

European Commission, DG CLIMA

Brussels, 14 September 2020

**EPF Feedback on the draft Delegated Act on “Greenhouse gas emissions from land use and forestry – CO2 offsets”**

The European Panel Federation (EPF), welcomes the possibility to provide a feedback on the draft Delegated Act on “Greenhouse gas emissions from land use and forestry – CO2 offsets” - amending Annex IV to Regulation (EU) 2018/841 as regards the forest reference levels to be applied by the Member States for the period 2021-2025. The wood-based panels industry believes that all sectors should contribute to the new EU 2030 emissions reduction target. It is important indeed to find right balance between CO2 emissions and removals while setting up the forest reference levels that each country must apply between 2021 and 2025.

In this respect, EPF calls on the European Commission to consider the following points in the framework of the finalisation of its Delegated Act “Greenhouse gas emissions from land use and forestry – CO2 offsets”:

- Although harvested wood products (HWP) are included in the draft delegated act, we believe that more emphasis should be put on the capacity to store carbon in HWP and to substitute energy-intensive and fossil-based products especially for construction and renovation;
- According to a recent Study “[Climate effect of the forest-based sector in the European Union](#)” The European forests and the forest-based sector provide integrated solutions to the global climate challenge on a very large scale. The overall and positive climate effect is estimated at -806 million tons of carbon dioxide equivalents annually. This corresponds to c. 20% of all fossil emissions in the European Union;
- The substitution effect and the long-term storage of carbon in HWP should hence be duly accounted when assessing sustainability considerations;
- The cascade use of wood principle should be applied to ensure the long-life cycle carbon storage and that the recycling of waste is always the priority option to avoid early CO2 emissions;
- There is a need to establish well-functioning markets for wooden secondary raw materials before eventual end of life energy recovery to avoid further pressure on natural resources and distortive effects on markets for (by-) products, wastes or residues;
- Finally, we strongly believe that the European Forest-based Industries ought to be positioned as integral contributors to achieving the climate and sustainability objectives of the European Green Deal.

*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, creates over 100,000 jobs directly and counts more than 5,000 enterprises in Europe. The production of wood-based panels in the EU-28 (+EFTA) in 2019 was an estimated 59.2 million m<sup>3</sup>. [www.europanel.org](http://www.europanel.org)*

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