

PAKi Managed Open Pooling for PPWR-Ready Pallet Flows

The PPWR (Regulation (EU) 2025/40) requires reusable transport packaging, including pallets, to circulate within a reuse system. The European Commission explicitly identifies the Euro pallet as an example of an open-loop reuse system that can operate without a system operator or central system management. The Commission Guidance of 5 June 2026 and the PPWR FAQ of August 2026 further clarify the applicable roles and requirements, including labelling, rotations and Article 29 reuse targets.

PAKi adds a managed service layer to standardised open-loop pallet flows. Through account logic, return incentives, collection, redistribution, quality processes, reconditioning support and digital transaction evidence, PAKi helps customers reduce operational complexity, increase control and transparency, and manage reusable transport packaging efficiently across partners and locations.

Product-level conformity and pooling service operation are separate. For EPAL Euro pallets, product-level conformity with PPWR requirements under Articles 5–12 is evidenced by the EPAL EU Declaration of Conformity within its stated scope. In standard PAKi open pooling flows, PAKi acts as distributor and managed open pooling service provider, not as manufacturer or designer of the EPAL Euro pallet. For other load carriers, the applicable evidence depends on the respective carrier type, manufacturer, standard owner, licensor or supplier documentation.

Regulatory scoping, Article 29 target assessment and formal compliance assessment remain with the responsible economic operator using the transport packaging.

1 The decision-relevant question

PPWR does not mandate a specific pooling model or require an open-loop reuse system to have a system operator. For standard Euro pallets, the key question is therefore not whether an open-loop reuse system exists, but how the specific pallet flow operates within that system. For customers, the focus therefore shifts to the specific pallet flow, available evidence and the obligations applicable to their role:

How well are my pallet flows managed and evidenced, and which PPWR obligations apply to my specific flows and role?

Article 27(3) PPWR allows economic operators to appoint a third party to be responsible for one or more mutualised reuse systems. PAKi provides a managed open pooling service layer for defined customer flows. Any formal role for PAKi as an appointed third party or system operator depends on the specific contractual setup and flow.

2 What PPWR requires for reusable pallet flows

PPWR requirement	What it means for pallet flows	PAKi's answer
Participation in a reuse system (Art. 27 + Annex VI)	Economic operators using reusable packaging must participate in one or more reuse systems meeting the applicable Annex VI requirements.	The Euro pallet is recognised as an open-loop reuse system that can operate without a system operator. PAKi adds a managed service layer through account logic, return incentives, collection, redistribution, quality processes and reconditioning support, providing a consistent way to manage pallet flows across multiple partners and locations.

PPWR requirement	What it means for pallet flows	PAKi's answer
Rotation requirements and reporting (Art. 11 + Annex VI)	Reusable packaging must be designed to ensure the future minimum number of rotations. Open-loop reuse systems without a system operator are exempt from calculating and reporting the number of rotations achieved.	PAKi provides structured data on pallet movements, balances and returns, complemented by independently reviewed LCA evidence on average use, providing consistent transparency and supporting evidence across PAKi-managed flows.
40 % reusable target by 2030 (Art. 29)	At least 40% of relevant transport packaging must be reusable within a reuse system by 2030, subject to the applicable scope, exemptions and calculation methodology. Target assessment and reporting remain with the responsible economic operator.	PAKi helps customers manage and scale reusable pallet flows across its European network and provides consistent data on volumes handled through PAKi accounts, supporting target management across locations and partners.

Sources: Regulation (EU) 2025/40; Commission Notice C(2026) 3702 final, 5 June 2026; European Commission, PPWR Frequently Asked Questions, 2nd ed., August 2026; RDC Environment, Comparative Life Cycle Assessment of pallet systems, 2024.

3 Reuse-system participation is not ownership-based

PPWR recognises both open-loop and closed-loop reuse systems. For customers using standard Euro pallets, the practical element to be considered is how efficiently their flows are managed and how much transparency and evidence they have. PAKi managed open pooling can therefore be compared with self-managed or bilateral pallet exchange and one-way pallet usage:

Criterion	PAKi managed open pooling	Self-managed or bilateral exchange	One-way
Reuse-system participation	Managed service layer within the recognised open-loop Euro pallet system.	Can also operate within the open-loop system, depending on the specific flow and setup.	Not a reuse system.
Return & settlement	Account logic, defined return processes, fees and settlement provide a structured approach to managing pallet returns and balances.	Return and settlement processes depend on the arrangements between the involved parties.	No return-for-reuse loop.
Collection & redistribution	European network supports collection and redistribution across customer locations and trading partners.	Depends on the customer's own network and bilateral arrangements.	No redistribution for reuse.

