents view these flows as a challenge to fair competition, particularly if products do not meet EU requirements on chemicals, safety or environmental performance. If EU-based companies face stricter obligations while direct imports are not effectively controlled, both the environmental effect and the legitimacy of the legislation may be weakened.

6.3 Analysis of furniture sector

The furniture sector differs from textiles in several respects. It has a more balanced relationship between imports and exports, and parts of the sector already work with durability, repairability, certifications and public procurement requirements. Furniture products are often less trend-driven and more long-lasting than textiles. This means that future ESPR requirements may formalise practices that already exist in parts of the Swedish furniture market.

At the same time, furniture companies face considerable uncertainty. Although furniture, including mattresses, has been identified as a priority product group under the ESPR, the detailed product-specific requirements have not yet been developed. As a result, companies currently lack clarity on which products will fall within scope, what types of data will be required, and how digital product passports should be applied in practice. This uncertainty makes it difficult for companies to assess future compliance needs, plan investments in data systems, or engage suppliers in preparation for forthcoming requirements.

The interviews suggest that furniture companies see opportunities if future rules recognise durability, repairability, replaceable components and responsible

material choices. However, they also point to challenges linked to supply chain transparency, material complexity and price competition from imports. A furniture product may include wood, metal, plastics, glass, textiles, foam, adhesives and surface treatments from several suppliers. Full traceability may therefore be difficult, especially for smaller companies with limited influence over upstream suppliers.

Competition also differs between market segments. Companies supplying public procurement may benefit from clearer sustainability requirements and established certification systems, while companies in price-sensitive private markets face stronger pressure from low-cost imports. Premium brands may be less directly affected by low-price competition, but companies in lower or mid-price segments may find it harder to pass on the costs of compliance. This underlines the importance of market surveillance and equal application of rules to imported products.

7 Discussion

7.1 Cross-sector findings: textiles and furniture

The results are significant because they show that upcoming EU sustainability legislation will affect Swedish textile and furniture companies as a broader business transition, not only as a compliance matter. The requirements are likely to influence product development, sourcing, supplier relations, information systems, stock management, waste handling, customer communication and competitive positioning.

One important implication is that companies with strong product control and reliable supplier data may become better positioned. This applies to companies that already work with stable suppliers, durable design, repairability, certifications and quality assurance. For such companies, ESPR, DPP and textile EPR may help demonstrate the value of existing practices and support a shift from price-based competition towards lifecycle value and transparency.

However, this outcome is not guaranteed. The same legislation could also create new burdens if requirements are unclear, too complex or unevenly enforced. A

recurring concern in both sectors is that companies may be pushed to invest in new systems before the final rules are known. This is especially problematic for SMEs, where resources are limited, and sustainability responsibilities are often combined with other operational tasks.

The findings therefore underline the importance of proportionality. This does not mean lowering environmental ambition but ensuring that compliance is realistic for different types of companies. Smaller firms may need simplified reporting, phased implementation, templates and practical examples. Without this, there is a risk that legislation designed to improve sustainability instead creates barriers for smaller actors.

Enforcement is equally important. Companies are concerned that direct imports from third-country platforms may not be subject to equivalent control in practice. If the rules are mainly applied to established EU-based actors, while products sold directly to consumers from outside the EU escape effective control, the legislation may fail to create fair competition. It may also reduce trust in the regulatory framework.

The results should be interpreted with some limitations. The company mapping is based on SNI codes and should be seen as an approximation. Some companies included in the mapping may not place relevant products on the market, while other relevant actors may be excluded if textiles or furniture are not their main registered activity. The size classification also contains uncertainty where companies exceed turnover thresholds while remaining in lower employee categories.

The trade statistics also have limitations. Import and export data show flows by value and volume, but they do not fully explain underlying causes. Changes over time may reflect inflation, consumer demand, post-pandemic effects, supply chain disruptions, global trade patterns or the rise of ultra-fast e-commerce. Further analysis would be needed to determine the relative importance of these factors.

Despite these limitations, the findings are consistent. The quantitative mapping, trade data and interviews all point to the same central issues: product data, traceability, proportionality, guidance and enforcement. These areas will be decisive for whether the transition becomes effective, fair and practically manageable.

7.2 Textile sector

For the textile sector, the results are particularly important because the sector is already closer to concrete regulatory implementation than furniture. Textile companies will need to prepare not only for ESPR-related product requirements and DPP, but also for EPR under the revised Waste Framework Directive. This means that textiles are affected by both product-policy and waste-policy developments at the same time.

The high level of import dependency increases uncertainty and complexity. Many Swedish textile companies rely on global supply chains, and future compliance will depend on access to reliable data from suppliers and subcontractors. This may be especially challenging where production takes place through several tiers of suppliers or where product composition changes between batches.

