

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-005-V02
Issue date	12/08/2026
Drawing / specification reference	Drawings and packaging specifications are registered in the controlled Technical Documentation File.
GTIN/Product reference	SKU: 2.QP1208MB3RR-CD, 2.QP1210MB3RR-CD, 3.QP1208MB3RR-CD, 4.QP1208MB3RR-CD, 4.QP1210MB3R-CD-AO, 4.QP1210MB3RR-CD, 5.QP1208MB3R-CD-AO, 5.QP1208MB3RR-CD, QP4048MB3RR-CD

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 is established in the European Union and has not appointed an EU authorised representative.

4. Packaging Identification & Description

Data point	Value
Article Code / Item Number	2.QP1208MB3RR-CD, 2.QP1210MB3RR-CD, 3.QP1208MB3RR-CD, 4.QP1208MB3RR-CD, 4.QP1210MB3R-CD-AO, 4.QP1210MB3RR-CD, 5.QP1208MB3R-CD-AO, 5.QP1208MB3RR-CD, QP4048MB3RR-CD
Article / Item Name	Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 closed deck 3 runners medium; Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 closed deck 3 runners medium; Plastic pallet 1200 x 1000 x 150 closed deck 3 runners medium; Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium; Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium; Plastic pallet 1220 x 1020 x 150 closed 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	Reusable transport packaging for professional handling, storage and logistics
Compostable	No compostability requirement or claim

5. Packaging component summary

Component description	Material / specification	Nominal weight per sales unit
Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium	Plastic · Mix HDPE / PP	13.800 g
Plastic pallet 1200 x 1000 x 150 closed deck 3	Plastic · Mix HDPE / PP	15.700 g

Component description	Material / specification	Nominal weight per sales unit
runners medium		
Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium	Plastic · Mix HDPE / PP	14.000 g
Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium	Plastic · Mix HDPE / PP	13.800 g
Plastic pallet 1200 x 1000 x 150 closed deck 3 runners medium	Plastic · Mix HDPE / PP	17.000 g
Plastic pallet 1200 x 1000 x 150 closed deck 3 runners medium	Plastic · Mix HDPE / PP	14.000 g
Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium	Plastic · Mix HDPE / PP	14.800 g
Plastic pallet 1200 x 800 x 145 closed deck 3 runners medium	Plastic · Mix HDPE / PP	13.800 g
Plastic pallet 1220 x 1020 x 150 closed deck 3 runners medium	Plastic · Mix HDPE / PP	17.800 g

6. PPWR Conformity Assessment summary

PPWR requirement	Evidence / comments	Conformity conclusion
Article 5 - substances in packaging	The declared packaging has been assessed against the substance requirements of Article 5 of Regulation (EU) 2025/40 (PPWR). Supporting material assessments, supplier declarations, REACH compliance information and analytical test evidence are maintained in the controlled Technical Documentation File. The Product does not contain intentionally added PFAS and is intended for the transport and storage of packaged goods and is not intended to come into contact with food.	COMPLIANT. The Product complies with the substance requirements of Article 5 of Regulation (EU) 2025/40 (PPWR). The sum of the concentration levels of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) is below the regulatory limit of 100 mg/kg (100 ppm). As the Product is not food-contact packaging, Article 5(5) PPWR is not applicable.
Article 6 - recyclable packaging	The pallets are designed for material recycling. Product construction, material identification and recyclability evidence are maintained in the controlled Technical Documentation File.	The declared packaging is recyclable. Future performance-grade and recycling-at-scale requirements will be assessed from the dates specified in Article 6 and the relevant delegated/implementing acts.
Article 7 - minimum recycled content in plastic packaging	Technical documentation records recycled content and chain-of-custody information for the declared Mix HDPE / PP material scope.	Minimum recycled-content percentages apply from 1 January 2030, subject to applicable scope, calculation rules, exemptions and implementing measures. Controlled review is scheduled accordingly.
Article 8 - biobased feedstock in plastic packaging	No bio-based plastic feedstock claim is made for the declared scope.	No current product requirement applies to the declared pallets under Article 8.
Article 9 - compostable packaging	The declared durable plastic pallets are not intended or claimed to be compostable.	Not applicable to the declared packaging scope.
Article 10 - packaging minimization	Dimensions, unit weights, functional requirements, durability and reusable design are documented per product. Weight and volume are limited to what is necessary for functionality, safety and repeated use.	The specific Article 10 minimisation obligation applies from 1 January 2030. The assessment will be maintained under the applicable methodology.
Article 11 - reusable packaging	The pallets are conceived, designed and manufactured for repeated professional use. The criteria in Article 11(1)(a)-(i) are addressed in the controlled Technical Documentation File: (a) intended for reuse; (b) designed for multiple rotations; (c) compliant with health, safety and hygiene requirements; (d) unloadable without loss of function; (e) inspectable, cleanable and, where appropriate, repairable; (f) reconditionable while maintaining function and safety; (g) capable of carrying required labels/information; (h) safely handleable and usable; and (i) recyclable at end of life.	COMPLIANT - reusable packaging. Supporting design specifications, performance data where applicable, durability information, inspection/cleaning instructions and repair or reconditioning evidence are controlled in the Technical Documentation File.
Article 12 - labelling of packaging	Current material identification is >PE-HD+PP< in accordance with the applied polymer-mixture notation. Reuse and traceability information is maintained for the declared scope.	Current applicable identification requirements are met. Harmonised PPWR material-composition and reusable-packaging labelling will be implemented from the dates determined by Article 12 and the relevant implementing acts.

