

EPF Feedback on the Inception Impact Assessment on the review of the requirements for packaging and other measures to prevent packaging waste

The European Panel Federation (EPF), welcomes the Inception Impact Assessment on the review of the requirements for packaging and other measures to prevent packaging waste as packaging represents about 7% of the applications of the production of our Members. The wood-based panel industry produces circular products from sustainable managed forest and strongly believes in enhancing the cascade use of resources, including wood, to foster recycling and reduce waste in line with the principles of circular economy. In this respect, EPF calls on the European Commission to consider the following points when elaborating its proposals for reducing packaging waste:

- Secondary raw materials availability should be ensured by guaranteeing at EU level a level playing field and avoiding market distortions for secondary bio-based materials;
- There is a need to establish well-functioning markets for secondary raw materials from recycled packaging to avoid further pressure on natural resources;
- The cascade use of wood principle should be applied when considering wood packaging waste in line with the waste hierarchy and the principles of circular economy (reduce, reuse and recycle);
- It should be recognised that in some member states recycling levels of 70-80% for wood packaging waste have been achieved by using the waste stream in the production of particleboard and so saving energy and other scarce resources;
- The capacity to store carbon in bio-based packaging and to substitute energy-intensive and fossil-based packaging should be duly accounted;
- Based on embedded carbon levels, green public procurements should be implemented to foster the use of sustainable nature-based solution for packaging;
- Packaging waste should be dramatically reduced for scarce non-renewable natural resources and fossil-based materials such as plastic;
- A clear set of rules should be implemented to avoid overpackaging, reduce complexity and increase recyclability EU wide.

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