

	Manufacturer	Producer	Importer	Distributor	End user
Definition	Who Entity that designs or has packaging produced under its own name or trademark; The entity that fills sales or grouped packaging	Manufacturer, importer or distributor who first makes packaging or packaged products available in a given Member State	An EU- incorporated legal entity (not just a branch) that places packaging originating from outside the EU onto the EU market	Any entity in the supply chain that makes packaging or packaged products available on the market, other than the manufacturer or importer	EU natural or legal person who does not make the product further available on the market in the form supplied to it
	Where One manufacturer EU-wide per packaging unit	One per supply chain per Member State, identified where packaging is expected to become waste	One per import transaction	Multiple distributors can exist in the same supply chain	One end-user per packaging unit
	Nuance If the brand owner is a micro- enterprise (<10 staff, ≤€2M turnover) and its packaging supplier is in the same Member State, the supplier is the manufacturer	The same entity can be both manufacturer and producer. If packaging is exported outside the EU, EPR obligations no longer apply	A branch without separate legal personality cannot qualify as an importer. A fully incorporated subsidiary or an authorised representative is required	An unpacker or logistics operator who repacks goods before distribution may qualify as a producer even without ownership of the goods	Importers unpacking or repacking products into smaller quantities before sending the packaged product, are not to be considered end users
Core Responsibilities	Product compliance; conformity assessment; EPR / waste financing <u>Ensures packaging meets all requirements</u> concerning sustainability and labelling before it is first placed on the EU market; Carries out the conformity assessment; drafts and signs the EU <u>Declaration of Conformity</u> ; maintains technical documentation; Bears sole legal responsibility	<u>Registers with the competent authority</u> in each Member State where packaging is first made available (link); Reports packaging volumes; <u>Pays EPR fees</u>	Ensures the manufacturer's <u>conformity documentation is available</u> . May be treated as manufacturer if no EU manufacturer is identified; Becomes the producer (and must register and pay EPR fees) in the Member State where it first makes packaging available	<u>Verifies packaging is accompanied by a Declaration of Conformity</u> ; Distributors do not need specific information on packaging material and weight; Becomes the producer (and must register and pay EPR fees) if it is the first to make packaging available in a Member State	Correctly dispose & recycle packaging as indicated on label. In case of imports from outside the EU, the distance seller acts as producer
Typical Case	Often you act in multiple roles at once! You put your brand on the packaging (even if produced by a supplier); You add new packaging for distribution in your name	You bring a packaged product on the market in an EU Member State	You bring packaged products originating from outside the EU onto the EU market	You resell products without changing the packaging	Typical case: You unpack the product to use in your process