

**EPF Response - Green-listing certain waste for the purposes of shipments to recovery between Member States**

**Provide views and input on how the Waste Shipment Regulation can be implemented with a view to boosting the internal market for waste in the EU, notably to incentivize that waste is diverted from disposal, such as landfilling, and is destined to recycling with the aim to ensuring that valuable materials and resources are re-introduced in the circular economy.**

The European Panel Federation (EPF), representing the European wood-based panels industry, welcomes the opportunity to provide input on the implementation of the Waste Shipment Regulation (WSR) with the aim of boosting the internal market for waste, promoting recycling, and reducing reliance on disposal. EPF would like to highlight several aspects critical to ensuring that the WSR delivers on its objectives without undermining circularity and raw material availability:

### **1. Support for digitalisation for waste shipments**

EPF supports the digitalisation of waste shipment procedures. Moving from paper-based to digital systems will:

- Reduce administrative burdens for companies,
- Improve traceability and data quality across the EU,
- Enhance enforcement against illegal shipments,
- Contribute to the functioning of the internal market for waste.

Digitalisation, if implemented uniformly and efficiently, can be a powerful tool to ensure that waste is directed to the most appropriate and sustainable recovery and recycling routes.

### **2. Maintain robust controls on wood waste shipments**

EPF firmly opposes any deregulation of the classification and control procedures currently applied to waste wood under the WSR. These safeguards are essential to:

- Prevent illegal trafficking of contaminated or non-recyclable wood waste,
- Avoid diversion of wood waste to low-value energy recovery applications in line with the cascading principle,
- Preserve environmental and public health standards.

EPF would like to highlight that the purpose of this procedure is not to facilitate incineration, but to ensure traceability, environmental protection, and appropriate material use. Removing or weakening this safeguard, particularly in the absence of harmonised collection and sorting systems, could lead to a diversion of valuable wood waste away from recycling towards early energy recovery. This would run counter to the EU's circular economy objectives and jeopardise access to raw materials for industries already equipped to process such waste in a resource-efficient, climate-friendly manner. EPF therefore supports keeping the status quo classification and oppose any deregulation that may compromise the cascade use principle.

### **3. No green-listing of additional wood waste streams at this stage**

EPF does not support the green-listing of additional categories of wood waste for transboundary shipments. Although the existing system has its limitations, the notification procedure provides essential oversight that:

- Acts as a quality control mechanism,
- Helps prevent uncontrolled exports of valuable material to energy use,
- Ensures strategic raw material availability for high-value recycling into new panels.

Without harmonised collection systems and proper quality standards across all Member States, relaxing these controls would likely lead to negative consequences for recycling and circularity efforts in the EU.

### **4. Preserve strategic access to quality wood waste for compliant recyclers**

EPF urges the Commission to prioritise a controlled framework that safeguards the access of compliant recyclers, such as wood-based panel producers, to quality wood waste. This access is vital for:

- Closing material loops in the circular economy,
- Achieving EU climate and resource-efficiency goals,
- Supporting value-added material recovery over energy use.

In conclusion, while we welcome efforts to modernise and streamline waste shipment procedures, this must not come at the cost of effective oversight and environmental safeguards. A well-functioning internal market for wood waste must be both efficient and robust, ensuring that valuable wood waste is recycled into new products rather than lost to energy recovery, landfill or illegal exports.

2025-039