



A Draft Commission Directive amending Annexes II, III, IV and V to Council Directive 2000/29/EC on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community

**ORGALIME POSITION PAPER
Brussels, 17 September 2003**

Orgalime speaks for 32 trade federations representing some 130,000 companies in the mechanical, electrical, electronic and metalworking industries of 21 European countries. These industries employ some 7.5 million people and account for 1200 billion Euro of annual output, which is a quarter of the EU's output of manufactured products and a third of the manufactured exports of the European Union.

Introduction

In 2002 the industries which Orgalime represents, traded goods to a value of 637 Billion Euros of which 263 Billion Euros outside the EU. Orgalime industries are therefore major users of pallets, box pallets and other load boards made in wood that will be affected by the proposed directive.

Before 2001, the EU had no regulation for the treatment of wood used in packages for international trade.

In October 2001, the EU introduced emergency measures in respect of wood packing comprised in whole or part of non-manufactured coniferous wood originating in Canada, China, Japan and the United States of America, in order to prevent the introduction and spread within the EU of organisms harmful to plants. These measures list certain requirements regarding treatment of wood and the officially approved marking. Some member states introduced their own design for marking to show that pallets of European origin were fulfilling the requirements regarding treatment if and when re-entering Europe.

In 2002, a new standard for packaging wood was adopted in draft form by FAO/IPPC. The final version with the IPPC tree mark was launched in June 2003. During the transition period, national legislation was accepted. A registration number and the treatment used had to be indicated according to the standard.

Under the present draft Commission Directive amending Annexes II, III, IV and V to Council Directive 2000/29/EC, the Commission aims to introduce a new marking standard that will replace all national markings that have been applied until now.

Many companies use the same pallets and boxes for both imports of material and parts and exports of products. As a consequence the directive would, if adopted in its present form, require re-marking of pallets used by companies in our industry.

Orgalime position

Orgalime welcomes the Commission's commitment to better protect Europe from organisms harmful to plants or plant products. We fully agree that pallets used for exportation and importation should be treated in a way to prevent spread of harmful organisms in the EU. Nevertheless, as re-marking of existing pallets would have a major impact, we would like to express our complains and concerns.

Orgalime would welcome:

- A longer transition period in order to enable old pallets to be replaced by new pallets marked according to the new directive. It should be taken into account that, although the lifetime of pallets and boxes obviously depends on the number of rotations and on construction, it is not unusual for such pallets to have a lifetime of 10 years.
- Avoiding a situation in which companies have to destroy or re-mark old pallets that fulfil all requirements but do not have the latest markings launched between 2001 and 2002.

Orgalime believes that these measures are important for the following reasons:

1. Destruction of pallets would be a waste of natural resources, which is contrary to the Commission's policy.
2. Re-marking and re-certification of pallets and boxes would create a massive flow of unnecessary road traffic.
3. Destruction and re-marking would give rise to unnecessary costs for companies in general.

Orgalime further believes that there is no scientific or technical justification for banning the continued use of wood packing material that was subject to an approved measure at the time of manufacture, and that was certified as such according to the official procedures of the authorities in the country where it was produced.

Orgalime believes that ideally the directive should be applicable to new products alone. Otherwise, we would recommend the proposed transition period (2004- 2006) to be extended to a period of 7 years from the date of publication. Such a transition period need only apply to existing stocks of pallets and boxes.