

EU Declaration of Conformity

Pursuant to Article 39 and following the model structure in Annex VIII of Regulation (EU) 2025/40 on packaging and packaging waste.



1. Declaration reference

Data point	Value
DoC number	QPALL-PPWR-DOC-PG-001-V01
Issue date	07/08/2026
Drawing / specification reference	Drawings and/or packaging specifications are registered in the controlled technical file.
GTIN/Product reference	SKU: 1.QP1111MB3R-AS, 1.QP1140MB3R-PAS, 1.QP1208MB3RR, 2.QP1111MB3R-AS, 2.QP1140MB3RR, 2.QP1208MB3RR, 2.QP1210MB3RR, 3.QP1111MB3R-AS, 3.QP1140MB3R-PAS, 3.QP1140MB3RR, 3.QP1208MB3RR, 3.QP1210MB3RR, 4.QP1208MB3RR, 4.QP1210MB3RR, 5.QP1208MB3RR, QP1111MB3R-SSB, QP1140MB3R-PAS, QP1212MB3RR, QP4048MB3RR

2. Manufacturer

Data point	Value
Company name	Q-PALL B.V.
Registered address	Edisonweg 9, NL-5466 AR Veghel, The Netherlands
Contact person, department	John van Boesschoten, PPWR Compliance
Email / phone	boesschoten@qpall.com · +31 413 353 111

3. EU Authorised Representative

Data point	Value
Applicability	Not applicable - the manufacturer has not appointed an EU authorised representative.

4. Packaging Identification & Description

Data point	Value
Article Code / Item Number	1.QP1111MB3R-AS, 1.QP1140MB3R-PAS, 1.QP1208MB3RR, 2.QP1111MB3R-AS, 2.QP1140MB3RR, 2.QP1208MB3RR, 2.QP1210MB3RR, 3.QP1111MB3R-AS, 3.QP1140MB3R-PAS, 3.QP1140MB3RR, 3.QP1208MB3RR, 3.QP1210MB3RR, 4.QP1208MB3RR, 4.QP1210MB3RR, 5.QP1208MB3RR, QP1111MB3R-SSB, QP1140MB3R-PAS, QP1212MB3RR, QP4048MB3RR
Article / Item Name	Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium; Plastic pallet 1140 x 1140 x 150 open deck 3 runners medium; Plastic pallet 1200 x 800 x 145 open deck 3 runners medium; Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium; Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium; Plastic pallet 1200 x 800 x 145 open deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium; Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium; Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium; Plastic pallet 1200 x 800 x 145 open deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium; Plastic pallet 1200 x 800 x 145 open deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium; Plastic pallet 1200 x 800 x 145 open deck 3 runners medium; Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium; Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium; Plastic pallet 1200 x 1200 x 156 open deck 3 runners medium; Plastic pallet 1220 x 1020 x 150 open deck 3 runners medium
Packaging type	Tertiary · Pallet
Primary Materials	Plastic / Mix HDPE / PP 100.0%
Material identification	>PE-HD+PP<
Product Category & Intended Use	Transport packaging
Compostable	No compostability requirement or claim

5. Packaging component summary

Component description	Material / specification	Nominal weight per sales unit
Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	11.700 g
Plastic pallet 1140 x 1140 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	13.600 g
Plastic pallet 1200 x 800 x 145 open deck 3 runners medium	Plastic · Mix HDPE / PP	11.400 g
Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	11.700 g
Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium	Plastic · Mix HDPE / PP	15.400 g
Plastic pallet 1200 x 800 x 145 open deck 3 runners medium	Plastic · Mix HDPE / PP	12.000 g
Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	15.600 g
Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	11.700 g
Plastic pallet 1140 x 1140 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	13.600 g
Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium	Plastic · Mix HDPE / PP	15.400 g
Plastic pallet 1200 x 800 x 145 open deck 3 runners medium	Plastic · Mix HDPE / PP	12.000 g
Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	15.100 g
Plastic pallet 1200 x 800 x 145 open deck 3 runners medium	Plastic · Mix HDPE / PP	12.000 g
Plastic pallet 1200 x 1000 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	14.000 g
Plastic pallet 1200 x 800 x 145 open deck 3 runners medium	Plastic · Mix HDPE / PP	12.000 g
Plastic pallet 1100 x 1100 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	12.300 g
Plastic pallet 1140 x 1140 x 156 open deck 3 runners medium	Plastic · Mix HDPE / PP	13.600 g
Plastic pallet 1200 x 1200 x 156 open deck 3 runners medium	Plastic · Mix HDPE / PP	16.700 g
Plastic pallet 1220 x 1020 x 150 open deck 3 runners medium	Plastic · Mix HDPE / PP	17.200 g

6. PPWR Conformity Assessment summary

PPWR requirement	Evidence / comments	Conformity conclusion
Article 5 - substances in packaging	Heavy metals: Q-Pall internal XRF screening is available for incoming recycled material; the supplied 2025/2026 overview contains 97 measurements and reports an average measured total of 42 ppm. The current analyser measures total chromium and does not distinguish Cr(VI). Supporting documentation does not yet fully substantiate this requirement for the complete declared scope. The declared packaging is not identified as food-contact sensitive. Therefore the PFAS limits specified under Article 5 of PPWR does not apply. Other substances of concern: Supplier statements address SVHC content at the 0.1% threshold and applicable REACH requirements. Supporting documentation does not yet fully	PFAS: Not applicable. Heavy metals and Other substances of concern: Based on the information currently available, no evidence of non-conformity with Article 5 has been identified. However, the supporting documentation does not yet cover the full declared packaging scope, and conformity therefore cannot be fully confirmed. The relevant supplier(s) have been requested to provide the missing information. This document will be reviewed and, where necessary, updated once the requested documentation has been received.

