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EU Declaration of Conformity for EPAL 3 pallets

pursuant to Article 39 of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste,
hereinafter referred to as "PPWR" (Packaging and packaging waste regulation)

Version 1.1 (July 2026)

Notes:
The EU Declaration of Conformity pursuant to Article 39 of the PPWR is based on the legal situation as of June 2026.
The European Commission is currently preparing various implementing or delegated acts and revising and supplementing explanatory notes, which may affect the application of the provisions forming the basis of this EU Declaration of Conformity pursuant to Article 39 of the PPWR. It is therefore subject to change in the legal situation resulting from secondary legislation and explanatory provisions issued by the European Commission.
EPAL will continuously adapt the EU Declaration of Conformity pursuant to Article 39 of the PPWR to developments in the secondary legislation and explanatory provisions relating to the PPWR, insofar as these affect the EU Declaration of Conformity pursuant to Article 39 of the PPWR.
In this EU Declaration of Conformity pursuant to Article 39 of the PPWR, it is assumed until further notice that the European Pallet Association e.V. (EPAL) is considered a manufacturer within the meaning of Article 15 of the PPWR on the basis of the standardisation and labelling of EPAL 3 pallets, even though EPAL is not the producer of the pallets. Following the legal assessment of EPAL, the classification of EPAL as a manufacturer within the meaning of Article 15 of the PPWR has not yet been conclusively clarified by the European Commission.

This EU Declaration of Conformity in accordance with Article 39 of the PPWR issued by the European Pallet Association e.V. (EPAL) for EPAL 3 pallets is the result of the conformity assessment procedure carried out by EPAL in accordance with Article 38 of the PPWR and Annex VII to the PPWR. The detailed results of the conformity assessment procedure are contained in EPAL's technical documentation for EPAL 3 pallets. The EU Declaration of Conformity in accordance with Article 39 of the PPWR issued by EPAL for EPAL 3 pallets complies with Annex VIII of the PPWR in terms of structure and content and contains the relevant elements in accordance with Annex VII of the PPWR.

1 EPAL-EU Declaration of Conformity No. 3: EPAL 3 pallets

This EU declaration of conformity in accordance with Art. 39 PPWR applies to new and used EPAL 3 pallets (EPAL 3).

EPAL is a registered trademark of European Pallet Association e. V.

2 Name and address of the manufacturer of the packaging (EPAL 3 pallet)

The manufacturer of EPAL 3 pallets in accordance with Art. 15 PPWR is:

European Pallet Association e.V. (EPAL)
Hamborner Str. 55, 40472 Düsseldorf (Germany)
Tel: +49 211 98 480 480
Email: ppwr@epal-pallets.org
Website: www.epal.eu

3 Responsibility for issuing the declaration of conformity

The sole responsibility for issuing this declaration of conformity lies with the manufacturer referred to in section 2, the European Pallet Association e.V. (EPAL).

4 Subject of the declaration of conformity: EPAL 3 pallets

The EU declaration of conformity in accordance with Art. 39 PPWR applies to EPAL 3 pallets (EPAL 3).

Description of the EPAL 3 pallet:

- EPAL 3 pallets are flat pallets with dimensions of 1,000 mm x 1,200mm x 144 mm (L/W/H).
- EPAL 3 pallets are made of wood (boards and blocks), optionally wood-based material (blocks) and steel (nails).
- EPAL 3 pallets can be identified by the marking with the registered trademark "EPAL im Oval" on the corner blocks. On the right-hand corner blocks and optionally on the left-hand corner blocks, there is the number "3" on the right above the "EPAL in oval" mark. In the case of optional marking with a QR code, the mark "EPAL in oval" and the number "3" are located on the left-hand corner block alone.
- EPAL 3 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 companies as well as for the storage of goods by companies.
- EPAL 3 pallets are reusable packaging in accordance with standard EN 13429:2004 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 without a system operator in accordance with Annex VI of the PPWR, Part A.
- EPAL 3 pallets are not intended for delivery to consumers or for use by consumers.
- New EPAL 3 pallets have the following appearance. The appearance of used EPAL 3 pallets may vary.

The further specifications and characteristics of EPAL 3 pallets are set out in the Technical Drawing of the EPAL 3 Pallet (**Annex)** and in the Technical Documentation of the EPAL 3 Pallet in accordance with Art. 38 PPWR and Annex VII PPWR.

