

One pack, five roles. Only one of them signs.

Every economic operator in the chain has duties under the PPWR, but the legal responsibility for a pack’s conformity sits with one party: the manufacturer. Find your role first — the rest follows from it.

IN APPLICATION SINCE 12 AUGUST 2026

CONFORMITY PROCEDURE Module A
DOC Per packaging type
KEEP FILES – SINGLE-USE 5 years
KEEP FILES – REUSABLE 10 years
ANSWER AN AUTHORITY 10 days

Who you are decides what you owe.

The same company can hold several roles at once — a brand that imports its own mailers is both manufacturer and producer. Work through each row that fits.

Art. 15 Manufacturer Has the packaging designed or made under its own name or trademark Places only conforming packaging on the market; runs the conformity assessment (Annex VII), draws up the technical documentation and the EU declaration of conformity; marks the pack with an identifier and its contact details; re-assesses when the design or applicable standards change; corrects, withdraws or recalls non-conforming packaging. IN FORCE
Art. 18 Importer Places packaging from a third country on the EU market Before placing on the market, makes sure the manufacturer carried out the conformity assessment and drew up the technical documentation, that the pack is labelled and accompanied by the required documents, and that the manufacturer’s identifier and contact details are present. Adds its own name and address. Keeps the DoC available. IN FORCE
Art. 19 Distributor Makes packaging available after it has been placed on the market Acts with due care. Before making packaging available, verifies that the EPR producer is registered, that the pack is labelled under Article 12, and that the manufacturer’s and importer’s markings are present. Holds back packaging it has reason to believe does not conform. IN FORCE

Art. 20

Fulfilment service provider

Warehouses, packs, addresses or dispatches

Makes sure warehousing, handling, packing and dispatch do not jeopardise the packaging's compliance. If it fills grouped, transport or e-commerce packaging, the empty space rules in Article 24 land on it too.

IN FORCE

Art. 44 · 45

Producer (EPR)

First makes packaging available in a Member State, or sells directly to end users in another

Registers in every Member State where it first makes packaging or packaged products available, and pays into extended producer responsibility.

Producers selling directly to end users in another Member State must appoint an authorised representative for EPR there.

NATIONAL REGISTERS

WHEN AN IMPORTER OR DISTRIBUTOR BECOMES THE MANUFACTURER

Article 21: if you place packaging on the market under your own name or trademark, or modify packaging already on the market in a way that could affect compliance, you take on the manufacturer's obligations in full.

THE DECIDING QUESTION

Who is the manufacturer of this pack?

The Commission's 2026 guidance works through the common cases. In short:

- **Sales and grouped packaging** — usually the party that fills it with its own product and completes the last processing steps, such as cutting, filling and sealing: typically the brand owner.
- **Transport and service packaging** — usually the company that makes it, unless the packaging visibly carries the user's name or trademark.
- **Unbranded packaging** — the party that orders it and decides its design specification.
- **Micro-enterprises** — where the brand is a micro-enterprise and its packaging supplier is in the EU, the supplier is treated as the manufacturer (Art. 15(12), 21).

However many parties help draft the paperwork, only one economic operator carries legal responsibility for the pack's conformity — the manufacturer.

PLACED ON THE MARKET — WHEN?

The moment that dates every obligation

"Placing on the market" is the first making available of packaging, empty or filled, on the EU market. The guidance adds practical markers:

- Sales and grouped packaging are generally placed on the market **when filled**.
- Transport and service packaging are placed on the market **empty**.
- For imports, the moment is **release for free circulation** at customs.

That is why stock produced before 12 August 2026 but placed on the market after it must meet the rules then in force.

Three documents an authority can ask for.

The conformity assessment is internal production control (Module A). No notified body is needed — but the file has to exist before the packaging is placed on the market, and you have ten days to produce it on request.

Technical documentation

Annex VII, point 2. At least, wherever applicable:

- general description of the packaging and its intended use
- conceptual design, manufacturing drawings, component materials
- explanations needed to understand the drawings
- harmonised standards, common specifications and other specifications applied
- a qualitative description of the Article 6, 10 and 11 assessments
- test reports

EU declaration of conformity

Annex VIII. One for each packaging type, under the manufacturer's sole responsibility:

- unique identification of the packaging
- manufacturer's name and address (and authorised representative)
- description of the packaging, allowing traceability
- Union legislation it conforms with
- harmonised standards or specifications used
- signature, place and date

Markings on the pack

Article 15(5)–(6) and 18(3):

- a type, batch or serial number, or other identifying element
- manufacturer's name or trademark, postal address and, if any, electronic contact
- importer's name and address, for imported packaging
- on the pack, or via a QR code / data carrier, or an accompanying document where that is not possible

Technical documentation & DoC

Art. 15(3), 17(2), 18(7)

5 years

FROM PLACING ON THE MARKET

10 years

FROM PLACING ON THE MARKET

ENFORCEMENT

Paperwork gaps get a chance to be fixed first.

Article 62 lists “formal non-compliance” — a missing or incorrect DoC, incomplete technical documentation, missing manufacturer or importer details, among others. The Member State must first require the operator to end the non-compliance. Only if it persists can the authority restrict, withdraw or recall the packaging.

That is not a grace period for substance limits. Packaging that breaches Article 5 is a product-safety question, handled under the risk procedures in Articles 58–60.

ENVIRONMENTAL CLAIMS

Claims must beat the legal minimum.

Article 14: an environmental claim about a property the PPWR regulates may only be made where the packaging **exceeds** the minimum requirement, using the regulation's own methods, and must say whether it covers the unit, part of it, or all of the operator's packaging. The evidence goes in the technical documentation.

Article 12(8) separately bans labels, marks or symbols likely to mislead or confuse about sustainability or waste handling.

Is it packaging at all?

The definition turns on function: containing, protecting, handling, delivering or presenting a product. Annex I gives worked examples. A few that surprise people:

Clothes hangers sold with a garment Clothes hangers sold separately
Mailing pouches with a catalogue or magazine inside Tool boxes
Cores, tubes and rolls that film or paper is wound on (unless part of production machinery) Printer cartridges; soluble detergent bags
Labels attached to a product, including sticky labels on fruit; staples; plastic sleeves Wax layers around cheese; sausage casings
Sterile barrier systems for medical products CD, DVD and video cases sold with the disc inside

Source: Regulation (EU) 2025/40, Annex I (indicative list).