

Survey on the outline of the European Strategy for Housing Construction

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HIGH LEVEL CONSTRUCTION FORUM

Dear Members of the High Level Construction Forum,

On Monday 27 October 2025, the HLCF webinar on the European Strategy for Housing Construction took place, during which the European Commission presented the outline of the Strategy. Please find the PowerPoint for more information below.

Now members of the High Level Construction Forum are given a final opportunity to share inputs before the finalisation of the Strategy by filling in this survey by **Tuesday 4 November 2025 23:59 CET**.

Please do not hesitate to reach out in case of any questions or queries via HLCF@ecorys.com

Kind regards,

The Technical Secretariat of the High Level Construction Forum

Please find here the PowerPoint for further information.

[HLCF Webinar 27 October 2025 European Strategy for Housing Construction.pdf](#)

General feedback on the preview of the European Strategy for Housing Construction

Please have a look at the PowerPoint (see above) more information on the preview of the European Strategy for Housing Construction, as presented during the HLCF webinar of Monday 27 October 2025.

- * Do you find any aspects (e.g. topics, projects, approaches, tools, etc.) missing in the Strategy on Housing Construction? If so, please elaborate.

When relevant for your input, please make a reference to the specific building block and/or slide number.

Make the cascade use principle operational for woody biomass used in construction. The outline recognises circularity but does not spell out how to prioritise material loops over premature energy recovery. Implementing the cascade, as enshrined into the Renewable Energy Directive (RED III)) would unlock stable secondary wood feedstock for construction products and reduce embodied emissions. Green public procurement (GPP) to recognise the role and potential of circular bio based solutions, such as wood-based products, as a pathway to both decarbonise the built environment and help deliver affordability in housing, which is an aspect that is not fully reflected in the current outline of the Strategy. The Strategy should commit to GPP criteria that gives preference to materials with low carbon footprint/Global Warming Potential, making allowance for embodied CO₂, recycled/biogenic content of construction products.

- * Which aspects (e.g. topics, projects, approaches, tools, etc.) of the Strategy on Housing Construction do you find most relevant?

When relevant for your input, please make a reference to the specific building block and/or slide number.

Digital, standardised pre demolition audits linked to permits (Building Block 1). This is foundational to surface secondary materials and build marketplaces/material banks. Recognition of renewable, circular materials (such as wood based panels) as a priority material strategy to reach decarbonisation of the built environment and an instrument to improve its affordability. A shift toward wood based urban construction is feasible and compatible with forest carbon preservation when cascading use and circularity are respected, which would validate the role of renewables in housing policy and unlock a quick, low carbon deployment at scale.

Specific feedback on secondary materials/products

Markets for secondary materials in construction are underdeveloped, leaving untapped potential for material use.

- * What is the single most relevant regulatory change needed to allow a better/faster development of markets for secondary construction materials and products?

The most impactful regulatory change is to implement and enforce the cascade use principle for woody biomass across construction and waste streams, and to align incentives accordingly. This is the essential first step to develop efficient markets for secondary materials. Prioritising material loops maximises carbon storage in long lived products and reduces demand for virgin raw materials; only residues not fit for material use should become bioenergy. This is consistent with both climate and circular economy objectives. RED III already sets the order of priorities for woody biomass - (a) wood based products; (b) extending service life; (c) re use; (d) recycling; (e) bioenergy; (f) disposal, and the Waste Framework Directive further enshrines an equivalent hierarchy for waste that prioritises material use. Today, however, implementation remains not only uneven but contradicted by support schemes that prematurely divert recoverable wood into energy. Where the hierarchy is applied, feedstock for recycling becomes more stable and predictable in price, waste is reduced, and emissions fall - unlocking a secondary raw material flows critical to housing supply. Priority policy changes: - Recalibrate public support to avoid distorting competition with material uses: remove subsidies for biomass energy where they pull recyclables out of material loops. We fully support the EU's energy transition, but not at the expense of a raw material that can deliver multiple high-value cycles. - Facilitate the use of post-consumer wood in affordable housing. - Improve overall collection, sorting and classification of post-consumer wood to facilitate reuse and recycling. - Embed the cascade principle in permitting and waste management plans to encourage product re use and recycling, including industrial symbiosis between demolition streams and construction product manufacturers.

- * Are there any specific construction material that you see as essential to monitor? If so, please elaborate on why this is important.

Woody biomass is a renewable but not infinite resource, and its monitoring is essential given the growing demand for new uses and the increasing diversion of material to early energy recovery. Close monitoring is needed to prevent unfair market distortions such as dumping or non-compliant imports, and to support the EU's strategic autonomy and the competitiveness of key value chains, including the wood-based panels sector that underpins affordable, low-carbon construction solutions.

