EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG GROW Unit C1

Brussels, 11 July 2022

EPF feedback on the Proposal for a Regulation laying down harmonised conditions for the marketing of construction products (CPR)

The European Panel Federation (EPF) welcomes the possibility to provide feedback on the Proposal for a Regulation laying down harmonised conditions for the marketing of construction products, amending Regulation (EU) 2019/1020 and repealing Regulation (EU) 305/2011. EPF believes that the single market for construction products is essential, welcomes the improvements regarding how the single market for construction products should function and believes it is essential especially within the framework of the achievement of the objectives of the circular economy and of climate neutrality by 2050. The wood-based panels industry therefore especially welcomes the objective of integrating sustainability aspects and environmental characteristics into the CPR.

Within the framework of the revision of the CPR, it is essential that the demands of the construction ecosystem can be heard and that a dialogue can be established between its representatives and the European institutions. In this respect, EPF calls on the Commission to consider the following general points as well as our more detailed comments and proposals (in annex) on the EC's proposed revision of the CPR:

- Ensure a harmonised European approach amongst Member States by effective implementation of the regulation.
- The inclusion of renewable raw materials within the framework of the circular economy.
- That administrative/financial burden is kept to an absolute minimum.
- Industry's data security and accuracy is of utmost importance from business and safety perspectives.
- Ensure consistency with EPBD.
- Ensure clarity in roles and responsibilities of each economic operator 'placing' or 'making available' on the market, enabling proper implementation of the regulation amongst economic operators responsible for those specific tasks, without over complicating the regulation; which in turn should be supported by a proper functioning market surveillance
- Welcomes the acknowledgement of the climate benefits of biogenic + embodied carbon and the use of European standards relating to EPDs and the PEF method for this and operational carbon.
- Has concerns regards the proliferation of delegated acts that do not include industry stakeholder engagement and calls for (based on EC guiding principles given in the CPR):
    - Cascading principle & waste hierarchy at the end of life to be the 'best fit' for each construction product sector by tailoring requirements through standardisation.
    - Technical and environmental solutions for each sector's products made through standardisation.

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To conclude, the wood-based panel industry produces sustainably sourced circular products that can be used for energy-efficient and climate-friendly construction and renovation in technically demanding end uses. It is therefore of utmost importance that the CPR enables products to be properly assessed and declared for both technical and environmental related characteristics in a sound and harmonised manner. This would empower end-users to make the most sustainable and appropriate technical construction products choices for their projects in a clear and transparent way.

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 and creates directly over 105,000 jobs. The production of wood-based panels in the EU-27 (+EFTA) in 2021 was an estimated 63.7 million m³. www.europanels.org

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