



APL CARTONS (PTY) LTD

Registration Number: 1988/001269/07

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Declaration of Compliance

To whom it may concern

We are a manufacturer and supplier of corrugated cartons used for packaging in various sectors, including the food, fresh fruit, and vegetable markets. We are certified to the international quality standard ISO 9001:2015 and the food safety standard FSSC 22000 and therefore maintain the required industry accreditations for Good Manufacturing Practice (GMP) and a comprehensive Food Safety Management System (FSMS).

We are committed to sustainable paper sourcing and are FSC® (Forest Stewardship Council®) Chain of Custody certified.

We hereby confirm the following:

Raw Material Compliance

The raw materials used in the production of our products comply with FDA and/or EU regulations for food-contact applications, where applicable. Our products are manufactured in accordance with good manufacturing practices and should be used only within the guidelines we specify.

Absence or Controlled Levels of Specific Substances

Based on information received from our raw material suppliers and our knowledge of the manufacturing process, the corrugated carton products covered by this declaration do not intentionally contain Substances of Very High Concern (SVHCs) from the current REACH Candidate List above the reporting threshold of 0.1% w/w.

The products we manufacture, and supply do not contain any of the following substances, or contain them at levels below the recommended limits stated in applicable FDA and/or EU regulations:

1. Chlorate / Sodium chlorate – pesticide/fumigant residues; paper bleaching
2. Heavy metals – from antiseptics, plastics, or recycled paper sources
3. MOSH (Mineral Oil Saturated Hydrocarbons) – from jute or recycled paper/board
4. MOAH (Mineral Oil Aromatic Hydrocarbons) – from jute or recycled paper/board
5. Phenophenol – fungicides (e.g., SOPP pallet treatments)
6. Phthalates – commonly used as plasticizers
7. Bisphenol A (BPA) – used in plastics and epoxy resins
8. Per- and Polyfluoroalkyl Substances (PFAS), including PFOA, PFOS, PFNA and their salts

This list is not exhaustive and will be updated as new requirements arise in the countries of destination.

Directors: FC GREEFF (Chairman), GE WILLIAMS (Managing),
WJL BURGER, PK DE V CLÜVER, WJ ERASMUS, PJ GRAAFF, E GREEFF,
UD MUNGAL (Independent), A NEL, WA VAN ZYL
Company Secretary: R DE VILLIERS

Regulatory Compliance

As the manufacturer and supplier, we declare that the production and supply of our corrugated cartons comply with all applicable legal and statutory requirements, including but not limited to:

1. FDA regulations (as amended) – applicable to food-contact materials
2. EC Regulation 1895/2005 (as amended) – on certain epoxy derivatives and heavy metals
3. EC Regulation 2023/2006 (as amended) – Good Manufacturing Practice for materials intended to come into contact with food
4. EC Directive 94/62/EC (as amended) – on packaging and packaging waste
5. EC Regulation 1935/2004 – on materials and articles intended to come into contact with food
6. EU Regulation 2025/40 – Packaging and Packaging Waste (PPWR). They are made from recyclable, paper-based fibres in accordance with EU recycling standards and are mono-material, free from non-recyclable coatings, inks, or adhesives.
7. Dutch legislation: Commodities Act Regulation on Packaging and Consumer Products - materials and articles intended to come into contact with food.
8. Belgian legislation: RD 11 May 199 - concerning materials and objects intended to come into contact with food.

Product Traceability and Specification Compliance

All products we manufacture meet our internal specifications, and every stock-keeping unit (SKU) has full traceability through batch control.

