EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
DG GROW.E.5

Brussels 8 December 2025

EPF Response - Call for Evidence on the Construction Services Act

The European Panel Federation (EPF), representing the European manufacturers of wood-based panels, welcomes the European Commission's initiative to enhance the functioning of the Single Market for construction and installation services through the forthcoming Construction Services Act.

General comments

EPF supports efforts to remove unnecessary administrative barriers and promote cross-border provision of construction services, particularly in view of the EU's Affordable Housing Plan and Strategy for Housing Construction. The wood-based panels industry supplies the core materials enabling offsite, modular and affordable construction solutions while allowing for long-term carbon storage. Ensuring smoother operation of construction services directly strengthens the sector's contribution to sustainable and affordable housing delivery.

EPF also encourages the Construction Services Act to align closely with the Circular Economy Act and other EU sustainability frameworks, ensuring coherence between service mobility, resource efficiency, and circular use of materials.

Construction materials & circularity

To complement the Construction Services Act focus on service provision, EPF invites the Commission to consider the **importance of material availability and circular flows** in the construction ecosystem. The industry faces increasing pressure from supply constraints and competing woody biomass demand (energy, biochemicals, etc.). A recent EPF Policy Paper on "Strategic Wood Availability" highlights a projected future gap between wood demand and sustainable domestic supply. This underscores the need for policies supporting **circularity, recycling, and cascading use of woody biomass** to ensure long-term material security for Europe's construction wood-based value chains.

The Construction Services Act should therefore encourage Member States to:

- Facilitate **reuse and recycling services** for construction materials within the Single Market;
- Simplify **cross-border shipment and classification of construction and demolition waste**, ensuring material recovery precedes energy recovery;
- Promote **digital traceability of construction materials**, enabling reuse and better integration of circular wood-based products.

Skills, recognition & innovation

EPF welcomes measures enhancing **mutual recognition of qualifications** and supports training in **sustainable construction and circular design**. Skills frameworks should include competences related to:

- Use of **bio-based and low-carbon materials**,
- **Offsite prefabrication and panelised systems**, and
- **Lifecycle carbon management** (design for disassembly, reuse, and recycling).

EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

Fair competition & level playing field

To preserve **strategic autonomy** and **industrial competitiveness**, EPF recommends that the Construction Services Act and related instruments ensure:

- **Fair competition** between EU and non-EU construction service providers, preventing dumping or non-compliant imports of materials or components;
- Enforcement of **EU product and sustainability standards** across all service providers active in the Single Market;
- Clear links between the Construction Services Act and green public procurement frameworks to promote **material efficiency and circular performance criteria** in construction contracts.

Conclusion

EPF supports the Commission's intention to modernise and harmonise the framework for construction services. For the initiative to fully contribute to the green and digital transitions, it should:

- Integrate circularity principles and cascading use of materials (especially woody biomass);
- Support the mobility of skilled professionals while ensuring sustainability competences; and
- Safeguard fair competition and material self-reliance within the European construction ecosystem.

Wood-based panels are indispensable for affordable, sustainable, carbon storing and circular buildings. The Construction Services Act should recognise this role by fostering service frameworks that enable their optimal use across borders.

2025-043