

## EU-Verpackungspläne gefährden den europäischen Warenhandel

Für die deutsche Industrie sind Verpackungen aus Holz lebensnotwendig zum Schutz und Transport von Gütern und Hightech-Produkten. In der Holzindustrie wiederum ist die gesamte Wertschöpfungskette am Kreislauf der Holzverpackungen beteiligt: Von der Sägeindustrie, aus der die Rohware für diese Holzverpackungen stammt, bis hin zur Holzwerkstoffindustrie, die Paletten und Kisten weiterverwertet.

In Brüssel sehen sich die deutsche Holzverpackungsindustrie und ihre Unternehmen nun durch die aktuellen Pläne zur EU-Verordnung über Verpackungen und Verpackungsabfälle (PPWR) massiv bedroht. Trotz Bemühungen zur Nachjustierung seitens der europäischen Institutionen sind unmittelbare negative Folgen für Handel und Verbraucher zu befürchten. Der Fokus des Entwurfs liegt bislang voll auf dem Kunststoff- und dem B2C-Bereich. Nicht ansatzweise jedoch werden die aktuellen Entwürfe den im B2B-Bereich eingesetzten Paletten und Exportverpackungen aus Holz gerecht.

Eine entsprechende komplette Ausnahme von der PPWR wäre der logische Schritt, um den Stärken und besonderen Eigenschaften des nachwachsenden Rohstoffes Holz gerecht zu werden – und um schweren Schaden von den Logistikketten und damit der deutschen Wirtschaft abzuwenden.

In Erwartung gravierender, negativer Auswirkungen auf die gesamte deutsche und europäische Wirtschaft, auf die Logistikketten und die Versorgung der Bevölkerung, formuliert die deutsche Holzindustrie folgende **Kernforderungen**:

- **Kein geschlossenes Kreislaufsystem, da dies verhindert, Holzabfälle zu langlebigen Anwendungen/Produkten zu recyceln. (Artikel 3)**
- **Verpflichtungen im Zusammenhang mit Leerraum/ übergroßen Verpackungen: Industrieverpackungen für Produkte über 100 kg sind auszuschließen. (Artikel 21)**
- **Keine obligatorische Verwendung von rezyklierten Materialien: Forderungen nach Recyclingholzeinsatz muss sich immer an der technischen Machbarkeit orientieren. (Artikel 6)**

Für die Diskussion auf europäischer Ebene wurden nachfolgend die wesentliche Kritik am Entwurf erläutert und konkrete Änderungsvorschläge formuliert. Detaillierte Vorschläge finden sich in der Europäischen Holzpaletten- und Verpackungsverbands (FEFPEB) in **Anlage 1**.

## Article 3 Definitions:

**32a) (new).** ‘High quality recycling’ means any recovery operation, as defined in Article 3, point (17), of Directive 2008/98/EC, that ensures that the distinct quality of the collected and sorted waste is preserved or recovered during that recovery operation, so that the resulting recycled materials are of sufficient quality to substitute primary raw materials **‘for packaging or other applications’**.

31. ‘Recyclability’ means the gradual suitability of any given packaging that is designed for recycling and leads to, after being recycled at scale, sufficient quality compared to the original material to substitute primary raw material.

### Justification:

**We support the EP definition of High-Quality Recycling along with clarification phrase of ‘for packaging or other applications’.** It is important to have an open loop approach for high-quality recycling to allow packaging wood waste to be recycled into different applications (mainly panel boards). Panel boards have an average lifetime of 20 years and can be recycled several times in cascade-use (as well as pallet-blocks) making it a long-lasting qualitative application.

## Article 21 – Obligation related to excessive packaging

1. By 1 January 2030, economic operators who fills the packaging in grouped packaging, transport packaging or e-commerce packaging, ***except for packaging of products weighing more than 100 kgs***, shall ensure that the empty space ratio is minimised in line with the provisions laid down in Part 1 of Annex IV, unless it is required to protect and transport fragile goods or it would lead to an increased amount of packaging material due to the specific shape of the product or sales packaging.