The estimates of direct imports via e-commerce are particularly uncertain but still important. They are based on available information from selected platforms and assumptions about product mix, number of products per parcel and average product weight. They should therefore be interpreted as illustrative estimates rather than complete measurements of direct imports to Sweden. Nevertheless, they point to a potentially significant flow of products that may be difficult to monitor through traditional market surveillance systems.

The interview material provides useful qualitative insight, but the number of interviews is limited. Several interviewed textile companies already work actively with quality and sustainability, which may mean that less prepared or more price-driven actors are underrepresented. Further interviews with companies operating in fast fashion, drop-shipping, low-cost imports and platform-based sales would provide a more complete picture of preparedness and challenges.

7.3 Furniture sector

For the furniture sector, the results suggest that ESPR may reinforce practices already present in parts of the market, particularly where companies work with durability, repairability, quality and public procurement requirements. However, the sector still faces major uncertainty because the detailed ESPR requirements for furniture have not yet been developed.

This uncertainty makes it difficult for companies to know what to prepare for. It also creates a risk that companies invest in digital tools, data systems or

consultancy services that may not correspond to the final legal requirements. Smaller companies may be particularly vulnerable to such risks, since they have less capacity to absorb unnecessary costs.

The interviews provide important insight but also have limitations. The low number of interviews of purely consumer-facing furniture retailers is a weakness, particularly since retail represents an important part of the market. Such companies may experience different pressures from imports, direct e-commerce and private consumer demand than companies mainly supplying public procurement or project markets.

There are also uncertainties linked to product complexity. Furniture products often consist of multiple materials and components, which may make traceability and documentation demanding. More knowledge is needed about what level of traceability is practically achievable for different types of furniture and sectors and what requirements would be both meaningful and proportionate.

8 Conclusions

8.1 Cross-sector findings: textiles and furniture

The study leads to several clear cross-sector conclusions.

1. Swedish textile and furniture companies will be significantly affected by the ongoing shift in EU sustainability legislation, although the timing and type of impact will differ between the sectors. The textile sector is further advanced in the regulatory process, while the furniture sector is still awaiting more detailed ESPR requirements.
2. Since both sectors are dominated by micro and small enterprises implementation must be designed with limited company resources in mind. Clear guidance, manageable reporting systems and practical support will be essential, particularly for smaller actors.
3. Companies generally support the objectives of the legislation. They recognise the need for stronger requirements and many welcome rules that reward quality, longer product lifetimes, transparency and responsible

production. The main concerns are not about the direction of travel, but about how the rules will be implemented.

4. Uncertainty is currently one of the greatest challenges. Companies need clarity on timelines, responsibilities, data requirements, fee structures, producer definitions and reporting obligations. Without this, they risk either delaying necessary preparations or investing in solutions that may not fit the final requirements.
5. DPP have potential to improve traceability, supplier dialogue, circular business models and customer communication. However, their value will depend on clear, interoperable and realistic requirements. If poorly designed, they risk becoming mainly an administrative burden.
6. National authority support and enforcement will be decisive. Companies need practical guidance, examples, templates and accessible channels for questions. At the same time, national authorities need sufficient resources for market surveillance and consistent enforcement. The success of the legislation will depend not only on the content of the rules, but on whether they are implemented clearly, proportionate and credible across the whole market.

8.2 Textile sector

The textile sector is highly import-dependent. Future compliance will therefore rely heavily on access to reliable data from international supply chains. Companies will need stronger systems for product information, supplier dialogue and documentation.

Textile companies will be affected by several regulatory requirements at once, including ESPR, DPP, the prohibition on destruction of unsold goods and EPR. This creates a more complex transition than for many other product groups.

Direct imports from third-country e-commerce platforms are a major challenge. If these products are not effectively controlled, EU-based companies may face stricter obligations while competing against products that do not meet the same standards in practice. This would weaken both fair competition and environmental effectiveness.

Textile EPR must be designed so that it creates real incentives for improved product performance. Eco-modulated fees should reward durability, repairability, reusability and recyclability, while remaining administratively manageable. The

system must also provide clarity on producer definitions, reporting obligations and the treatment of smaller companies.

8.3 Furniture sector

The furniture sector appears more balanced between imports and exports, and parts of the sector already work with durability, repairability and public procurement requirements. This provides a relatively strong starting point for future ESPR implementation.

However, furniture companies face significant uncertainty because the detailed ESPR requirements are not yet known. Companies need clarity on which products will be covered, what data will be required and how DPP should be applied to furniture and mattresses.

Future requirements should recognise the specific characteristics of furniture products, including long lifetimes, repairability, replaceable components and material complexity. Requirements that are too general may fail to reflect meaningful sustainability performance, while requirements that are too detailed may become difficult for smaller companies to apply.

