



THE OPEN PALLET POOL.

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**Statement by the European Pallet Association (EPAL)  
Delegated Act  
on the exemption of pallet wrappings and straps  
from the reuse obligations under Article 29(2/3) PPWR**

**EPAL supports the Commission's proposal to exempt pallet wrappings and straps from the obligation to reuse them in full (100%) pursuant to Art. 29 (2/3) PPWR.**

**Pallet wrappings and straps are essential for the functioning of pallet logistics and thus for the entire transport and storage logistics chain. Even minor disruptions to pallet logistics therefore have an immediate negative impact on the supply of goods to industry and private households. As there is currently no realistic and scalable alternative to conventional, non-reusable pallet wrappings and straps, the introduction of a 100% reuse obligation would lead to serious disadvantages for industry and trade in Europe.**

**1 No adequate alternative available**

There is currently no reusable alternative to conventional, non-reusable pallet wrappings and straps that has identical technical properties, and it is not foreseeable that adequate and scalable alternatives will be available in the near future.

In particular, there is no reusable alternative to shrink pallet wrappings, which is essential for stabilising goods on pallets. This applies both to the technical properties of the pallet wrappings and to the use of used pallet wrappings in automated systems for packaging goods on pallets using pallet wrappings and straps. Where experimental solutions do exist, they have no realistic prospect of successful scaling. However, this would be necessary to avoid disruptions to a large number of supply chains.

**2 No reverse logistics and reuse systems**

The reuse of pallet wrappings and straps requires a reuse system and reverse logistics to ensure collection, sorting, cleaning and distribution. Neither of these exist. Given the special characteristics of pallet wrappings and straps, it is also unlikely that pallet wrappings and straps will be able to be removed without damage in the future. However, this is a prerequisite for pallet wrappings and straps to meet the standard of new pallet wrappings and straps and thus be able to replace them through reuse.



### **3 Disproportionate costs**

The use of alternative pallet wrappings and straps for goods stored and transported on pallets would entail disproportionate additional costs for industry, trade and logistics. On the one hand, these additional costs would result from efficiency losses in pallet logistics. On the other hand, the costly introduction of a reuse system that does not currently exist would involve considerable additional expenditure. Both would impair the competitiveness of European companies and lead to cost increases for the end consumer.

### **4 Disruption of logistics processes**

Abandoning the pallet wrappings and straps currently in use would lead to massive disruptions to logistics processes and supply chains. In the context of the increasing automation of logistics processes, it is essential that there is no threat of disruption to the automated transport and storage of goods. However, this would be the case if less suitable wrapping of goods on pallets meant that they no longer had uniform dimensions or if goods fell off during transport.

### **5 Protection of people and goods**

Pallet wrappings and straps are of central importance for the safety of goods logistics. Shrink pallet wrappings in particular effectively prevent stacked goods from falling, which can lead to both personal injury and damage to the goods. With the widespread storage of palletised goods in high-bay warehouses, it is essential that no goods can fall off the pallets. However, this can only be ensured by pallet wrappings and straps that meet the technical specifications of the pallet wrappings and straps commonly used today, which are non-reusable.

Without a suitable alternative, a 100% reuse obligation for pallet wrappings and straps would therefore be disproportionate due to the associated risks to people and goods.

### **6 Priority for recycling and increasing the recycling rate**

The open EPAL pallet pool is a prime example of the reuse of packaging and the avoidance of plastic packaging, because EPAL pallets are a perfect alternative to disposable pallets and plastic pallets.

However, there is currently no such alternative for pallet wrappings and straps. As long as no adequate alternative exists, a 100% reuse obligation must not be used to introduce a de facto ban on the pallet wrappings and straps commonly used today.

Instead, the recycling and recycled content of pallet wrappings and straps should be increased to compensate for the disadvantage of their lack of reusability. Manufacturers of pallet wrappings and straps have already made significant progress in this area, which should be encouraged. This will achieve the same or possibly even better protection of resources and avoidance of plastic waste than would be the case with a 100% reuse obligation for pallet wrappings and straps.

EPAL therefore strongly supports the Commission's proposal to exempt pallet wrappings and straps from the reuse targets set out in Article 29 (2/3) PPWR. The delegated act proposed by the Commission is the right way to ensure that the PPWR is implemented in a way that reflects the practical reality of modern supply chains and combines the objectives of the PPWR with the interests of European industry, trade and logistics in a practical and proportionate manner.

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