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CEI-Bois contribution to European Commission call for evidence for Housing Simplification Package

The European Confederation of Woodworking Industries (CEI-Bois) welcomes the European Commission's intention to make regulatory simplification a central component of its response to the housing affordability crisis. Increasing the supply of new and renovated housing requires a regulatory framework that reduces unnecessary complexity, delays and costs while preserving high standards of safety, environmental performance and quality.

CEI-Bois therefore supports the Commission's recognition that simplification must go hand in hand with efforts to strengthen the productivity, capacity and competitiveness of the construction ecosystem, while advancing the transition towards a climate-neutral built environment. Timber construction can help deliver affordable and sustainable housing faster, with a high degree of prefabrication, less disruption on site and a lower climate impact. Ensuring a stable, predictable, and sustainably sourced raw material supply will allow the industry to realise these opportunities fully.

CEI-Bois particularly supports the Commission's proposed mapping of the combined impact of EU legislation and its implementation on housing supply and affordability. The cumulative interaction of EU requirements, national transposition, regional and local rules, permitting procedures, building codes and technical standards can generate substantial complexity, uncertainty, costs and delays. **The exercise should therefore identify and remove unnecessary burdens arising both from EU legislation and from domestic implementation, regulatory layering and gold-plating, while promoting clearer and more coherent rules, streamlined and progressively digitalised permitting procedures, and greater regulatory predictability for companies, particularly SMEs.**

CEI-Bois also welcomes the Commission's focus on increasing productivity in construction and renovation, especially via industrialised construction methods such as offsite construction, prefabrication and modular solutions. These can shorten project timelines, reduce costs, improve quality and resource efficiency, and facilitate the scaling-up of housing delivery. **CEI-Bois therefore calls for the Housing Simplification Package to remove the regulatory, permitting and standardisation barriers that currently constrain these solutions and to support their deployment in conjunction with circular and bio-based construction materials.** In this way, simplification can contribute simultaneously to greater housing supply, improved affordability, a more competitive European construction ecosystem and the decarbonisation of the built environment.



In this context, **CEI-Bois would like to share with the European Commission its recommendations on the regulatory and implementation barriers affecting housing construction and renovation as part of the present call for evidence.** For clarity, the recommendations are organised below around four closely connected dimensions:

- planning and environmental assessment;
- land, nature and environmental rules;
- construction performance, circularity and technical regulation;
- market-enabling instruments.

Taken together, the proposals seek to reduce avoidable duplication and uncertainty, improve the consistency of implementation, and enable industrialised and bio-based construction solutions to be deployed more efficiently and at scale.

HOUSING SIMPLIFICATION PACKAGE: CEI-BOIS RECOMMENDATIONS

1. Planning, permitting and environmental assessment

Legal instrument:

- Environmental Impact Assessment (EIA) Directive 2011/92/EU amended by 2014/52/EU
- Strategic Environmental Assessment (SEA) Directive 2001/42/EC

Feedback:

Simplification should mainly be based on and thus also address the specific needs of industrial, off-site and prefabricated housing delivery models, for which unpredictability in permitting can be as damaging as the overall duration of procedures. In such delivery models, uncertain timelines weaken investment confidence, disrupt production planning and reduce the ability to scale housing delivery efficiently. Priority should therefore be given to clearer interfaces between SEA and EIA, fewer overlapping assessments, more predictable procedural timelines, wider use of digital procedures and one-stop-shop approaches. These digital one-stop shops should allow information to be submitted only once. Authorities should provide clear timelines, specific requests for any additional information required, and a single contact person.

It is worth considering how innovative technologies could digitize future building applications and permits—thereby making them faster, more efficient, more transparent, and more cost-effective. These digital processes can then be extended to other areas of administration.

The often large stock of older buildings in cities, combined with high social, architectural, and ecological standards for new construction and the resulting increasing complexity, leads to processing times of up to one year for paper-based building applications.

A combination of Building Information Modeling (BIM), Artificial Intelligence (AI), and Augmented Reality (AR) into a comprehensive, fully digital, and automated approval process could help here. Instead of 2D paper plans, fully digital 3D building models are used. This could develop into an



innovative foundation for managing the entire construction project—from planning and submission to on-site construction supervision and the final inspection of the completed structure. LCA-analysis should however be included.

Where environmental impacts have already been adequately assessed at plan level, unnecessary duplication at project level should be avoided unless there is a clearly demonstrated and genuinely project-specific justification. The aim should not be to weaken environmental protection, but to improve coherence, legal certainty and delivery capacity.