Market surveillance will also be important for furniture. If imported products are not subject to the same level of control as products sold by established Swedish or EU-based actors, companies investing in sustainability and compliance may face unfair competition.

9 Knowledge gap and recommendations for further investigations

9.1 Cross-sector findings: textiles and furniture

Several knowledge gaps remain across both sectors. One important gap concerns company readiness in relation to product data. More information is needed on what data companies currently have, what is missing, and which gaps will become

most critical under ESPR, DPP and textile EPR. This includes data on materials, chemical content, recycled content, durability, repairability, production sites and end-of-life treatment.

A second cross-sector gap concerns digital product passport solutions. Existing and emerging market initiatives should be mapped and assessed to determine whether they are likely to align with future EU requirements. This is particularly important because companies may otherwise invest in systems that later prove insufficient or unnecessary.

A third gap concerns enforcement and market surveillance. Further analysis is needed on how authorities can effectively monitor imported products, online platforms and low-value consignments. This should include customs data, product testing, cooperation between authorities and possible sanctions for non-compliance.

Finally, more knowledge is needed on how national authorities can reach micro and small enterprises. Many smaller companies may not follow EU policy processes or participate in industry networks. Future work should therefore examine which communication channels, guidance formats and support models are most effective before the requirements enter into force.

9.2 Textile sector

For textiles, the most important knowledge gap concerns direct imports from third-country e-commerce platforms. Current data is insufficient to determine the total volume, product composition, value and compliance status of products entering Sweden through these channels. Further investigation is needed to assess how large these flows are and whether the products comply with EU rules on chemicals, safety, labelling and sustainability.

More knowledge is also needed about textile companies with business models that are less represented in the present interview material. This includes fast-fashion companies, drop-shipping businesses, online marketplaces, importers of low-price products, second-hand operators and repair actors. These actors may face different challenges and may have different levels of preparedness.

Another knowledge gap concerns textile EPR. Further analysis is needed on how fee structures, eco-modulation, reporting obligations and producer definitions will affect different types of textile companies, especially micro and small enterprises.

9.3 Furniture sector

For furniture more interviews should be conducted with companies that sell furniture directly to private consumers and that offer products from several brands. These actors seem to experience different pressures from imports, direct e-commerce and consumer price sensitivity than manufacturers or companies active mainly in public procurement.

More knowledge is also needed about traceability in furniture supply chains. Furniture products may contain many materials and components, including wood, metal, plastics, textiles, foam, adhesives and surface treatments. Further work should examine what level of product and material data is currently available and what level of traceability would be realistic and meaningful under ESPR.

A further knowledge gap concerns mattresses. Since mattresses are included as a specific subgroup in the study and may be affected by future ESPR requirements, additional analysis is needed on their material composition, recyclability, repairability, collection systems and end-of-life treatment.

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Appendices

Appendix 1

CN-code	Official description (SCB)	Included in ESPR	Included in WfD
4203	Articles of apparel and clothing accessories, of leather or composition leather (excl. footware and headgear and parts thereof, and goods of chapter 95, e.g. shin guards, fencing masks)	Yes	Yes
61	CHAPTER 61: ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, KNITTED OR CROCHETED	Yes	Yes
62	CHAPTER 62: ARTICLES OF APPAREL AND CLOTHING ACCESSORIES, NOT KNITTED OR CROCHETED	Yes	Yes
6504	Hats and other headgear, plaited or made by assembling strips of any material, whether or not lined or trimmed (excl. headgear for animals, and toy and carnival headgear)	Yes	Yes
6505	Hats and other headgear, knitted or crocheted, or made up from lace, felt or other textile fabric, in the piece (but not in strips), whether or not lined or trimmed; hairnets of any material, whether or not lined or trimmed (excl. headgear for animals, and toy and carnival headgear)	Yes	Yes
6301	Blankets and travelling rugs of all types of textile materials (excl. table covers, bedspreads and articles of bedding and similar furnishing of heading 9404)	No	Yes
6302	Bedlinen, table linen, toilet linen and kitchen linen of all types of textile materials (excl. floorcloths, polishing cloths, dishcloths and dusters)	No	Yes
6303	Curtains, incl. drapes, and interior blinds; curtain or bed valances of all types of textile materials (excl. awnings and sunblinds)	No	Yes
6304	Articles for interior furnishing, of all types of textile materials (excl. blankets and travelling rugs, bedlinen, table linen, toilet	No	Yes

