



European Federation of Wooden pallet  
and Packaging Manufacturers  
**NEWSLETTER FEFPEB II**  
**December 2024**



Dear FEFPEB Partner,

FEFPEB is connected to the ongoing EUDR implementation process, in close conjunction with CEI Bois, our Brussels partner for the EU woodworking industries.

EUDR Update:

### 1. EUDR - LAUNCH OF THE EUDR INFORMATION SYSTEM

On 4 December 2024, the European Commission launched the EUDR Information System. The system is now live and available for users to submit and manage Due Diligence Statements.

Kindly note that two systems will run in parallel:

- the LIVE Server of the Information System;
- the ACCEPTANCE Server, which is a replica training platform meant to allow economic operators to get familiar with the Information System.

[Read more](#)

### 2. 30th MEETING OF THE EU DEFORESTATION PLATFORM: CEI-BOIS SUMMARY OF THE MAIN POINTS

On 6 December 2024, CEI-Bois attended in person the 30th meeting of the EU Deforestation Platform.

On this occasion, the European Commission highlighted that a simplification of the EUDR will continue through the updating of the Frequently Asked Questions (FAQ) and the Guidance document.

For this reason, all the questions that were not answered during the meeting can now be submitted to DG ENVI. CEI-Bois will proceed in this way.

Please find here reported a summary of the main updates and clarifying answers provided by the European Commission:

[Read more](#)

### 3. FEFPEB INPUT TO CEI BOIS FOR A.O. DEFORESTATION PLATFORM

This is FEFPEB input to CEI Bois for the meeting of the "Multi-Stakeholder Platform on Protecting and Restoring the World's Forests" on Friday 6 December 2024, with attention for the Guideline and FAQ EUDR.

There is big concern in our industry caused mainly by the fact that there are many elements to be clarified.

For further clarification / confirmation on the impact of the EUDR for the wooden pallet and packaging industry we would like address you with the following.

It is related to **point 2.5 and 2.6 of the updated FAQ** and connected to previous communication.

#### 1. Operators and Traders

**A pallet or packaging manufacturer who is placing on the market** unloaded (stand-alone) packaging material for support, protect or carry another product, in the course of a **commercial activity** and **for the first time** the manufacturer is defined as **"operator"** and covered by the EUDR

If this wooden packaging material is supplied to a customer and used for support, protection or carry of other products, in the framework of commercial activities this customer activity is not covered by the EUDR. Within open pallet pools (EPAL- type): the operator is entitled to produce these pallets which are supplied to the customers.

If the supplier is a **"trader"** who is making the wooden pallets and packaging **available on the market** unloaded (stand-alone) the trader is covered by the EUDR.

If not defined as "operator" these suppliers are regarded "traders"

The traders can be:

1. Trading companies supplied with wood packaging material by operators and deliver the material to their customers for support, protection and carrying of their products
2. Closed pallet pool companies: the pallet pool system is running with wooden pallets supplied by operators, and delivered to customers for transport of their goods, a renting system where the closed pool remains owner of the pallet and secures return of the pallets after a trip and bring the pallets back in the system again. The closed pallet pools are covered by the EUDR and not the customer, that seems to a logic conclusion

Is this correct?

#### 2. Repair

Our interpretation has always been:

If any wooden pallet or packaging is returned to a company and repaired:

- With recycled timber components: no EUDR
- With new timber components: covered by EUDR

This is a question that was submitted to CEI Bois and the EC and the assumption was that if a repaired pallet contains new timber, that (part) of the pallet would be covered by EUDR. No official confirmation that this interpretation is correct has been received.

Is our interpretation correct?

**But now the repair / re-use element of our logistical environment causes great confusion, when reading 2.6 of the FAQ**

- If wooden pallets and packaging are returned by the retailer to its supplier as stand alone wooden packaging this is regarded as making available on the market and covered by the EUDR.
- This would mean that any company using the wooden pallets and packaging for support, protection and carrying of their products and returning the wood packaging to the supplier, the customer was not covered by the EUDR initially but will now be regarded as trader and covered by the EUDR
- Then the supplier brings the wooden packaging material into circulation delivering to the customer as stand alone packaging and then again the supplier again is covered by the EUDR for the second time

**And so on, this seems to be a highly undesirable and unnecessary consequence of the EUDR interpretation and this should be avoided and we advise the following:**

- **A customer using wooden packaging material for support, protection or carry a product should never be covered by the EUDR**
- **A supplier of wood packaging material is only (again) covered by the EUDR when repair is carried out with new timber**

This is certainly not the final input from the different parts of our industry, but the need for clarification must be clear.



Best regards,

Fons Ceelaert  
Secretary general

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