Article 3 should include comparative analysis of climate effects as well as resource efficiency for showing the advantages of wood (low weight, renewable, CO₂-positive).

Harmonised rules among Member States regarding which projects that need EIA should make a more neutral competitiveness.

Introduce streamlined screening procedures in place of a full Strategic Environmental Assessment (SEA) for certain residential development plans. This simplified approach would apply in cases such as urban residential developments, areas that are directly connected to existing settlements, and plans with a limited spatial scope. By allowing a lighter assessment process in these clearly defined situations, the measure would reduce administrative burdens at the early planning stage and accelerate the approval of zoning and development plans, thereby facilitating faster housing delivery while maintaining appropriate environmental oversight.

In the context of environmental assessments, introduce procedural preclusion rules to prevent the indefinite reopening of consultation processes through repeated objections. Under this approach, late-stage objections would no longer be able to reopen procedures that have already been completed. Such a measure would reduce delays caused by prolonged consultations and litigation, while also creating faster and more predictable permitting procedures for housing development projects.

In principle, it is important to secure more funding to accelerate the decarbonization of housing construction and to mobilize public land to ensure a sufficient supply of available and affordable building sites, as well as to create alternative financing instruments.

2. Land, nature and environmental rules

Legal instrument:

- Nature Restoration Regulation

Feedback:

Targets to increase green space and tree cover in urban areas might restrict the possibilities to enlarge the building area. It is essential that the regulatory framework does not restrict or hinder the sourcing of renewable wood raw materials in order to provide sufficient supply for decarbonisation of buildings. National implementation that is more stringent than that of other Member States creates competitive imbalances.

Legal instrument:



- Soil Monitoring and Resilience Directive 2025/2360

Feedback:

Important to keep clean-up costs at a balanced level.

Legal instrument:

- Habitats Directive 92/43/EEC
- Birds Directive 2009/147/EC amended by Regulation (EU) 2019/1010 on alignment of reporting obligations

Feedback:

National implementation that is more stringent than that of other Member States creates competitive imbalances and increases uncertainty, costs and delays in housing planning and permitting, potentially affecting the timely availability of suitable land for development.

In relation to the European Commission's ongoing "stress test" of the Birds and Habitats Directives, establish of an EU-wide codified framework for the population-level assessment of protected species in the context of housing development. The objective is to reduce legal uncertainty in project approvals, facilitate the timely permitting of housing projects and prevent delays caused by differing interpretations of species protection requirements.

Legal instrument:

- Ambient Air Quality Directive 2024/2881 (recast)

Feedback:

Wood construction offers significant advantages in terms of lower fine dust emissions, both during the construction phase and during demolition, compared to conventional solid construction methods:

- High degree of prefabrication - in prefabricated construction, components are produced in factory facilities regardless of weather conditions, which drastically reduces pollution and dust generation on the construction site.
- Dry construction method - timber construction is largely dry. Dust-intensive processes such as mixing and applying mortar or concrete on-site are eliminated.
- Less waste - serial prefabrication results in less waste and scrap directly at the construction site.
- Low-dust dismantling - instead of demolishing buildings with heavy equipment, timber structures can often be dismantled, which minimizes fine dust pollution from demolition debris (such as brick dust).

3. Construction performance, circularity and technical regulation



Legal instrument:

- Waste Framework Directive 2008/98/EC

Feedback:

For reuse, common or horizontal standards and specifications are required to assess the technical quality of reused materials.

Some countries and/or industries have proven and established methods to process treated products, so they no longer are classified as “waste or dangerous substances” and can be reused. Such methods should be acknowledged and their implementation facilitated.

Legal instrument:

- Energy Performance of Buildings Directive (recast)

Feedback:

Implementation of the EPBD should remain economically feasible and should not create cumulative cost burdens that undermine affordable housing delivery. The framework should better align affordability, low-carbon performance and industrial construction and renovation methods, including repeatable prefabricated solutions. Lifecycle-based approaches are welcome, but data requirements, technical obligations and implementation timelines should remain proportionate, especially for SMEs and affordable housing providers.

Thresholds and limit values e.g. for GWP for different types of buildings (residential, office, etc.) should be based on the best existing commercially viable projects (instead of conservative values based on current praxis) to help the EU reach its climate goals for 2030 or 2040. Furthermore, these limit values should be reviewed and tightened on a regular basis (every 3rd year or so).

