EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

European Commission
Secretariat-General, SG.C.2

Brussels, 3 February 2026

EPF response - Call for Evidence on the Communication on Better Regulation

The European Panel Federation (EPF) welcomes the opportunity to provide input on the Commission's Better Regulation policy. As a sector operating at the intersection of climate, industrial, environmental and circular economy policies, the wood-based panels industry is directly affected by the quality, coherence and implementability of EU legislation. EPF therefore strongly supports continued efforts to ensure that Better Regulation remains fit for purpose in a context of accelerating policy ambition and increasing regulatory complexity.

Reconciling evidence-based policymaking with the need for urgent action

EPF recognises the need for the Commission to act swiftly in response to urgent challenges, notably climate change, energy security and competitiveness. However, urgency should not come at the expense of robust evidence and realistic impact assessment. To better reconcile these objectives, the Commission could:

- **Make greater use of existing sectoral data and real-world evidence**, including industry data, before resorting to assumptions that may distort outcomes.
- **Introduce regular and credible review clauses** in legislation, with a genuine possibility to adjust requirements where evidence or implementation experience demonstrates unintended effects.

Ensuring a holistic and efficient approach to stakeholder consultations

EPF welcomes the Commission's commitment to stakeholder consultation, but notes increasing consultation fragmentation, particularly where similar information is requested repeatedly across overlapping policy files. To improve efficiency and effectiveness, the Commission could:

- **Adopt a more cross-cutting approach to consultations**, especially where initiatives span multiple policy fields (e.g. climate, circular economy, construction, chemicals), by better coordinating consultations across DGs.
- **Reuse and capitalise on recent consultation inputs**, avoiding repetitive data requests when relevant information has already been provided in closely related processes.
- **Improve feedback loops**, by more clearly explaining how stakeholder input has been used, including where it has not been taken on board and why.

Making EU laws simpler and easier to implement in practice

From an industry perspective, regulatory complexity and uncertainty increasingly arise not from core legislative acts alone, but from the cumulative effect of delegated acts, implementing acts, guidance documents and IT systems. Practical steps to improve simplicity and implementability could include:

- **Clearer delineation between essential requirements in basic acts and technical details in secondary legislation**, limiting the scope creep of delegated and implementing acts.
- **Improved alignment of timelines**, ensuring that secondary legislation, guidance and digital tools are available well before obligations apply.
- **Greater legal certainty**, by avoiding reliance on non-binding guidance to clarify essential compliance elements that should be addressed in binding texts.

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- **User-centred digitalisation**, ensuring that digital tools (registries, reporting platforms and databases) are interoperable, tested with end-users and genuinely reduce administrative burden rather than adding parallel obligations.
- **Systematic consideration of cumulative impacts**, particularly where multiple pieces of legislation apply to the same products, operators or data streams.

Finally, EPF encourages the Commission to further strengthen **ex post evaluation and fitness checks**, not only to assess policy effectiveness but also to identify concrete simplification opportunities based on real implementation experience.

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