



## FEFPEB POSITION STATEMENT / 22 FEBRUARY 2019

### **“NO DEAL” EXIT UNITED KINGDOM : STATEMENT FOR WOODEN PALLETS AND PACKAGING**

Wooden pallets and packaging move the world, 85% of all transport of goods worldwide is on or within Wood Packaging Material (WPM).

Supply chains cannot work without wooden packaging and therefore any major disruption to the circulation of wooden pallets and packaging has immense repercussions on the trade of goods between countries.

The FAO Guideline ISPM 15 contains requirements for WPM to reduce the risk of the spreading of quarantine pests. Pallets and Packaging moving between the European Union and third countries (other continents) need to be ISPM 15 compliant.

For intra EU movement of WPM ISPM 15 is not required (with the exception of Portugal), because the risk of pest infestations is regarded as low. FEFPEB supports this position (see the attached FEFPEB statement /comments from 2008 and 2013).

In case of a “no deal” Brexit post 30 March 2019, the United Kingdom will be regarded as third country and the consequence will be that all WPM moving between EU and UK must meet the requirements of ISPM 15.

If the UK will be leaving the EU without a deal, it does not change the plant health risk between the EU and UK and FEFPEB therefore strongly advocates maintaining the current situation, no ISPM 15 requirements for flows between EU and UK.

This would be the best solution for WPM and logistics in general, if the EU (and the UK!) are willing to approach this issue from the phytosanitary perspective.

FEFPEB is however aware of the broader scope and the enormous legal and political impact of Brexit. If it is therefore decided that WPM moving between EU and UK must be ISPM 15 compliant after 30 March 2019, FEFPEB calls for a pragmatic implementation and controlling policy, in order to allow an orderly transition period and thereby avoid a disastrous disruption of trade post Brexit.

A phase-in period to increase and adapt the Heat Treatment capacity of the industry would be of the essence.

We estimate a realistic requirement of one year in general and two years for the pallet pools, with many millions of wooden pallets in circular economic re-use models in circulation and palletized goods already in the supply chain.

Costs for investments in HT capacity are substantial as official EU studies have established and timescales for implementation lengthly.

Phytosanitary checks by the NPPO's will continue to be carried out in the EU and UK on a risk-targeted basis, a pragmatic approach for WPM must be possible, given the low phytosanitary risk of WPM used in EU-UK flows. The UK government has already indicated that it will take such a pragmatic approach (reference the attached statement of 19 February 2019).

FEFPEB continues dialogues with the EU and UK partners to ensure uninterrupted transport with WPM, deal or no deal Brexit.

#### **ABOUT FEFPEB**

*Since 1946, Fédération Européenne des Fabricants de Palettes et Emballages en Bois (FEFPEB) - the European Federation of Wooden Pallet and Packaging Manufacturers - has been the recognized European representative organisation of national timber packaging associations, including*

- *Pallets*
- *Lightweight packaging*
- *Industrial packaging*
- *Pallet Pools*

*FEFPEB is a "not for profit" organisation representing the manufacturers, repairers and traders in the field of wooden packaging and related institutions and organisations.*

*FEFPEB's objectives include the promotion of timber packaging and to represent the interests of the European wooden pallet and packaging industry.*

#### **MEMBERS**

*18 European countries, of which 16 are represented by their national professional associations of wooden pallet and packaging manufacturers, are full members of FEFPEB. Multiple companies involved in the industry, including suppliers of timber and timber blocks, machines and equipment are associated or individual members. The major European pallet pools (EPAL, CHEP, LPR, IPP Logipal and PRS) all belong to FEFPEB as full member, which together own or regulate more than billion timber pallets worldwide, have a pallet pools membership*