

PPWR - Information for our customers

Our role: supplier of customised packaging solutions

Regulation (EU) 2025/40 on packaging and packaging waste (Packaging and Packaging Waste Regulation - PPWR) establishes a harmonised European legal framework for packaging. It entered into force on 11 February 2025 and generally applies from 12 August 2026. It also covers industrial transport packaging, reusable packaging, load carriers, container inserts and dividers.

Our clear position

For customised packaging solutions designed or manufactured according to the customer's requirements, PE-PACKAGING considers its role to be that of a supplier within the meaning of the PPWR. Assuming the role of packaging manufacturer or EPR producer is not part of our standard supply model.

PE-PACKAGING as supplier

PE-PACKAGING develops and manufactures customised industrial packaging, reusable load carriers, container inserts, dividers and protective packaging. Our work is normally based on the customer's requirements, such as specifications, drawings, component data, functional requirements, approvals, container numbers, project identifiers or customer branding.

In these cases, the customer determines the intended use and the essential requirements of the packaging and makes it available under its own name, trademark or clear project identification. PE-PACKAGING supplies the packaging or its components and supports the responsible customer with the available product, material and supplier information.

In our understanding, the mere physical manufacture of packaging does not automatically mean that PE-PACKAGING assumes the obligations of the packaging manufacturer or of an EPR producer.

The customer's responsibility as manufacturer

Where customised packaging is designed or manufactured according to the customer's requirements and made available under the customer's name, trademark or clear identification, we generally regard the customer as the responsible manufacturer of the packaging.

The responsible manufacturer must assess and ensure that the packaging complies with the applicable PPWR requirements. Depending on the packaging category and the relevant application date, this may include in particular:

- performing the conformity assessment,
- preparing and retaining the technical documentation,
- issuing the EU declaration of conformity,
- providing the required manufacturer, identification and contact details,
- meeting the applicable requirements concerning substances, packaging minimisation, recyclability, reusability and labelling.

PE-PACKAGING supports the responsible manufacturer with the information available to us. However, we do not replace the manufacturer's own conformity assessment and do not assume that responsibility solely by supplying the packaging.

Information provided by PE-PACKAGING

Upon a specific product-related request, and where available and applicable to the project concerned, we can provide in particular:

- product and material descriptions, drawings and specifications,
- information on material composition and available supplier declarations,
- information on packaging minimisation, reusability and repairability,
- information on recyclability and the separability of materials, where relevant criteria and supporting evidence are available,
- project- and article-specific information supporting identification and traceability.

No assumption of the EPR producer role in our standard supply model

The EPR producer role must be distinguished from the role of the packaging manufacturer. It depends in particular on who first makes packaging or packaged products available in a Member State and in which Member State the packaging is expected to become waste.

In its standard supply arrangements, PE-PACKAGING does not consider itself the EPR producer. In our position, the design, manufacture or supply of customised packaging alone does not constitute an assumption by PE-PACKAGING of national registration, reporting, financing, take-back or scheme participation obligations.

Any different allocation of roles or assumption of additional obligations requires an express written agreement before the start of the project and a separate legal and commercial assessment. Any mandatory legal classification remains unaffected.

Product- and project-specific assessment

PPWR documentation can only be prepared on a product-, project- and role-specific basis. A general conformity statement covering the entire product portfolio would therefore not be appropriate. For an assessment, we require at least:

- the article or project number and the applicable drawing revision,
- the packaging category and intended use,
- the delivery or destination country,
- confirmation of the name, trademark or identification under which the packaging is made available,
- confirmation of who determines the essential design specifications and approves the packaging.

For packaging supplied in the past, the date on which it was first placed on the market, the documentation available at that time and any applicable transitional rules must also be considered. A retrospective or general EU declaration of conformity can therefore not be issued without assessing the specific product.

Your PPWR enquiry

Please submit product-related PPWR enquiries to your contact at PE-PACKAGING. Please state the article or project number, the drawing revision, the delivery or destination country and the intended allocation of roles. We will then assess which documents can be provided in our capacity as supplier and whether further information is required.

Important notice

This information describes the general position and current implementation status of PE-PACKAGING. It does not constitute legal advice. The applicable legislation, the actual supply and distribution routes and the specific project agreements remain decisive. Legal basis: Regulation (EU) 2025/40 and Commission Notice C/2026/3084 of 10 June 2026.