**By 3 years after the entry into force of this Regulation, the Commission is empowered to adopt implementing acts in accordance with Article 58 to establish the methodology for the calculation of the empty space ration set out in paragraph 1.**

The methodology shall take into account the special characteristics of packaging which needs to be placed in an empty space large enough to comply with applicable legal requirements or to protect the product, in particular concerning packaged products of irregular shapes, packaging containing more than one sales packaging or product, packaging containing liquid products, packaged products the content of which can easily be damaged, packaged products that can be damaged by larger products due to their small dimensions, and the minimum space on the transport packaging to enable attachment of the shipment labels.

### Justification:

**Industrial packaging is developed to fit to purpose ensuring that the product is protected and delivered safely. To reduce the empty space in packaging of heavy products with irregular shapes, much more material will have to be used and the process to produce it will**

be more complicated and costly. In addition, they will be more complicated to handle in the logistics chain. Safety of the workers who handle the packaging will also be reduced as it will be more prone to accidents. Hence, **industrial packaging for products weighing more than 100 kg should be exempted from complying with mandatory empty space ratio.** We support the EP position adding the exemption for products weighing more than 100 kgs and the Council text on secondary legislation.

## Article 6 (4) Recyclability of all Packaging on the Market

By 1 January 2028, the Commission shall after consulting the Packaging Forum established under Article 12a and taking into consideration standards developed by the European Standards Organizations, in order to adopt implementing acts to establish:

a) design for recycling criteria and recycling performance grades based on the parameters listed in Table 2a of Annex II for packaging categories listed in Table 1 of that Annex.

Design for recycling criteria and recyclability performance grades shall:

(i) take into account the ability of packaging waste to be separated into different material streams for recycling, sorted and recycled, so that the resulting secondary raw materials are of sufficient quality compared to the original material and can be used to substitute the primary raw materials for packaging or other applications where the quality of the recycled material is retained, where feasible.

(ii) consider established collection, sorting and recycling processes proven in an operational environment;

(iii) exclude materials or products, in such cases, where the use of secondary raw materials is technically impossible, from the obligation to have a minimum recycled content

(b) provide how to perform recyclability performance assessment and express its result in recyclability performance grades

(c) provide a framework concerning the modulation of financial contributions to be paid by producers to comply with their extended producer responsibility obligations set out in Article 40(1), based on the packaging recycling performance grades.

(d) When adopting the implementing acts referred to in the first subparagraph, the Commission shall take into account the results of the assessment, if any, carried out pursuant to Article (5)(1)(a). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 59(3).

### Justification:

**No mandatory use of recycled materials:** For some packaging materials the use of recycled material is technically not feasible (e.g. pallet boards, plywood made from veneer). In such cases, where the use of secondary raw materials is technically impossible, a minimum recycled content cannot be prescribed without effectively banning entire types of packaging.

Therefore, a requirement for the use of recycled wood must always be based on technical feasibility. We urge you to ensure that this exemption remains possible.

Folgende Verbände der Deutschen Holzindustrie unterstützen diese Position.



Hauptverband der Deutschen Holz und Kunststoffe verarbeitenden Industrie und verwandter Industriezweige



HPE Bundesverband Holzpackmittel - Paletten - Exportverpackungen



Deutsche Säge- und Holzindustrie Bundesverband



Verband der Deutschen Holzwerkstoffindustrie



Bundesverband Deutscher Fertigbau



Verband der Deutschen Möbelindustrie



Verband Fenster + Fassade



Verband der Deutschen Parkettindustrie

Studiengemeinschaft Holzleimbau e.V.

Studiengemeinschaft Holzleimbau



Bundesverband Innenausbau



Interessenverband Nageplatten



Bundesverband Bestattungsbedarf