Legal instrument:

- Construction Products Regulation 2024/3110

Feedback:

The implementation of the CPR-2024 should also be assessed from the perspective of scalability of industrial construction and SME feasibility. Simplification should focus on clearer and more workable rules for environmental performance declarations, avoidance of disproportionate worst-case approaches, support for production-weighted averages where justified, and faster and more predictable pathways for innovative and prefabricated solutions to access the Single Market. In this context, the stepwise introduction of environmental indicators under CPR-2024 should be acknowledged, noting that the absence of weighting factors currently limits full comparability between product variants. A transitional phase focusing on core indicators for modules A–D may therefore be appropriate until harmonised weighting methodologies are established, after which more advanced aggregation and comparability tools can be introduced to support industrialisation and innovation.



Requirements on sustainable resource use in the CPR-2024 (Annex I, section 8) should acknowledge the positive impacts of material coming from renewable sources on climate change. Likewise, the positive impact from substitution/displacement (as presented in a practical way in the ISO 13391-series on Greenhouse gas dynamics) should also be acknowledged.

The Housing Simplification Package should support further harmonisation under the CPR-2024 of prefabricated building elements and systems that fall within its scope as construction products. For these products, it should identify and remove duplicative national product-level testing and approval requirements and ensure the cross-border acceptance of relevant test results and harmonised technical documentation. This is particularly important for industrialised timber construction, where repeated national assessments undermine scale, cross-border delivery and SME participation. However, aspects relating to the design, assembly, installation and performance of completed construction works should remain subject to national rules and should not be brought within the scope of the CPR. At the same time, greater mutual recognition of relevant test results and assessments concerning these aspects of construction works should be promoted, without affecting Member States' competence to regulate construction works.

Regarding indoor air emissions, additional national assessment parameters and requirements beyond harmonised EU approaches can create barriers to the use of construction products and undermine the Single Market. This is particularly relevant for wood products, where non-harmonised parameters such as aggregate VOC indicators may lead to the exclusion of otherwise suitable products from construction projects. The Housing Simplification Package should therefore promote a harmonised, substance-based and health-relevant approach to construction product emissions and avoid additional national parameters that create unnecessary barriers.

EU "mutual recognition" (Cassis-de-Dijon principle, 1979) should not be applied to Eurocode safety factors, because these are not product properties but national structural design parameters. It does not make sense that the partial safety factors applied in structural design would change for the same construction product when crossing a border within the European Economic Area (EEA) and Switzerland. This situation creates inconsistencies with the effective functioning of the Single Market for construction products.

Legal instrument:

- Eurocodes and harmonised technical standards

Feedback:

Eurocodes and related national implementation should better support repeatable industrial solutions, cross-border delivery and sufficiently consistent design conditions for modern housing construction, while ensuring that improvements in consistency are achieved through the established Eurocode development process and consensus among Member States. Excessive divergence in national interpretations, National Annexes and approval cultures can reduce economies of scale, increase redesign and adaptation costs, and weaken the market uptake of prefabricated and industrialised systems. Simplification should therefore also be understood as



a need for more consistent application, fewer unnecessary national barriers and a more supportive framework for repeatable solutions that can be deployed efficiently across markets. This would strengthen both Single Market functioning and housing delivery capacity without undermining the role of Member States in setting justified national parameters.

Design for deconstruction and other aspects of reuse and circularity should be addressed through a coordinated and iterative development of horizontal standards for structural design (Eurocodes) and product standards, ensuring that material properties (e.g. for reused timber) and design rules are developed consistently. This framework should be sufficiently established before requirements from CPR-2024 (Annex I, Section 8) are applied.

The second-generation Eurocodes have substantially increased in volume (over 7000 pages). This in turn increases work required during structural design and ultimately increases the final cost of building projects. The EU needs therefore to identify dissemination best practices and facilitate and finance the development of user-friendly implementation of the codes for users as large.

4. Market-enabling instruments

Legal instrument:

- Public Procurement Directives and the proposed Public Procurement Act

Feedback:

Public procurement should support affordable and sustainable housing delivery at scale by rewarding overall building and delivery performance rather than basing decisions solely on material choice or the lowest upfront price. Award criteria should give appropriate weight to whole-life GHG emissions, construction time, lifecycle cost, quality and circularity. Long-term biogenic carbon storage may be considered separately where it can be reliably assessed. Procurement should allow industrial, serial and prefabricated methods to demonstrate their contribution to predictable and efficient delivery. Selection requirements should be proportionate to the contract, and procedures should enable SMEs to participate, including through consortia.

Furthermore, Commission Recommendation (EU) 2026/2069 notes, under the current Union public procurement rules, public buyers may choose between general-contractor models and the division of contracts into lots. This presents the options as a binary choice and overlooks a third, intermediate model: the justified combined award of several technically and economically interlinked lots for serial, modular and systemic construction (a cross-trade award).

