



EPF Feedback on the Inception Impact Assessment on “Construction products – review of EU rules”

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on the review of the Construction Products Regulation EU No 305/2011. The wood-based panel industry produces sustainably sourced circular products that can be used for energy-efficient and climate-friendly construction and renovation. It is therefore of utmost importance that the CPR enables products to be properly assessed and declared for all characteristics, including those related to the circular economy at a European level. This will aid end-users to make the best construction products choices for their projects in a clear and transparent way.

The issue of hENs not being cited in the EU OJ is one that needs to be unblocked with a degree of urgency as this stifles industry in being able to adapt to market needs as well as regulatory needs. We believe this can be done with the current regulatory framework but do accept that there will be necessary legal adaptations following legal precedents being set. We believe this can be done mainly through better cooperation and working with all the relevant actors being fully engaged (broadly speaking Option I).

We support the streamlining of the DoP and CE marking information and also recognise that electronic information should be the future means to integrate with information gathering systems used throughout the building process and ultimately to end of life. This will enable well-functioning markets for secondary raw materials from recycled construction and demolition materials to avoid further pressure on natural resources;

The current CPR has helped Europe through its harmonisation of building practices, codes and materials. Recently this has been threatened in certain Member States. Any review of CPR should avoid further regionalism and fragmentation by securing a level European playing field, thereby benefitting Europe’s half a billion citizens.

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 57.6 million m³. www.europanel.org