

EPF feedback on the draft Commission Delegated Regulation establishing the applicable Assessment and Verification Systems under Regulation (EU) 2024/3110

The European Panel Federation (EPF), representing manufacturers of wood-based panels across Europe, welcomes the opportunity to comment on the draft Delegated Regulation establishing the applicable Assessment and Verification Systems (AVS) for construction products.

EPF recognises the Commission's objective to ensure continuity with the CPR acquis while maintaining a high level of protection of health, safety and the environment. However, for several product categories and essential characteristics relevant to wood-based panels, the proposed AVS levels raise **concerns regarding proportionality, feasibility, and unintended cost impacts**, without demonstrable safety or environmental benefits.

A core principle under the CPR is that AVS should be risk-based and proportionate. EPF therefore encourages the Commission to ensure that **AVS assignments are consistently made per essential characteristic**, limiting higher AVS systems strictly to genuinely higher-risk characteristics such as fire performance, and avoiding spill-over to other characteristics where notified-body involvement adds limited value.

1. Dangerous Substances

REACH is the legislation dealing with dangerous substances by either restriction or by authorisation and economic operators placing products on the market must comply with the requirements of REACH. Within REACH there is no compulsory requirement to test products, nor any requirement to have the products 3rd party tested, the manufacturer is free to ensure compliance/carry out their due diligence as they see fit. The CPR should therefore mimic the principles of REACH by setting the AVCP level 4 for so called dangerous substances. In addition the CPR should not make any extra requirements for substances already covered by REACH i.e. the inclusion of a substance under REACH means exclusion from the CPR and harmonised standards.

We must also ensure we uphold the principle that products should only need testing where there is a requirement under the CPR i.e. via inclusion in a standardisation request following a Member State legal requirement and the placing of a product in said Member state(s).

a. Emissions of DS to indoor air – Table 1, row 6 of Annex II

The application of AVS 3 for emissions of DS to indoor air would make initial type testing by notified bodies compulsory, notably for formaldehyde and VOC emissions. For wood-based panels, this represents a significant departure from the current system, which has proven effective in delivering low-emission products through factory production control (FPC) and harmonised testing regimes.

EPF is concerned that this change would lead to **substantial cost increases** and create a **serious risk of insufficient testing capacity** across the EU, EPF therefore **reiterates its call for AVS 4** for emissions to indoor air, in line with a risk-based and proportionate approach and consistent with the proven performance of the sector.

b. Content of DS – Table 1, row 8 of Annex II

EPF is concerned that applying AVCP 2+ to products for content of dangerous substances would unnecessarily burden manufacturers of products, that are currently AVCP 4, with unnecessary auditing and potentially testing. Again EPF reiterates its call for AVCP 4 for so called dangerous substances and the exclusion from the CPR of all substances covered by REACH..

2. Windows and pedestrian doors – Table 1, rows 10 to 14 of Annex III

The draft foresees AVS 1, 2+ and 3 depending on the essential characteristics. EPF notes that these levels appear high compared to other construction products.

3. Prefabricated wood-based loadbearing stressed skin panels (including OSB) – Table 1, rows 80, 81 of Annex III

The draft assigns **AVS 1** for fire resistance and structural performance, and AVS 4 for other characteristics. EPF understands that the AVS 1 classification likely originates from existing ETAG-based approaches and that AVS 1 may be justifiable for **fire resistance**.

However, EPF cautions against any **spill-over of AVS 1 to non-fire-related characteristics or any precedent effect leading to AVS 1 being extended to other wood-based panel categories where the risk profile does not justify it**.

In particular, EPF considers that structural performance for these products should be subject to an AVS level that is proportionate and consistent with comparable products, notably structural wood-based panels (currently AVS 2+) and structural timber products.

For consistency with those levels, EPF considers that **AVS 2+ would be more appropriate** for structural performance, while accepting AVS 1 strictly limited to fire resistance performance.

4. Wood-based non-stressed skin panels – Table 1, rows 82, 83 of Annex III

EPF considers the proposed AVS 2+ for structural use, and AVS 4 for non-structural use to be proportionate and broadly aligned with current practice. No change is requested for these product categories.

5. Factory composite panels and wall/roof kits combining timber with other materials – Table 1, rows 234 to 238, 241, 242 of Annex III

EPF agrees in principle that AVS 3 and AVS 4 are generally appropriate for these products. However, EPF stresses that **AVS 3 should be limited to reaction-to-fire performance only**, and not extended to all essential characteristics.

6. Suspended ceilings – Table 1, rows 239, 240 of Annex III

EPF agrees with the proposed approach of AVS 3 for fire performance, and AVS 4 for other characteristics, which reflects a balanced, characteristic-based and risk-based allocation of third-party involvement.

Conclusion

EPF calls on the Commission to further refine the draft delegated act to ensure:

- **Proportionality and feasibility**, especially regarding indoor air emissions,
- Clear **limitation of high AVS levels to genuinely high-risk characteristics**, notably fire resistance,
- Recognition of **robust FPC systems** already in place in the wood-based panels sector.

EPF stands ready to engage constructively with the Commission services to ensure that the final delegated act supports safety and sustainability objectives without undermining competitiveness and innovation in the European wood-based panels industry.

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