5 Conformity with the relevant Union harmonisation legislation

The following applies to the conformity of EPAL 3 pallets with the relevant provisions of the PPWR:

5.1 Art. 5-12 PPWR – Sustainability requirements

EPAL 3 pallets meet the requirements for the sustainability of packaging regulated in Art. 5-12 PPWR, insofar as these are applicable:

- Art. 5 PPWR Requirements for substances in packaging
- Art. 6 PPWR Recyclable packaging
- Art. 10 PPWR Packaging minimization
- Art. 11 PPWR Reusable packaging
- Art. 12 PPWR Labelling of Packaging

Notes:

- Art. 6 PPWR (Recycable packaging) is currently only partially applicable to EPAL 3 pallets because the delegated acts pursuant to Art. 6 (4) PPWR are not yet available.
- Art. 7 PPWR (Minimum recycled content) applies only to plastic packaging and therefore not to EPAL 3 pallets.
- Art. 8 PPWR (bio-based raw materials) applies only to plastic packaging and therefore not to EPAL 3 pallets.
- Art. 9 PPWR applies only to compostable packaging and therefore not to EPAL 3 pallets.
- Art. 11 PPWR (Reusable packaging) is currently only partially applicable to EPAL 3 pallets because the delegated act pursuant to Art. 11 (2) PPWR has not yet been submitted.
- Art. 12 PPWR (Labelling of Packaging) only partially applies to EPAL 3 pallets. Pursuant to Article 12(1) and (6) of the PPWR, application begins 24 months from the entry into force of the implementing acts that have not yet been submitted.

The details on the application and fulfilment of the provisions pursuant to Art. 5-12 PPWR are contained in the Technical Documentation for EPAL 3 pallets.

5.2 Art. 15 (4) PPWR – Series production

The conformity of EPAL 3 pallets with the technical specifications in accordance with Section 6.3 is continuously checked by EPAL's independent quality assurance and carried out by external inspection companies (production and repair of EPAL 3 pallets) and external testing institutes (production of wood-chip blocks and nails). In accordance with Art. 15 para. 4 PPWR, these quality assurance measures ensure that EPAL 3 pallets in series production comply with the information in this declaration of conformity.

5.3 Art. 26, 27, 29 PPWR and Annex VI PPWR – Reuse system

A reuse system is available for EPAL 3 pallets. This is the EPAL pallet pool. The EPAL pallet pool is an open-loop reuse system without a system operator in accordance with Annex VI Part A of the PPWR and complies with the requirements for open-loop systems without a system operator, regulated in Annex VI Part A of the PPWR. Details regarding compliance of the EPAL pallet pool with the provisions of Article 26, 27, 29 PPWR and Annex VI to the PPWR are set out in the Technical documentation for EPAL 3 pallets.

6 Harmonised standards, common specifications and other technical specifications

The following standards and specifications have been considered in the assessment of conformity:

6.1 Harmonised standards

- EN 13429 Packaging reusability
- EN 13430 Requirements for packaging recoverable by material recycling
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and amended in accordance with Regulation (EU) 2023/1464 (assessment of wood-chip blocks)
- IPPC standard ISPM15 EPAL 3 pallets are heat-treated according to the IPPC standard ISPM15 as part of the production process

6.2 Common Specifications

There are currently no implementing or delegated acts with common specifications pursuant to Art. 37 PPWR, which regulate the application of Art. 5-12, 24 and 26 PPWR in detail and which are applicable to EPAL 3 pallets.

6.3 Technical Specifications

The following technical specifications apply to EPAL 3 pallets:

- EPAL Technical Regulations for the Production and Repair of EPAL 3 Pallets
- EPAL Technical Regulations for the Quality and Quality assurance of EPAL blocks

7 Notified Body

There is currently no notified body that carries out tests regarding the content of this EU declaration of conformity for EPAL 3 pallets.

