



European Federation of Wooden pallet
and Packaging Manufacturers
FEFPEB Newsletter August 2026



UPDATED PPWR DEVELOPMENTS

The [Packaging and Packaging Waste Regulation 2025/40](#) (PPWR) entered into force on **11 February 2025** and applies generally from **12 August 2026** and covers:

- Covers all packaging and packaging waste, regardless of material or origin
- Sets requirements for manufacturing, composition, and the reusable or recoverable nature of all packaging placed on the EU market
- Includes packaging waste management and prevention measures

Click [here](#) for a summary of the Packaging and Packaging Waste Regulation (EU) 2025/40.

1. Updated FAQ PPWR released

The European Commission has published the second edition of its Frequently Asked Questions on PPWR.

The updated document ([click here](#)) contains several new clarifications of direct relevance to manufacturers and users of wooden pallets, crates, and other industrial transport packaging. Although the FAQ is not legally binding, it provides an important indication of how the Commission expects the PPWR to be interpreted and enforced from its general application date of **12 August 2026**.

2. First Analysis FAQ

The FAQ is currently analysed but a DGA / Nikhil Varghese indicated the main implications for FEFPEB and its members which are set out below.

Manufacturer of standard transport packaging (FAQ reference: Section II, Q5)

The Commission confirms that transport packaging must be assessed at the point when the empty packaging has reached its final form and can be used without further manufacturing or transformation.

A cardboard or wooden box may therefore already be in its final form even if it is supplied flat and subsequently assembled. Similarly, different packaging items used together—such as pallets, boxes, wraps, straps and tape—do not automatically become one newly manufactured packaging unit. Each item may already have its own manufacturer and require its own supporting documentation.

For standard, unbranded transport packaging, the company physically manufacturing the packaging will normally be considered the manufacturer. Where the packaging carries another company's name or trademark, that company will generally be considered the manufacturer. A sticker added solely for logistics or shipment purposes is not regarded as branding.

Producer responsibility for transport packaging (FAQ reference: Section II, Q9)

The FAQ also clarifies the allocation of producer responsibility for EPR purposes.

Where a manufacturer supplies standard, unbranded transport packaging to another company in the same Member State, the physical packaging manufacturer will normally also be the producer. Where the packaging is supplied to a company in another Member State and filled there, the recipient will generally become the producer in that destination Member State. Where packaging is manufactured under another company's name or trademark, that company will normally be the manufacturer and producer, subject to the specific exception for micro-enterprises.

This confirms that EPR responsibility may remain with manufacturers of standard, unbranded wooden packaging supplied domestically. The Commission has therefore not adopted the broader interpretation that responsibility should always sit with the filler or user of the packaging. This is not in alignment with FEFPEB interpretation.

Custom-made wooden packaging (FAQ reference: Section X, Q14)

The update provides a particularly useful clarification for industrial and export packaging. Where a company orders custom-made transport packaging and determines or commissions its design and specifications, the ordering company will be considered the manufacturer. The company physically producing the wooden packaging will instead be the supplier and must provide the customer with the technical information necessary to demonstrate compliance. This broadly supports FEFPEB's requested interpretation for packaging engineered around the customer's product, dimensions, handling requirements and transport conditions. A practical distinction will nevertheless need to be made between genuinely custom-designed packaging and standard catalogue products selected by a customer without meaningful input into their design. FEFPEB questions to the Commission is further explaining this.

Treatment of existing stocks (FAQ reference: Section X, Q5)

The Commission confirms that packaging manufactured before 12 August 2026 but not yet placed on the market by that date does not need to be destroyed, remanufactured or physically relabelled.

For these existing stocks, the required packaging identifier and the manufacturer's name and contact details may be provided through a document accompanying the packaging. The FAQ also indicates that accompanying documentation may be used for reusable packaging already placed on the market.

This is relevant to stocks of pallets, boxes, crates and other wooden packaging produced before the PPWR application date and avoids the need for widespread retrospective remarking.

Identification and accompanying documents (FAQ reference: Section X, Q7)

For packaging manufactured after 12 August 2026, the required identification and manufacturer information should normally be affixed directly to the packaging.

However, the Commission confirms that the information may be provided in an accompanying document where the size or nature of the packaging does not allow it to be affixed directly. This must be assessed case by case, taking account of the packaging's physical dimensions, shape and functional characteristics.

This flexibility may be relevant where wooden packaging already carries ownership, phytosanitary, safety, repair or pooling marks, or where repeated handling, repair and exposure to weather make additional labels impractical or unlikely to remain legible. Although the FAQ does not create a blanket exemption for wooden packaging, Members relying on accompanying documentation should be able to explain and document why direct marking is not feasible for the packaging type concerned.

