

EPF feedback on revising biofuel, bioliquid and biomass fuel production pathway values and modifying methodology under RED III

The European Panel Federation (EPF), representing manufacturers of wood-based panels across Europe, welcomes the opportunity to comment on the draft delegated act revising the greenhouse gas (GHG) accounting rules for biofuels, bioliquids and biomass fuels under Annexes V and VI of the Renewable Energy Directive (RED III).

EPF acknowledges the need to update default values and methodologies based on more recent data and IPCC guidelines. However, the proposed revisions are not neutral from a material-use perspective and may have **unintended consequences for the efficient and cascading use of woody biomass**.

Wood-based panels are long-lived, circular, and carbon-storing products that rely heavily on **wood residues and post-consumer wood**. These same feedstocks are also addressed in the draft delegated act as eligible biomass pathways for energy use, potentially benefiting from financial support when default GHG values meet the required thresholds. This risks **increasing competition for secondary wood resources**, despite their high value for material recycling and carbon storage.

EPF therefore recalls that **RED III already recognises the cascading principle** (Article 3(3a)), which requires prioritising material uses of woody biomass over energy recovery wherever technically and economically feasible. In this context, GHG accounting methodologies and default values should not indirectly incentivise early energy recovery of wood that remains suitable for material use or recycling.

EPF recommends that:

- The application of revised default values under Annexes V and VI be accompanied by **clear safeguards** to prevent the diversion of recyclable wood and wood industry residues away from material uses.
- Future revisions of GHG accounting methodologies explicitly assess **cross-sectoral impacts on biomass availability**, including effects on wood-based manufacturing industries.
- The Commission ensures **closer upstream engagement with material-use industries**, when developing or revising delegated acts with significant implications for biomass allocation.

EPF stands ready to contribute constructively to future technical work to ensure coherence between climate objectives, circular economy principles, and the efficient use of limited biomass resources.

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