

## **EPAL EUDR-Information for users of EPAL pallets**

### **EUDR compliance of the use of EPAL pallets** **No separate EUDR obligations of the users of EPAL pallets**

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According to the current status, the EU Deforestation Regulation (EUDR) will come into force on December 30, 2025. However, the provisions of the EUDR do not apply to users of EPAL pallets, i.e., all companies that deliver goods to their customers on EPAL pallets, or to the recipients of the goods.

Users of EPAL pallets are therefore not affected by the provisions of the EUDR and do not have to observe or fulfill any EUDR obligations:

#### **Loaded EPAL pallets are exempt from the application of the EUDR**

The provisions of the EUDR are not applicable if the EPAL pallets are used for the delivery of goods (see section 1 below).

The supplier of goods and the consignee of goods are therefore not affected by the EUDR.

#### **Used empty EPAL pallets are exempt from the application of the EUDR**

The provisions of the EUDR are not applicable if used EPAL pallets are returned as part of reuse and pallet exchange (see point 2 below).

The EPAL pallet exchange is therefore not affected by the EUDR.

#### **When purchasing and passing on new EPAL pallets, pallet users do not have any EUDR obligations**

The purchase and replacement delivery of new and used EPAL pallets is not subject to EUDR obligations for users of EPAL pallets (see point 3 below).

In detail:

### **1 EUDR does not apply to the supply of goods on EPAL pallets**

The provisions of the EUDR apply only to the supply of new unloaded wooden pallets. The provisions of the EUDR do not apply to loaded EPAL pallets. The supplier of the goods and the consignee of the goods therefore do not have to observe or comply with any EUDR obligations.

Explanation:

Annex I to the EUDR specifies the EUDR-relevant products. However, paragraph 4415 explicitly excludes loaded wooden pallets (and other loaded wooden packaging) from the application of the EUDR. This is also explicitly confirmed in point 2.5 of the EU Commission's FAQ on the EUDR (version 4, April 2025).

### **1.1 Suppliers of goods**

The provisions of the EUDR do not apply to companies that use EPAL pallets to deliver goods to their customers. Suppliers of goods are therefore not obliged to pass on EUDR-relevant information to their customers. This applies to the use of new EPAL pallets as well as to the use of used EPAL pallets.

Explanation:

See pont 1 above: Loaded EPAL pallets are exempt from the application of the EUDR.

### **1.2 Consignees**

The provisions of the EUDR do not apply to companies that receive goods from their suppliers on EPAL pallets. The consignees are therefore not obliged to check the EUDR conformity of the EPAL pallets or to accept or request EUDR-relevant information and to collect such information. This applies both to the delivery of goods on new EPAL pallets and to deliveries of goods on used EPAL pallets.

Explanation:

See pont 1 above: Loaded EPAL pallets are exempt from the application of the EUDR.

## **2 EUDR does not apply to the return of empty used EPAL pallets as part of the pallet exchange**

The provisions of the EUDR also do not apply to pallet exchange in the open EPAL pallet pool, i.e. to the return delivery or collection of used empty EPAL pallets after they have been used for goods deliveries.

Explanation:

The EU Commission has clarified in point 2.6 of the FAQ on the EUDR (version 4, April 2025) that the return of empty wooden packaging after it has been used does not fall under the EUDR. In the new version of Annex I to the EUDR, which was presented by the EU Commission in April 2025, used wooden packaging like EPAL pallets is generally excluded from the application of the EUDR.

### **2.1 Return or redelivery of used (empty) EPAL pallets**

The provisions of the EUDR do not apply to the return or return of used EPAL pallets, e.g. as part of the EPAL pallet exchange. This applies regardless of which form of pallet exchange is practiced. The sale of used EPAL pallets is also exempt from the application of the EUDR.

Companies that have received goods on EPAL pallets and then return the empty EPAL pallets to the goods supplier, to the freight forwarder or to a service provider therefore do not have to observe or fulfil any EUDR obligations. In particular, they do not have to collect and store EUDR data or pass it on to the pallet recipient.

Explanation:

See point 2 above: Used EPAL pallets are exempt from the application of the EUDR.

### **2.2 Return or purchase of used (empty) EPAL pallets**

The provisions of the EUDR do not apply to the return or purchase of used EPAL pallets, e.g. in the context of the EPAL pallet exchange. The recipient of the used (empty) EPAL pallets does not have to observe or comply with any EUDR obligations.

This applies to goods suppliers who collect or accept the used EPAL pallets, as well as to other companies that support the pallet exchange and reuse of EPAL pallets, e.g. service providers, pallet traders and freight forwarders. All of these companies do not need to collect and store EUDR data or share it with third parties.

Explanation:

See point 2 above: Used EPAL pallets are exempt from the application of the EUDR.

### **3 EUDR does not apply to the replacement supply of new EPAL pallets**

As part of the EPAL pallet exchange, users may be obliged to replace lost or damaged EPAL pallets. If used EPAL pallets are purchased and delivered for this purpose, this is exempt from the application of the EUDR (see point 2 above).

If new EPAL pallets are purchased and delivered – either from a pallet manufacturer or from a pallet trader – the provisions of the EUDR are generally applicable to these new EPAL pallets. However, only the suppliers of the new EPAL pallets (manufacturers or traders) are affected. If the suppliers of new pallets are based in the EU, they are not obliged to pass on the EUDR data to buyers and users. There is therefore no obligation on the part of the buyers and users to check the EUDR conformity of the new EPAL pallets or to collect EUDR data or to document the purchase in any other way in accordance with EUDR.

The purchase of new EPAL pallets is therefore also not associated with additional EUDR obligations for the EPAL pallets users (goods suppliers and consignees).

Explanation:

According to Articles 4 and 5 of the EUDR, the EUDR obligations apply only to so-called operators (i.e. the manufacturers of new pallets) and to traders of EPAL pallets who place new EPAL pallets on the market for the first time. The delivery of the new EPAL pallets to the users is the placing on the market, not the first use of new EPAL pallets by the users. The users of EPAL pallets are therefore not market operators and traders within the meaning of the EUDR.

Users of EPAL pallets, such as goods suppliers and consignees, therefore do not have to observe or fulfil any EUDR obligations when purchasing and delivering new and used EPAL pallets.

### **4 Summary: No disadvantages for users of EPAL pallets due to the EUDR**

The provisions of the EUDR do not apply to users of new and used EPAL pallets. For users of EPAL pallets, the start of the application of the EUDR on 30.12.2025 will therefore not entail any additional work or any other disadvantage.

The EUDR conformity of EPAL pallets is guaranteed and documented solely by the manufacturers and traders of the new EPAL pallets. Suppliers and consignees of goods as well as other users of EPAL pallets do not have to check the EUDR conformity of EPAL pallets themselves and therefore do not have to receive, check or collect EUDR data.

If, despite the lack of obligation, users of EPAL pallets wish to document the EUDR conformity of the new EPAL pallets they purchase, e.g. as part of their sustainability reporting, they can agree with the suppliers of new EPAL pallets to communicate the EUDR reference number of the new EPAL pallets. In contrast to other pool systems, the open EPAL pallet pool offers complete transparency of the origin of the pallets, including the IPPC and EPAL marking on the centre blocks.

European Pallet Association e.V.  
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