



FEFPEB STATEMENT

16 September, 2020

A position statement on ISPM15 enforcement after Brexit

By the European Federation of Wooden Pallet and Packaging Manufacturers (FEFPEB)

Wooden Packaging Material (WPM), including pallets and lightweight and industrial wooden packaging are critical to the smooth trade of goods between countries. This was evidenced during the recent COVID 19 lockdown periods earlier this year, when the governments of several countries in Europe designated the manufacture and repair of pallets and packaging as 'essential' sectors, which should continue operating throughout the pandemic restrictions to ensure supplies of items including food, drink and pharmaceutical goods.

If the production, repair or movement of WPM becomes disrupted, vital international supply chains are also disrupted.

When the UK fully leaves the EU on January 1st, 2021, there will be an important change in the law governing movements of wood packaging material (WPM) between these now separate markets. From this date, all WPM moving from the UK to the EU and vice versa must be compliant with International Standard for Phytosanitary Measures no.15 (ISPM15) regulations. This means the WPM must have received heat treatment – or another equivalent treatment – and be clearly marked as such.

The current enforcement regime for ISPM 15 between EU countries is based on the fact that the plant health risk of WPM movements in these areas of the world is negligible. When the Brexit transition period ends at the end of 2020, this risk to plant health will not change. The wooden packaging industry is therefore clear in its assertion that there is no scientific or fact-based justification for a change in the rules or enforcement regimes applied at EU and UK borders from January 1st, 2021.

The European Federation of Wooden Pallet and Packaging Manufacturers (FEFPEB) has been liaising with industry representatives in the UK and Europe. Together, we want to ensure we take an aligned approach to this important issue.

This means:

- Continuing to work together to ensure that there are sufficient stocks of ISPM15-compliant WPM available for January 1st, 2021
- Asking plant health authorities in each EU country for confirmation that they will continue to employ a risk-based approach to ISPM15 enforcement after Brexit. This would be fully consistent with current EU legislation relating to ISPM15 - and would allow member states to continue to do this after 1st January, 2021

In the UK, TIMCON has engaged the government's Department for Environment, Food & Rural Affairs (DEFRA). They have issued a joint position statement in which TIMCON states that its members are working hard to increase production and treatment capacity to ensure adequate stocks of ISPM15-compliant pallets and packaging; and Defra clarifies that it advocates the continuation of a risk-based approach to enforcement to WPM movements entering the UK after Brexit.

It is important, and in everybody's interest, that we seek similar clarifications from the national wooden pallet and packaging associations and plant health authorities across Europe. FEFPEB is therefore now calling on all its national association members to communicate the following points to their own membership:

- Continue to expand your treatment and production capacity to provide an increase in stocks of ISPM15-compliant pallets and packaging to cover the demand for ISPM 15 compliant wood packaging material
- Encourage your national government departments/national plant protection organisations (NPPOs) for clarity on the ISPM15 enforcement regime after Brexit

FEFPEB is engaging other EU organisations to further communicate the importance that ISPM15 inspections in all EU member states should continue to be carried out on the current low-risk basis.

We will also be reminding key parties of the following facts about wooden packaging and pallets.

They are:

- The most cost-effective means of transporting goods
- A key part of a truly circular economy (sustainable, repairable, reusable, recyclable)
- The most hygienic choice of transit packaging
- The preferred choice of transit packaging for many years

We strongly recommend you act on this issue. It is in the interest of businesses, and ultimately consumers, in both the UK and the EU that we take an aligned approach – and that we speak with a joint voice across the UK and EU markets.

About FEFPEB

- The European Federation of Wooden Pallet & Packaging Manufacturers (Fédération Européenne des Fabricants de Palettes and Emballages en Bois – FEFPEB) represents European national timber packaging associations, including the pallet, lightweight packaging and industrial packaging sectors. It was established in 1946.
- It is a not for profit organisation, whose objectives include promotion of timber packaging and representing the interests of the European wooden pallet and packaging industry.
- National professional associations of wooden pallet and packaging manufacturers are full members of FEFPEB.
- Other 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 (including EPAL, CHEP, LPR, IPP Logipal and PRS) are also part of FEFPEB.

For more information, please contact: info@fefpeb.eu