



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



Dear FEFPEB Partner,

This is to receive an update on the current advocacy topics and actions relevant for the wooden pallet and packaging industry

The European Commission launched the initiative to simplify the administrative burdens of EU Environmental Legislation and did ask for feedback by stakeholders.
FEFPEB contributed to the Call of Evidence for an **Environmental Omnibus** with input from our membership.

Two contributions: One specifically dealing with sub-sector concerns on **EUDR**, **PPWR** and **EPR** with the assistance of our *advocacy partner DGA* and one in co-operation with *CEI Bois* on **EUDR**.

1. FEFPEB feedback DGA

For the **formal document** containing our feedback [click here](#).
A **summary** was sent as well and this reads as follows:

The European Federation of Wooden Pallet and Packaging Manufacturers (FEFPEB) welcomes the opportunity to contribute to the European Commission's Environmental Omnibus. Representing national associations and companies active in the manufacture, repair, and trade of wooden pallets and packaging, most of which are SMEs, we emphasize that our products are inherently sustainable, circular, and form critical infrastructure for logistics and trade. Disproportionate regulatory burdens risk undermining both environmental objectives and the resilience of European and global supply chains.
FEFPEB sees the Environmental Omnibus as a chance to align ambition with practicality by simplifying requirements, avoiding duplication, and ensuring legislation works for SMEs. We make the following recommendations:

a. Practical Extended Producer Responsibility (EPR) frameworks

- Apply EPR obligations in only one country, either where packaging is manufactured or first used, to prevent double payments and administrative inefficiencies.
- Adapt obligations to reflect the specificities of B2B packaging, which is often customised, produced in very small batches, and reused multiple times across borders, making detailed reporting impractical.

b. Reduce bureaucratic burden of PPWR compliance

- Exempt wooden packaging from Annex VII (b)–(f) documentation requirements, which replicate obligations designed for other sectors and are unworkable for small-batch, bespoke wooden packaging.
- Exempt packaging batches of fewer than 10,000 units from conformity declarations.

c. Current obligations demand documentation that far outweighs the environmental impact of the products, imposing disproportionate costs on SMEs and hindering efficient operations without delivering meaningful benefits.

d. Simplify and strengthen the EU Deforestation Regulation (EUDR)

- Introduce a zero-risk category for countries where deforestation and illegal logging do not occur, including all EU Member States, and exempt such products from due diligence.
- Delay application of the EUDR until this category is in place.
- Prioritise recognition of existing traceability systems, such as ISPM15, to avoid duplication.

e. As it stands, the EUDR imposes impractical bureaucracy, diverts skilled workers from production, reduces competitiveness, and treats sustainable, circular products as though they carried the same risk as high-risk commodities.

f. Proportionate labelling rules for B2B transport packaging

- Exempt B2B wooden transport packaging from consumer-style labelling under the PPWR.
- Allow reuse and recycling information to be shared via delivery documents rather than physical labels or QR codes, which are impractical in B2B logistics chains.

Conclusion

Wooden pallets and packaging already embody circularity, sustainability, and resource efficiency. The Environmental Omnibus must be used to reduce unnecessary burdens, ensure proportionate rules, and safeguard the competitiveness of SMEs. By adopting FEFPEB's recommendations, the Commission will strengthen supply chain resilience, support a truly circular wooden packaging sector, and achieve environmental goals without undermining the operational realities of industry.

2. CEI Bois feedback on EUDR

Click [here](#) for the official response on the Call of Evidence for the Environmental Omnibus.
And click [here](#) for the link k to the new Advocacy Focus of CEI Bois / September 2025.

3. Delay enforcement date EUDR?

With the enforcement date of 1 January 2026 coming near, national authorities raised their concerns on the implementation difficulties, also related to **Extended Producer Responsibility (EPR)**.

The Austrian Federal Ministry of Agriculture and Environment and Polish Ministry of Climate and Environment have submitted input to the Commission's consultation on the Environmental Omnibus. Both Austria and Poland are calling for a postponement of the PPWR.

In particular:

- **Poland** is requesting a one-year postponement of the “highly detailed” reporting requirements in the PPWR. In addition, the Polish ministry calls for a **delay in the implementation of the EU anti-deforestation obligations** and the removal of several provisions in the EU Industrial Emissions Directive ([click here](#)).
- **Austria** is requesting a postponement of PPWR. The ministry requests postponement, particularly of EPR provisions, until 2028 when the CE Act will potentially enter into force. An interesting ask for FEFPEB is the call for a refined definition of producer and manufacturer within the framework of the CE Act in the legal form of a directive to allow MS to clearly define the entity liable for EPR fee payment ([click here](#)).

The requests from Austria and Poland to postpone the entry into application of PPWR are in line with that of German Federal Minister for Environment, Carsten Schneider, who on 1 September called for the same. It is also plausible that additional countries will follow with similar requests.
The proposal for Environmental Omnibus is expected in October which will give us more clarity on the provisions that the Commission will aim to tackle via the Omnibus and set apart for the CE Act.

It is a high pressure cooker, we follow these developments, keep on acting on it and keep you informed.

4. 72nd FEFPEB congress / Thursday 23 and Friday 24 October 2025 - Vienna call for participation

The congress is coming near, the programme is nearly completed and FEFPEB is looking forward to welcome you as industry partner.
Click [here](#) for information on registration, hotel accomodation and the congress programme.

It is worthwhile to come to Austria for a rewarding concentrated FEFPEB event.



Best regards,

Fons Ceelaert
Secretary general

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