

EU DECLARATION OF CONFORMITY

Packaging — Regulation (EU) 2025/40, Article 39 and Annex VIII | Metal container (square box, m³, U-box, container, 20' - 40' container)

Declaration No. METC_1	Packaging type Metal container (square box, m³, U-box, container, 20' - 40' container)	Version v1.0	Date of issue 2026 08 11	Supersedes — (first version)	Prepared by Business Support Group
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1. Unique identification of the packaging	METC_1
2. Name and address of the manufacturer and, where applicable, of the authorised representative	VM Building Solutions NV Europalaan 73 9800 Deinze BE0434.559.604
3. Statement of responsibility <i>Fixed wording from Annex VIII — do not amend.</i>	This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration — identification of the packaging allowing traceability	Metal transport packaging container (reusable) consisting of a galvanized steel or painted steel container used for the containment, protection, handling, storage and transport of VM Building Solutions products. Available in square box, U-box, metal bin, metal pallet box, and ISO freight container formats (20 ft and 40 ft). Dimensions and capacity vary by type (including m³ containers). Main material: carbon steel. Components may include steel frame, steel walls, reinforcing profiles, hinges, locking devices, lifting points and identification plate. Intended for repeated industrial use in logistics and transport operations. Used as transport packaging for the movement and storage of packaged or unpackaged products within the supply chain.
5. Conformity with the relevant Union harmonisation legislation	The object of the declaration referred to in point 4 is in conformity with the relevant Union harmonisation legislation: Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (OJ L, 22.1.2025). Fulfilment of the requirements laid down in or pursuant to Articles 5 to 12 of that Regulation that apply to this packaging has been demonstrated, as set out in field 8 and in the technical documentation. Reference to the other Union acts applied: None.
6. References to harmonised standards, common specifications or other technical specifications used	As at the date of issue, no harmonised standards under Article 36 and no common specifications under Article 37 of Regulation (EU) 2025/40 have been cited in the Official Journal of the European Union for the requirements within the scope of this declaration. Collection and review of declarations of compliance from suppliers is an ongoing process; the statements above reflect the documentation available at the date of this declaration.
7. Notified body <i>Not applicable under Module A.</i>	Not applicable. Conformity assessed under Annex VII, Module A — internal production control. No notified body intervenes in this procedure.

8. Additional information — scope of this declaration	In scope. Fulfilment has been demonstrated in respect of Article 5(1) (substances of concern to be minimised) and Article 5(4) together with Article 5(6) (sum of lead, cadmium, mercury and hexavalent chromium not exceeding 100 mg/kg, with the supporting evidence held in the technical documentation). These are the requirements of Articles 5 to 12 that apply to this packaging type on the date of issue. Not in scope on the date of issue. Article 5(5) — this packaging is not intended to be in contact with food; to be confirmed if this packaging type is ever used for a food-contact product. Article 6 — applies from 1 January 2030, or 24 months after entry into force of the delegated acts under Article 6(4), whichever is later. Article 9 — covers packaging referred to in Article 3(1)(1)(f) and sticky labels affixed to fruit and vegetables; not applicable to this packaging type. Article 10(1) — applies from 1 January 2030; the corresponding essential requirement of Directive 94/62/EC remains in force until 31 December 2029 under Article 70(1)(b). Article 12 — applies from 12 August 2028, or 24 months after entry into force of the implementing acts under Article 12(6) or (7), whichever is later. Articles 7 and 8 — outside material scope, independent of any future date. Both articles apply only to the plastic part of packaging — Article 7(1) to ‘any plastic part of packaging placed on the market’, and Article 8 to ‘biobased feedstock in plastic packaging’. The carbon-steel body of this packaging contains no plastic part. This exclusion is not a matter of timing: it does not depend on 1 January 2030, on any delegated or implementing act, or on any future Commission review under Article 8, and will not change unless a plastic component is added to this packaging type, in which case that component — not the steel body — would need to be assessed separately. Article 10(2). This paragraph carries no date of its own. VMBSO adopts the position that it is deferred on the same basis as Article 10(1) under Article 70(1)(b), pending confirmation from external counsel; this position is recorded in the technical documentation. Article 11 — reusability, the point to resolve for this packaging type. The Excel description for this packaging type states explicitly that it is reusable. Where this packaging circulates within a return, repair or re-circulation arrangement, Article 11 already applies — it does not wait for 2030 — and this packaging type is reusable, not single-use: retention under Annex VII, point 4 becomes 10 years, not 5, and the Annex VI, Part B criteria and the qualitative description required by Annex VII, point 2(e) must be completed and referenced here before this declaration is signed. Where no such arrangement exists for a specific unit of this packaging, it remains single-use with the 5-year retention period. This must be resolved per product line rather than assumed. Article 15(4) and Annex VII, point 3. The manufacturer maintains procedures to ensure that ongoing series production remains in conformity with the technical documentation, including monitoring of changes in design, materials or applicable
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	standards that could affect conformity. These procedures are described in the technical documentation.
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Photographic reference (supporting field 4)



Place and date of issue	Name and function	Signature
Deinze 2026 08 11	Sammy Baron Business Support Director	