Product Specification:

PRODUCT CHARACTERISTICS				
COUNTRY OF ORIGIN	Republic of South Africa			
METHOD OF PRODUCTION	Batch Production			
PRODUCT / MATERIAL COMPOSITION	Component	Material	Average Weight %	
			Single Wall	Double Wall
	Corrugated Board	Paper	97.46	97.47
	Corrugating Adhesive	Starch Based	2.06	2.27
	Printing Inks	Water Based	0.38	0.24
	Carton Closing Adhesive	Cold Set Glue	0.09	0.03
ACCEPTANCE CRITERIA OF MATERIAL	Suitable for use in food packaging			
SOURCE AND ORIGIN	The product is of plant and chemical source (paper and additives). The origin of raw materials depends on type but include South Africa, Europe, USA, Australia			

INKS	Water based Inks are used on the outside liner of the carton. All inks used are water based and suitable for use in food packaging.
PACKAGING FORMAT	Bundle strapped and packed on wooden pallet with protection board between product and pallet. Protective shrink-wrapping available on customer request
SHELF LIFE	Although specific shelf life is not relevant for the safety of the product, quality defects can occur after 18 months from date of delivery.
DESCRIPTION OF LABELLING, LOT ID & CODING FOR TRACEABILITY	Work Order / Batch Number printed on the carton for traceability.
STORAGE, DISTRIBUTION, AND INTENDED USE	
HANDLING BEFORE USE REQUIREMENTS	Do not remove any strapping until boxes is ready for use
	Do not use the bundle straps as a handle to carry/transport boxes
STORAGE REQUIREMENTS	Store cartons inside, away from moisture and heat.
	Not in direct sunlight for extended periods (2 days or more) to prevent fading printed colours
	Store cartons on a flat, clean surface area.
DISTRIBUTION METHOD	The product is distributed in trucks tarped or tautliner trucks. The shipment is closed to the environment. Transportation is done at ambient temperatures.
INTENDED USE OF THE PRODUCT, TARGET MARKET AND POTENTIAL ABUSE	Cartons are use in fresh fruit (whole), beverages (packed), general food products and Industrial products as packaging material. The intended use of the product includes dry solids with the surface containing no free fat or oil, room temperature filled and stored, refrigerated storage or frozen storage. Packaging for transport and distribution
	Possible abuse of the product: Not suitable for consumption. Not to be used after exposure to excessive atmospheric moisture (dampness)
COMPLIANCE	
ALLERGENS	Based on the information from raw material suppliers, we can state that there is no risk of any allergens in our product. Suppliers provide SDS (Safety Data Sheet) accordingly. No allergens are used in the production facility.
GMO	No GMOs
ETHICAL SOURCING	FSC certified – SGSCH-COC-011474
FOOD GRADE STATUS	Paper used are suitable for food contact. Additional functional barriers are recommended when product is in contact with printed areas on the inside of the carton.

RECYCLABILITY	Recyclable
BIODEGRADABILITY	Biodegradable
IRRADIATION	The process of Irradiation does not form part of any carton manufacturing process.
Packaging and Packaging Waste Compliance: The company does not act as the exporter, packer, or distributor of the final packaged products placed on the EU market. Consequently, while it is responsible for ensuring that its packaging products comply with all applicable material, design, recyclability, and substance requirements defined in the regulation, the obligations related to the final use, filling, labelling, and placement of packaged goods on the EU market remain the responsibility of the exporter.	
Product Identification	Product: Monolayer Corrugated Carton Material: Fiber-based (paper, Starch based adhesives, water-based inks) The packaging covered by this declaration includes: Single-wall corrugated cartons (one fluted medium between two linerboards). Double-wall corrugated cartons (two fluted mediums between three linerboards)
Customer Reference	Reference document: APL EU2025/40 PPPWR – Specification Sheet for Individual Units.
Technical Documentation	Material specifications and supplier declarations PFAS test report Heavy Metals test report Recyclability test report – CEPI test method version 3 Compliance with EN 13430 (Packaging – Requirements for recycling)
Conformity Assessment	Meets the applicable EU2025/40 PPWR requirements.

Kind regards

Paul Vermeulen

Signed: 

Position: Group Operations Manager

Date: 30/07/2026