

EPF Response to the Call for Evidence on the European Biotech Act

The European Panel Federation (EPF) welcomes the initiative for a European Biotech Act. We appreciate the Commission's commitment to unlocking the full potential of biotechnology and biomanufacturing to drive sustainability, competitiveness, and resilience across EU industries. As a key stakeholder in the forest-based bioeconomy, we strongly support a framework that accelerates the development and deployment of safe and sustainable biotech solutions, particularly those enhancing the circular and climate-smart potential of the wood-based sector.

The 2024 [Communication on Biotechnology and Biomanufacturing](#) rightly recognises the sustainable wood-based sector as a critical avenue for biotechnological innovation. Wood-based panels are uniquely positioned to act as long-term carbon stores and fossil-based material substitutes in construction, furniture, packaging and beyond. Industrial biotechnology offers opportunities to:

- Enhance raw material utilisation via for instance bio-based binders;
- Improve panel performance and recyclability through biotech-derived additives;
- Increase circularity by enabling biotechnological recovery of wood fibres and lignin from post-consumer products.

However, the transition from laboratory innovation to scaled industrial application remains constrained by regulatory, investment and market challenges.

EPF proposes therefore the following recommendations to ensure efficiency of the European Biotech Act in supporting EU circular bioeconomy:

Regulatory streamlining and harmonisation

- The Act should ensure biotech-based wood products are evaluated under fit-for-purpose, streamlined procedures, particularly under the Ecodesign for Sustainable Products Regulation (ESPR).
- Biotech applications such as bio-based adhesives must for instance not face the same regulatory complexity as pharma or agri-food products. A differentiated risk-based approach is essential.
- The Act should seek alignment with international standards and avoid creating unnecessary barriers to trade, ensuring the competitiveness of EU wood-based biotech products in global markets.

Support for pilot and demonstration facilities

- EU-level support is needed for biotech pilots and scale-up demonstrations in the wood sector, which lack the visibility and scale of health or agri-food biotech.
- Horizon Europe and the planned update of the Bioeconomy Strategy should include calls dedicated to bio-based innovation in wood panel production, including funding for industrial-scale testing and deployment.

Recognition of carbon storage and substitution in LCA and PEF

- EPF strongly welcomes the Commission's intention to revise the Product Environmental Footprint (PEF) methodology to better capture carbon storage and substitution benefits in bio-based products.

- The new methodology must be tailored to recognise the long-term carbon storage of durable wood-based products, and avoid disadvantaging bio-based materials vis-à-vis fossil-derived alternatives.

Stimulating market demand through public procurement and labelling

- Public procurement directives should actively support the scale-up of bio-based products and materials by integrating sustainability and circularity criteria into purchasing decisions. As one of the largest buyers in the EU economy, the public sector has the leverage to create predictable demand and accelerate the market uptake of innovative bio-based solutions. This is particularly important for sectors like construction and furniture, where bio-based materials offer substantial carbon mitigation potential through carbon storage and substitution of fossil-based alternatives.
- Voluntary labelling and certification should be developed with clear, harmonised criteria for bio-based carbon content and sustainability.

Skills development and knowledge transfer

- Biotech upskilling initiatives under the Act must include process engineers, technicians and materials scientists in manufacturing industries such as wood-based panels.
- Support should be provided to facilitate cross-sector collaboration between biotech researchers and forest-based industry actors to ensure industrial relevance and market readiness of innovations.

The European Biotech Act has the potential to be a catalyst for sustainable industrial transformation. For the wood-based panel sector, biotechnology represents not only an innovation pathway but also a crucial enabler for climate action and circularity. EPF stands ready to contribute to the consultation and policy design processes, and urges the Commission to ensure full alignment between the Biotech Act, the Bioeconomy Strategy, the Circular Economy Act and implementation of the Clean Industrial Deal.

Ref: 2025-023