EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG CLIMA, C3

Brussels, 20 November 2020

EPF Feedback on the Inception Impact Assessment on the Amendment of the Land Use, Land Use Change and Forestry Regulation (EU) 2018/841

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on the Amendment of the Land Use, Land Use Change and Forestry Regulation and the opportunity to provide feedback on the intended initiative. The wood-based panels industry believes that this initiative will be a key element in implementing a coherent framework to allow the objectives of the European Green Deal to be achieved and to combat climate change. Sustainable land and forest management together with carbon removals via sequestration in forests, storage in harvested wood products and substitution of fossil-based and energy intensive materials is indeed essential to achieve the new 2030 climate targets and reach climate neutrality by 2050. This is the 3S framework of the forest-based industry that today makes a positive climate contribution equivalent to 20% of all EU fossil emissions.

In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals:

- Acknowledge the multifunctionality of EU forests to unleash the full potential of the sustainable circular bioeconomy;
- Guarantee a level playing field by avoiding unnecessary market distortions to ensure wood availability for increased pools of sustainably sourced harvested wood products;
- Foster fossil-based and energy intensive material substitution with bio-based products and solutions;
- Develop and implement a solid methodology for evidence-based accurate calculation of carbon removals that takes into account the climate benefits of material substitution[1];
- Implement further the sustainability criteria to promote material use over early energy recovery in line with the principles of circularity and of the waste hierarchy;
- Empower consumers through the development of labels promoting climate smart 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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[1] According to a recent Study "Climate effect of the forest-based sector in the European Union" The European forests and the forest-based sector provide integrated solutions to the global climate challenge on a very large scale. The overall and positive climate effect is estimated at -806 million tons of carbon dioxide equivalents annually. This corresponds to c. 20% of all fossil emissions in the European Union.

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