

European Commission DG CLIMA.C3 - DG AGRI.D4

Brussels, 7 October 2021

EPF response on the roadmap on restoring sustainable carbon cycles

The European Panel Federation (EPF) warmly welcomes the possibility to provide feedback on the Roadmap on Climate change – restoring sustainable carbon cycles. Reaching netzero greenhouse gases emissions by 2050 and negative emissions thereafter requires both important carbon emissions reductions and carbon removals from the atmosphere. The new 2030 EU target of net greenhouse gas removals in the sector covering the new EU Forest Strategy for 2030 and the LULUCF/RED II revisions is therefore of the utmost importance if we are to meet the objectives of climate neutrality.

Given the urgency of the climate crisis and the certainty that the reductions and removals transition will not happen in time unless it is accelerated, it is indeed essential to establish incentives to enhance carbon stocks and increase removals in sustainably sourced harvested wood products especially for construction, renovation for energy efficiency and furniture allowing for the substitution of other carbon intensive materials. Developing sustainable streams of carbon from biomass is clearly the way forward.

In this respect, EPF asks the Commission to consider the following points when finalizing its proposals on restoring sustainable carbon cycles:

- Ensure that all forest biomass used for bioenergy with carbon capture and storage is sourced in full compliance with the sustainability criteria and in line with the cascading principle and the waste hierarchy to ensure the long-life cycle carbon storage and that the recycling of waste is always the priority option;
- Foster recycling to maintain sustainable carbon cycles by establishing wellfunctioning markets for wooden secondary raw materials before eventual end of life energy recovery to avoid further pressure on natural resources and distortive effects on markets for by-products, wastes or residues;
- Maximise resource availability by Introducing targets for the exclusion of bio-based materials from entering landfill;
- Promote plantations and active forest management to increase carbon removals, create jobs in shrinking rural areas and support the EU forest-based bioeconomy;
- Guarantee that carbon credits reward carbon storage in forest biomass only when the timber enters the market to help unlock the full potential and climate benefits of a sustainable and circular EU forest-based bioeconomy;
- Develop a comprehensive, verifiable and science-based carbon removals certification system ensuring the authenticity of removals and rewarding carbon storage and substitution of other carbon intensive materials by climate friendly nature-based materials such as wood throughout their whole life cycle;
- Ensure consistency with other EU climate policies to create a competitive industrial market for recycling and long-lasting storing carbon.



To conclude, EPF believes that the carbon removal strategy should reward the carbon storage in harvested wood products to promote a sustainable forest bioeconomy and the transition to a more nature-based circular economy that will help to extend the carbon lifecycle in wood products, thus benefitting our climate. It holds indeed a huge potential especially in the framework of the implementation of the 'Fit for 55' package, the implementation of the Bioeconomy Strategy, the Renovation Wave Strategy and the New European Bauhaus initiative to help turn the built environment from a source of GhG emissions into a carbon sink, as specifically called for by EC President von der Leyen.

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 22billion 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.europanels.org

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