

Response to the consultation on the roadmap towards the 'renovation wave' initiative

The **European Panel Federation (EPF)** warmly welcomes the Renovation Wave initiative for public and private buildings. EPF strongly believes that the renovation of the built environment across the European Union should at the same time enhance energy efficiency and foster the use of sustainable and climate-friendly products and solutions. In this respect, the construction sector ought to be supported to embrace the principles of the circular economy, of the waste hierarchy and resource efficiency. In order to ensure the transition towards a resilient and sustainable economy, EPF calls for the following recommendations to be addressed:

- Assessing the impact of renovation approaches including an impact assessment of the proposed policies and measures by:
 - Assessing the environmental and energy performance by categories of buildings, reflecting the results into a minimum green public procurement threshold for sustainable products to boost the use of biogenic carbon storing materials and solutions for better resource and energy efficiency;
 - Defining accurate accounting rules to measure and confirm the substitution effect of using biogenic products instead of carbon-intensive materials in order to extend carbon storage via greater use of natural products and increase the total harvested wood products' carbon stock in the built environment. Such rules should consider the increased circularity of carbon through removals and storage in wood construction. As proposed by the new Circular Economy Action Plan, their integration in a "regulatory framework for certification of carbon removals" should be explored.
- Adopting a life-cycle approach in line with the circular economy to maximise the reuse, recycling, and recuperation of materials in their procurement strategies;
- Ensuring that bio-based materials used for construction and renovation, including all wood wastes, should return to the value-chain by fostering eco-design, increasing recycling targets and favouring wherever possible the use of secondary raw materials for construction and renovation products (without compromising product safety and performance standards) ahead of eventual end of life incineration;
- Identifying the internal technical market barriers that might lead on discrepancies in the use of construction products within Member States;
- Guaranteeing that the review of the Construction Products Regulation ensures that the design of new and renovated buildings is in line with the needs of circular economy and lead to increase use of sustainable and climate friendly materials.
- Increasing the availability of relevant and comprehensive data on building across the European Union;
- Fostering off-site prefabrication of building materials such as walls and roofs since it constitutes a very promising way to accelerate large scale renovations and constructions in a speedy and cost-efficient manner;
- Designing new long-term financing mechanisms for renovation aiming to boost a green renovation wave;
- Setting up, at Member States level, financial tools for supporting renovation for the private-owned residential and tertiary built environment through attractive interest rates for green renovation loans;
- Engaging all relevant stakeholders in the development of the green renovation wave.



EUROPEAN PANEL FEDERATION
WOOD - BASED PANELS

The renovation of existing buildings using wood-based products can contribute significantly to sustainable urban development, energy efficiency and to climate change mitigation. The renovation of building envelopes, such as façades and roofs, with highly insulated wooden components, can reduce heat losses and related energy demand significantly.

When legally harvested and sourced from sustainable managed forests, wood is the only material capable of reducing carbon dioxide emissions and thus can play a vital role in climate change mitigation. Moreover, wood-based products need less energy in their manufacturing process and thus have a lower environmental impact than other materials throughout their life cycle.

LCAs of different building materials has demonstrated unequivocally the environmental advantages of using wood in construction and renovation. The small environmental footprint coupled with wood's renewability, its ability to store sequestered carbon dioxide and its superior insulation properties, make wood the material of choice in deep renovation projects and new constructions.

*The **European Panel Federation (EPF)** has members in 25 countries and represents the manufacturers of particleboard, MDF, OSB, hardboard, softboard and plywood. The EU wood panel industry has an annual turnover of about 22 billion Euros, creates over 100,000 jobs directly and counts more than 5,000 enterprises in Europe. www.europanel.org*