EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG ENER Unit C1

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EPF Feedback on the Inception Impact Assessment on the revision of the Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on the revision of the Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (RED II). The wood-based panels industry believes that the promotion of the use of renewables and the transition towards a decarbonised European society are key to achieving the objectives of the Green Deal and ought to play a fundamental role in the post COVID-19 recovery. In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals for the revision of the Directive on the promotion of the use of energy from renewable sources:

- The revision of the RED II should be in line with the principles of the circular economy, the waste hierarchy established in Directive 2008/98/EC and the carbon neutrality target;
- Key outcomes from RED II should not be lost, especially Recital 21 and the obligation on Member States to ensure that their support schemes do not create market distortions on raw material markets (including wood);
- The cascade use of wood principle should be applied to ensure the long-life cycle carbon storage and that reuse and recycling are always the priority options;
- There is a need to establish well-functioning markets for wooden secondary raw materials before eventual end of life energy recovery to avoid further pressure on natural resources and distortive effects on markets for (by-)products, wastes or residues;
- The revision of the Directive should focus on the full compliance with the sustainability criteria laid down in Article 29(2) to (7), the energy efficiency criteria and the greenhouse gas emissions criteria.

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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