EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG ENV - Unit B1
DG GROW - Unit C1
DG ENER - Unit C4

Brussels, 13 November 2020

EPF Feedback on the Inception Impact Assessment on the Sustainable Products Initiative

The European Panel Federation (EPF), warmly welcomes the Inception Impact Assessment on the Sustainable Products Initiative and the review of the Ecodesign Directive. The wood-based panels industry believes that this initiative will be a key element in implementing a coherent framework allowing for achieving the objectives of a resilient circular economy and climate neutrality while strengthening the role of consumers in the green and sustainable transition. In this respect, EPF calls on the European Commission to consider the following points when elaborating its legislative proposals to ensure that products placed on the EU market more sustainable:

- Ensure that the Sustainable Products Initiative allows for the efficient implementation of circular bioeconomy throughout the Union;
- Acknowledge that - while durability, resource efficiency and eco-design are desirable qualities - the key element is the nature of the raw materials used;
- Promote therefore the use of naturally renewable, locally sourced and climate smart (carbon storing) raw materials, products and solutions;
- Acknowledge and account for material substitution to avoid the use of energy-intensive materials especially for sustainable construction and renovation for energy efficiency of the built environment;
- Develop well-functioning markets for secondary raw materials in line with the principles of the waste hierarchy and material use preference to enhance resource efficiency through multiple downcycling in cascades;
- Ensure that product-specific targets for recycled content is applied only when technically feasible in order to take into account the specific characteristics of different categories of products;
- Safeguard the preference for 'made in EU' sustainable products through green public procurement rules especially with respect to the Renovation Wave and the Sustainable Built Environment Initiatives;
- Ensure the empowerment of consumers choices through adequate sustainability labelling, digital passports and other information on environmental footprints of products and solutions.

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 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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