



EPAL sample form

EU Declaration of PPWR Conformity for EPAL Euro pallets

pursuant to Art. 39 PPWR in conjunction with Annex VIII PPWR

Version: 1.1 (July 2025)

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Note:

This sample form of the EU Declaration of Conformity for EPAL Euro pallets is a draft and is based on the legal situation in July 2025. It is subject to changes in the legal situation due to future EU implementing laws (delegated acts) and implementing regulations of the EU Commission. EPAL will continuously adapt the sample form to the development of the delegated acts and the implementing regulations insofar as they relate to the EU declaration of conformity and the requirements to be demonstrated therein. EPAL will publish the final version of the sample form in good time before the start of the obligation to submit EU declarations of conformity for the PPWR conformity of packaging in accordance with Art. 39 PPWR on 12 August 2026.

1 EPAL Declaration of Conformity No. 1: EPAL Euro pallets

The declaration of conformity applies to EPAL Euro pallets (EPAL1 pallets).

EPAL Euro pallets are flat wooden pallets with dimensions of 1,200 mm x 800 mm x 144 mm (W/L/H).

2 Name and address of the manufacturer of the packaging (EPAL Euro pallet)

The manufacturer of the packaging (manufacturer of EPAL Euro pallets) is the following company, which is approved by EPAL for the production of EPAL Euro pallets:

..... (from August 2026: Name and address of the manufacturer of the packaging)

3 Organization responsible for the standardized specifications of the packaging (EPAL Euro pallet)

The standardized specifications of the packaging (EPAL Euro pallet) are regulated by:

European Pallet Association e.V. (EPAL)

Hamborner Str. 55, 40472 Düsseldorf (Germany)

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The open EPAL pallet pool is a reuse system in accordance with Art. 29 (1) PPWR.

The EPAL association and the EPAL pallet pool organised by EPAL meet all the requirements for reuse systems in the form of an open loop system in accordance with Annex VI, Part A, Nos. 1 and 3 of the PPWR.

4 Responsibility of the manufacturer of the packaging (EPAL Euro pallet) for the correctness of the declaration of conformity

The manufacturer of the packaging referred to in number 2 (manufacturer of EPAL Euro pallets) is solely responsible for the conformity of the EPAL Euro pallets to be specifically assessed with the provisions of the PPWR and the specifications of EPAL.



5 Subject matter and description of the packaging (EPAL Euro pallet)

EPAL Euro pallets have the following essential properties:

- EPAL Euro pallets (EPAL1 pallets) are **flat wooden pallets** with dimensions of 1,200 mm x 800 mm x 144 mm (W/L/H).
- EPAL Euro pallets are **transport packaging** in accordance with Art. 3 (7) PPWR and Art. 29 paras. 1-3 PPWR. They are used for the transport of goods between companies and their premises as well as for the storage of goods by companies.
- EPAL Euro pallets are **reusable packaging** in accordance with the EN 13429:2004 standard and in accordance with Art. 11 Para. 1 PPWR and Art. 29 Para. 1-3 PPWR. Reuse takes place in the open EPAL pallet pool, an open loop reuse system in accordance with Annex VI of the PPWR, Part A. Using EPAL Euro pallets therefore fulfills the obligations for the use of reusable packaging regulated in Art. 29 Para. 1-3 PPWR.
- EPAL Euro pallets are not intended for delivery to consumers or for use by consumers.

The other specifications of EPAL Euro pallets are presented in the Technical Drawing (**Annex 1**) and the Technical Documentation (available from September 2025).

6 Relevant EU legislation, compliance with which is confirmed by this EU Declaration of Conformity

EPAL Euro pallets meet the requirements of PPWR conformity in accordance with Art. 39 PPWR in conjunction with Art. 5-12 PPWR:

6.1 Art. 5 PPWR – Requirements for substances in packaging

EPAL Euro pallets meet the requirements of Art. 5 PPWR for substances in packaging. Boards and solid wood blocks from EPAL Euro pallets do not contain any substances of concern.

Wood-chip blocks from EPAL Euro pallets can contain heavy metals and/or formaldehyde. Their concentration and emissions comply with the provisions of Regulation (EC) No. 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and Regulation (EU) 2023/1464 amending the REACH Regulation.

