

PPWR Compliance Statement – Wooden Pallets

Overview The new EU Packaging & Packaging Waste Regulation (PPWR) introduces stricter rules for packaging placed on the EU market.

Wooden pallets are exempt from PPWR reuse obligations (under Articles 26-30) and remain fully compliant as transport packaging.

Wooden pallets remain one of the least-impacted packaging types because the EU recognises them as part of a long-established, high-reuse circular system.

This statement explains how our pallets comply with PPWR and what responsibilities apply to you as the exporter of goods.

1. Wooden pallets are exempt from PPWR reuse obligations

The PPWR sets reuse targets and system requirements for many types of packaging. Wooden pallets are exempt from these reuse **consumer-facing rules**.

This means:

- No reuse targets
- No mandatory reuse system
- No rotation tracking
- No reuse labels or QR codes
- No digital passport requirement

Our pallets already operate within a proven, industry-wide repair and reuse model, which the EU has formally recognised.

2. Our pallets meet all applicable PPWR design and safety requirements

We confirm that our wooden pallets comply with the PPWR's general rules for packaging, including:

- **Recyclability:** Wood is fully recyclable and meets the PPWR Grade B recyclability requirement.
- **Material safety:** We use compliant timber and fasteners with no restricted substances.
- **Minimisation:** Pallets are engineered for performance and contain no unnecessary material.

- **ISPM-15:** All export pallets are heat-treated and marked in accordance with international standards.

3. EPR Responsibilities for Pallets and Packaged Goods (EU Market)

Under EU law, Extended Producer Responsibility (EPR) applies to the company that places packaging on the EU market.

This means:

- If you purchase empty pallets from us for use outside the EU, no EPR obligations apply to either party.
- If you import our pallets into an EU Member State, you become the “producer” of that packaging and are responsible for EPR registration and reporting in that country.
- If you export goods into the EU on our pallets, you are responsible for EPR obligations related to the *packaged goods* you place on the market.
- We will provide pallet specifications (material, weight, recyclability) if required for your EPR reporting.

In short: EPR follows the packaging placed on the EU market. For goods shipped into the EU, EPR follows the goods, not the pallet. For empty pallets imported into the EU, EPR follows the pallet.

4. What you can expect from us

- Full PPWR-compliant documentation
- Clear pallet specifications for your EPR reporting
- Consistent ISPM-15 compliance
- A stable, circular, repairable packaging solution recognised by the EU as low-impact and high-reuse

DISCLAIMER: The guidance in this document is offered for informational purposes only to support understanding of PPWR requirements. It does not constitute legal advice, create any legal obligations, or replace the need for independent professional assessment. Organisations remain responsible for ensuring their own compliance with all applicable laws and regulations.