	linen, kitchen linen, curtains, incl. drapes, interior blinds, curtain or bed valances, lampshades and articles of heading 9404)		
6309	Worn clothing and clothing accessories, blankets and travelling rugs, household linen and articles for interior furnishing, of all types of textile materials, incl. all types of footwear and headgear, showing signs of appreciable wear and presented in bulk or in bales, sacks or similar packings (excl. carpets, other floor coverings and tapestries)	No	Yes
9401	Seats, whether or not convertible into beds, and parts thereof, n.e.s. (excl. medical, surgical, dental or veterinary of heading 9402)	NA	NA
9402	Medical, surgical, dental or veterinary furniture, e.g. operating tables, examination tables, hospital beds with mechanical fittings and dentists' chairs; barbers' chairs and similar chairs having rotating as well as both reclining and elevating movement; parts thereof	NA	NA
9403	Furniture and parts thereof, n.e.s. (excl. seats and medical, surgical, dental or veterinary furniture)	NA	NA
940421	Mattresses of cellular rubber or plastics, whether or not covered	NA	NA
940429	Mattresses, fitted with springs or stuffed or internally filled with any material (excl. cellular rubber or plastics, pneumatic or water mattresses and pillows)	NA	NA
940490	Articles of bedding and similar furnishing, fitted with springs or stuffed or internally filled with any material or of cellular rubber or plastics (excl. mattress supports, mattresses, sleeping bags, pneumatic or water mattresses, blankets, covers, quilts, bedspreads, eiderdowns and duvets "comforters")	NA	NA
94041000	Mattress supports for bed frames (excl. spring interiors for seats)	NA	NA

Appendix 2. Indicative questions for the semi structured interviews with textile companies

Ecodesign Regulation

- Do you work with ecodesign today and what aspects do you prioritise (e.g. choice of materials, lifespan, repairability, circularity, chemicals, climate impact)?
- How do you see the upcoming requirements of the Ecodesign Regulation affecting your business?
- Which requirements do you find most challenging and most positive for your own business?
- Do you have a policy for resource use and circular economy, or in some other way a steering towards circular economy and reduced resource use?
- Do you have measurable goals for reduced resource use (reduced production volumes and reduced waste amounts – e.g. in terms of lifespan, repairability, amount of recycled and/or renewable materials, etc.)?
  If yes, can you give examples?

Digital Product Passports

- In what way do you see that the digital product passports will affect your business/products?
- How do you prepare for the DPP and are there challenges/benefits?
- What phase are you in when it comes to digital product passports? (no active work, planning, piloting or implementation)

Prohibition of destruction of unsold textiles in the Ecodesign Regulation

- How will this affect your business?
- How do you currently handle unsold goods, returns and excess stock (e.g. destruction, outlet/sale, return to supplier)?
- Are there internal guidelines or goals governing this?
- How do you prepare for the ban?
- What alternative solutions are you working on or planning to develop (e.g. resale, repair/reconditioning, reprocessing, donation or reuse)?

Producer responsibility

- What knowledge do you have about the future producer responsibility for textiles?
- What, if any, concrete measures have you already started or do you plan to start to adapt the business?
- In what ways do you see that producer responsibility can affect your business, such as business model, costs or assortment?
- What opportunities and challenges do you see linked to the introduction?

Direct imports

- How is your business affected by direct imports from third countries (countries outside the EU)?
- Are measures necessary to maintain competitiveness in the internal market (EU market)

Conclusion

- What are the key risks of future requirements?
- What opportunities do you see with upcoming requirements?
- What is important for us to understand about the Swedish market for textiles?
- What support would you need from authorities to be able to prepare for the upcoming legislation? Do micro and small enterprises need special solutions or exemptions to meet the requirements? If yes, what support is needed?
- Do you see a need for support from the authorities during the implementation phase of the new requirements, if what, what kind of support?

Appendix 3. Indicative questions for the semi structured interviews with furniture companies

Ecodesign Regulation for sustainable products

- How do you work with ecodesign today?
- What aspects do you prioritise (e.g. choice of materials, lifespan, repairability, circularity, chemicals, climate impact)?
- What knowledge do you have about the upcoming Ecodesign Regulation?
- How do you perceive that the coming requirements will affect your business?
- Which parts of ecodesign and the new requirements do you find most challenging and most positive?

Digital Product Passports

- What phase are you in when it comes to digital product passports? (planning, piloting or implementation)
- In what way is your current work with product information, traceability and data collection in line with the upcoming requirements for digital product passports, and where do you see any gaps?

- **Direct imports**
  How is your business affected by direct imports from third countries (countries outside the EU)?
- What measures do you see as necessary to maintain competitiveness in the internal market (EU market)?

Conclusion

- What are the key risks of future requirements?
- What opportunities do you see with upcoming requirements?
- What is important for us to understand about the Swedish market for textiles/furniture?
- What support would you need from authorities to be able to prepare for the upcoming legislation?
- Do micro and small enterprises need special solutions or exemptions to meet the requirements? If yes, what support is needed?
- Do you see a need for support from the authorities during the implementation phase of the new requirements, if what, what kind of support?

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This report has been reviewed and approved in accordance with IVL's audit and approval management system.