



THE OPEN PALLET POOL.

EU Declaration of Conformity
pursuant to Art. 39 PPWR
for EPAL Box pallets

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EU Declaration of Conformity for EPAL Box 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" (EU 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 Box 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 Box 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 Box pallets. The EU Declaration of Conformity in accordance with Article 39 of the PPWR issued by EPAL for EPAL Box 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. 20: EPAL BOX pallets

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



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

The manufacturer of EPAL Box 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

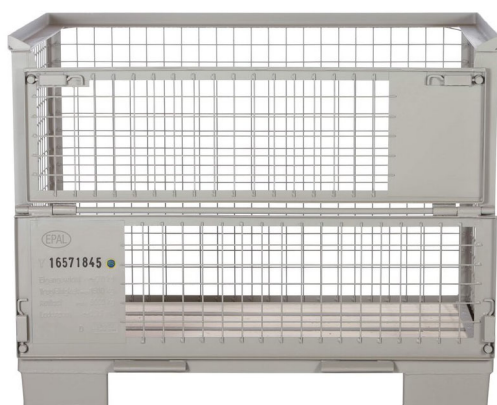
The sole responsibility for issuing this declaration of conformity lies with the manufacturer referred to in section 2, the European Pallet Association e.V. (EPAL).

4 Subject of the declaration of conformity: EPAL Box pallets

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

Description of the EPAL Box pallets:

- EPAL box pallets are steel containers with the (internal) dimensions 1,200 mm x 800 mm x 970 mm (L/W/H).
- EPAL box pallets are made of steel (frame, feet, lattice and inscription plates) and wood (floor boards). The steel components are painted with water-based paint.
- EPAL box pallets can be identified by the marking with the registered trademark "EPAL in oval" on the inscription plate (raised embossing and EPAL test seal).
- EPAL Box 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 Box 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 Box pallets are not intended for delivery to consumers or for use by consumers.
- New EPAL Box pallets have the following appearance. The appearance of used EPAL Box pallets may vary.



The further specifications and characteristics of EPAL Box pallets are set out in the Technical Drawing of the EPAL Box pallet (**Annex**) and in the Technical Documentation for EPAL Box pallets 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 Box pallets with the relevant provisions of the PPWR:

5.1 Art. 5-12 PPWR – Sustainability requirements

EPAL Box 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 (Recyclable packaging) is currently only partially applicable to EPAL Box 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 Box pallets.
- Art. 8 PPWR (bio-based raw materials) applies only to plastic packaging and therefore not to EPAL Box pallets.
- Art. 9 PPWR applies only to compostable packaging and therefore not to EPAL Box pallets.
- Art. 11 PPWR (Reusable packaging) is currently only partially applicable to EPAL Box 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 Box 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 Box pallets.

5.2 Art. 15 (4) PPWR – Series production

The conformity of EPAL Box pallets with the technical specifications in accordance with Section 6.3 is guaranteed by EPAL's independent quality assurance and continuously checked by external inspection companies (production and repair of EPAL Box pallets). In accordance with Art. 15 para. 4 PPWR, these quality assurance measures ensure that EPAL Box 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 Box 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 Box 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

- DIN 15155 Pallets; box pallet with mesh side panels and 2 frontside flaps
- EN 13429 Packaging reusability
- EN 13430 Requirements for packaging recoverable by material recycling

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 Box pallets.

6.3 Technical Specifications

The following technical specifications apply to EPAL Box pallets:

- EPAL Technical Regulations for the Production and Repair of EPAL Box pallets
- UIC Leaflet 435-3

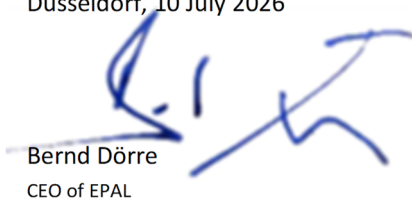
7 Notified Body

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

8 Additional information

There is currently no additional information.

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

A handwritten signature in blue ink, appearing to read "Bernd Dörre".

