

DECLARATION OF CONFORMITY — PPWR

Metal wirehoods (muselets) — Sparkling wine, semi-sparkling wine and champagne

DOCUMENT REF.

DEN-MU-PPWR-2301 / 2026

REVISION

01 / 2026

ISSUE DATE

5 August 2026

1. Scope of this declaration

This declaration applies to the **metal wirehoods (muselets)** supplied by Eurocap NV as a component of the closure system of sparkling wine, semi-sparkling wine and champagne bottles. It is issued with reference to Regulation (EU) 2025/40 on packaging and packaging waste (PPWR).

The declaration covers the wirehood as a whole, comprising the metal wire, the metal cap plate and the coatings applied to that plate. It does not cover the cork or synthetic stopper beneath the wirehood, nor the transport packaging in which the wirehoods are delivered; those are the subject of separate declarations.

2. Product description and composition

The wirehood is a wire cage fitted with a metal cap plate. Its function is to retain the stopper against the internal pressure of the bottle and to prevent the stopper from being expelled. It is made exclusively of metal components and is not intended to come into direct contact with the foodstuff.

The product is composed of the following metallic components:

- **Metal wire** — galvanised, or galvanised and lacquered, mild steel.
- **Metal cap plate** — electrolytic tinplate, optionally lithographed.
- **Coatings** — varnishes and printing inks applied to the cap plate.

The structure is predominantly metallic and is compatible with industrial steel recycling streams. The steel material identification code **FE 40** is communicated by QR code on the transport documents and on the packaging.

Indicative recycled-material content, based on supplier information and subject to variation between supply batches: wire approximately 20 %, cap plate approximately 22 %. These figures are given for information only; see section 4.4 on the legal status of recycled content under the PPWR.

3. Classification of the product under the PPWR

The wirehood is a **component of a packaging unit** within the meaning of Article 3(1) of Regulation (EU) 2025/40. The packaging unit is the individual bottle offered for sale to the end user, which is **sales packaging** under that article. Because the wirehood must be completely and permanently removed in order to reach the product, it is assessed as a **separate component** rather than an integrated one, by analogy with the treatment of crown corks in the European Commission's PPWR frequently-asked-questions document.

The wirehood is therefore **not** grouped (secondary) packaging, which the PPWR defines as packaging that bundles several sales units, and it is not transport packaging. Logistic and transport packaging fall outside the scope of this declaration.

DECLARATION OF CONFORMITY — PPWR

Metal wirehoods (muselets) — Sparkling wine, semi-sparkling wine and champagne

DOCUMENT REF.

DEN-MU-PPWR-2301 / 2026

REVISION

01 / 2026

ISSUE DATE

5 August 2026

4. Compliance with the requirements of Regulation (EU) 2025/40

4.1 Recyclability and design for recycling (Article 6)

Article 6(1) requires all packaging placed on the market to be recyclable. The wirehood is designed to be compatible with existing industrial steel recycling streams:

- Predominantly metallic structure, recoverable through established metal recovery systems.
- No elements that would significantly interfere with standard steel recycling processes.
- No non-separable components that would hinder recycling.

The recyclability performance grades referred to in Article 6 and Annex II (grades A, B and C) rest on design-for-recycling criteria to be established by delegated acts, which are due by 1 January 2028 and apply from 1 January 2030 at the earliest. The recycled-at-scale condition applies from 2035, and from 1 January 2038 packaging must achieve at least grade B to be placed on the market. Until those criteria are in force, no grade can be assigned to this product. On the basis of the material and design characteristics described above, Eurocap NV expects the product to achieve a high recyclability performance. Actual recyclability depends on local collection and sorting infrastructure.

4.2 Minimisation of weight and volume (Article 10)

The product consists solely of the functional elements required for its purpose — the wire and the cap plate — with no additional components and no superfluous decorative elements. Its weight is already reduced to the minimum compatible with the mechanical resistance and the safety function that the application demands. The Article 10 obligation, assessed against the performance criteria of Annex IV, applies from 1 January 2030; the product is designed in line with it.

4.3 Substances of concern and heavy metals (Article 5)

On the basis of the information available to us and of written supplier declarations, Eurocap NV declares that:

- **No PFAS are intentionally added** in the manufacture of the wirehood components.
- **No substances of concern** are known to be present above the applicable regulatory thresholds. In accordance with Article 5(1), the presence and concentration of such substances is minimised.
- **The sum of lead, cadmium, mercury and hexavalent chromium is below 100 ppm by weight**, in accordance with Article 5(4), which applies to the packaging and to each of its components. Compliance is demonstrated in accordance with CEN report CR 13695-1.

This information is derived from supplier declarations, material specifications and internal assessment. The presence of traces attributable to environmental contamination cannot be entirely excluded. Eurocap NV applies an ongoing process of identification and reduction of substances of concern in line with regulatory requirements.

Article 5(5) prohibits, from 12 August 2026, the placing on the market of food-contact packaging containing PFAS at or above 25 ppb for any individual PFAS (targeted analysis, polymeric PFAS excluded from

DECLARATION OF CONFORMITY — PPWR

Metal wirehoods (muselets) — Sparkling wine, semi-sparkling wine and champagne

DOCUMENT REF.

DEN-MU-PPWR-2301 / 2026

REVISION

01 / 2026

ISSUE DATE

5 August 2026

quantification), 250 ppb for the sum of PFAS, and 50 ppm for PFAS including polymeric PFAS. The wirehood is not intended for, and in normal use does not come into, direct contact with the foodstuff. No PFAS are intentionally added, and fluorine evidence is obtained from suppliers for the technical documentation referred to in Annex VII.

