EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG ENER B2 and C1

Brussels 7 October 2025

EPF Response to the Call for Evidence on the EU Heating and Cooling Strategy

The European Panel Federation (EPF), representing the European wood-based panels industry, welcomes the opportunity to contribute to the consultation on the forthcoming Heating and Cooling Strategy. EPF strongly supports the EU's objectives of decarbonisation, energy efficiency, affordability, and competitiveness. However, we are deeply concerned about the continued reliance on solid biomass (e.g. pellets and fuelwood) as a heating source, as highlighted in the Call for Evidence.

We would like to emphasise the following points:

- **Contradiction with the cascading use principle**
  - The large-scale use of woody biomass for energy directly conflicts with the cascading use principle enshrined in the Renewable Energy Directive, which prioritises material uses of wood before energy recovery.
  - Burning wood for heating destroys valuable raw materials that could instead be used in long-lived harvested wood products, thereby undermining resource efficiency.
- **Pressure on raw material availability**
  - Increased demand for biomass for heating and cooling will exacerbate competition for wood resources, placing significant strain on industries such as the wood-based panels industry.
  - Short-term combustion reduces wood's long-term climate benefits and risks destabilising raw material markets.
- **Missed carbon storage opportunities**
  - Wood-based panels and other harvested wood products store carbon over long lifespans while enabling circular recycling loops.
  - Diverting woody raw materials to energy erodes this storage function, releasing carbon immediately rather than locking it into the bioeconomy and the built environment.
- **Impacts on health and the environment**
  - The Call for Evidence itself recognises that biomass use in residential heating is a major source of particulate emissions and poor air quality.
  - Scaling up biomass burning will worsen these impacts, undermining both public health and environmental integrity, while contradicting the EU's ambitions under the Zero Pollution Action Plan.
- **Towards a circular, resource-efficient, and clean heating future**
  - EPF strongly advocates prioritising alternative solutions such as energy efficiency, electrification via heat pumps, geothermal, solar thermal, and large-scale district heating with waste heat recovery.
  - These solutions are consistent with the EU's objectives of a circular bioeconomy, improved resource efficiency, and reduced environmental impacts, while safeguarding the availability of wood for higher-value uses.

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In conclusion, EPF believes that the Heating and Cooling Strategy must clearly recognise that woody biomass combustion is not a sustainable long-term solution. Instead, it should place strict limits on energy uses of wood and promote alternatives that respect the cascading use principle, safeguard raw material availability for high-value industries, and ensure genuine climate and environmental benefits.

EPF stands ready to engage further with the Commission to ensure that the Strategy supports Europe's goals of decarbonisation and circular resource efficiency as foreseen in the upcoming Circular Economy Act.

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