

DECLARATION OF COMPLIANCE (DoC): EU EXPORT & FOOD CONTACT REGULATIONS

Products Covered: Virgin Timber Export Pallets (SA Pine & Saligna)
Issue Date: June 2026
Validity: Valid for pallets supplied under ISPM15 code: ZA-M33-HT

Morreto Trade (Pty) Ltd hereby certifies that our wooden packaging pallets comply with all applicable European Union (EU) environmental, chemical safety, and food-contact frameworks detailed below.

1. Packaging and Packaging Waste Regulation (PPWR) – Regulation (EU) 2025/40

- **Recyclability:** Our pallets are made of 100% natural virgin wood (p. 1). They achieve the highest recyclability performance tier (Class A/B) under mechanical recycling pathways.
- **Recycled Content:** Not applicable. Material is strictly virgin timber to maintain structural integrity for food-grade shipping.
- **Heavy Metals Limit:** Compliant. The total combined concentration of Lead (Pb), Cadmium (Cd), Mercury (Hg), and Hexavalent Chromium (Cr VI) is far below the 100 ppm threshold. No heavy metals are introduced during manufacturing, assembly, or treatment.
- **PFAS Substances:** Compliant. Per- and polyfluoroalkyl substances (PFAS) are entirely absent from our process. Total concentration is 0 ppm (well below the 250 ppm limit).

2. Wood Sourcing & Environmental Sustainability

- Most timber is sourced from verified Forest Stewardship Council (FSC) certified commercial plantations.
- Species utilized are limited to South African Pine (*Pinus patula/radiata*) and Saligna (*Eucalyptus saligna*).

3. Food Contact & Good Manufacturing Practice (GMP)

- **Regulation (EC) No. 1935/2004 & No. 2023/2006:** Our facility utilizes strict quality control systems. Pallets are safe for use as secondary/tertiary packaging in transport chains where fresh produce or tea is outer-wrapped.
- **Treatment Safety:** The only chemical treatment applied is BIOX 5000 (Oxychlorine Solution) (p. 1). It functions as a surface disinfectant and fully volatilizes (pp. 1-2). It leaves zero hazardous chemical residues on the wood (pp. 2, 9).
- **Exclusions:** Regulation (EU) No. 10/2011 (Plastics) and Regulation (EU) 2024/3190 (Bisphenol A/BPA) are Not Applicable to our natural wooden products.

4. REACH & SVHC – Regulation (EC) No. 1907/2006

- Our pallets are classified as "Articles" without intended release of substances under REACH.
- They contain 0% Volatile Organic Compounds (VOC) (p. 9).
- They contain no Substances of Very High Concern (SVHC) on the EU Candidate List above the 0.1% w/w threshold.

5. Mechanical Fasteners

- Assembly relies exclusively on mechanical ring-shanked coil nails.
- Nails are free of chemical coatings, oils, or heavy metal treatments.

We confirm that our pallets fulfil all structural and safety requirements for unrestricted placement on the EU market.

Best regards,



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