

An Emerging Framework for Timber Buildings

Policy and standards briefing

December 2023

Purpose of this briefing

This briefing presents an overview of some of the recent policy and standards developments and their direct implications for stakeholders and experts of the construction sector and timber industry. The brief also empowers stakeholders to anticipate and prepare for the forthcoming policy and standardisation changes. It aims to provide insights into how these sectors can align their practices with environmental best practice. As such, the primary audience for this briefing includes professionals, policymakers, and advocates within the construction sector and timber industry, providing them with actionable information to navigate the evolving policy landscape.

Background

The EU Green Deal launched in 2019 delivered a series of major policy developments over the last years, including on the importance of forests and of the transformation of the construction sector to the EU goal of becoming climate neutral by 2050. The Green Deal led to the adoption of new policies and the revision of existing ones, some of which are still under negotiations. Some of those recognise the role of timber in decarbonising construction, and placed it in the context of preventing deforestation and forest degradation, restoring biodiversity and growing the forest carbon sink. In parallel, European and international standardisers are developing new standards related to timber and forestry.

Policy and standards development in the field

I. EU construction sector

Setting Whole Life Carbon pathways for buildings

The EU [Energy Performance of Buildings Directive](#) (EPBD) establishes measures to promote sustainable construction practices and enhance the energy performance of both new and existing buildings. While it has historically focused on energy consumption of buildings, its 2023 recast is expected to introduce one major change: to account for so-called **whole life carbon** (WLC) emissions¹,

¹ For definitions of the different forms of carbon dioxide emissions from buildings, see ECOS. (2023). [Seeing the forest through the trees: How sustainable timber buildings can help fight the climate crisis](#), pages 5 and 6.

encompassing the carbon emissions of buildings across their entire lifecycle, thus including the manufacturing of construction materials, construction, energy use and end of life of buildings. An agreement on the revision was reached in December 2023. EU countries will need to transpose and implement the new rules, which include developing national **WLC targets and limits for emissions from new buildings**.

In the planning and development stages of new construction, market actors will be obligated to estimate, calculate, and disclose lifecycle emissions per square for all new developments as of 2030. From 2030 also, these emissions will be limited with a progressive downward trend to reach 'net zero' by 2050.

Member States will retain autonomy on how to account for carbon storage in buildings. This will allow countries such as France to apply their own rules to incentivise the use of bio-based materials.

Creating transparency about construction products' impacts

The **EU Construction Products Regulation (CPR)** sets rules for the marketing of construction products in the EU, as well as a common language to assess their performance and allow comparisons. The regulation is currently under revision. At the time of writing, political negotiations are still underway and it is difficult to predict future requirements. The revision process is due to close in the first quarter of 2024.

This revision of the CPR is expected to bring new rules to increase transparency on the impacts of construction products placed on the European market via **reporting requirements based on the lifecycle analysis methodology for Environmental Product Declarations (EPD)** contained in the standard EN15804+A2,² including greenhouse gas emissions. A process for setting emission thresholds for some product categories is also expected to start.

II. Timber and forestry

Preventing deforestation and forest degradation from international trade

The **EU Deforestation and Forest Degradation Regulation (EUDR)** provides rules to prevent the import or export of products into/from the EU and which are linked to the conversion of forests to farmland ('deforestation'), or from the conversion of primary forests or natural forests into plantations ('forest degradation'). These products include goods in their various forms, both as raw and transformed materials: wood (including for construction purposes), cattle, cocoa, coffee, oil palm, rubber, and soya.

From December 2024 (June 2025 for small enterprises) imports and exports of these products must be covered by a **due diligence statement** and follow **traceability rules** linking commodities to the specific plots of land where they were produced, with varying degrees of strictness depending on the level of deforestation risk in the exporting country. The products will also need to be compliant with the laws of the country of production, including related to human and labour rights, the rights of affected indigenous peoples, and prior and informed consent rules.

The EUDR is an opportunity for construction stakeholders to demand and obtain precise geolocation data about the origin of timber whenever it is imported from outside the EU. Better strategies yet exist to avoid any risk of deforestation or forest degradation: timber construction value chains can source local

² EN 15804:2012+A2:2019 Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products.

reused or recycled wood material. As a second option, actors should source local timber from ecologically managed forests where forest carbon and biodiversity are preserved.

