



European Federation of Wooden pallet and Packaging Manufacturers

NEWSLETTER FEFPEB APRIL 2025



A. EUDR update

1. Outcome meeting EU wood sector federations – DG ENV on EUDR implementation

DG ENV oral replies during the meeting on 4 February 2025 are included to the questions and possible solutions jointly submitted by CEI Bois regarding remaining EUDR implementation uncertainties ([click here](#)).

CEI-Bois had collected input from its Members and compiled everything together with the input coming from the other meeting participants, namely CEPI, EFIC, EOS, EPF, ETTF, FEFPEB, and FEP. While not all the questions could be addressed during the meeting given the limited time, DG ENV was nevertheless able to provide oral replies on a significant number of topics, as can be seen in the attached document.

The topic “Wood Pallets and Packaging” clarifies the obligations for manufacturers and repairers linked to new and repaired WPM. Our input has been actively taken on board.

The document is important but not legally binding

2. Feedback meeting “Multi-Stakeholder Platform on Protecting and Restoring the World’s Forest” on 4 March 2025

Here a summary of the relevant points raised. Overall, the meeting focused on providing participants with updates on the ongoing implementation of the EUDR.

In the spotlight: **NEW RELEASED DOCUMENT** “EUDR compliance. Understanding your company position in beef, cocoa, coffee, palm oil, rubber, soy, and wood supply chains.”

KEY ELEMENTS PRESENTED DURING THE MEETING

DG ENV emphasised its engagement with stakeholders in order to be well prepared for the entry into application of the EUDR.

Countries benchmarking: the comitology committee will meet in April.
Broader consultation will be launched soon on the final Study related to the countries benchmarking.

The EU Commission informed that a [new document on the implementation of the EUDR](#) has been published. This document provides an overview of how the obligations apply, depending on the company type (operator/trader), size (non-SME/SME) and position in the supply chain (first placing/downstream) within the EU - illustrated through 11 supply chain scenarios. It is **intended to be read alongside the third iteration of the FAQs and the guidance document**, which give additional detail on obligations, as well as the Regulation itself. The EU Commission emphasised that **this document is not legally binding**.

Competent authorities & EUDR guidelines. A small working group composed of Member States experts has been involved in the preparation of the EUDR guidelines. Therefore, the EU Commission believes that Member States will not divert from the guidelines.

Omnibus. DG ENV believes that the Q&As and the guidelines will serve as instrument to simplify the EUDR therefore DG ENV is not of the opinion that the EUDR shall be re-opened in a legislative process such as the Omnibus, as this will create even more uncertainties in the EUDR applications.

Q&A: April 2025 – a new revised document will be published. The EU Commission anticipated that the following issues will be presented and further clarified in the revised Q&A:

The meaning of the word “ascertain” – and more specifically, Article 4.9 will be better explained. In particular the EC is expected to explain the obligations of downstream operators in relation to “do collect or do not collect” geolocation information.

The role of SMEs as exporters and how they can make use of Article 4.8 when they are exporting.

Definition of “company groups” and the role of SMEs when they are part of a group.

Custom representatives.

Technical clarification on the IS.

E-commerce – new clarifications are also expected to be published.

“Samples”. The EU Commission informs that they are looking at different possibilities as DG ENV is receiving a lot of questions regarding this issue. At the moment, as explained by the EU Commission, the legislative text of the EUDR doesn't foresee any exclusions for “samples” and therefore it will be difficult to find a facilitation solution

To be continued.

B. PPWR Update

1. FEFPEB recommendation for labelling requirements

This recommendation is the follow-up of the meeting Task Force PPWR – DG ENV (Waste Framework Directive & Packaging Team), held on 4 February 2025.

In this meeting FEFPEB was able to present the specific characteristics of our industry related to the discussion on PPWR compliance.

Developing secondary legislation on PPWR FEFPEB will lend technical input to the Commission, on topics such as labelling, reuse, EPV, rotations and reuse targets.

The focus was on the labelling topic and the recommendation was shared with the Commission shortly ([click here for the document](#)).

2. Pallet Wrappings, Straps and Alternatives

On behalf of the EC DG ENV Deloitte interviewed our chairman TF PPWR Marcus Kirschner, on 10 March 2025 on this specific PPWR aspect.

[Click here](#) for the very interesting and detailed input from Marcus.

3. EUROOPEN survival guide

[Click here](#) for a nice publication from EUROOPEN on the PPWR process for your information

C. CEI Bois Advocacy Focus January 2025

The Advocacy Focus March 2025 contains an overview of the CEI Bois activities, including the EUDR ([click here](#)).

D. FEFPEB Federation matters

1. Associazione Filiera Legno – Imballaggi (Italy) new full member FEFPEB

FEFPEB welcomes a second Italian association in the field of wooden pallets and packaging.
The association contains 148 listed members.

Filiera Legno – Imballaggi informed FEFPEB about a steady growth, with a total turnover of € 1,78 billion and nearly 10,000 employees.

Contact information

www.filieralegno.it

info@filieralegno.it

President: Mr Michele Morese

Secretary general: Mr Marco Luchetti

2. SEILA to new offices in France

After 20 years located at 62 Rue de Turbigo / Paris, our French partner association for Industrial Packaging SEILA moved offices to:

120 Avenue Ledru Rollin 75011 Paris.

www.seila.fr

3. FEFPEB spring meeting – 11 and 12 June 2025 / Amsterdam (the Netherlands)

Official FEFPEB representatives received the invitation and programme line up.
Feedback on the meeting will be provided in the June Newsletter.



Best regards,

Fons Ceelaert
Secretary general

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