6.2 Art. 6 PPWR – Recyclable packaging

EPAL Euro pallets meet the requirements of Art. 6 PPWR for the recyclability of packaging.

All components of EPAL Euro pallets (wooden boards, wooden blocks or wood-chip blocks as well as steel nails) can be 100% recycled. Wood material and metals can be easily separated during recycling. There are specific waste streams for the recycling of wood and wood-based materials as well as for the recycling of metal (steel nails). By recycling EPAL Euro pallets, secondary raw materials of sufficient quality are obtained to replace primary raw materials (wood chips and scrap metal).

6.3 Art. 7 PPWR – Minimum recycled content in plastic packaging

6.4 Art. 8 PPWR – Bio-based raw materials in plastic packaging

EPAL Euro pallets are not plastic packaging.

Art. 7 and 8 PPWR therefore do not apply to EPAL Euro pallets.



6.5 Art. 9 PPWR – Compostable packaging

EPAL Euro pallets are not compostable packaging.

Art. 9 PPWR therefore does not apply to EPAL Euro pallets.

6.6 Art. 10 PPWR – Minimization of packaging

EPAL Euro pallets meet the requirements of Art. 10 PPWR for packaging minimisation.

The dimensions, weight and volume of EPAL Euro pallets are solely due to the requirements for stability and safety in transport and warehouse logistics as well as the special requirements for reusable packaging set out in Art. 11 PPWR.

6.7 Art. 11 PPWR – Reusable packaging

EPAL Euro pallets are reusable packaging in accordance with Art. 11 PPWR. They are used for an average period of about 7 years. EPAL Euro pallets complete an average of 5-10 cycles per year, depending on the intended use (transport or storage) and the type of product being transported or stored.

EPAL Euro pallets meet the following requirements for reusable packaging in accordance with Art. 11 para. 1 PPWR:

- **Art. 11 paragraph 1a PPWR**

- Purpose and design for reuse**

- EPAL Euro pallets are intended to be used over a period of several years. They are designed and produced to be so stable that they have a high load capacity of 1,500 kg and can therefore be used and reused as an exchange pallet by different companies from all industries. The high quality of EPAL Euro pallets as the basis for reuse is guaranteed by the internationally uniform and independent quality assurance of production and repair with more than 25,000 unannounced inspections per year.

- **Art. 11 paragraph 1b PPWR**

- Suitability for maximum number of re-uses (rotations)**

- EPAL Euro pallets are designed to be so stable that they are suitable for a very large number of applications and rotations. Damage (e.g. from forklifts and pallet trucks) can be easily repaired by replacing damaged components, so that reuse can then continue. The reuse of EPAL Euro pallets has been practised in national and international processes and supply chains in transport and warehouse logistics since 1991.

- **Art. 11 paragraph 1c PPWR**

- Respect for consumer health, safety and hygiene**

- The use of EPAL Euro pallets is not associated with any risks to the health of the users or to safety and hygiene. The restriction to only a few materials (wood and wood-based materials as well as nails made of steel) and the complete avoidance of plastics prevents a health-endangering impairment of the environment (e.g. no abrasion of microplastics). EPAL Euro pallets can be easily cleaned in the event of soiling. Wood has an antibacterial effect and reduces the risk of adverse effects on hygiene in the event of contamination.



▪ **Art. 11 paragraph 1d PPWR**

Unloading without damaging the packaging and without impairing reusability

EPAL Euro pallets can be loaded, unloaded and reloaded manually or automatically without damaging the EPAL Euro pallet.

Even in the event of foreseeable misuse during unloading, the stable construction of the EPAL Euro pallet means that there is generally no damage and therefore no impairment to the reuse of the EPAL Euro pallet.

▪ **Art. 11 paragraph 1e PPWR**

Unloading and reloading without damaging the packaged product and in compliance with safety and hygiene regulations

EPAL Euro pallets can be loaded, unloaded and reloaded manually or automatically without damaging the goods transported or stored on the pallets. There are no safety hazards associated with loading, unloading and reloading if the generally applicable occupational safety regulations are observed. Contamination of EPAL Euro pallets that occurs during unloading or reloading can be easily removed by cleaning and does not pose any hygiene risks.