7. Standards & technical specifications applied

Standard / specification	Applicability	Scope
Regulation (EU) 2025/40	Full	Applicable requirements in Articles 5-12; Article 39; Annex VII Module A; Annex VIII.
EN 13427	Applicable framework	Framework for use of European packaging standards.
EN 13428:2004	Applicable	Prevention by source reduction / minimisation assessment.
EN 13429:2004	Applicable	Reusable packaging and reuse-system considerations.
EN 13430:2004	Applicable	Packaging recoverable by material recycling.
EN 15343:2007	Applicable where relevant	Plastics recycling traceability and assessment of recycled content.
EN 13432:2000	Not applicable	No industrial-compostability requirement or claim.
Decision 97/129/EC	Where currently applicable	Packaging material identification codes.

8. Notified body or third party

Data point	Value
Notified under PPWR	Not applicable - conformity assessment is based on internal production control under Annex VII Module A.
External laboratory / test evidence	A notified body is not required. Supplier, material and analytical evidence used in the conformity assessment is referenced in the controlled Technical Documentation File.
Laboratory role	External or internal testing is used where appropriate to substantiate product, material and substance characteristics; it does not transfer the manufacturer's responsibility.
Reference reports	Supporting evidence and report references are registered in controlled file QPALL-TDF-PPWR-PG-005.

9. Union legislation applicable for this conformity statement

Legislation	Applicability statement
Regulation (EU) 2025/40 - PPWR	Applicable to the declared packaging scope, with each requirement assessed according to its application date and relevant implementing/delegated acts.
Directive 94/62/EC - PPWD	Transitional requirements remain relevant only where expressly applicable before the corresponding PPWR requirements apply.
Regulation (EC) No 1907/2006 - REACH	Applicable substance and supply-chain information requirements are addressed in the Technical Documentation File.
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 conformity assessment and controlled Technical Documentation File referenced herein, Q-PALL B.V. declares that the packaging identified in Sections 4 and 5 fulfils all requirements of Regulation (EU) 2025/40 that are applicable to the declared scope on the date of issue.
Signed for and on behalf of	Q-PALL B.V.
Place and date of issue	Veghel · 12/08/2026
Name of person signing for the manufacturer	Bjorn Oosterhof
Function / title	Managing Director
Signature	
Technical Documentation File	QPALL-TDF-PPWR-PG-005

Data point	Value
Document retention, category & period	10 years after the packaging has been placed on the market, in accordance with the applicable PPWR requirement.
Update triggers	Update following a change in product/SKU scope, component supplier, material composition, component weight, intended use, supporting evidence, applicable standard, or relevant PPWR delegated/implementing act.
Annexures available upon request	Annexure A - Packaging identity, PPWR role map and traceability; Annexure B - Reusability and performance evidence; Annexure C - Substances, supplier/material and analytical evidence; Annexure D - Recyclability and recycled-content evidence.
Change control	V02: declaration made legally consistent; Article 5 stated compliant; Article 11(a-i) expanded; detailed evidence, measurements, uncertainties and gap analysis moved to the controlled Technical Documentation File; application-date nuances and standards updated.

This Declaration reflects the legal requirements applicable on the date of issue and will be reviewed and updated when additional PPWR requirements, delegated acts or implementing acts become applicable.