EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG ENV B3

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EPF Feedback on Environmental impact of waste management – revision of EU waste framework

The European Panel Federation (EPF) welcomes the opportunity to provide feedback on the call for evidence for an impact assessment on the revision of the EU Waste Framework Directive (WFD). EPF believes that the sound implementation of the waste hierarchy established in the WFD favouring the prevention of waste and material use over disposal and early energy recovery is of the utmost importance to uphold the principles of circular economy, enhance carbon life cycles, resource efficiency and environmental sustainability.

Furthermore, EPF considers that waste prevention and collection are key enablers of the climate neutrality objective while reducing the pressure on natural capital especially for woody biomass for which demand is expecting to rise given its role in climate mitigation, protection of ecosystemic services and the deployment of a resilient and circular bioeconomy. It is essential to "simplify waste management for citizens and ensure cleaner secondary materials for businesses" as announced in the Green Deal.

In this respect, EPF calls on the European Commission to consider the following points while preparing the revision of the EU Waste Framework Directive:

- Promote full implementation of the provisions of the waste hierarchy on waste prevention, preparation for re-use and recycling;
- Provide clear guidance on waste-prevention provisions for efficient separate collection to improve waste re-use and preparation for re-use and recycling especially for construction & demolition waste;
- Reduce waste generation by requiring where possible selective demolition and segregation at source;
- Support collection schemes that keep the wastes separate, keeps them clean and makes them available to candidate recyclers in sufficiently large quantities by establishing well-functioning and competitive markets for secondary raw materials;
- Ensure material use preference for woody biomass to enhance and maintain the carbon life cycle through the application of the cascading principle;
- Establish a level playing field by avoiding market distortions from subsidies for early energy recovery from woody biomass.

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-27 (+EFTA) in 2020 was an estimated 58 million m³. www.europanels.org

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