

European Commission, DG ENVI, B1
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**EPF Feedback on the Inception Impact Assessment on
“Environmental performance of products and businesses –
substantiating claims”**

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on environmental performance of products and businesses. The wood-based panels industry produces sustainably sourced circular products with a low environmental footprint. We believe that misleading claims on product and business environmental and climate-related performances constitute a genuine obstacle to the development of a sustainable green and circular economy and therefore in turn form a barrier to a better European society as envisaged in the European Green Deal. In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals on environmental performance of products and businesses:

- Recommendation 2013/179/EU establishing the Product and Organisation Environmental Footprint (PEF and OEF) methods should be reviewed in line with the principles of the circular economy, of the waste hierarchy, of resource efficiency and of material and energy efficiency;
- It is essential to elaborate and implement EU-wide a reliable and integrated method to appropriately quantify environmental and climate-related impacts of products and businesses to empower consumers and to ensure comparability and fair competition, thereby avoiding greenwashing;
- An EU legal framework should be established to ensure that green claims are duly substantiated within the framework of an integrated, comprehensive and unique methodology;
- EU common formats should be further developed to help consumers make sustainable and climate-friendly choices in order to foster the green transition towards a climate-neutral, resource-efficient and circular economy;
- Green public procurement methods should be applied to promote the use of the most sustainable and climate-friendly materials, products and solutions;
- Unnecessary administrative burden should be avoided especially for SMEs.

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

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