

EU DECLARATION OF CONFORMITY

Packaging — Regulation (EU) 2025/40, Article 39 and Annex VIII | Wooden pallet, other than an EPAL-pallet

Declaration No. WP_1	Packaging type Wooden pallet, other than an EPAL-pallet	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	WP_1_1 => WP_1_X																																													
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	Wooden transport pallet (single-use or reusable, as applicable) other than an EPAL-pallet, consisting of a load-bearing platform manufactured from sawn timber and assembled with metallic fasteners (nails and/or staples). The pallet is intended for the handling, storage, protection and transport of products throughout the supply chain. Construction comprises deck boards, stringers or blocks, bottom boards and fastening elements. Dimensions vary according to pallet specification. Used as transport packaging for unitized loads in industrial and commercial logistics operations. treated in accordance with ISPM 15 where used in international trade (see field 6) <table><tr><th></th><th>width</th><th>length</th><th>height</th><th>Info Réf. article/ article :</th></tr><tr><td>WP_1_1</td><td>206</td><td>106</td><td>22</td><td>200597000</td></tr><tr><td>WP_1_2</td><td>206</td><td>106</td><td>15</td><td>208308000</td></tr><tr><td>WP_1_3</td><td>206</td><td>106</td><td>22</td><td>200601000</td></tr><tr><td>WP_1_4</td><td>206</td><td>106</td><td>19</td><td>207950000</td></tr><tr><td>WP_1_5</td><td>306</td><td>106</td><td>20</td><td>209424000</td></tr><tr><td>WP_1_6</td><td>206</td><td>106</td><td>22</td><td>200606000</td></tr><tr><td>WP_1_7</td><td>206</td><td>106</td><td>22</td><td>207951000</td></tr><tr><td>WP_1_8</td><td>206</td><td>106</td><td>16</td><td>208312000</td></tr></table>		width	length	height	Info Réf. article/ article :	WP_1_1	206	106	22	200597000	WP_1_2	206	106	15	208308000	WP_1_3	206	106	22	200601000	WP_1_4	206	106	19	207950000	WP_1_5	306	106	20	209424000	WP_1_6	206	106	22	200606000	WP_1_7	206	106	22	207951000	WP_1_8	206	106	16	208312000
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	<table><tr><td>WP_1 _X</td><td>ALL OTHER BESPOKE DEMENSIONS FOR THE PACKAGING</td><td>X</td></tr></table> Used to support and transport palletised VMZINC® and EPDM products for road transport within the Union.	WP_1 _X	ALL OTHER BESPOKE DEMENSIONS FOR THE PACKAGING	X
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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. <i>Note, outside the scope of this declaration: ISPM 15 phytosanitary treatment and the IPPC/ISPM 15 heat-treatment (HT) mark apply to wood packaging only where it is actually used in international trade crossing the external Union border — not for intra-Union road transport as described in field 4. Where this pallet type is also used for consignments arriving from outside the Union (for example the CCM/Carlisle EPDM import stream), ISPM 15 applies to that specific use and should be checked and referenced in the technical documentation under Regulation (EU) 2016/2031, which is a plant-health requirement and not a PPWR conformity requirement.</i>			
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. 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 wooden 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 wooden 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. This pallet type is single-use: it is not part of a 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 batch or customer arrangement instead involves return, repair or re-circulation, that batch is reusable, not single-use, and must be assessed separately — retention becomes 10 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.
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Photographic reference (supporting field 4)



Palletised VMZINC® zinc sheet on a wooden pallet — photograph supplied by VMBSO, not a stock image.

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