



European Federation of Wooden pallet
and Packaging Manufacturers
NEWSLETTER FEFPEB
MAY 2025



Dear FEFPEB partner,

This is to provide you with a new update on the implementation phase of the EUDR as a follow up on previous FEFPEB newsletters, to be found [here on the FEFPEB website](#).

The European Commission published an updated **Guidance Document** and **FAQ**, also the result of efforts to simplify the implementation of the EUDR from 1 January 2026 on.

[Click here on Regulation on Deforestation-free products - European Commission](#) for the full EUDR dossier

These are the important documents and we point at some aspects of specific interest to our industry.

[Click here for the Updated Guidance Document](#)

Very relevant for our industry

- **Definitions** "Placing on the market", "making available on the market", "export" / page 3 and 4
- **Product scope / clarification packing and packaging materials** / page 17 and 18
- **Role of SME and non SME traders / SME companies have limited obligations DDS information** / page 12

[Click here for FAQ's](#)

Relevant issues

- **2.5. How does the Regulation apply to wood and paper used for packaging? (UPDATED)** – page 26
- **2.6. Would the return of a relevant empty packaging by the retailer to its supplier be considered 'making available on the EU market' when the concerned packaging was placed on the EU market in its own right (i.e. standalone packaging) prior to the return? (UPDATED)** – page 26

Advocacy actions

In close alliance with the sub-sector partners in the wood sector and co-ordinated by CEI Bois the questions, observations and suggestions to improve and clarify the content of EUDR were taken on board.

The latest updates on the Guidance Document and the FAQs were discussed in a recently held internal meeting CEI Bois / EOS .

For the wooden pallet and packaging industry the picture has become sharper

- **Packaging is in the scope of the EUDR only when it is placed for the first time on the market or made available in its own right (stand alone packaging), rather than as packaging for support, protection or carrying another product**
- **As soon as the pallet or packaging is used to support, protect or carry another product, it is no longer covered by the EUDR, even if it is listed separately on the invoice of a product or when it is returned by a retailer to its supplier**
- **Once the concerned packaging becomes a packaging material used exclusively as packaging material to support, protect or carry a product, it is then not covered by the scope 27 of the Regulation. This means that selling or renting used packaging material to other companies is not subject to EUDR. Similarly, empty packaging material already used for the first time to support, protect or carry another product, for instance when traded within a closed loop exchange system (i.e., pallets are transferred from one company to another to be reused for transport) is not covered by the Regulation.**
- **If used packaging must be repaired, the EUDR applies only when new timber is used for repair**

What's next?

- **The state of affairs will be one of the key topics on the agenda of the FEFPEB spring meeting, 11 and 12 June Amsterdam to identify remaining questions and matters.**
- **In order to inform and comfort our customers a FEFPEB EUDR statement is under construction, content to be decided upon in Amsterdam.**

We keep the industry informed.



Best regards,

Fons Ceelaert
Secretary general

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