4.4 Recycled content (Article 7)

The minimum recycled-content obligation of Article 7 applies to the **plastic parts** of sales, grouped and transport packaging. The wirehood contains no plastic part and is therefore outside the scope of Article 7. The recycled steel content stated in section 2 is provided for information only and is not a declaration of compliance with Article 7.

4.5 Reusability (Article 11)

The wirehood is neither designed nor intended for reuse. The requirements of Article 11 on reusable packaging therefore do not apply.

4.6 Labelling and traceability (Article 12)

The harmonised labelling requirements of Article 12 depend on implementing acts that the European Commission has not yet adopted. Labelling of sales packaging applies from 12 August 2028, or 24 months after the entry into force of those implementing acts, whichever is later. Eurocap NV will adapt the product and its documentation to the harmonised labelling for separate waste collection as soon as the specifications are published, and monitors regulatory developments on packaging labelling and on the interaction between the PPWR and digital product passport requirements under other Union legislation.

5. Functional performance and durability

The wirehood is designed to ensure safety during bottling and during subsequent handling by the consumer. Its mechanical strength, torsion performance and durability comply with the dimensional and functional specifications set out in the relevant technical data sheet. The product maintains its performance for at least 24 months when stored under the environmental conditions indicated in that data sheet.

6. Environmental aspects and end-of-life

Steel offers a high recovery efficiency and can in principle be recycled indefinitely without loss of its intrinsic properties. The wirehood is recyclable through existing metal recycling streams and thereby contributes to circular economy objectives.

7. PPWR conformity check

The table below records, requirement by requirement, the status of the product against Regulation (EU) 2025/40 at the date of issue of this declaration. Where a requirement depends on a delegated or

DECLARATION OF CONFORMITY — PPWR

Metal wirehoods (muselets) — Sparkling wine, semi-sparkling wine and champagne

DOCUMENT REF.

DEN-MU-PPWR-2301 / 2026

REVISION

01 / 2026

ISSUE DATE

5 August 2026

implementing act that has not yet entered into force, the status is recorded as pending rather than as conform.

ARTICLE	REQUIREMENT	STATUS	BASIS / REMARK
5(1)	Minimisation of substances of concern	Conform	Supplier declarations, material specifications, internal assessment.
5(4)	Sum of Pb, Cd, Hg and Cr (VI) below 100 ppm by weight	Conform	Applies at component level. Evidence in accordance with CEN report CR 13695-1.
5(5)	PFAS limits for food-contact packaging, from 12 August 2026	Not applicable	Not in direct food contact. No PFAS intentionally added; fluorine evidence held for Annex VII.
6	Packaging shall be recyclable; design for recycling	Conform in principle	Predominantly metallic, compatible with existing steel recycling streams.
6 / Annex II	Recyclability performance grade (A, B, C)	Pending	Delegated acts due 1 January 2028, criteria apply from 1 January 2030; grade B minimum from 1 January 2038. No grade assignable today.
7	Minimum recycled content in plastic packaging	Not applicable	The product contains no plastic part.
9	Requirements for compostable packaging	Not applicable	The product is not placed on the market as compostable packaging.
10 / Annex IV	Minimisation of packaging weight and volume, from 1 January 2030	Conform	Functional elements only; weight at the minimum compatible with mechanical resistance and safety.
11	Requirements for reusable packaging	Not applicable	Single-use component; not designed or intended for reuse.

DECLARATION OF CONFORMITY — PPWR

Metal wirehoods (muselets) — Sparkling wine, semi-sparkling wine and champagne

DOCUMENT REF.	REVISION	ISSUE DATE	
DEN-MU-PPWR-2301 / 2026	01 / 2026	5 August 2026	
ARTICLE	REQUIREMENT	STATUS	BASIS / REMARK
12	Harmonised labelling, from 12 August 2028	Pending	Implementing acts not yet adopted. Product and documentation will be adapted once specifications are published.
15, 38, 39 / Annex VII	Manufacturer obligations, conformity assessment, EU declaration of conformity	See section 8	The EU declaration of conformity is drawn up by the manufacturer of the finished packaging. Eurocap NV supplies the information required under Article 16(1).

8. Basis, limitations and validity

This declaration is based on Eurocap NV's knowledge of the product and its composition, on written confirmations received from the upstream manufacturer and material suppliers, and on the regulatory framework in force at the date of issue. Eurocap NV has not carried out quantitative analytical testing on every production batch; the declaration relies on the absence of intentional addition and on the documented composition of the inputs. Substance-specific testing can be agreed on a case-by-case basis.

Under Regulation (EU) 2025/40 the EU declaration of conformity provided for in Article 39 is drawn up by the manufacturer of the packaging in its final form, following the conformity assessment procedure of Article 38 and on the basis of the technical documentation described in Annex VII. Where Eurocap NV supplies the wirehood as a packaging component, this document serves to provide the manufacturer with the information and documentation required under Article 16(1), and does not replace that manufacturer's own declaration of conformity. CE marking on packaging does not indicate compliance with the PPWR.

This declaration remains valid until a material change occurs in the product composition, in the manufacturing process or in the applicable European or national legislation, and in any event for no longer than **three (3) years from the date of issue**. Upon release of this declaration all previous versions lose their validity. For any question regarding this declaration, or to request supporting documentation, please contact the Eurocap NV Quality department at the address shown in the footer of this document.