

European Commission

Brussels, 27 July 2021

EPF feedback on the draft implementing regulation on rules to verify sustainability and greenhouse gas emissions saving criteria and low indirect land-use change-risk criteria

The European Panel Federation (EPF) warmly welcomes the possibility to provide a feedback on the draft implementing regulation on rules to verify sustainability and greenhouse gas emissions saving criteria and low indirect land-use change-risk criteria. EPF believes that it is essential to develop comprehensive and harmonised EU-wide rules to apply across the certification system, bringing about the necessary legal certainty on the rules applicable to economic operators and voluntary schemes with a view to ensure compliance with the sustainability and GHG emissions saving criteria. Supporting the development of voluntary schemes that set clear standards for the production of sustainable biofuels, bioliquids and biomass fuels is indeed key to substantiate sustainability claims.

Overall, EPF welcomes the proposals encompassed in the draft implementing regulation especially with regard to biomass fuels to avoid critical non-conformities subject to certificate refusal under Article 29(3), (4) and (5) of the Renewable Energy Directive (EU) 2018/2001 such as fraudulent issuance of proof of sustainability, deliberate production of wastes or residues, for example, the deliberate modification of a production process to produce additional residue material, or the deliberate contamination of a material with the intention of classifying it as a waste. In this respect, it is important to secure that voluntary schemes apply the specific rules and exemptions for waste and residues set out in Renewable Energy Directive (EU) 2018/2001 only if such raw material falls within the scope of the respective definitions in Article 2 of that Directive. Therefore, voluntary schemes should provide economic operators with clear instructions on how they assess whether raw materials are considered waste and residues.

Moreover, EPF supports the proposal on auditing of waste and residues to cover the whole supply including the economic operator where the waste or residue arises as well as the proposal on auditing of mass balance system to ensure compliance with the sustainability and greenhouse gas saving criteria by allowing mixing of raw material and fuel with differing sustainability characteristics only if raw material and fuels belong to the same product group.

Finally, you can find here attached a proposal for a consultation system (already shared with the Commission back in December 2020) to help verifying whether projects by applicants for biomass energy support comply with the sustainability requirements of REDII and to evaluate any potential distortions of raw material markets prior to accepting such projects. Such a consultation system could indeed ensure that preferential material use of forest biomass in line with the cascading use and the waste hierarchy is a key principle that can at the same time help reduce increasing pressure on natural capital and assist in the fight against climate change by storing carbon in harvested wood products and substituting other energy intensive materials.



EUROPEAN PANEL FEDERATION
WOOD - BASED PANELS

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 26 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-27 (+EFTA) in 2020 was an estimated 58 million m³. www.europanel.org

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