



Brussels, 14 September 2010

**Public Consultation on the preparation of a new Communication on Raw Materials  
Contribution of the European Confederation of Woodworking Industries, CEI-Bois aisbl**

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**Register of Interest representatives' registration number 2736429262-21**

**POLICY AREA: DEFINING CRITICAL RAW MATERIALS**

Securing a sustainable raw material supply is crucial for any industry sector operating within the EU. CEI-Bois therefore deplores that the current focus is put mainly on access to raw materials in 3<sup>rd</sup> countries and on a limited number of raw materials only (metals and minerals).

For the woodworking industries, wood is definitely a critical raw material. Despite the fact that the EU can boost an annual increase in standing wood volume, the pressure on the material is strongly rising from an increasing demand for woody biomass for renewable energy production and protective measures in the context of climate policies.

CEI-Bois therefore believes that the definition of criticality has to be reconsidered. It should, in fact, not only be defined by absolute existence of a raw material, but on the availability in the supply-demand balance set by the market actors and policies, which have an impact on the availability of a raw material to European Industry.

Furthermore, the critical nature of one or other material may differ strongly from sector to sector.

Renewable raw materials would deserve a special focus also because of the competition being faced with the non-material use sector (renewable energy production). In this context, impacts of subsidies for renewable energy on the availability of wood for material use need to be thoroughly assessed.

**POLICY AREA: TRADE**

The woodworking industries advocate a free and fair trade. In this context, we consider that:

- The EU should launch a debate at WTO level on raw material export restrictions aiming at clarifying the existing rules and proposing adjustments where necessary to establish discipline.
- The EU should advocate strengthening of WTO rules on hidden subsidies such as access to finance at "non-market" conditions.
- Raw material access should be considered as sine-qua-non conditions in all EU bilateral and regional agreements with third countries.

## **POLICY AREA: DEVELOPMENT**

The questionnaire raised a specific question “Do you consider that wood should be addressed in the framework of development policy? If yes, please specify what are the main issues to be analysed.”

It cannot be denied that certain concerns over the use of wood and its legal or sustainable origin derive from developments within developing countries.

With its work on establishing FLEGT agreements with producing countries outside the EU, we believe that the EC has already given an answer to this question: indeed, wood is to be considered in the framework of the development policy due to its critical nature.

## **POLICY AREA: IMPROVEMENT OF THE REGULATORY FRAMEWORK CONDITIONS INSIDE THE EU**

The woodworking industries, primarily using a naturally renewable raw material, are key to the EU becoming a bio-based green economy. Not only do they supply carbon-storing low energy wood products, they also play a key role in an efficient use and transformation of the available resource.

Climate change policies put in place at European and national level focus strongly on the use of renewable sources of energy, in particular wood and woody biomass. This development is having an impact on the raw material supply of the woodworking industries, and even threatens its future in some cases.

CEI-Bois therefore strongly pleads for a cascaded use of wood, whereby suitable wood assortments are first used to produce wood-based products, which can be re-used or repaired and recycled prior to a final use as a renewable source of energy. This approach has as an additional advantage that carbon remains stored for a much longer period thereby contributing to reducing CO<sub>2</sub> emissions over a longer period.

Furthermore, in order to enhance the mobilisation of available wood resources at EU level, administrative and legal obstacles to efficient forest management are to be eliminated.

## **POLICY AREA: RESOURCE EFFICIENCY & RECYCLING**

The woodworking industries are constantly working on improving resource efficiency and towards a most optimum use of the wood raw material. It is crucial that the future supply of wood for the industry remains secured and that EU policies take due account of the fact that, without a proper wood supply, the sector will not be able to contribute any further to greening EU economy.

In this context, the EU should foster the recycling of wood by-products and residues by supporting research on collecting, sorting and cleaning technologies and by improving waste regulations.

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The European Confederation of Woodworking Industries, CEI-Bois aisbl, is the voice of the European woodworking and furniture industries.

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