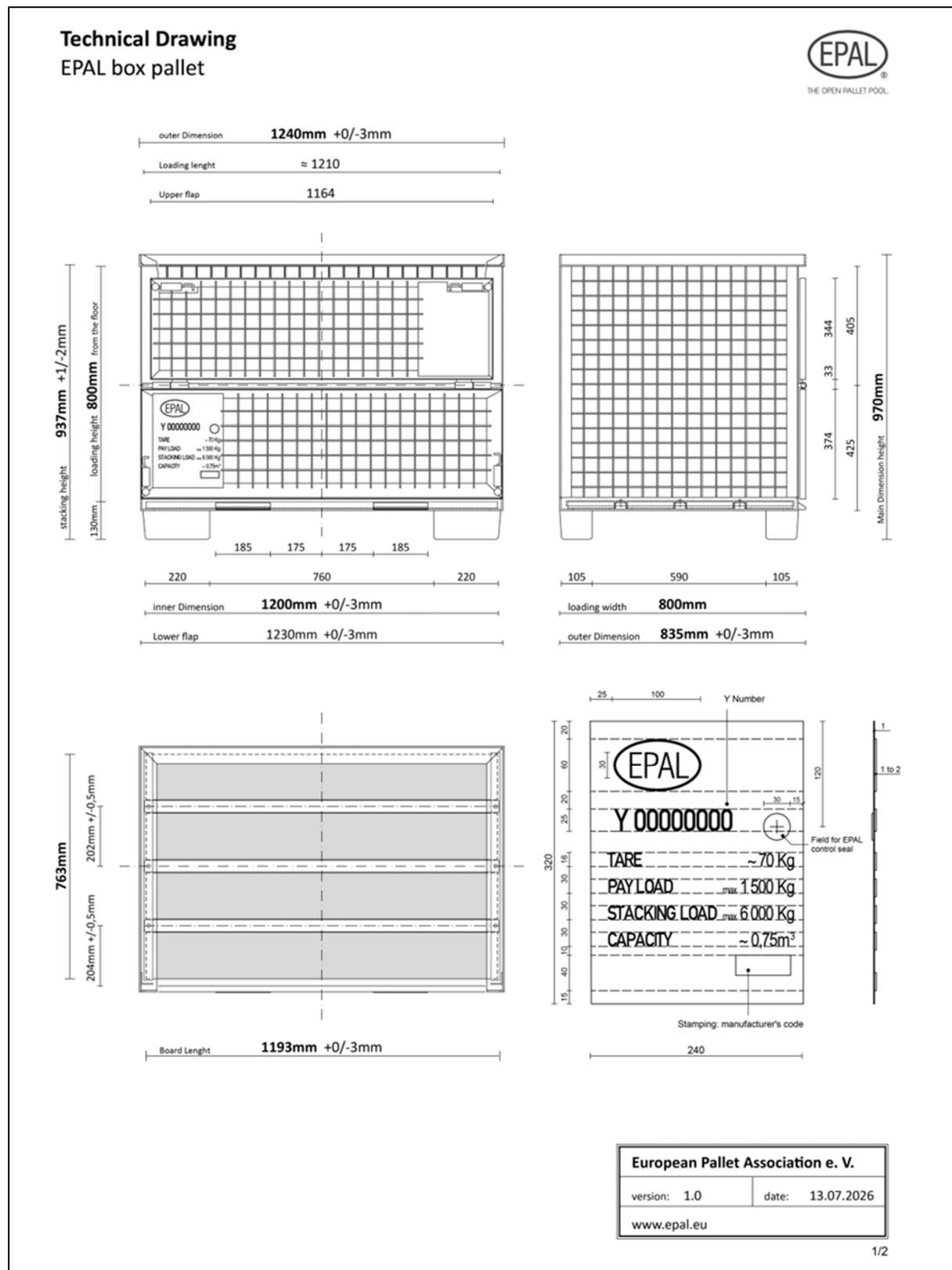
Bernd Dörre
CEO of EPAL



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Annex Technical drawing of the EPAL Box pallet



Annex Technical drawing of the EPAL Box pallet

Technical Drawing
EPAL box pallet


Part list

Part No.	Componentdescription	Dimension (mm)	Remarks
1	Floor frame	L 45 x 4 x ~ 4054	Optionally: can be lightweight section
2	Longitudinal member	Top hat section 40/75 x 3 x 1192	
3	Protector	Sheet metal 2 x 50 x 185	
4	Block	right	Pressed parts
5		left	
6	Foot side	right	Pieces of plate cut identically
7		left	
8	Foot	right	Optionally: No. 8 and No. 9
9		left	
10	Corner upright	L 40 x 4 x 784	Optionally: No. 4 and No. 7
11	Support for locking lug	Flat 4 x 20 x 95	
12	Stacking frame	L 60 x 40 x 4 x ~ 2894	Optionally: can be lightweight section
13	Gusset plate	Sheet metal 2,5 x 35 x 55	
14	Intermediate plate	Fl. 4 x 16 x 30	
15	Locking lug	Rd ø 20 x 28	Turned part
16	Central rod	Rd ø 16 x 1220	
17	Lower flap frame	Upper part	Optionally: can be lightweight section
18		Lower part	Lightweight section
19	Upper flap frame	Upper part	Lightweight section
20		Lower part	Optionally
21		Reinforcement	L 30 x 20 x 3 ~ 2984
22	Lock bearing plate	Fl. 3 x 16 x 130	
23	Piece of pipe	Rohr 21 x 2 x 60	Optionally: No. 25 und No. 26
24	Intermediate part	Fl. 4 x 50 x 15	
25	Half hinges for	lower flap	Optionally: No. 23 and No. 24
26		upper flap	
27	Lower locking guide	Fl. 3 x 25 x ~ 90	Variant: 3 x 25 x ~ 90
28	Locking rod	As shown in drawing	6 x 145
29		Mirror image of drawing	
30	Lock spring	Dr. 1,4 A	
31	Pin	3,2 x 16	EN ISO 1234
32	Bottom board	156 x 22 x 1193	
33	Flang	Bl. 2 x 48 x 802	
34	Steel - blind rivet	4,8 x 12,0	Rivet head ø min. 9,5
35	Steel lattice work	Front panel flaps	Mesh 50 x 50 ± 2 Wire dia. ø 4,0 ± 0,1
36		Side panel ø 4,0 ± 0,1	
37		Rear panel	
38	Address plate	Sheet metal 1 x 240 x 320	Marking: see TR EPAL Box Pallets Marking
39	Inscription plate	Sheet metal 1 x 240 x 320	

European Pallet Association e. V.

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