

EPF Response to the Call for Evidence on the Simplification of Administrative Burden in Environmental Legislation

The European Panel Federation (EPF), representing the wood-based panels industry in Europe, welcomes the Commission's initiative to reduce administrative burdens under environmental legislation. EPF strongly supports the objective of maintaining environmental ambition while ensuring that legislation remains implementable, proportionate and business-friendly, in particular for sectors already engaging in circular and low-carbon practices.

Accordingly, we would like to highlight the following **five priority areas** for simplification and streamlining:

1. Administrative burden & technical challenges under the Industrial Emissions Directive (IED)

While efforts to modernise and digitalise permitting processes under the IED are welcomed, EPF would like to stress that permitting under the IED must become faster and more predictable, as current delays are a major bottleneck for industrial investment. Digitalisation should serve this goal by reducing duplication, ensuring interoperability between EU and national systems, and streamlining applications and monitoring.

Moreover, we would like to stress that the problems with the IED are much bigger than just administrative burden. The main challenges are linked to the revision of the Seville process, which risks leading to an extreme lowering of Best Available Techniques Associated Emission Levels (BATAELs) down to levels that may no longer be technically and/or economically viable. On top of this, the potential introduction of numerous new BATAELs for various hazardous substances would make compliance increasingly complex and costly, given the challenges and expense of testing. These risks could seriously undermine both competitiveness and investment certainty in the wood-based panels industry.

2. Administrative burden under the EU Deforestation Regulation (EUDR)

While not explicitly listed in the current consultation scope, the EUDR poses substantial new administrative demands. For operators using composite materials like panels, the due diligence obligations (traceability, geolocation, risk assessment) can be disproportionate to the actual deforestation risk. In this respect, EPF encourages the Commission to explore simplified pathways and include the EUDR in the upcoming Environmental Omnibus.

3. Reporting fragmentation under the Extended Producer Responsibility (EPR)

The lack of harmonisation in EPR requirements across Member States creates unnecessary duplication and compliance complexity. EPF therefore encourages the Commission to:

- Promote a centralised EU reporting portal for EPR compliance;

- Harmonise key definitions (e.g. reuse, recycling, recyclability of composite materials, etc.);
- Ensure alignment of EPR obligations with circular use cases such as reuse and cascading use of wood.

4. Digitalisation of Environmental Compliance

Digital reporting should be designed with interoperability and user efficiency in mind. For this reason, EPF supports:

- The streamlining or elimination of platforms such as the SCIP database, which have created overlapping obligations under REACH and waste legislation;
- The development of integrated systems that allow companies to report once for multiple requirements (e.g. product content, emissions and circularity indicators).

5. Streamlining proportionality in environmental reporting

Finally, EPF calls for a general principle of proportionality to be applied across all reporting and administrative obligations. For companies like wood-based panels manufacturers, compliance costs can be disproportionate to actual environmental risk. Simplified templates, longer reporting intervals, and exemption thresholds for low-impact installations should be considered.

In conclusion, EPF strongly supports the Commission's objective to make environmental policies more efficient and implementable without compromising on ambition. We remain at your disposal to provide further technical input and sectoral case studies in support of this initiative.

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