
Feedback to the Sustainable Products Initiative Inception Impact Assessment

16 November 2020

CEI-Bois, the umbrella Confederation representing the European Woodworking Industry, wishes to submit its comments on the Inception Impact Assessment of the Sustainable Products Initiative. The European Woodworking industry is aligned with the objective of the initiative, that is to reduce the overall life-cycle climate and environmental footprint of the products placed on the EU market.

The sustainable use of natural resources, including forests and forest products, is a key tenet of the 2030 Agenda for Sustainable Development. The 2015 Paris Agreement also highlights the contribution of forests to climate change mitigation and adaptation. Technical and methodological progress has facilitated better monitoring of the life cycle of harvested wood products. This gives them a key role in strategies for transitioning to low-carbon economies.

A natural, renewable material, wood has a uniquely low impact and resource-efficient production and processing cycle, which has numerous applications in construction, furniture products and interiors, packaging and more, contributing to develop a sustainable green economy:

- The European timber industry is committed to sourcing only **legally and sustainably harvested raw material**.
- European timber processing and wood products manufacturing also generates **low to zero waste**, as resulting by-products and residues can be used as raw material for other wood-based products and renewable energy source.
- The service life of wood structures and products can be increased through **improved building design** and also **maintenance, repair and renovation** of existing materials and structures.
- Timber products are not only long-lasting, but can be easily repaired, re-purposed or recycled. Even when the useful life of a timber product has ended, it can still be burned in order to generate heat (as excellent alternative to fossil fuels) and/or can be shredded or cut for a range of sustainable uses, including products such as insulation and animal bedding.
- The wood pallet and **packaging sectors** are now among the most highly geared industries to **recovery, repair and reuse**. A whole business has developed to give used pallets a new lease of life several times over through replacement of worn and damaged sections with new timber and blockboard.
- **Wood is a natural insulator**. Wood is a natural insulator due to air pockets within its cellular structure. As an insulator wood is 15 times better than masonry, 400 times better than steel, and 1,770 times better than aluminium.
- **Wood products store carbon** and, at the end of multiple lifecycles, can be used as a carbon neutral energy source.
- Finally, since the beginning of the COVID-19 pandemic, people are spending more time in their home than ever before. Homes have been serving as makeshift workplaces, schools and gyms. Wood can contribute to **happier living spaces**. Research has shown that reducing the amount of man-made materials and introducing natural alternatives, such as wood, lowers stress and anxiety levels at home. Marjut Wallenius, a doctor of psychology at the University of Tampere (Finland), declared: *“Wood has psychological effects on people and a similar stress-reducing effect to nature”*.

To accelerate the transition to a sustainable, circular economy, the upcoming Sustainable Products Initiative should incorporate the following measures:

- **Life-cycle assessment of the environmental impact of products** should be the guiding principle of the initiative. Where already available, the use of harmonised standards to perform LCA should be supported. This is the case of construction products: standards developed by CEN/TC 350, and in particular the standard EN15804, offer a harmonised methodology already in place to transfer environmental information about a product along the value chain. EN15804 provides a platform for presenting the environmental impact of construction products for whole building assessments, especially through the use of machine readable EPDs and Building Information Modelling (BIM). This allows professionals to assess environmental impacts as well as the benefits from all stages of construction activities, from design and planning to demolition.
- The uptake of **climate-friendly materials** should be incentivised. To that aim, criteria for a robust and transparent carbon accounting method to monitor and verify the emissions associated with the manufacture of the materials and their subsequent use for instance in construction, including benefits associated with **carbon storage**, should be developed at EU level. This is preliminary to designing effective incentives for increasing the share of low-carbon construction and renovation, for example in **Green Public Procurement** criteria.
- Measures to facilitate recycled content or remanufacturing in products are welcome; however, product-specific targets for minimum recycled content in construction products should be carefully assessed and imposed only when technically applicable and economically feasible. For example, the usage of recovered wood has reached on average 40% of raw material needs in the European particleboard industry, with some countries using recovered wood for up to 90% of their wood procurement. However, this is not technically feasible for, e.g., solid lumber beams. Market factors driving demand for recycled wood also play an important role and vary across Europe. Furthermore, it should be noted that the “recyclability” and “reusability” factors depend very much on the global market. Any mandatory demand in relation to these two concepts would be highly problematic.
- Finally, the Initiative should be developed in synergy with the updated 2018 Bioeconomy strategy: the special role and importance of **renewable materials in the circular bio-economy** should be taken into account, and support should be given to the development of innovative biobased products through Research, Innovation and Development funding.

CEI-Bois is the European Confederation of the Woodworking Industries. It represents 21 European and National organisations from 15 countries and is the body backing the interests of the whole industrial European wood sector: more than 180.000 companies generating an annual turnover of 152 billion euros and employing 1 million workers in the EU.