

VMV Notice

Information obligations of suppliers of packaging under PPWR¹

As Verband Metallverpackungen e.V (VMV) we confirm that our members that deliver empty sales packaging or packaging components (closures) are suppliers as defined by PPWR².

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 trademark³. 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 VMV 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 exclusively to use these documents to **present the required details for empty sales packaging or packaging components as delivered to their customers.**

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

VERBAND METALLVERPACKUNGEN E.V.

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¹ [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](#)

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

³ PPWR, Article 3 (13)