



European Federation
of Building
and Woodworkers



Dear Honourable Member of the European Parliament,
Dear Mr Cuffe,

We the undersigned, would like to warmly congratulate you on the content of your Draft Report on maximising the energy efficiency of the EU building stock on behalf of the Committee on Industry, Research and Energy and on the amendments you tabled on behalf of the GREENS/EFA Group. Within the framework of the elaboration of the compromise amendments, we would like to kindly draw your attention to the following points that we believe to be fundamental for the successful implementation of the Renovation Wave and the development of a sustainable built environment. We therefore would like to call for:

- **Empowering consumer choices** for favouring sustainable and climate-friendly products and solutions for construction and renovation;
- **Increasing off-site prefabrication of building components** such as walls and roofs since it constitutes a very promising way to accelerate large scale renovations and constructions in a cost-efficient manner;
- **Securing a level playing field** and avoiding unnecessary market distortions for wooden raw materials and additional carbon emissions from support schemes for energy from biomass;
- Reducing embodied energy and **increasing the use of sustainable materials** in buildings;
- Assessing the environmental and energy performance by categories of buildings to **identify the most climate-friendly solutions for construction and renovation**, reflecting the results into a minimum green public procurement threshold for sustainable products to boost the use of biogenic carbon storing materials and solutions for better resource and energy efficiency;
- **Defining accurate accounting rules to measure and confirm the substitution effect of using biogenic products instead of carbon-intensive materials** in order to extend carbon storage via greater use of natural products and increase the total harvested wood products' carbon stock in the built environment. Such rules should consider the increased circularity of carbon through removals and storage in wood construction. As proposed by the new Circular Economy Action Plan, their integration in a “regulatory framework for certification of carbon removals” should be explored;
- **Ensuring that bio-based materials used for construction and renovation, including all wood wastes, should return to the value-chain** by fostering eco-design, increasing recycling targets and favouring wherever possible the use of secondary raw materials for construction and renovation products (without compromising product safety and performance standards) ahead of eventual end of life incineration.

We thank you for taking the time for considering our proposals and we look forward for the publication of your own initiative report.

Yours sincerely,

European Panel Federation (EPF)
European Organisation of the Sawmill Industry (EOS)
European Federation of the Parquet Industry (FEP)

European Federation of Building and Woodworkers (EFBWW)
Zero Waste Europe (ZWE)

The **European Panel Federation (EPF)** has members in 25 countries and represents the manufacturers of particleboard, MDF, OSB, hardboard, softboard and plywood. The EU wood panel industry has an annual turnover of about 22 billion Euros, creates over 100,000 jobs directly and counts more than 5,000 enterprises in Europe. www.europanel.org

The **European Federation of the Parquet Industry (FEP)** reunites more than 50 European parquet manufacturers, 8 national parquet associations and around 20 suppliers to the industry. The primary goal of FEP is to strengthen and improve the position of wood flooring amongst other floor covering products as well as to enhance the growth, prosperity and stature of the European parquet manufacturing industry – thereby protecting its interests and reinforcing its image. www.parquet.net

Through its member federations and associated members, the **European Organisation of the Sawmill Industry (EOS)** represents some 35,000 sawmills manufacturing sawn boards, timber frames, glulam, decking, flooring, joinery, fencing and several other wood products. Together they represent around 80% of the total European sawn wood output in a sector that has a turnover of around 35 billion EUR and employs about 250,000 people in the EU. The European Sawmill Industry recognises that it is imperative to combat climate change and at the same time avoid curbing economic and social development. Sustainably managed forests and products derived from these forests play an essential role in mitigating climate change by reducing greenhouse gases emissions and contribute to an environmental-friendly economic growth. The positive effects of using wood from sustainably managed forests can be strengthened if actions are taken to use more long-life wood products. www.eos-oes.eu

The **EFBWW** is the **European Trade Union Federation** grouping 75 national free trade unions from 34 countries, representing members in the Building, Building Materials, Wood, Furniture, Forestry and Allied sectors. The EFBWW is an officially recognised European social partner for the Construction, wood and Furniture sectors, defending workers' rights at EU level. www.efbww.eu

Zero Waste Europe (ZWE) is the European network of communities, local leaders, businesses, experts, and change agents working towards the same vision: phasing out waste from our society. We empower communities to redesign their relationship with resources, to adopt smarter lifestyles and sustainable consumption patterns, and to think circular. www.zerowasteurope.eu