- * What kind of data points would be required from pre-demolition audits to serve the purpose of supporting the creation of market places for secondary materials?

Pre demolition audits should record a standardised set of data that marketplaces and Digital Product Passports can process directly, enabling efficient secondary material markets with high value re use and recycling. Data points that would make secondary materials visible, comparable and tradable at scale: - Material categories with quantities: Standardised identification of product/material types (e.g., particleboard, OSB, plywood, MDF /HDF, concrete, steel, etc.), promoting not only a 'like-for-like' matching on marketplaces but also efficient pre-sorting (by avoiding mixing fractions), which would encourage the default routing to the highest value reuse /recycling pathway. - Embodied CO2 values and Carbon footprint/GWP indicators: Accounting for biogenic carbon storage and aligned with EN 15804 (A1–A3, and A1–A5 where feasible), they would allow designers and buyers to make climate aligned choices, creating demand pull for lower impact secondary inputs, supporting technology-neutral comparison across materials. - Energy demand for re processing (indicative): Indicative estimate of energy demand for re processing would help steer materials to the lowest energy, highest value routes.

Specific feedback on industrialised/off-site construction

Industrialised/offsite construction is one of the solutions needed to improve productivity and provide more housing and renovation in Europe. One of the main problems for the development of offsite in Europe is the lack of scale and instability of demand because of the regulatory fragmentation for offsite construction.

- * What is the single most relevant regulatory change needed to allow a wider and more integrated European market for offsite construction?

Most relevant regulatory change needed is an EU wide harmonisation for off site “building kits” under the CPR, coupled with targeted alignment of national building rules for their acceptance. Concretely, develop harmonised European standards and conformity routes for complete building elements (walls, floors, roofs, hybrid assemblies), not only single products, and ensure mutual recognition of kit assessments across Member States. Additionally, public procurement should explicitly include and promote off site construction solutions, especially wood-based modular solutions.

Specific feedback on the Competitiveness Construction Tool/cross-border EU Market

- * Can a cross-border EU market help the development of offsite construction? If applicable, please elaborate.

Yes. A cross border EU market (covering both finished off site “building kits” and their inputs) would materially accelerate off site construction by creating stable, scalable demand and predictable acceptance of factory made building elements across Member States, expanding industrialised housing solutions. Prefabricated wood-based panel systems are well suited to off site manufacturing, as they can be assembled into complete building elements (walls, floors, roofs and hybrid modules) with repeatable quality and quick installation.

- * In your opinion, what should be the priorities to quickly start a cross-border EU market?

To kick start a cross border EU market that supports housing affordability, a focused package of priority measures is needed: - Harmonise product standards and market access rules so that construction materials made from bio based and recycled inputs can be traded across borders without re approval if the essential characteristics are unchanged. Use CPR instruments to provide clear, EU wide conformity routes with the least possible burden and cost. - Ensure regulatory consistency between EU and national requirements, avoiding overlapping or contradictory rules (e.g., waste/product status, CPR performance declarations). Coordinate implementation across governance levels (local, regional, national, EU) so that policy translates into real demand for affordable materials - linking standards, permitting, and public procurement. - Mutual recognition of Environmental Product Declarations (EPDs) across the EU/EEA. Today’s fragmented EPD schemes impose duplicative costs, and slow market entry for sustainable products. Mutual recognition (with common core rules aligned to EN 15804 and CPR) would enable comparable, trusted information while cutting red tape. - A unified regulatory environment will reduce costs, increase investor confidence, and rapidly scale green construction and renovation, advancing both climate objectives and housing affordability.

- * In your opinion, what are the main barriers for a cross-border EU market?

Regulatory fragmentation: The current lack of harmonisation across Member States on product standards and market access procedures is creating re approval loops and delays.

Personal details

* Which type of organisation do you represent?

EU-level business association

* Which country do you represent? Or do you represent interests at the EU level?

EU-wide

* In which field(s) is your organisation active?

Minimum 1 selection(s)

- Architecture
- Business services
- Construction Materials
- Consultancy
- Communication
- Construction (execution, off-site/on-site)
- Economics and Finance
- Energy
- Education and skills
- Engineering
- Environment
- Finance
- Decarbonisation
- Digital
- Housing and real estate
- Insurance
- Labour relations
- Legal
- Logistics
- Manufacturing
- Property Development
- Property Management
- Property occupation
- Public sector
- Research
- Standardisation
- Social
- Transport
- Waste
- Other field(s)

What is the name of the organisation you represent?

European Panel Federation

Privacy agreement

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Contact

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