Cross-trade awards can support SME participation by complementing, rather than replacing, the traditional division of contracts into individual trade lots. Companies delivering integrated timber systems are themselves predominantly SMEs and can bid for a combined group of technically interdependent activities. Work that is genuinely separable from the integrated system can continue to be awarded as individual lots or subcontracted by the system providers to other regional and local SMEs. This approach therefore enables SME system providers to deliver integrated prefabricated solutions while preserving opportunities for specialised SMEs to participate in the remaining work.

Therefore, the EU public procurement framework should enable contracting authorities to apply this model with legal certainty, without requiring them to choose a full general-contractor model. It should also make clear that Member States may — and are encouraged to — allow contracting authorities to combine several lots where this is “justified” (rather than “required”) by economic, technical or scheduling considerations. Modern and industrialised construction methods, including timber-based construction, should be expressly identified as a relevant example of when such a combination may be justified.

Equally importantly, the EU public procurement framework should recognise that, for serial, modular and systemic construction, an early integrated award combining permit-stage design and execution under the same economic operator is frequently an objectively justified choice, rather than an exception requiring special justification. Early integration of permit-stage design with manufacturer-specific fabrication and assembly design helps avoid mismatches between the design and the prefabricated building system. Manufacturers of engineered-timber and prefabricated building systems repeatedly report that separating design from execution can lead to costly redesign, adaptation loops and loss of prefabrication efficiency once construction starts.

Enabling cross-trade awards for engineered-timber systems in public procurement should be recognised as a low-cost climate lever for scaling carbon-storing construction without new subsidies, in line with the emphasis in Commission Recommendation (EU) 2026/2069 on decarbonised, bio-based construction materials.

Legal instrument:

- Proposed Industrial Accelerator Act

Feedback:

A level playing field must be ensured between the construction materials covered by the Industrial Accelerator Act (IAA) and the bio-based construction products addressed by the Bioeconomy Strategy. The IAA’s mandatory qualifying targets for low-carbon steel, concrete/mortar and aluminium in construction should therefore be removed. They would create dedicated public demand for three pre-selected material groups, while no equivalent measure exists for competing bio-based construction products, many of which are manufactured in the EU and contribute to the same industrial, competitiveness and climate objectives.

Although the IAA impact assessment acknowledges the possibility of material substitution, it does not adequately demonstrate how this differentiated treatment would affect competing construction solutions or building-level climate outcomes. This lack of assessment is particularly difficult to justify because an EU framework for establishing green public procurement requirements for construction products already exists under Article 83 of the Construction Products Regulation. The CPR framework envisages an in-depth assessment of market and competitive implications before such requirements are introduced, whereas the IAA would establish a separate procurement route without equivalent safeguards for the prior selection of material groups and targets.



Moreover, the proposed Public Procurement Act forms part of an ongoing process to redesign the EU green public procurement framework, including its application to construction products, and, if adopted, could shape the future public procurement of sustainable construction products. Irrespective of whether future requirements are established under the CPR or the proposed horizontal PPA framework, the IAA would nevertheless create a parallel route providing dedicated demand support to preselected construction materials.

It should also be noted that the EPBD provides a separate but equally relevant building-level framework. Its life-cycle GWP approach assesses the climate performance of new buildings as a whole without prescribing the use of particular construction materials. Compliance with an IAA qualifying target would therefore not, by itself, demonstrate a lower building-level GWP or a better climate outcome than an alternative design or material solution.

In light of the above, EU policy should instead use materially inclusive, performance-based and evidence-based frameworks that allow all suitable construction solutions to compete according to their demonstrated performance.

Legal instrument:

- EU Taxonomy

Feedback:

Taxonomy-related requirements should be made more workable and proportionate for housing delivery, especially for SMEs and for projects that combine affordability and sustainability objectives in practice. Better alignment between the Taxonomy, the EPBD and the CPR is needed in order to avoid overlapping reporting burdens, inconsistent signals and unnecessary compliance complexity. The framework should support practical transition pathways, lifecycle improvements and scalable low-carbon housing solutions, rather than unintentionally excluding them through criteria that are difficult to apply in real projects. A more coherent and usable framework would better support investment, implementation and the wider housing policy objective of delivering affordable and sustainable homes at scale.

The EU Taxonomy should give credit to the renewability of sustainable biobased building materials. The positive impact from substitution/displacement (as presented in a practical way in the ISO 13391-series on Greenhouse gas dynamics) when bio-based are used instead of fossil-based should also be acknowledged.