

(English version)

**Question for written answer E-003123/26  
to the Commission  
Wouter Beke (PPE)  
(24 July 2026)**

*Subject:* Definition of ‘manufacturer’ under the PPWR in the context of private-label models

The application of the definition of ‘manufacturer’ under Article 3(13) of the Packaging and Packaging Waste Regulation (PPWR) appears unclear in the context of private-label business models. In such models, one undertaking produces and packages a product, while another places it on the market under its own name or trademark. This creates uncertainty regarding the distribution of obligations between the economic operators concerned.

1. In a private-label model, which entity should be considered the manufacturer within the meaning of Article 3(13) PPWR?
2. Whose contact details must be indicated on packaging pursuant to Article 15(6) of the regulation, and may the details of another economic operator acting on behalf of the manufacturer be provided instead of those of the manufacturer?
3. Does the Commission intend to discuss this issue within the Expert Group on Waste or issue guidance to ensure consistent application of the PPWR across the EU?

Submitted: 24.7.2026

**Answer given by Ms Roswall on behalf of the European Commission  
(14 September 2026)**

Ahead of the general application of the Packaging and Packaging Waste Regulation (PPWR) <sup>(1)</sup> and in order to support the effective and timely implementation thereof by economic operators and Member States, the Commission has issued a Guidance document on the PPWR as well as a Frequently Asked Questions (FAQ) document <sup>(2)</sup>.

These documents clarify that under Article 3(1), point 13(a) of the PPWR, if a packaging bears a name or trademark, it is the economic operator under whose name or trademark the packaging is placed on the market that will be considered the ‘manufacturer’.

This also applies even if another economic operator is responsible for physically carrying out the manufacturing or filling of that packaging.

Pursuant to Article 15(6) of the PPWR, the contact details of the operator considered to be the ‘manufacturer’ must be indicated on the packaging. This obligation cannot be fulfilled by any other economic operator.

The Commission is committed to ensuring a pragmatic implementation of the PPWR, and to closely involving stakeholders in this process, including in the context of the Waste Expert Group.

Given that stakeholders expressed a strong need for further clarification on the definition of the manufacturer, the Commission provided this at a meeting of the Waste Expert Group on 1 July 2026. Following this request, to ensure a consistent application, the Commission updated the FAQ for the PPWR accordingly.

Further information can be found in Section 2 of the above-mentioned Guidance document on the PPWR, as well as Chapter II of the FAQ.

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<sup>(1)</sup> Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, OJ L, 2025/40, 22.1.2025.

<sup>(2)</sup> [https://green-forum.ec.europa.eu/packaging-and-packaging-waste-regulation-implementation\\_en](https://green-forum.ec.europa.eu/packaging-and-packaging-waste-regulation-implementation_en).