



**EUROPEAN PANEL FEDERATION**  
WOOD - BASED PANELS

European Commission  
DG ENER Unit B3

Brussels, 21 March 2021

**EPF Feedback on the Inception Impact Assessment on the revision of the Energy Performance of Buildings Directive 2010/31/EU**

The European Panel Federation (EPF) welcomes the Inception Impact Assessment on the revision of the Energy Performance of Buildings Directive 2010/31/EU as part of the “Fit for 55” package included in the Commission Work Programme 2021. The decarbonisation of the built environment is indeed essential to achieve the new 2030 Climate Target and climate neutrality by 2050. The wood-based panels industry believes that energy efficiency renovation of the built environment as set in the objectives of the Renovation Wave Strategy holds great potential for reducing GHG emissions and turning the built environment into a carbon sink by using carbon storing and climate friendly materials such as wood. Therefore, EPF favours strongly Option 3, namely, to amend the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation.

In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals for the revision of the Energy Performance of Buildings Directive:

- Promote the use of nature-based materials such as wood-based panels since they can play a crucial role underlining their double benefit of carbon storage in EU building stock and energy-intensive material substitution;
- Implement green public procurement criteria for public buildings related to life-cycle carbon emissions and circularity of construction materials;
- Develop a comprehensive methodology where carbon storage benefits can be accounted for thus allowing consumers to choose materials that offer carbon storage, such as long-lived harvested wood products;
- Support off-site prefabricated modular solutions with locally sourced nature-based materials to hasten the rate of energy efficiency renovations especially for large-scale and deep renovation of social housing to tackle energy poverty;
- Set-up mandatory minimum energy performance criteria for construction and renovation.

*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)*

Ref: 2021-008