

**EPF response on the call for evidence for an impact assessment
on the certification of carbon removals – EU rules**

The European Panel Federation (EPF) warmly welcomes the possibility to engage with the call for evidence for an impact assessment on the certification of carbon removals that was announced in the Communication on restoring sustainable carbon cycles. Indeed, it is essential in order to reach net-zero greenhouse gases emissions by 2050 and negative emissions thereafter to put the emphasis on both emissions reductions and carbon removals from the atmosphere. In this respect, the elaboration of comprehensive, evidence-based and harmonized EU rules on certification of carbon removals is of the utmost importance.

Given the urgency of the climate crisis, it is fundamental to establish incentives to enhance carbon stocks but also increase removals particularly 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 elaborating its proposal for the establishment of an EU framework for the certification of carbon removals:

- Ensure that all forest biomass used for bioenergy with carbon capture, storage and utilisation is sourced in full compliance with the sustainability criteria and in line with the circular economy approach, the cascading principle and the waste hierarchy to ensure the long-life cycle carbon storage and that the recycling of waste always remains the priority option;
- Provide a variety of baselines and additionality criteria to cater for different types of removals while ensuring sound methodologies on monitoring, reporting and verification to upscale of carbon removals and ensuring comparability of precise, accurate and timely measurement for removals;
- Develop a comprehensive, verifiable and science-based carbon removals certification system ensuring the authenticity of removals while rewarding carbon storage and substitution of other carbon intensive materials by climate friendly nature-based materials such as wood throughout their whole life cycle, thus including long-lasting products as well as by-product and residual wood utilisation as certifiable carbon removals;
- Promote plantations, reforestation, afforestation, agroforestry and active forest management while rewarding carbon storage in forest biomass when the timber enters the market to help unlock the full potential and climate benefits of a sustainable and circular EU forest-based bioeconomy;
- Avoid overemphasising forest set-aside programs for carbon removals as it likely will increase carbon leakage and cause substantial restrictions on harvestable domestic timberland and endanger the EU forest-based circular bioeconomy and the win-win opportunities that sustainable forest management and carbon storage in harvested wood products can represent to help achieving EU climate goals;



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- Establish a centralised EU system that would allow private operators as well as public authorities to validate projects and certify the carbon removals achieved;
- Scale up carbon removal certificates as a business model to create sustainable jobs and maintain livelihoods in rural areas;
- Consult with stakeholders to refine the EU framework on a regular basis to ensure proper functioning of the system and the rewarding of the most efficient carbon removals solutions;
- Put the emphasis on cost effective, renewable, and immediately available solutions such as carbon removals in long-lived and sustainably sourced harvested wood products to be used especially in construction and furniture to turn the built environment into a carbon sink;
- Provide transparent information for consumers with a single type of certificate to ensure equivalence of certified carbon removals and to develop competitive markets for renewable and carbon storing materials and products to foster carbon removals;
- Ensure maximum synergies and consistency with other relevant EU policies, especially the EU Emissions Trading System, to create efficient incentives for the deployment of competitive industrial carbon removal solutions and avoid trade-offs with the EU sustainability goals.

To conclude, EPF believes that an EU framework for the certification of carbon removals is a unique opportunity to unlock the full potential of EU forest-based circular bioeconomy and reward the carbon storage in harvested wood products and help 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.

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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