

EU DECLARATION OF CONFORMITY

Packaging — Regulation (EU) 2025/40, Article 39 and Annex VIII | Paper filler (stabilization of the products)

Declaration No.	Packaging type	Version	Date of issue	Supersedes	Prepared by
PF_1	Paper filler (stabilization of the products)	v1.0	2026 08 11	— (first version)	Business Support Group

1. Unique identification of the packaging	PF_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	A paper filler used to stabilize products inside a package, described as a paper-based void-fill and cushioning packaging component. Its function is to stabilize, separate, cushion and protect products against movement and damage during storage and transport.
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’. This paper-based packaging component 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 paper 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. This packaging type is single-use by nature (loose paper void-fill, not returned or re-circulated) and Article 11 does not apply. This is a lighter confirmation than for the wooden pallet or the metal container: confirm only that no returnable or reusable format is in use for the product lines covered by this declaration. Retention of this declaration and the technical documentation is five years from the date this packaging is placed on the market (Annex VII, point 4). 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 standards that could affect conformity. These procedures are described in the technical documentation.
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Photographic reference (supporting field 4)

[space reserved for a reference photograph of the actual packaging — to be added]

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