Monitoring the impacts on EU forests

The [EU Forest Monitoring Law \(FML\)](#) is a recent proposal to support the **production of more accurate and complete data on the status and trends of EU forests** along key environmental indicators. If done right, this proposal could create public access to the data, increase transparency about the sustainability of forest management practices, and therefore support better informed decision-making for sustainable timber sourcing. However political negotiations concerning the FML are only starting, and a lot could still change before it is fully adopted.

The new law proposal is currently under public consultation, allowing anyone to provide feedback concerning this new initiative.³ Stakeholders in the timber construction sector who are sensitive to the need for increasing transparency in the forest value chain are encouraged to show their support for the proposal. In particular, the call for more clarity concerning the state of forests and impacts of various management practices.

Assessing the carbon dynamics of forests and wood product value chains

The field of voluntary reporting also progressed in 2023 with the ongoing development of **a standard to assess the 'carbon dynamics of wood and wood-based products'**, developed by [ISO Technical Committee 287](#). This new standard, expected for publication early 2025, will provide companies of the forestry and timber value chains to **calculate and report the climate impacts of forestry activities and wood products, including the timber used in buildings**. It will allow to separately report the whole set of emissions from forest processes (including biomass growth, soil, deadwood, etc.), the emissions from value chains, the carbon stored in wood products, and potential avoided emissions from the use of wood compared to other materials.

III. Sustainable finance

Driving construction sector decarbonisation with sustainable finance

The [EU Sustainable Finance Taxonomy](#) ('the taxonomy') provides a set of criteria to define 'environmentally sustainable' economic activities, concerning for instance the construction of new buildings, the renovation of existing buildings, as well as forest management.⁴ The taxonomy thus **helps to direct investments towards those activities which can report alignment with the criteria**.

At present, the taxonomy criteria are in dire need of revision in order to (1) consistently mandate the disclosure of WLC emissions for all new buildings and major renovations, (2) support transparency of construction products placed on the EU market with the disclosure of EPD results, (3) provide WLC limits at the EU or national level, (4) upgrade sustainability criteria for the production of key construction materials, including timber, cement and concrete, and steel.

³ To provide your feedback to the Forest Monitoring Law proposal, access the [EU consultation page](#).

⁴ Read the ECOS position paper ["Why does the taxonomy miss the mark on construction?"](#) for more information.

IV. Carbon removals certification

Strengthening the framework for carbon removal certification

The proposal for an **EU Carbon Removals Certification Framework (CRCF)** aims at clearing the field of voluntary carbon removal certification by setting up an EU mechanism to recognise certification schemes which meet the **EU 'quality' criteria**. For years, private schemes for the quantification and monitoring of carbon removals have led to a flurry of misleading climate neutrality claims, particularly linked to forest carbon offsets.⁵ The CRCF will be complemented by sector-specific methodologies for forest-based removals, carbon storage in long-lasting timber buildings, and other forms of storage (including geological storage, direct air capture, etc.). A certification process would lead to the creation of an **'EU carbon removal certificate'** stating that carbon is accounted for and monitored according to an approved methodology. The system would allow incentivising carbon storage via public or private schemes, such as green public procurement. The CRCF is still currently under political negotiations.

Long-lasting carbon removals from forestry and construction stored carbon present opportunities for climate mitigation, yet the historically high levels of greenwashing in this field require caution, particularly in relation to voluntary carbon offset markets.⁶ Carbon removal activities should for instance not lead to biodiversity loss from impacts of forestry on natural ecosystems. Responsible actors should also call for construction stored carbon to only be recognised where buildings are designed to last for very long periods of time under normal use and maintenance, and contribute to circularity from timber reuse/recycling at the construction and end-of-life stages of the building lifecycle.

About ECOS

ECOS is an independent international NGO with a network of members and experts advocating for environmentally-friendly technical standards, policies and laws. We ensure the environmental voice is heard when they are developed and drive change by providing expertise to policymakers and industry players, leading to the implementation of strong environmental principles. ECOS work towards policies and standards for sustainable use of timber was funded by Built by Nature.

For more information, please consult our website <https://ecostandard.org/>.

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⁵ Read the ECOS report **'Greenwashing, certified?'** for an analysis of issues surrounding climate neutrality claims.

⁶ Read the ECOS position paper **'No shortcuts for carbon storage in products'** for a more detailed analysis.