EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission DG ENER Unit C3

Brussels, 21 September 2020

EPF Feedback on the Inception Impact Assessment on "EU energy efficiency directive (EED) – evaluation and review"

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on the review of the Directive 2012/27/EU on energy efficiency and the related more ambitious targets for the reduction of the EU's greenhouse gas emissions by at least 50% to 55% by 2030. Enhanced energy efficiency is indeed a key objective of the Green Deal in the framework of the incoming Renovation Wave Initiative in mid-October and in our recovery from the COVID-19 crisis. The wood-based panels industry believes that it is especially essential to foster energy efficiency of the EU building stock. In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals for the review and evaluation of the EU energy efficiency directive:

- The review of the energy efficiency directive ought to rise to the challenge of climate neutrality objective by 2050 and the 2030 milestone;
- Improving energy efficiency should work hand in hand with resource efficiency in line with the principles of the circular economy, the waste hierarchy and the carbon neutrality target;
- There is a need to foster well-functioning markets for secondary raw materials from recycled construction and demolition materials that are free from distorting subsidies to avoid further pressure on natural resources;
- Ambitious investment should be mobilised in the renovation of residential and commercial buildings and tourist accommodation in order to improve the energy performance of the EU building stock as well as to stimulate the recovery;
- The rate of building renovation needs to be increased, as the existing building stock represents the single biggest potential sector for energy savings;
- The capacity to store carbon in wood-based construction products and to substitute energy-intensive and fossil-based products for construction and renovation should be duly accounted when assessing sustainability considerations;
- Based on embedded carbon levels and insulation properties, green public procurements should be implemented to foster the use of sustainable nature-based products for construction and renovation;
- Cost and energy effective approaches for renovation should be identified such as off-site prefabrication of building components such as timber frame construction to accelerate large scale renovations and reduce waste;
- NECPs should duly reflect the results of the review of the energy efficiency directive to ensure proper implementation.

EPF represents the manufacturers of wood-based panels being particleboard, dry process fibreboard (MDF), oriented strand board (OSB), hardboard, softboard and plywood. EPF has members in 32 European countries. The EU wood panel industry has a turnover of about 22 billion euro every year, creates over 100,000 jobs directly and counts more than 5,000 enterprises in Europe. The production of wood-based panels in the EU-28 (+EFTA) in 2019 was an estimated 59.2 million m³. www.europanels.org

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European Panel Federation
Rue Montoyer 24, 1000 Brussels, Belgium
Tel +32 2 556 25 89 - info@europanels.org - www.europanels.org
EU Transparency Register: 572064811767-22 – IBAN: BE33 4268 1660 1346 – VAT: BE 0464.722.149