Imported wooden packaging (FAQ reference: Section X, Q11)

The updated FAQ also sets out specific obligations for packaging imported from outside the EU.

From 12 August 2026, the importer must verify that the non-EU manufacturer has:

- completed the applicable conformity-assessment procedure;
- drawn up the EU declaration of conformity;
- complied with the identification requirements; and
- supplied the necessary supporting documents.

The importer must also indicate its own name, trade name or trademark, postal address and available electronic contact details on the packaging or, where that is not possible, in an accompanying document.

These obligations apply even to generic or unbranded imported packaging. The absence of a brand does not remove the importer's responsibility for ensuring that the packaging is compliant and properly documented.

This will be relevant to imported pallets, crates, boxes and wooden packaging components supplied from third countries.

Interaction with food-law information (FAQ reference: Section X, Q13)

The Commission confirms that information already supplied under food legislation will not automatically satisfy the PPWR requirements.

Existing food traceability information will meet Article 15(5) only where it identifies the packaging itself, enables it to be linked to the relevant PPWR declaration of conformity and is provided on the packaging or in an accompanying document in the required manner.

Similarly, the food business operator named under food legislation may not be the same company as the manufacturer of the packaging under the PPWR. Where the same information is intended to fulfil both sets of rules, it must independently satisfy the requirements of each legal framework.

This is particularly relevant to wooden food-contact packaging such as crates, boxes, trays and pallets used in food supply chains.

Conformity assessment for transport packaging (FAQ reference: Section XV, Q11)

The Commission confirms that transport packaging is not exempt from the conformity-assessment requirements.

Different formats—such as pallets, pallet collars, boxes, wrapping and straps—must generally undergo separate assessments and have separate declarations of conformity. This may create a considerable administrative burden where several standard transport-packaging components are used together in one logistics operation.

Reusable pallets and open-loop systems (FAQ reference: Section VIII, Q1; Section XIII, Q2 and Q5)

The FAQ identifies the Euro Pallet as an example of an open-loop reuse system without a system operator.

Packaging circulating in this type of system is exempt from the reusable-packaging label, individual QR-code tracking and reporting of rotations. However, the producer's underlying EPR responsibility remains in place, and the reuse system must include procedures to ensure that EPR obligations are implemented when the packaging becomes waste.

Overall assessment

The updated FAQ supports FEFPEB's position on custom-made packaging and provides useful flexibility for existing stocks, batch-level identification and accompanying documents. I have made a comparative document that show what concerns from our latest document that we wanted to send to the Commission has been fully addressed, partially addressed and not addressed at all.

3. Next phase

THE PPWR APPLIES FROM 12 AUGUST ON BUT THE PHASE OF FURTHER IMPLEMENTATION BY DELEGATED ACTS, WHICH WILL TAKE YEARS FROM, IS LEADING FOR FEFPEB FOCUS ON ADVOCACY PLANNING AND ACTIONS.

In this respect it is interesting to note what the European Commission stated at a recently held meeting on PFAS and Food Packaging:

Subsequently, the priority actions for the rest of the year were presented, notably the Implementing Act on harmonised registration and reporting formats for extended producer responsibility, the Implementing Act on Labelling and the three acts on recycled plastic content. The priorities for 2027 are the Guidelines on packaging bans, the standardisation request for packaging minimisation, the implementing act on the calculation of the reuse rates and Delegated act on the design for recycling criteria. The COM representative gave insight into the preparatory works for each initiative

4. Other urgent topics

a. EC: Have your say Reporting model EPR ([click here](#))

Deadline feedback 10 September 2026

NOTE: Only one category on wood/cork – incl. composite packaging majority wood-cork

20.0 for less than 10 Tonnes packaging per year delivered in EU

20.0 for more than 10 tonnes packaging per year delivered in the EU.

b. Ramboll study / consultation definition minimum number or rotations reusable packaging

Just received and on the agenda of the Task Force PPWR, taking into account a deadline for feedback by 18 September 2026.

Then a final stakeholders workshop is scheduled for mid-October 2026, FEFPEB will take part.

The overall approach by Ramboll is to establish differentiated minimum rotation requirements according to packaging format and material, rather than applying a single threshold across all reusable packaging.

Of particular relevance for FEFPEB, Ramboll currently proposes:

- Wooden pallets: 15 minimum rotations
- Plastic pallets: 20 minimum rotations

FEFPEB will inform the membership on the developments

Best regards,

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Secretary general

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