

European Commission  
DG ENV - Unit B1  
DG GROW - Unit C1  
DG ENER - Unit C4

Brussels, 22 June 2022

**EPF and EPLF**  
**Feedback on the Proposal for a Regulation**  
**establishing a framework for setting ecodesign requirements for sustainable products**

The European Panel Federation (EPF) welcomes the opportunity to provide feedback on the Proposal for a Regulation establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC. The wood-based panels industry believes that this ambitious initiative will be a key element in implementing a coherent framework allowing for achieving the objectives of a resilient circular economy and climate neutrality by 2050 while strengthening the role of consumers in the green and sustainable transition. The proposal as published is very much welcomed but EPF would like to underline a number of aspects that are missing or can be improved ahead of the upcoming delegated acts, namely we propose to:

- Include a clear reference to the renewability of raw materials as ecodesign requirement. This would incentivise the use of products made of sustainably sourced renewable materials and unlock the full potential of the circular bioeconomy throughout the Union. While durability, resource efficiency and ecodesign are desirable qualities - the key element is the nature of the raw materials used.
- Acknowledge and account for carbon storage and material substitution to avoid the use of fossil energy-intensive materials, especially for sustainable construction and renovation for energy efficiency of the built environment.
- Ensure full consistency with the Construction Products Regulations (CPR) allowing for all relevant environmentally related characteristics be taken into account for construction products given the importance of the environmental footprint of the built environment.
- Ensure that the requirements for specific products or product groups are coherent and cost-efficient while considering the relevant technical characteristics for that specific product or group of products. E.g., ensure that product-specific targets for recycled content are only applied (1) based on technical feasibility, (2) taking into account the specific characteristics of different categories of products which includes (3) solid data on their respective life cycles.
- Guarantee that all relevant stakeholders are consulted through the Ecodesign Forum and in the development of the upcoming delegated acts.
- Develop well-functioning markets for secondary raw materials in line with the principles of the waste hierarchy and material use preference to enhance resource efficiency in line with the principle of cascading use of woody biomass to maintain sustainable carbon cycles and the best environmental value.
- Ensure the empowerment of consumer choices through adequate sustainability labelling (e.g., storage of biogenic carbon content), digital passports and other information on environmental footprints of products.
- Ensure that Member States do not set national provisions on products already regulated by the ESPR in order to preserve the internal market and avoid barriers to trade.

*EPF represents the manufacturers of wood-based panels being particleboard, dry process fibreboard (MDF), oriented strand board (OSB), hardboard, softboard and plywood. EPF has members in 32 European countries. The EU wood panel industry has a turnover of about 22 billion euro every year and creates directly over 100,000 jobs. The production of wood-based panels in the EU-27 (+EFTA) in 2020 was an estimated 58 million m<sup>3</sup>. [www.europanel.org](http://www.europanel.org)*

*Established in 1994, the Association of European Producers of Laminate Flooring (EPLF) represents the leading producers of laminate flooring in Europe and their suppliers. The focus of its work revolves around research, development, standardisation and representation at international trade fairs. [www.eplf.com](http://www.eplf.com)*

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