

EU Declaration of Conformity

ECO PGS Pallets

Pursuant to Regulation (EU) 2025/40, Annex VIII (DoC)

DoC-ECOPGS-09.2026

Date: 2026 09 23

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1 EU Declaration of Conformity

Packaging in scope: All ECO PGS pallet types listed in section 7

Type: Reusable transport packaging

Declaration number: DoC-ECOPGS-09.2026

2 Name and address of the manufacturer

PGS REVERSE SAS

Centre Multi-Marchandises – BP 495,
76807 Saint-Étienne-du-Rouvray (France)

Tel: +33 (0)2 35 64 18 09

E-mail: reverse@pgsreverse.com

Website: www.pgsreverse.com

PGS REVERSE SAS is the manufacturer within the meaning of PPWR Art. 3(13). It determines the specifications of the ECO PGS pallet and places it on the market under its own mark ("property ECO PGS"). Production and reconditioning activities are carried out by PGS Group SAS entities and external entities approved by PGS REVERSE.

3 Responsibility for issuing the Declaration of Conformity

This Declaration of Conformity is issued under the sole responsibility of the manufacturer, referred to in section 2. PGS REVERSE SAS declares that the ECO PGS pallets in scope of this Declaration comply with Regulation (EU) 2025/40 (PPWR).

4 Subject of the Declaration



Illustration of an ECO PGS Pallet 800 x 1200

PGS REVERSE

Centre Multi-Marchandises - BP 495 - 76807 SAINT ETIENNE DU ROUVRAY CEDEX - FRANCE
SAS au capital de 1 000 000 € - 521 377 739 RCS ROUEN - Siret 521 377 739 00011 - TVA FR81521377739 - APE 7739Z

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Main materials

Wood: solid wooden boards and beams; wood species stemming from PEFC certified forests and/or PEFC controlled sources.

Wooden blocks: compressed wooden blocks (heat-treated in accordance with the IPPC standard ISPM 15, when required). Includes adhesives.

Nails: steel (non-alloy).

Substances used on the pallets

Paint: green coating (water-based).

Ink: marking ink.

Phytosanitary treatment: heat treated and marked in accordance with ISPM 15, where required.

Description

- The ECO PGS pallet is **transport packaging** within the meaning of PPWR Art. 3(7): it is used by companies for the transport and storage of goods. It is not intended for consumer use.
- The ECO PGS pallet is a **tertiary packaging** and is not designed for direct food contact.
- Throughout the entire cycle, **PGS REVERSE retains ownership of the pallet**.
- The ECO PGS pallet **can be identified by the marking "Property of ECO PGS" and the distinctive green color**.
- After each rotation, the ECO PGS **pallet is returned to an approved reconditioning site**, where it is sorted and inspected; damaged boards or blocks are replaced with new or reclaimed parts before the pallet re-enters circulation.
- The ECO PGS pallets that can no longer be repaired are withdrawn from the cycle; the **wood and steel can be recycled** as secondary raw materials (e.g. wood chips, scrap metal).

5 Conformity with the PPWR and other Union legislation

ECO PGS Pallets comply with the requirements of Articles 5–12 PPWR, insofar as applicable:

- **Article 5 – Substances:** substances of concern are minimized and the total concentration of Pb, Cd, Hg and Cr(VI) does not exceed 100 mg/kg. **Article 5(5) is not applicable because the pallet is non-food contact packaging.**
- **Article 6 – Recyclability:** the pallet is recyclable in accordance with Article 6(1) and EN 13430:2004; wood and steel are directed to established material-recycling streams.
- **Articles 7–9:** not applicable; the pallet contains no plastic packaging material and is not compostable packaging.
- **Article 10 – Minimization:** the design is assessed under the transitional requirements and EN 13428:2004. Article 10(1) and (2) apply from 1 January 2030.
- **Article 11 – Reusability:** the pallet meets Article 11(1) and EN 13429:2004 and is designed for repeated use, inspection, repair and reconditioning within the ECO PGS pool.
- **Article 12 – Labelling:** Article 12(1) does not apply to transport packaging, except e-commerce packaging. Article 12(2) will be applied from the date specified therein.

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The detailed assessment and supporting evidence are retained in the technical documentation. This Declaration will be reviewed where later PPWR measures materially affect the declared pallet.

Other applicable Union legislation

- REACH Regulation (EC) No 1907/2006: no Candidate List substance is present above 0.1 % w/w; compressed wood blocks comply with the applicable formaldehyde restriction in Annex XVII, entry 77, as amended by Regulation (EU) 2023/1464.
- POPs Regulation (EU) 2019/1021: no listed substance is present above the applicable concentration limit.

6 Harmonized standards / common specifications

- EN 13429:2004 – Packaging: Reuse.
- ISPM 15 (IPPC) – Heat treatment of wood packaging material.

No common specifications published under the PPWR as of mid-2026.

7 Overview types and compositions

The packaging types listed below are included in the scope of this Declaration.

Overview ECO PGS pallet types
ECO PGS 1000 x 1200* – 3 bottom deckboards (semelles)
ECO PGS 800 x 1200 (Lourde)
ECO PGS 1000 x 1200 – 5 bottom deckboards (semelles)
ECO PGS 1140 x 1140 – PGS9
ECO PGS 800 x 1200 ECO800
ECO PGS 1300 x 1100 – PGS7
ECO PGS 900 x 1200 – ECOPELLET
ECO PGS 1020 x 1200 - ECOFRUIT

*Dimensions: Width x length (mm)

8 Notified body

Not applicable. No mandatory third-party conformity assessment applies to this packaging under the PPWR provisions in force on 12 August 2026.

Saint-Étienne-du-Rouvray, 25/08/2026

Eric DEMÉ

Director, PGS REVERSE SAS



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