DECLARATION OF CONFORMITY PPWR

This Declaration of Conformity is issued in accordance with Regulation (EU) 2025/40 on packaging and packaging waste.

1. Product: Buckles - Unique identification number of the product (Annex VIII, point 1): PPWR-BU-001
Declaration type: Type-level declaration, covering all production of the packaging type identified below. This is not a batch- or shipment-specific declaration; batch/lot traceability is maintained in the technical documentation.
Issue Date: see footnote
Effective from: 12.08.2026 (date of general application of Regulation (EU) 2025/40)

2. Manufacturer

Cordstrap B.V., acting as manufacturer within the meaning of Article 3 of Regulation (EU) 2025/40 (the entity placing the packaging product on the EU market under its own name).

Cordstrap B.V.
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3. Object of the Declaration

Packaging type: Buckles
Intended use: Packaging component intended to connect, secure and maintain strapping or lashing systems under tension, thereby enabling load restraint, load stabilisation and the secure transport and handling of goods throughout the supply chain.
Full material composition, drawings and component-level data are maintained in the manufacturer's technical documentation (Annex VII) and are available to market surveillance authorities upon request.
The product is not intended for direct food contact.

4. Responsibility Statement

This declaration of conformity is issued under the sole responsibility of the manufacturer, Cordstrap B.V., in accordance with Article 39(4) of Regulation (EU) 2025/40.

5. Conformity Assessment Procedure

Internal production control (Module A), as set out in Annex VII of Regulation (EU) 2025/40. No notified body involvement is required or has been used. No harmonised standards have been published in the Official Journal specifically for the other PPWR sustainability requirements at the date of this declaration; applicable requirements have been assessed against the criteria in Articles 5–12 and Annex IV of Regulation (EU) 2025/40.

6. Compliance Statement

The product has been assessed against the sustainability requirements of Articles 5 to 12 of Regulation (EU) 2025/40, with the following results:

Art.	Requirement	Status	Basis
Art. 5	Substances of concern	Applicable. Complied with.	The sum of concentrations of lead, cadmium, mercury and hexavalent chromium does not exceed 100 ppm. The presence and concentration of substances of concern in the material itself and in emissions, ash or leachate when packaging waste is incinerated or landfilled is minimised in

			accordance with Article 5(1)–(2). Detailed substance data are maintained in the technical documentation (Annex VII).
Art. 6	Recyclable packaging (design for recycling)	Applicable.	Product consists primarily of steel components and may include surface treatments or protective coatings, such as phosphate or zinc-based coatings, depending on the product variant. The primary material components are recyclable within established metal recycling streams where suitable collection, sorting and recycling infrastructure exists. The manufacturer assesses that this packaging meets the recyclability requirement of Article 6(1), which applies from 12 August 2026. Quantitative recyclability performance grading under Article 6(4) delegated acts is not yet in force and will be assessed and incorporated into a revised declaration once the relevant harmonised methodology is adopted.
Art. 7	Minimum recycled content (plastic packaging)	Applicable. No target in force.	This product consists primarily of steel components and is not plastic packaging within the meaning of Article 7. Mandatory minimum recycled content requirements for plastic packaging therefore do not apply.
Art. 8	Bio-based feedstock (plastic packaging)	Applicable. No target in force.	This product consists primarily of steel components and is not plastic packaging within the meaning of Article 8. Bio-based feedstock requirements and future assessments under Article 8 therefore do not apply.
Art. 9	Compostable packaging	Not applicable.	The product is not designed or placed on the market as compostable packaging.
Art. 10	Packaging minimisation	Applicable. Complied with.	Weight, dimensions, wire diameter, tensile capacity and other performance characteristics are limited to what is necessary to perform the intended connection, load-retention and load-stabilisation function within strapping and lashing assemblies. The minimisation assessment was conducted in accordance with the performance criteria in Annex IV and the methodology of harmonised standard EN 13428:2004, which remains applicable as an assessment methodology. Article 10(1) applies from 1 January 2030; compliance will be reassessed against any updated standard once adopted.
Art. 11	Reusable packaging	Not applicable.	The product may remain functional after use under certain conditions; however, it is not placed on the market as reusable packaging within a formal reuse system as defined under Article 11 and related PPWR provisions. No Article 11 compliance claim is therefore made.
Art. 12	Labelling	Applicable. Complied with.	As transport packaging, the product is outside the scope of the Article 12(1) material composition labelling requirement for consumer sorting, which does not apply to transport packaging (except e-commerce packaging) or packaging subject to a deposit and return system. Where applicable, material identification markings are applied in accordance with Commission Decision 97/129/EC, which remains applicable until 12 August 2028. Harmonised labelling formats under Article 12(6)–(7) implementing acts will be

			incorporated once published and applicable to this product type.

Compliance is demonstrated and evidenced through internal production control and the technical documentation held under Annex VII. This declaration will be revised without delay if any status above changes as a result of updated delegated or implementing acts, or as a result of a change to the product, its materials, or its intended use.

7. Declaration

Cordstrap B.V. declares, under its sole responsibility, that the packaging type described in this Declaration complies with Regulation (EU) 2025/40 as set out in Section 6 of this document. The technical documentation and this EU declaration of conformity are retained for a period of five years from the date the packaging is placed on the market (single-use packaging), in accordance with Article 39 and Annex VII, point 4, and are made available to competent authorities upon request. This declaration is drawn up in English and will be translated into the language(s) required by any Member State where the packaging is placed on the market, upon request.



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This declaration reflects the manufacturer's assessment as of the issue date above based on currently available implementing and delegated acts. Cordstrap B.V. maintains and updates its technical documentation and will issue a revised declaration if the regulatory basis for any statement above changes.