

Declaration of Conformity No. BP-73

According to European Packaging and Packaging Waste Regulation (EU) 2025/40

In line with our sustainability objectives and regulatory obligations under the European Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR), we hereby confirm that the reusable transport plastic packaging manufactured by bekuplast GmbH starting August 12, 2026 and beyond complies with the applicable harmonised standards and requirements outlined in the regulation.

Important Notice

With this declaration, the manufacturer bekuplast GmbH declares that the packaging adheres to the requirements laid out in the Packaging and Packaging Waste Regulation (EU) 2025/40. The technical documentation for this packaging describes in detail the adherence to the requirements laid out in Section 5 of this document.

The manufacturer's Declaration of Conformity shall be made available in the Member State in which the packaging is placed on the market. Pursuant to Article 39(5) PPWR, the competent authorities of that Member State shall be responsible for verifying the accuracy and completeness of the Declaration of Conformity.

1. Unique identification of the packaging:

Item number	Item description
PV1208.3K00-0930E0	Export Variopallet 1200x800 mm, Basic, 3 runners
PV1208.3K10-0930E0	Export Variopallet 1200x800 mm, Basic, 3 runners
PV1208/3K00-0930E0	Export Variopallet 1200x800 mm, Basic, 3 runners
PV1208/3K10-0930E0	Export Variopallet 1200x800 mm, Basic, 3 runners

2. Manufacturer Information

Manufacturer or authorised representative: bekuplast GmbH
Address: Industriestr. 1, 49824 Ringe, Deutschland
Email: info@bekuplast.com
Phone: +49 5944 9333-0
Member state in which the RTP is placed on the market: All EU Member States

3. Statement of Responsibility

This declaration of conformity is issued under the sole responsibility of the manufacturer.

4. Object of the declaration – Product Identification

Product Name: Returnable Transport Packaging (RTP)
Product Type: Pallet
Material: High-Density Polyethylene (HDPE)-Polypropylene (PP) Mix
Intended Use: For multiple reuse cycles in logistics and transport applications
Identification of the packaging allowing traceability: Production period according to the date stamp

5. Regulatory Basis & Product Compliance Details

The object of the declaration is in conformity with the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).

In accordance with Article 39 PPWR, the reusable transport plastic packaging covered by this declaration meets the requirements of PPWR conformity, and fulfils the requirements laid down in or pursuant to Articles 5 to 12 as follows:

Article 5 Requirements for substances in packaging

- Meets the requirements for the threshold of the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium to not exceed 100 mg/kg.
- Is free from restricted hazardous substances in line with REACH Regulation (EC) No. 1907/2006 and Regulation (EU) 2023/1464 amending the REACH Regulation.
- The packaging is in compliance with Commission Decision 2009/292/EC.

Article 6 Recyclable packaging

- Meets the requirement for the mechanical recyclability of plastic packaging at end-of-life in accordance with Art. 6.1. and 6.2. of the PPWR, pending further clarification by the EU Commission on specific rules regarding design-for-recycling and the recycled-at-scale methodology.

Article 7 Minimum recycled content in plastic packaging

- As of 2030: The manufacturing site of this product meets the minimum recycled content target for plastic packaging: 10% for contact-sensitive applications and 35% for any other applications in accordance with PPWR Article 7(1b and 1d).

Article 8 Biobased feedstock in plastic packaging and Article 9 Compostable packaging

- Do not apply to the packaging types covered by this declaration.

Artikel 10 Packaging minimisation

- Meets the minimization of packaging requirements of Article 10 PPWR, meaning that it is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality. The 50% maximum empty space ratio specified in Article 24(1) does not apply to reusable packaging within a system of re-use. This exemption is set out in Article 24(5).

Article 11 Reusable packaging

- Fulfils all the requirements to be considered reusable set out in Article 11(1)(a-i):
 - a) it has been conceived, designed and placed on the market with the objective to be re-used multiple times;
 - b) it has been conceived and designed to accomplish as many rotations as possible under normally predictable conditions of use;
 - c) it fulfils applicable requirements regarding consumer health, safety and hygiene;
 - d) it can be emptied or unloaded without being damaged in a way that would prevent its further function and re-use;
 - e) it is capable of being emptied, unloaded, refilled or reloaded while maintaining the quality and safety of the packaged product and ensuring compliance with the applicable safety and hygiene requirements, including those on food safety;
 - f) it is capable of being reconditioned while maintaining its ability to perform its intended function;

- g) it allows for affixing of labels and the provision of information on the properties of that product and on the packaging itself, including any relevant instructions and information for ensuring safety, adequate use, traceability and shelf-life of the product;
 - h) it can be emptied, unloaded, refilled or reloaded without risk to the health and safety of those responsible for doing so; and
 - i) it fulfils the requirements specific to recyclable packaging so that it can be recycled when it becomes waste.
- Pending the publication of the delegated acts under Article 11, the packaging meets all currently applicable requirements to be considered reusable.

Article 12 Labelling of packaging

- Pending the publication of the delegated acts under Article 12, the packaging meets all currently applicable labelling requirements.

6. Harmonised Standards and Supporting Documentation

Supporting technical documentation demonstrating conformity is maintained by the manufacturer.

7. Signed for and on behalf of: bekuplast GmbH

Ringe, 10.09.2026



Jörg Deglmann
Chief Executive Officer

Vers.: 1