



EUROPEAN PANEL FEDERATION
WOOD - BASED PANELS

European Commission
DG ENER Unit B3

Brussels, 30 March 2022

**EPF Feedback on the Revision of the Energy Performance of Buildings
Directive COM(2021)802**

The European Panel Federation (EPF) welcomes the opportunity to provide feedback on the revision of the Energy Performance of Buildings Directive as part of the “Fit for 55” package with the aim to align the with the European Green Deal and decarbonise the EU's building stock by 2050. This is essential to achieve the new 2030 Climate Target and climate neutrality by 2050. The wood-based panels industry believes that energy efficient renovation of the built environment, as set in the objectives of the Renovation Wave Strategy and in line with the vision of the New European Bauhaus, holds great potential for reducing GHG emissions and for increasing energy efficiency. This can be done by improving insulation and by turning the built environment from a carbon emitter into a carbon sink through the use of carbon storing and climate friendly materials such as wood and wood-based panels.

In this respect, it is essential to duly take into account the whole life-cycle performance and the life-cycle Global Warming Potential (GWP) of buildings in both new construction and in all renovations. In doing so, promoting the use of sustainably sourced materials that bring the double benefit of carbon storage in EU building stock and energy-intensive material substitution is of the utmost importance in order to achieve the decarbonisation objectives.

Moreover, EPF welcomes the revision of the Long-term National Renovation Strategies to be fully integrated into the National Energy and Climate Plans to be in line with the new climate ambitions. The establishment of a building ‘Renovation passport’ providing owners with a tool to facilitate their planning and a step-by-step renovation towards zero-emissions level is also very much welcomed. As stated in the revision proposal, buildings are a significant material bank and therefore it is essential to make the best use of innovative digital tools (such as BIM and digital building databases) and the Level(s) framework to increase material efficiency and enhance sustainable carbon cycles in the construction ecosystem.

In the light of the above, EPF calls on the European Commission, the Parliament and the Council to consider the following points in the tripartite negotiations to implement the increased ambition towards building decarbonisation into legislation:

- Promote the use of nature-based materials such as wood as they can play a crucial role in turning the built environment into a carbon sink by their double benefit of carbon storage in EU building stock and substitution of fossil energy-intensive materials;
- Implement green public procurement criteria for public buildings related to life-cycle carbon emissions and circularity of construction materials;



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- Develop a comprehensive EU regulatory framework for carbon credits remunerating carbon removals where carbon storage benefits can be accounted for and rewarded, thus allowing consumers to choose materials that offer carbon storage, such as harvested wood products;
- Support off-site prefabricated modular solutions with locally sourced nature-based materials to hasten the rate of energy efficiency renovations especially for large-scale and deep renovation of social housing to tackle energy poverty; Furthermore, off-site prefabrication such as timber-frame construction offers better working conditions in a safe and protected environment and facilitates collecting, reusing and recycling construction waste;
- Set-up mandatory minimum energy performance criteria for both new construction and renovation, requiring the use of carbon storing materials with excellent thermal insulation properties such as nature-based materials;
- Ensure that, when promoting energy from renewable sources integration in the energy production for the built environment, specifically for solid biomass, all sustainability requirements are met, and no subsidies are granted for early energy recovery from woody biomass in line with the principles of the waste hierarchy and cascade use to avoid raw material market distortions and to secure a level playing field;
- Guarantee that energy and heat installations meet the highest technical standards for energy efficiency and reduced emissions, especially for installations using biomass.

To conclude, the revision of the EPBD offers the opportunity to introduce requirements to report and reduce the emissions of a building over the entire life cycle, including manufacture, transport, construction, use and demolition. There is indeed a need to move beyond the energy performance metrics to allow architects and consumers to make the right sustainable choices in construction and renovation while accounting for whole life emissions of the built environment. Nature-based materials such as wood and wood-based panels are ideal in this context.

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 and creates directly over 100,000 jobs. 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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