VM BUILDING SOLUTIONS

EU DECLARATION OF CONFORMITY

Packaging — Regulation (EU) 2025/40, Article 39 and Annex VIII | Straps (metal, plastic, fabric…)

Declaration No.	ST_1	**Packaging type**	Straps (metal, plastic, fabric…)	**Version**	v1.0
Date of issue	2026 09 17	**Supersedes**	— (first version)	**Prepared by**	Business Support Group

1. Unique identification of the packaging	ST_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 *Fixed wording from Annex VIII — do not amend.*	This declaration of conformity is issued under the sole responsibility of the manufacturer.
4. Object of the declaration — identification of the packaging allowing traceability	Packaging components used to secure, bundle, stabilize or handle packaged goods, pallets or packaging units during storage, transport and distribution. Straps may be manufactured from metal, plastic, textile, fabric or other suitable materials and form part of the overall packaging system when placed on the market together with the packaged product. This declaration covers the strapping used by VM Building Solutions as transport packaging for palletised and bundled VM Building Solutions products. The material of each strap reference (steel, polypropylene, polyester or textile), its width, thickness and breaking strength, and the closure system used (seal, buckle or weld) are recorded per article reference in the technical documentation, because the material determines which of the requirements set out in field 8 apply.
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 *Not applicable under Module A.*	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.

Article 7.

Applies from 1 January 2030, or three years after entry into force of the implementing act referred to in Article 7(8), whichever is later — and only to those strap references that are wholly or partly plastic.

Article 7(1) applies to any plastic part of packaging placed on the market. Plastic strap references (polypropylene or polyester strapping) are a plastic part within the meaning of that paragraph; the applicable minimum recycled-content percentage depends on the packaging category and format under Annex II, Table 1, and is to be confirmed once that classification is made per reference.

Steel strapping and textile or fabric strapping contain no plastic part and are outside the material scope of Article 7. That exclusion is not a matter of timing: it does not depend on 1 January 2030, on any implementing act, or on any future Commission review, and changes only if a plastic component is added to the reference concerned.

Article 8.

No manufacturer obligation at this stage. Article 8 currently only requires the Commission to review biobased plastic packaging by 12 February 2028 and, where appropriate, to bring forward a legislative proposal; it does not yet impose any requirement capable of applying to this packaging, regardless of material.

Where the reference concerned is steel, textile or fabric, Article 8 is in addition outside the material scope, since it addresses biobased feedstock in plastic packaging.

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 design: strapping is cut and discarded when the load is broken down, it is not part of any return, repair or re-circulation arrangement, and Article 11 does not apply.

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). Where a specific arrangement instead involves returnable or re-circulated strapping, that arrangement is reusable, not single-use, and must be assessed separately — retention becomes ten years and the Annex VI, Part B criteria and the qualitative description required by Annex VII, point 2(e) apply.

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.

Note, outside the scope of this declaration: Article 29 and the re-use targets.

Article 29 sets re-use targets for transport packaging and is not one of Articles 5 to

	12; it is therefore not part of what is declared here. It is recorded because it is the provision most often raised in relation to this packaging format. Commission Delegated Decision (EU) 2026/429 of 25 February 2026 (OJ 6.5.2026, in force since 26 May 2026, recital 2 amended by the corrigendum of 1 April 2026) exempts economic operators using pallet wrappings and straps for the stabilisation and protection of products put on pallets during transport from the 100 % re-use requirements of Article 29(2) and (3). The general 40 % target of Article 29(1) continues to apply from 1 January 2030. That exemption concerns re-use only; it does not remove the obligation to draw up this declaration, as confirmed by external counsel on 21 August 2026 with reference to the Commission FAQ. **Open point at the date of issue.** Material composition and weight per packaging unit have not yet been received for every strap reference. The supplier information requests issued from 8 September 2026 onwards through PPWR.Purchase@vmbuildingsolutions.com cover this point. This declaration is to be reviewed and, where necessary, reissued once those statements are complete (Article 39(2): the declaration is to be kept up to date).

Photographic reference (supporting field 4)

No photograph is attached to this version. A photograph of the packaging as placed on the market is to be added to the technical documentation together with the outstanding supplier statements.

Place and date of issue	Deinze 2026 09 17
Name and function	Sammy Baron Business Support Director
Signature	