Criterion	PAKi managed open pooling	Self-managed or bilateral exchange	One-way
Flow transparency & evidence	Structured account data on movements, balances and returns provides consistent visibility across PAKi-managed flows, complemented by independently reviewed LCA evidence.	Depends on the customer's systems, data and arrangements with individual partners.	No reuse-flow evidence.
CO₂e performance	LCA-backed environmental advantage within the scenarios and assumptions assessed.	Depends on process design, transport distances and handling.	Highest CO ₂ e impact among the scenarios assessed in the RDC LCA.

Sources: Regulation (EU) 2025/40; European Commission, PPWR Frequently Asked Questions, 2nd ed., August 2026. Environmental comparison: RDC Environment, Comparative Life Cycle Assessment of pallet systems, 2024, ISO 14044:2006 compliant and independently reviewed; results apply to the scenarios and assumptions assessed.

4 How PAKi manages open-pooling flows

Six operational elements provide customers with greater structure, control and transparency across their load-carrier flows:

1. Standardised reusable load carriers

Euro pallets, UIC pallets, Euro box pallets and Düsseldorfer pallets, where applicable. Standardised specifications enable exchange and reuse across companies and locations within PAKi's network. Product-level conformity is evidenced through documentation from the relevant manufacturer, standard owner, licensor or supplier; for EPAL Euro pallets, PAKi refers to the EPAL EU Declaration of Conformity within its stated scope.

2. Managed account logic

Participants operate through PAKi account structures. Orders, returns and releases are debited and credited per transaction, creating consistent operational records of pallet movements and balances.

Example: a customer orders 1,000 pallets in a quality defined in the "Quality guide for load carrier qualities at PAKi". If the customer later releases 800 pallets of the same quality, the account shows an outstanding balance of 200 pallets. This account logic works across physical collection, original pallet vouchers and PAKi eVouchers.

3. Return incentives and settlement

Pallet debts, credits, delay fees, storage fees and settlement processes provide structured financial and operational incentives to return or pass on load carriers, while making outstanding balances transparent and manageable.

4. Collection and redistribution infrastructure

Ordering, release, pick-up, drop-off and redistribution are supported through PAKi's European network in 32 countries. Customers can return pallets where they are available and order them where they are needed, supporting redistribution across locations and trading partners.

5. Quality and reconditioning support

Load carriers must meet the applicable exchange, quality and repair criteria. For EPAL Euro pallets, this includes EPAL technical specifications and repair standards; for other standardised load carriers, the applicable carrier-specific standards and exchange criteria apply. PAKi Field Service can support customers on site with quality or repair-related issues, helping keep load carriers fit for continued reuse.

6. Digital flow transparency and evidence

PAKi pallet accounts provide digital records of pallet movements, balances, orders and returns. Portal, eVoucher and Drop & Drive add transaction evidence where used. The RDC LCA (ISO 14044:2006) complements this operational data with independently reviewed average-use data (28 average uses) and environmental performance evidence. PAKi data provides additional transparency for managed flows and complements, but does not replace, the manufacturer's documentation of compliance with future minimum-rotation requirements.

5 What PAKi provides and what remains with the operator

PAKi provides operational and product-related evidence for defined pallet flows and supports flow-specific role clarification. The responsible economic operator determines the applicable PPWR scope, Article 29 obligations and final compliance assessment.

PAKi provides	Responsible operator determines
Product conformity evidence where available. For EPAL Euro pallets, PAKi refers to the EPAL EU Declaration of Conformity within its stated scope.	Whether additional product-level documentation is required for other load carriers or specific flows.
Structured operational evidence from PAKi-managed flows, including transaction, balance and return data.	Which flows and volumes fall within PPWR scope and how they are included in the operator's Article 29 target assessment and reporting.
Flow-specific clarification of PAKi's role as distributor, managed pooling service provider or, where contractually defined, an appointed third party.	Final PPWR applicability and compliance assessment for the specific flows, countries, contractual roles and reporting scope.

6 Next steps: PAKi PPWR Flow Assessment

PAKi works with logistics and supply chain teams to map existing pallet flows, identify potentially PPWR-relevant volumes and align PAKi account and evidence structures with operational and reporting needs. The starting point is a structured flow assessment covering your carrier mix, transaction volumes, flow setup and reporting requirements.

Contact your PAKi contact person or info@paki-logistics.com to discuss a PPWR Flow Assessment. Further information: paki-logistics.com

Legal note: PAKi provides managed open pooling services and supporting operational evidence for pallet flows under Regulation (EU) 2025/40. In standard EPAL Euro pallet flows, PAKi acts as distributor and managed pooling service provider, not as manufacturer; PAKi refers to the EPAL EU Declaration of Conformity within its stated scope. Any formal role for PAKi as an appointed third party or system operator depends on the specific contractual setup and flow. Final PPWR scope, Article 29 target assessment and compliance responsibility remain with the relevant economic operator. The RDC Environment LCA (ISO 14044:2006) provides environmental performance evidence and is not a regulatory compliance certificate.