PPWR requirement	Evidence / comments	Conformity conclusion
	substantiate this requirement for the complete declared scope.	
Article 6 - recyclable packaging	The Q-Pall packaging master data records a recyclability rate of 100% for every declared packaging item.	Evidence coverage: Complete Current legal status: Not yet applicable in August 2026 Overall Article 6: Reassessment required when the PPWR Design for Recycling criteria apply.
Article 7 - minimum recycled content in plastic packaging	Recorded technical documentation reports recycled-content value(s) of 96 and Mix HDPE / PP; Mix HDPE / PP / LDPE for its stated material scope.	Evidence coverage: Complete Current legal status: Not yet applicable in August 2026 Overall Article 7: Reassessment required when the recycled-content targets and calculation rules apply.
Article 8 - biobased feedstock in plastic packaging	No bio-based plastic feedstock claim has been identified for the declared scope.	Article 8: Not applicable - no bio-based plastic feedstock claim identified.
Article 9 - compostable packaging	No compostability requirement or claim.	Article 9: Not applicable for the declared packaging scope.
Article 10 - packaging minimization	Packaging dimensions are identified in the Q-Pall item names and unit weights are recorded for every declared packaging item.	Evidence coverage: Complete Current legal status: PPWR Article 10 is not yet applicable in August 2026; transitional PPWD minimisation requirements remain relevant through 2029 Overall Article 10: Maintain the current technical basis and complete the PPWR assessment when the future methodology applies.
Article 11 - reusable packaging	The Q-Pall packaging master data records the use cycle as Reusable for every declared packaging item.	Evidence coverage: Complete Overall Article 11: Reusable-packaging evidence is available; minimum rotation requirements must be reassessed when the applicable implementing rules take effect.
Article 12 - labelling of packaging	Q-Pall identifies the current recycled-polyolefin formulations as >PE-HD+PP< or >PE-HD+PP+PE-LD< using ISO 11469 / ISO 1043 polymer-mixture notation. For legacy/market-practice plastic identification the mixed-polymer pallets are recorded as code 7 / Other plastics rather than code 2 / HDPE. The current Q-Pall pallet portfolio uses two recorded recycled polyolefin formulations: Mix HDPE / PP and Mix HDPE / PP / LDPE. A third formulation is expected for future SKUs but has not been added because the SKU/formulation data have not yet been supplied.	Evidence coverage: Complete Article 12(1): Not applicable to this ordinary transport packaging scope (excluding e-commerce packaging). Article 12(2): The packaging is reusable; reusable-packaging information requirements must be assessed in line with the applicable reuse system and the relevant implementing rules. Current identification: >PE-HD+PP<.

7. Standards & technical specifications applied

Standard / specification	Applicability	Scope
Regulation (EU) 2025/40	Full	Applicable requirements in Articles 5-12
EN 13430:2004	Not specifically referenced	Supplier recyclability information is available, but the recorded facts do not specifically reference EN 13430:2004.
EN 15343:2007	Not specifically referenced	Recycled-content information is available, but the recorded facts do not specifically reference EN 15343:2007.
EN 13432:2000	Not applicable	No industrial compostability requirement or claim
EN 17427:2022	Not applicable	No home-compostable claim identified
EN 13428:2004	Partial	Transitional packaging minimisation input
EN 13429:2004	Reusable packaging indicated in packaging data	Reusable packaging evidence
Decision 97/129/EC	Partial	Packaging material identification codes where currently applied

8. Notified body or third party

Data point	Value
Notified under PPWR	Not applicable - internal production control under Annex VII Module A

Data point	Value
External laboratory / test evidence	No specific supporting information is recorded because this requirement has been assessed as not applicable to the declared packaging scope.
Laboratory role	No specific supporting information is recorded because this requirement has been assessed as not applicable to the declared packaging scope.
Reference reports	Supporting supplier evidence is registered in the controlled technical file. Detailed supplier and document information is restricted to the internal Supplier evidence tab.

9. Union legislation applicable for this conformity statement

Legislation	Applicability statement
Regulation (EU) 2025/40 - PPWR	Applicable to the declared packaging scope, with individual requirements assessed according to their application dates.
Directive 94/62/EC - PPWD	Transitional requirements remain relevant where expressly applicable before the corresponding PPWR requirements apply.
Decision 97/129/EC	Material-identification codes apply where currently used on the packaging.

10. Declaration, sign-off and change control

Data point	Value
Declaration statement	This declaration of conformity is issued under the sole responsibility of the manufacturer identified in Section 2. On the basis of the technical details and documentation referenced herein, the manufacturer declares that the packaging system identified in Sections 4 and 5 fulfils all currently applicable requirements laid down in or pursuant to the configured Articles of Regulation (EU) 2025/40 for the declared status and application dates.
Signed for and on behalf of	Q-PALL B.V.
Place and date of issue	Veghel · 07/08/2026
Name of person signing for the manufacturer	Bjorn Oosterhof
Function / title	Managing Director
Signature	
Document retention, category & period	10 years after the packaging has been placed on the market
Update triggers	Update on a change in component supplier, Packaging Item, material composition, component weight, group scope, SKU intended use, supporting evidence or an applicable PPWR implementing/delegated act.
Annexures available upon request	Annexure A - Packaging identity, PPWR role map and traceability; Annexure C - Substances, PFAS and food-contact compliance evidence