

EPF feedback on the Environmental Omnibus Package

The European Panel Federation (EPF) welcomes the Commission's Environmental Omnibus Package and its objective to simplify environmental legislation while maintaining a high level of environmental protection and supporting European competitiveness .

1. General assessment

EPF supports the overall direction of the package, notably:

- the objective to reduce administrative burden by 25% (35% for SMEs);
- the focus on simplification without lowering environmental ambition;
- the recognition that environmental legislation must be implementable in practice to deliver results .

At the same time, EPF stresses that **simplification must go beyond targeted adjustments and address structural inefficiencies, fragmentation and lack of proportionality**, which remain key barriers to industrial competitiveness.

2. Environmental assessments and permitting (COM(2025) 984)

EPF strongly supports the proposal to streamline and accelerate environmental assessments and permitting procedures. Faster and more predictable permitting is essential for enabling investments in wood-based panels manufacturing and recycling capacity. In particular, EPF welcomes:

- the introduction of a single, coherent framework for environmental assessments across sectors;
- the move towards digitalisation and “once-only” principles;
- the establishment of clear timelines and single points of contact .

However, EPF highlights the following points:

- EPF stresses that accelerated permitting for energy projects, including biomass-based energy, **should be fully consistent with the cascading use principle**. In particular, permitting frameworks should avoid incentivising the early energy recovery of wood that is suitable for material uses. Ensuring **priority access to raw materials for material applications**, such as wood-based panels, is essential to maximise carbon storage and resource efficiency. Failure to do so risks creating market distortions and supply constraints for circular bioeconomy sectors.
- The concept of **strategic sectors and accelerated procedures** should be applied in a technologically neutral way and should explicitly recognise **circular bioeconomy industries, including wood-based panels manufacturing and recycling**.
- Implementation at Member State level will be critical. Without sufficient administrative capacity and harmonised practices, simplification risks remaining theoretical.
- The introduction of tools such as tacit approval or overriding public interest must ensure legal certainty and avoid divergent national interpretations .

3. Waste, reporting and circular economy (COM(2025) 986)

EPF strongly supports several simplification measures proposed under the Waste Framework Directive and related legislation, notably:

- Removal of the SCIP database, which has created duplicative obligations with limited practical value;
- Harmonisation of reporting under Extended Producer Responsibility (EPR);
- Simplification of environmental management system requirements and reporting obligations.

These measures are fully aligned with EPF's previous calls for:

- eliminating overlapping reporting requirements;
- ensuring interoperability of digital systems;
- enabling “report once, use multiple times” approaches.

Nevertheless, EPF underlines that further steps are needed:

- **Full harmonisation of definitions and methodologies** across Member States (e.g. recycling, reuse, composite materials);
- Development of a **centralised EU reporting interface**;
- Strong alignment with upcoming tools such as **Digital Product Passports**, to avoid creating new parallel systems.

4. Industrial emissions and environmental management (COM(2025) 986)

EPF welcomes efforts to reduce administrative burden under the Industrial Emissions Directive (IED), including:

- allowing grouping of installations under a single environmental management system;
- removing duplicative requirements (e.g. chemical inventories, audits);
- extending implementation timelines.

These changes go in the right direction. However, EPF reiterates that:

- **permitting delays and regulatory uncertainty remain the main bottlenecks**, beyond administrative burden alone;
- simplification should not be undermined by **increasingly stringent or impractical technical requirements** that could affect investment certainty in the wood-based panels sector.

Moreover, EPF considers that **simplification of the IED should go further**, in particular by:

- ensuring greater predictability and stability in the Seville process, including **realistic and technically achievable BAT-AELs**;
- taking into account the intrinsic variability of industrial processes relying on natural raw materials, such as wood, including differences linked to species and climatic conditions, when setting BAT-AELs and monitoring requirements;
- before introducing new parameters and substances, ensure that monitoring is technically and economically feasible;
- strengthening alignment with other EU instruments (e.g. ETS) to avoid inconsistencies and double regulation;
- introducing clear **proportionality principles for low-risk installations**, including simplified permitting and monitoring requirements.

EPF notes the **increasing use of environmental performance indicators**. While they can improve transparency, many remain insufficiently standardised and difficult to define, particularly for processes relying on natural raw materials. EPF therefore stresses that such indicators should not, at least initially, be translated into binding limits. Their premature use risks legal uncertainty, disproportionate costs and misrepresentation of actual performance.

A **phased, evidence-based approach is needed**, using indicators first for monitoring and benchmarking, supported by robust methodologies and data. Their regulatory use should only be considered once they are mature, clearly defined and comparable. This is essential to ensure proportionality, legal certainty and to avoid distortions for sectors with variable raw materials.

5. Cross-cutting priorities for EPF

Building on the Omnibus package and EPF's earlier input, the following priorities remain essential:

- **Proportionality**: obligations should reflect actual environmental risk and avoid disproportionate costs for low-risk sectors such as wood-based panels.
- **Digitalisation and interoperability**: systems must be integrated, user-friendly and avoid duplication across legislation.
- **Harmonisation**: consistent implementation across Member States is key to preserving the Single Market.
- **Investment certainty**: simplified and predictable permitting is critical to support industrial decarbonisation and circularity.

6. Conclusion

EPF supports the Environmental Omnibus as an important step towards a more efficient regulatory framework. The package addresses several long-standing concerns raised by industry, particularly on reporting burden and permitting procedures.

However, its success will depend on **effective implementation, deeper harmonisation and continued efforts to ensure proportionality and coherence across EU environmental legislation**.