

EPF Feedback on the Revision of Regulation (EU) 2019/1020 on Market Surveillance and Compliance of Products

The European Panel Federation (EPF), representing Europe's wood-based panels manufacturers, welcomes the revision of Regulation (EU) 2019/1020. Effective, consistent and well-resourced market surveillance is essential to safeguard product safety, preserve fair competition and ensure the credibility of EU regulatory frameworks. The following points highlight issues of specific importance to the wood-based panels sector.

Strengthen controls at EU external borders

EPF members face persistent challenges from imported products that do not meet EU technical, safety or environmental requirements. Stronger border controls are essential to prevent non-compliant products entering the market. Authorities should systematically verify:

- technical and chemical compliance;
- correct classification and labelling;
- conformity with applicable harmonised standards;
- completeness and accuracy of technical documentation, including traceability information.

A more risk-based, intelligence-driven approach is needed to focus resources on high-risk product groups and countries of origin.

Improve coordination between customs and market surveillance

Disparities in enforcement across Member States undermine the functioning of the single market. EPF supports:

- better information exchange between customs and market surveillance authorities;
- EU-coordinated inspections and joint operations;
- harmonised enforcement methodologies;
- pooling of expertise for complex product categories.

Exploring the potential of an EU Market Surveillance Authority could help strengthen consistency and support Member States with limited resources.

Ensure robust enforcement of EUTR & future EUDR requirements for sanctioned wood

EPF stresses the need for strong enforcement against the placing on the EU market of wood products from Russia and Belarus, in line with sanctions and EUTR/EUDR obligations. This is particularly relevant for high-risk products such as birch plywood. Authorities must address circumvention practices, including:

- rerouting through intermediary countries;
- relabelling, misdeclaration of origin or falsifying the country of origin of goods;
- minimal processing to disguise provenance.

Enhanced intelligence-sharing, customs cooperation and EU-wide enforcement campaigns are essential to protect responsible EU manufacturers and ensure sanctions are effective. At the same time, laboratory analysis of doubtful wood import samples to prove its true origin as well as the cooperation between customs or reinforcement agencies with the industry at European or national level should be part of the solution to stop the illegal flow of wood products into the EU.

Ensure coherence with the ESPR and Digital Product Passports

The upcoming Ecodesign for Sustainable Products Regulation (ESPR) framework will create new obligations, including Digital Product Passports. To avoid duplication and maximise efficiency, EPF recommends:

- full alignment between DPP data requirements and market surveillance procedures;
- direct access for authorities to relevant DPP information;
- integrated, digital-ready processes rather than parallel reporting systems.

This would ensure predictable, efficient checks for both authorities and manufacturers.

Address challenges with online sales

Online marketplaces are a major entry point for non-compliant products, including furniture items and wood-based components. EPF supports:

- clearer obligations for fulfilment service providers;
- equal treatment of online and offline channels;
- improved traceability of small parcels;
- more resources for digital and e-commerce surveillance.

This is essential to maintain fair competition in a fast-growing distribution channel.

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