



EU Declaration of Conformity (PPWR – Annex VIII)

WOODEN PALLETS AND INDUSTRIAL PACKAGING, not intended and not designed for direct contact with food, identified by pallet code/model.

1. Manufacturer Information (Article 3, paragraph 13)

Company name: Az tech srl
Registered office (address): Nucleo Tagliata 43 Racconigi CN, Italy
Administrative office (address): Nucleo Tagliata 43 Racconigi CN, Italy
E-mail: info@aztech.it

2. This declaration is issued under the sole responsibility of the packaging Manufacturer.

3. Description of the packaging

Packaging identification

Unique packaging identification number: AZT 09/2026

Type of packaging pursuant to Article 3:

- ☐ Primary (Paragraph 1, point 5)
- ☐ Secondary (Paragraph 1, point 6)
- ☒ Tertiary (Paragraph 1, point 7)
- ☐ Packaging component (Paragraph 1, letter a)

Indicate the packaging category No. pursuant to Annex II, Table 1: 23

Predominant packaging material (e.g., paper, plastic, wood, etc.): wood

Format (illustrative and non-exhaustive) pursuant to Annex II, Table 1: Wooden pallet

Article 5 – Requirements for substances contained in packaging*

The manufacturer indicated above assumes responsibility for the compliance of the packaging covered by this declaration with the applicable requirements of Regulation (EU) 2025/40.

The manufacturer also confirms that the supplied packaging material:

without prejudice to the restrictions on chemicals set out in Annex XVII to Regulation (EC) No 1907/2006 and specific measures for materials and articles intended to come into contact with food set out in Regulation (EC) No 1935/2004, which are not applicable in this case, the sum of lead, cadmium, mercury, and hexavalent chromium concentrations does not exceed 100 mg/kg (updated as of 12/19/2024);

is designed in such a way as to minimize substances of concern – including in emissions and in all materials derived from waste management, such as secondary raw materials, ashes, or other materials destined for disposal – and to limit negative environmental impacts caused by microplastics;

shall be promptly updated in light of new knowledge regarding substances of concern, while respecting the guaranteed characteristics, in particular under the procedures referred to in Article 68(1) and (2) of Regulation (EC) No 1907/2006, as well as the criteria referred to in Article 6(4) of Regulation (EU) 2025/40 or based on the results of its own risk assessments, so that neither reuse nor recycling is compromised, no risks to health or the environment arise, and no disadvantages occur for the user.

Does the packaging component contain hazardous substances, including lead, cadmium, mercury, hexavalent chromium, or other substances of concern (including PFAS)?

No ☒

Yes ☐

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If the answer is "Yes", provide details on the substances of concern present in the packaging and specify their concentration in the following table, expressed in mg/kg.

Name of the substance	Concentration (mg/kg)*

***The total concentration of lead, cadmium, mercury, and hexavalent chromium must be less than 100 mg/kg; PFAS limits do not apply since the packaging is not Food Contact Packaging.**

Based on the available declarations and evidence, no substances included in the REACH Candidate List are declared in concentrations higher than 0.1% by weight in the article. This wording does not equate to a declaration of absolute absence of SVHCs and must be reviewed in the event of an update to the Candidate List, changes to the formulation, or a change of supplier.

For lead, cadmium, mercury, and hexavalent chromium, the applicable cumulative limit is 100 mg/kg. For PFAS and fluorinated substances, the conclusions are formulated exclusively within the scope of validity of the reports and declarations available for individual suppliers, components, and samples.

Within the currently documented scope, no exceedances of the Article 5 limits emerge in the tested samples.

Article 6 – Recyclability*

Is the packaging recyclable? ("*recyclability*": the compatibility of packaging with waste management and treatment by design, based on separate collection, sorting into separate streams, recycling at scale, and the use of recycled materials to replace primary raw materials. Art. 3, point 38)

Yes ☒ (Separately)

No ☐

Article 7 – Minimum recycled content in plastic packaging

All plastic parts of packaging placed on the market contain the minimum percentage of recycled material recovered from post-consumer plastic waste (mandatory from **January 1, 2030**).

Does the plastic packaging contain the minimum percentage of recycled plastic material, or is it planned to include it in future product revisions or developments?

Yes ☐

No ☒

If yes, attach appropriate supporting documentation. (Es. **UNI EN 15343, Second Life Plastic (PSV), Recycled Plastics Traceability**)

Article 8 – Bio-based feedstocks in plastic packaging

By **February 12, 2028**, the European Commission will assess the introduction of targets and requirements for bio-based content in plastic packaging.

Does the plastic packaging contain a percentage of bio-based material, or is it planned to include it in future product revisions or developments?

Yes ☐

No ☒

If yes, attach appropriate supporting documentation.

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Article 9 – Compostable packaging

By **February 12, 2028**, the manufacturer must ensure compliance with the applicable compostability requirements according to the following article.

Is the packaging currently compostable, or is compliance with these requirements planned for future product revisions or developments?

Yes ☐

No ☒

If yes, attach appropriate supporting documentation (**UNI EN 13432 certification**)

Article 10 – Packaging minimization

By January 1, 2030, the manufacturer or importer must ensure that packaging placed on the market is designed in such a way that its weight and volume are reduced to the minimum necessary to ensure its functionality, taking into account the shape and material of which it is made.

Has the packaging been designed to minimize weight and volume while ensuring functionality?

Yes ☒

No ☐

Article 11 – Reusability (where applicable)*

The packaging is reusable if it meets the requirements established in this article.

Is the packaging reusable, or is compliance with the requirements planned for future product revisions or developments?

Yes ☐

No ☒ Not reusable if its suitability characteristics are compromised.

Article 12 – Packaging labeling*

By August 12, 2028, the packaging must bear the harmonized labeling information required by Article 12 of the PPWR, including the indication of material composition to facilitate proper collection and sorting. **As of today's date, the packaging must fulfill mandatory environmental labeling obligations (specific to each European state; in Italy, Article 219, paragraph 5 of Legislative Decree 152/2006 and subsequent amendments).**

Is this information already present on the label, or is its implementation planned for future product revisions or developments?

Yes ☒

No ☐

4. The object of the declaration described in point 3 is in conformity with the relevant Union harmonization legislation (reference to the other Union acts applied).

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR);

ISPM No. 15 - Regulation of wood packaging material in international trade (ISPM No. 15 is the fifteenth standard of the IPPC - International Plant Protection Convention), where applicable.

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5. References to the relevant harmonized standards or common specifications used or references to the other technical specifications in relation to which conformity is declared:

Essential requirements on packaging and packaging waste applicable during the transitional phase.

UNI EN 13430:2005 - Packaging – Requirements for packaging recoverable by material recycling.

UNI EN 13427:2005 – Packaging – Requirements for the use of European Standards in the field of packaging and packaging waste.

UNI EN 13428:2005 – Packaging - Requirements specific to manufacturing and composition – Prevention by source reduction.

6. Involvement of the Notified Body (where applicable)

Not applicable

7. Additional information

Supporting technical documentation, including analytical data, supply chain information, and design assessments, is kept by the manufacturer and will be made available to the competent authorities upon request.

AZ Tech S.r.l.