▪ **Art. 11 paragraph 1f PPWR**

Possibility of reconditioning (repair) without impairing the intended functions

EPAL Euro pallets can be easily repaired by replacing damaged or missing components (boards and blocks) with new or reclaimed components. There are more than 1,300 EPAL-licensed repair shops in almost all European countries. After repair, EPAL Euro pallets can be reused for the transport and storage of goods without any restrictions.

▪ **Art. 11 paragraph 1g PPWR**

Possibility of labelling

EPAL Euro pallets can be marked by branding or inkjet printing. The marking is applied to the outside of the blocks on the long side (1200 mm side) of the pallet. The marking "EPAL in oval" documents the reusability of the EPAL Euro pallet and its exchangeability in the open EPAL Euro pallet pool.

▪ **Art. 11 paragraph 1h PPWR**

Unloading and reloading without endangering the health and safety of persons

EPAL Euro pallets can be loaded, unloaded and reloaded manually or automatically. This does not pose any risks to the health and safety of persons if the generally accepted regulations of occupational safety are complied with (e.g. use of work gloves, safety shoes and safety helmets, observance of safety regulations for forklifts, pallet trucks, automated systems and racks, etc.).

▪ **Art. 11 paragraph 1i PPWR**

Compliance with the requirements for the recyclability of packaging pursuant to Art. 6 PPWR

EPAL Euro pallets meet the requirements for the recyclability of packaging in accordance with Art. 6 paras. 1 and 2 PPWR. All components of EPAL Euro pallets (wooden boards, wooden blocks or blocks made of wood-based materials as well as steel nails) can be 100% recycled. The materials of the components (wood and steel) can be easily and effectively separated and sorted and collected in specific waste streams. The recycled material can be reused, e.g. wood chips for the production of wood chip pallet blocks and scrap metal for the production of pallet nails.



6.8 Art. 12 PPWR – Labelling of packaging

EPAL Euro pallets will meet the requirements of Art. 12 PPWR for the labelling of packaging.

The specific requirements are currently (as of June 2025) regulated by the EU Commission in an implementing act. Taking into account the future regulation of labelling obligations, EPAL will publish all relevant information online and provide a QR code for this purpose, which is either part of the labelling of EPAL Euro pallets or can be passed on in the delivery documents.

7 Harmonized standards and other technical specifications

The internationally uniform technical specifications of EPAL Euro pallets are regulated in the Technical Regulations of the EPAL for the production and repair of EPAL Euro pallets (EPAL TR 2:2025.1). They are summarised in the Technical Documentation, which forms part of this Declaration of Conformity (**Annex 2** to this Declaration of Conformity).

EPAL's Technical Regulations for EPAL Euro pallets comply with the international standard EN 13698-1.

EPAL Euro pallets are heat-treated in accordance with the IPPC standard ISPM15.

The reusability of EPAL Euro pallets complies with the provisions of the EN 13429:2004 standard.

EPAL Euro pallet chipboard blocks comply with the REACH Regulation (Regulation (EC) No. 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and as amended in accordance with Regulation (EU) 2023/1464).

8 Notified Body

It is not yet known whether an external conformity assessment for packaging will be regulated and which notified bodies will carry out the conformity assessments under the PPWR (as of June 2025). EPAL's certification and permanent quality assurance, which applies to manufacturers and repairers of EPAL Euro pallets, ensures that EPAL Euro pallets comply with the requirements of the PPWR.

9 Additional information

All requirements for the conformity of EPAL Euro pallets are the subject of EPAL's quality assurance measures. The regular inspections carried out by the manufacturers of EPAL Euro pallets to ensure compliance with the provisions of the EPAL Technical Regulations for EPAL Euro pallets therefore also demonstrate the PPWR conformity of EPAL Euro pallets. Every manufacturer of EPAL Euro pallets is inspected at least once a month by EPAL's independent inspection company. The result of the tests is proven in inspection protocols. The certification and licensing of EPAL therefore also serves as proof of the PPWR conformity of EPAL Euro pallets manufactured by the EPAL-certified and EPAL-licensed company.

European Pallet Association e.V. (EPAL)
Düsseldorf, 25 July 2025

Annex 1 **Technical drawing of the EPAL Euro pallet**

Annex 2 **Technical documentation of EPAL Euro pallets**

pursuant to Art. 39 PPWR in conjunction with Annex VII PPWR (available from September 2025)

Annex 1 Technical drawing of the EPAL Euro pallet

