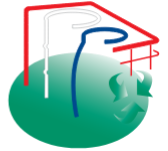




EIPA

SERRED  
RESPONSIBLE CARE



## Information obligations of suppliers of packaging under PPWR <sup>1)</sup>

EIPA (European Industrial Packaging Association) is the umbrella organisation under which the following industrial packaging associations have come together:

**SEFA – European Association of Steel Drum Manufacturers**

**SEFFI – European Association of Fibre Drums Manufacturers**

**SERRED – European Association of Reconditioners**

**As EIPA we confirm that the members of these associations that deliver empty (industrial) sales packaging are suppliers as defined by PPWR <sup>2)</sup>.**

Article 16 PPWR stipulates that **suppliers provide manufacturers with all the information** and documentation necessary for the manufacturer to demonstrate the conformity of the packaging and the packaging materials with this Regulation, including the technical documentation referred to in Annex VII and required under or pursuant to Articles 5 to 11.

**Please note that our members will of course provide the required information. However, they will not provide a declaration of conformity or a technical documentation as these fall within the remit of the manufacturer.** According to PPWR a manufacturer is any natural or legal person that develops or manufactures packaging or a packaged product under their own name or trademark <sup>3)</sup>. Therefore, **manufacturers are typically brand owners or fillers using packaging**, and thus customers of our members. PPWR obliges manufacturers to:

- Carry out conformity assessment (Article 38; Annex VII)
- Establish technical documentation (Annex VII)
- Draw up the EU Declaration of Conformity (Article 39; Annex VIII)
- Retain documentation (5 years single-use / 10 years reusable) (Article 15)

As EIPA we are developing **guidance documents** that will **help our members** provide the required information and support their customers to the greatest possible extent. Once finalized, our members will be invited to use these documents to **present the required details for empty (industrial) sales packaging as delivered to their customers.**

For further information, please do not hesitate to contact us.

European Industrial Packaging Association (EIPA); April 2026

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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](#)

<sup>2</sup> PPWR, Article 3 (16): 'supplier' means any natural or legal person that supplies packaging or packaging material to a manufacturer

<sup>3</sup> PPWR, Article 3 (13)