



Public Consultation on the preparation of a new Communication on Raw Materials Contribution of the European Organisation of the Sawmill industry, EOS aisbl

Register of Interest representatives' registration number 18751401956-24

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

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

For the sawmill industry, wood is definitely a critical raw material, representing 70% of its costs. 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.

EOS 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.

Renewable raw materials 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 sawmill industry advocates for 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

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. Sourcing directly from forest owners, the sawmilling sector plays a central role in a modern wood strategy, aiming at valorising the renewable raw material in the best possible way and supplying both wood products and wood energy. In addition, sawmills can also supply other actors in the wood value chain, such as e.g. panel factories, the pulp & paper or bio-energy industries, with raw material.

In this respect, EOS 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 CO₂ 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 sawmill industry is 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.

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