8 Additional information

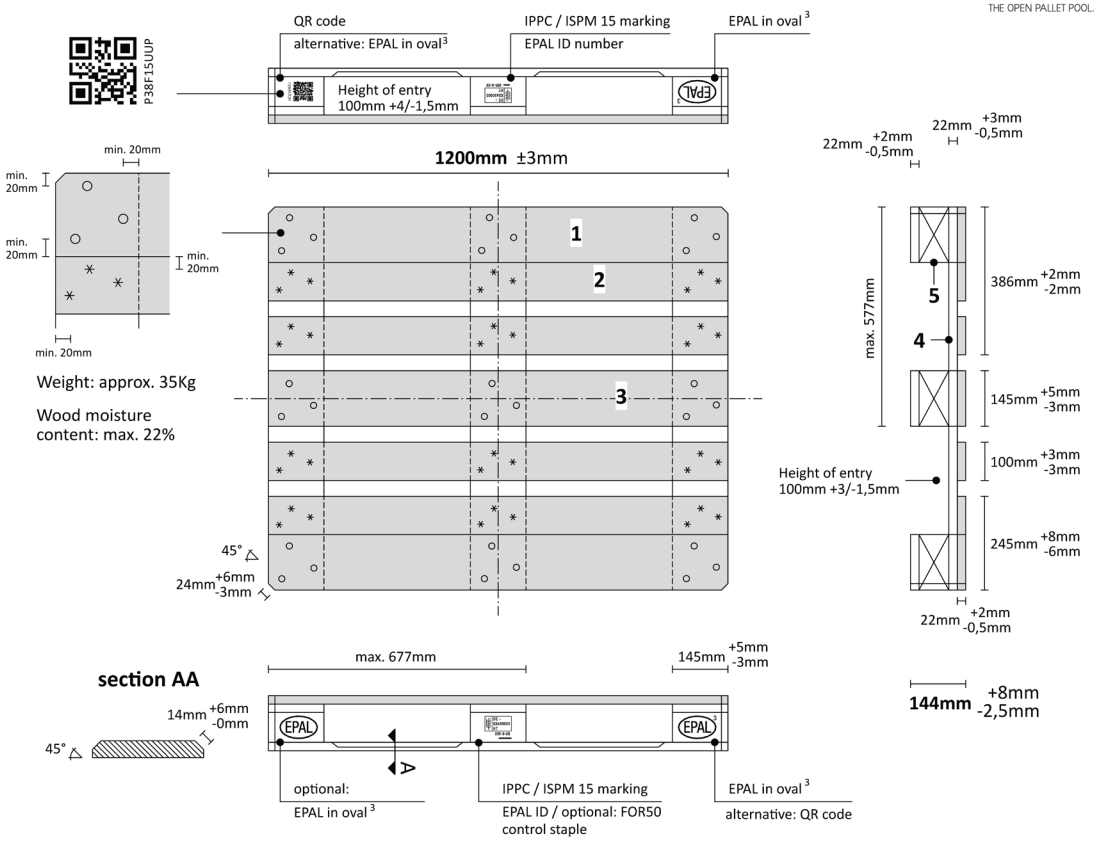
There is currently no additional information.

European Pallet Association e.V.
Düsseldorf, 10 July 2026

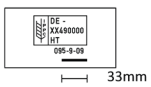
Bernd Dörre
CEO of EPAL

Annex Technical drawing of the EPAL 3 pallet

Technical Drawing
EPAL 3



Position of the
EPAL control staple



EPAL Nails

- **Nail type 1:** 90mm +2/-2, 27 pcs.
- **Nail type 2:** 55mm +2/-5, 36 pcs.
- **Nail type 3:** 70mm +2/-2, 27 pcs.

alternative
- **Nail type 4:** 40mm +1/-4, 36 pcs.

Part list

Part No.	QTY	Component-description	Nominal dimensions L / W / H or T (mm)	Tolerances L	W	H or T (mm)
1	2	Outer deck board	1200x145x22	+3/-3	+5/-3	+2/-0,5
2	4	Intermediate deck board	1200x100x22	+3/-3	+3/-3	+2/-0,5
3	1	Central deck board	1200x145x22	+3/-3	+5/-3	+2/-0,5
4	3	Stringer board	1000x145x22	+3/-3	+5/-3	+3/-0,5
5	9	Block	145x145x78	+5/-3	+5/-3	+1/-1
6	2	Outer bottom board	1200x145x22	+3/-3	+5/-3	+2/-0,5
7	1	Central bottom board	1200x145x22	+3/-3	+5/-3	+2/-0,5

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version: 1.0	date: 13.07.2026
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