What is your role under PPWR?

For companies placing packaged products on the EU market.

Are you established within the EU, meaning incorporated as a legal entity in a Member State?

ART. 3(17) / ART. 3(19) PPWR

NO

ACTION REQUIRED

Appoint an authorised representative

Non-EU companies don't directly hold PPWR obligations. If you do place packaging on the EU market you must either incorporate an EU subsidiary, or appoint an EU-established authorised representative (Art. 3(19)) to act on your behalf. A branch or VAT registration alone is not sufficient.

e.g. Japanese manufacturer selling packaged goods into the EU

YES

Are you the first to place this packaging on the EU market?

ART. 3(15) / ART. 3(16) PPWR

Close explanation — placing on the market

Placing on the market — the first supply of packaging or packaged products for distribution, consumption or use on the EU market in the course of a commercial activity. This is the trigger for manufacturer and importer obligations under PPWR.

e.g. Aartsen importing cucumbers packed in foil from outside the EU and selling them to Albert Heijn — that first supply into the EU market is the moment of placing on the market. Albert Heijn subsequently selling to consumers is not.

NO

ROLE IDENTIFIED

Distributor

You make packaging available downstream but are not the first to place it on the market. Art. 19 applies — verify labelling and registration; no DoC obligation.

e.g. wholesaler reselling branded goods to retailers

YES

Does your own brand or trademark appear on the packaging, or was it designed or manufactured under your name?

ART. 3(13) PPWR

YES

ROLE IDENTIFIED

Manufacturer

Issue DoC (Art. 15), hold technical file, collect substance compliance data from suppliers. Applies regardless of where the packaging was physically made.

e.g. brand owner, own-label retailer, private label

NO

Is the packaging placed on the market under another EU party's brand?

ART. 3(13) PPWR

YES

OUTSIDE PPWR SCOPE

No PPWR role for this packaging

The EU brand owner is the manufacturer and bears all PPWR obligations. The party producing or packing it has no independent PPWR role — they are the brand owner's supplier. Supplier is not a defined role under PPWR.

The manufacturer must collect material composition and substance compliance data from them to fulfil their own Art. 5 and Art. 15 obligations.

e.g. contract packer for AH private label — Albert Heijn is the manufacturer; the contract packer has no PPWR obligations of its own

NO

ROLE IDENTIFIED

Importer (assumes manufacturer obligations)

ART. 21(2) PPWR

No EU-established manufacturer exists for this packaging. Manufacturer obligations transfer by law to the EU importer — issue the DoC yourself, maintain the technical file, and collect substance compliance data from the non-EU supplier.

e.g. cucumber packed in foil outside the EU, no brand on pack (Aartsen)

e.g. Japanese nuts producer supplying an EU importer under the Japanese brand — brand owner is non-EU, no EU manufacturer in the chain

ART. 18 — NOTE

What about the standard importer role? Art. 18 defines an importer who simply verifies and retains an existing DoC — without assuming manufacturer obligations. In practice this is rare: it only applies when an EU-established manufacturer already exists in the chain and has issued the DoC. For most brand owners and food importers, either you are the manufacturer (own brand) or you assume manufacturer obligations as the only EU party in the chain (Art. 21(2)). The pure Art. 18 importer role does not appear in this tree because the preceding questions already exclude it.