



1. Developments PPWR

FEFPEB request for clarification on Commission draft notice on PPWR

This month the FEFPEB Task Force PPWR, chairman Marcus Kirschner, sent a request ([click here](#)) for clarification on a Commission draft notice on PPWR.

There are several topics that create the risk of legal uncertainty and disproportionate obligations for wooden transport packaging, main concerns are:

- **Definition of “manufacturer”:** The current interpretation based on who “orders and decides on the design specifications” does not sufficiently reflect commercial realities in wooden transport packaging supply chains. In many cases, the first user who finalises, brands, assembles or deploys the packaging should be considered the manufacturer for PPWR purposes — especially in layered, multi-component seaworthy packaging systems and in open-loop reuse models such as EPAL.
- **Definition of “producer” and EPR allocation:** The draft risks mixing manufacturer and producer roles, potentially reallocating EPR obligations to upstream pallet manufacturers who neither control the placing on the market nor the end-of-life outcome. Existing systems (e.g. Spain, Sweden, Belgium) demonstrate that identifying the first user placing goods on the market as the single producer ensures legal certainty and avoids double counting.
- **Labelling of reusable transport packaging:** The proposed restrictive approach to reuse labelling and retrofitting is not operationally realistic for wooden pallets exposed to harsh handling and long service lives. Retrofitting requirements for assets already circulating in professional supply chains would generate disproportionate cost and environmental burden.
- **Reuse targets in international trade:** Clarification is needed on the application of reuse targets to imported transport packaging and on the definition of “user”, to avoid internal inconsistencies and unintended trade distortions.
- **System operator definition and open-loop exemptions, custom-designed transport packaging documentation, PFAS testing implications for solid wood food-contact packaging, and scope of technical documentation and conformity assessment obligations,** including interpretation of “each type of packaging”.

Given the technical complexity and the importance of ensuring harmonised implementation across Member States, FEFPEB - representing the wooden packaging industry did ask the European Commission to meet with the PPWR team to discuss these points in detail and to contribute constructively to workable clarifications.

2. New LCA study environmental impact one-way pallets published by University of Firenze (Italy)

The work carried out by the University of Florence, in collaboration with ASSOIMBALLAGGI of FEDERLEGNOARREDO, focused on analyzing the environmental impacts of one-way pallets, produced by companies with and without an in-house sawmill.

In accordance with the PCR 2019:13 Packaging, the Life Cycle Assessment (LCA) methodology was applied, which generated results focused on the Climate Change indicator included in the EF 3.1 methodology, considering the upstream, core, and downstream phases.

The results showed that raw material procurement contributes more to fossil fuel emissions than other phases; in fact, the values were 5.14E-01 kg CO₂eq. and 1.43E+00 kg CO₂eq., for the scenarios of companies with and without a sawmill, respectively.

On the other hand, the results associated with biogenic carbon demonstrate how wood offers a significant environmental gain thanks to its ability to absorb CO₂ during its formation, providing, for both scenarios analyzed, a CO₂ storage of -1.77E+01 kg CO₂eq. in companies with a sawmill and -1.81E+01 kg CO₂eq. in companies without a sawmill. Furthermore, the impacts associated with the end-of-life cycle (e.g., waste-to-energy) also result in an environmental gain, although not substantially affecting the overall impacts (-3.59E-01 kg CO₂eq. in companies with a sawmill and -2.15E-01 kg CO₂eq. in companies without a sawmill).

In conclusion, the analysis highlights how biogenic carbon makes custom wooden pallets not only a key indicator of circularity, but a true decarbonization vector capable of actively contributing to the removal of greenhouse gases from the atmosphere.

Please go to [LCA Pallet | FLA](#) for the summary.

3. EUDR: Instructions for the national competent authorities

This is to find a joint recommendation, supported by 19 European organisations and published yesterday ([click here](#)).

CEI Bois is one of the supporting organisations.

In a nutshell, the document reflects a united call from across the value chain on the following key elements:

- A company acting both as operator and first downstream operator should not be required to pass on reference numbers to its clients. This point is of particular importance for sawmills that are also directly involved in harvesting activities.
- Only first downstream operators have the obligation to collect DDS reference numbers from operators. Further downstream operators should not be required to request or collect such information.
- Only first downstream operators should have access to the operator’s DDS via reference and verification numbers; however, the conditions for such access need to be clearly defined.
- Since downstream operators and traders do not have access to due diligence reference numbers beyond the first step of the supply chain, and considering that the systemic obligation of ascertaining under former Article 4(9) has been removed, this obligation cannot be fulfilled in practice.
- It should be clarified that re-importers are considered downstream operators and therefore are not required to submit a new DDS. To facilitate operations, the re-import of in-scope products (or parts thereof) should be accompanied by a conventional DDS number and/or TARIC code to be included in the customs declaration.

Reaching a joint position within a European organisation is inherently complex, as national priorities do not always fully align. Developing a position paper supported by 19 European associations is therefore even more demanding. Each paragraph has been carefully assessed to ensure a balanced and constructive consensus. The result is a position that, while reflecting diverse perspectives, is collectively endorsed across the value chains.

This broad support should be seen as a strong signal of alignment and commitment from the different sectors in the EUDR scope.

Best regards,

Fons Ceelaert
Secretary general

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