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PPWR Guide

Manufacturer Identification on
Private Label Products and
Directly Imported Products from
outside the EU

Netto



salling group

Comercial Quality Department
SALLING GROUP

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PPWR Guide

As part of the implementation of [EU Regulation 2025/40](#) on packaging and packaging waste (PPWR), the manufacturer must be identified on the labeling of both packaged products intended for sale and various types of packaging.

Manufacturer vs. Producer

PPWR distinguishes between a manufacturer (who is responsible for compliance with the product requirements themselves) and a producer (who, under *Extended Producer Responsibility* (EPR), is responsible for registration, reporting, and financing of waste management activities).

	MANUFACTURER	PRODUCER
DEFINITION	 Manufacturer of packaging/packaged products. The trademark owner or the party that commissions the product and has an influence on the design specifications is considered the manufacturer.	 Any manufacturer, importer or distributor that makes packaging/packaged products available for the first time in the territory of a Member State or directly to an end user in another Member State.
SCOPE	 One economic operator in the EU (starting point)	 The economic operator that makes packaging/packaged products available for the first time in the territory of a Member State.

In this guide, only the “**manufacturer**” is referred to. For own-brand products and other/“no-name” brands imported from outside the EU, the responsibility of the manufacturer will rest with “the importer”.

For further guidance on the role of importers, please refer to the European “[Blue Guide](#)”.

Packaging Types

This guide describes the packaging types listed below.

Types of packaging

3 types of packaging

PRIMARY (sales packaging)	SECONDARY (multipack/film/trays/displays)	TERTIARY (transport packaging)
		
Packaging in direct contact with the product	Packaging that groups several sales units	Packaging that facilitates handling and transport

On all types of packaging, a single address for the “manufacturer” within the EU must be provided. This guide will explain when and how Netto must appear on the labeling as the manufacturer.

For further explanations of the three packaging types, see [APPENDIX 1: PACKAGING TYPES](#).

Note: This guide does not cover Extended Producer Responsibility (EPR) obligations in individual Member States. The examples provided should be interpreted solely based on their wording and are therefore not intended as design templates.

Guide refers on several occasions to the Danish Environmental Protection Agency’s FAQ, which can be found at the following links:

[Frequently Asked Questions and Answers – Danish Environmental Protection Agency](#) (Frequently Asked Questions and Answers - Packaging Environmental Requirements)

[Frequently Asked Questions and Answers – Danish Environmental Protection Agency](#) (Frequently Asked Questions and Answers - Extended Producer Responsibility for Packaging)

FAQ: In [Appendix 2](#) we have included a few common questions and answers relating to PPWR.

Manufacturer Role in Netto

Netto becomes the manufacturer of the following products:

- 1) **The packaging or the packaged product is manufactured under Netto's own name/trademark;**
or
- 2) **Netto places the order for the packaging and determines the packaging design specifications (regardless of trademark registration);**
or
- 3) **Netto imports the packaging/package product from a third country as an importer in accordance with the PPWR rules.**

Note:

A company does not become the manufacturer merely by affixing a sticker or label containing its company name or logo, for example on a transport box. The company must have modified the packaging itself, such as through printing or design changes, before it is considered the manufacturer.



- If a price sticker is applied (e.g. due to price reduction on a product approaching its expiry date), would this be considered a “modification of the packaging” and thus result in assuming the manufacturer’s obligations?

The Commission has verbally confirmed that applying a sticker to packaging does not make the party applying the sticker the manufacturer. The Commission will update its FAQ to reflect this.

Kilde: [Miljøstyrelsen](#)

Manufacturer Information for Different Types of Products

This guide is based on products associated with Netto Denmark.

Where Netto meets the criteria for being the manufacturer of the products described above, the following address must appear on the packaging/product:

Netto, Mimersvej 1, DK-4600, netto.dk

Application of QR code

As a general rule, manufacturer information and identification must be provided on each type of packaging (primary/multipack, secondary, and transport packaging). Where the size or nature of the packaging does not allow this, the information may be provided via an appropriate QR code/data carrier or accompanying document in accordance with Article 15(5) and (6) of the PPWR.



This QR code containing manufacturer information may be used for Netto DK.

International packaging with Multiple Languages

When Netto Denmark is the manufacturer of products that are also sold in Germany and Poland, the website addresses for the respective countries must be added to the product declaration to facilitate customer contact (see the example in the section on food products). The following information must be added to the German (DE) and Polish (PL) declarations, respectively:

DE: **Kundenkontakt: netto.de**

PL: **Kontakt i in-formacje: netto.pl**

Only one manufacturer may be indicated on the packaging, and the address to be provided is determined by the country responsible for designing/procuring the product. If the German or Polish entity is to be identified as the manufacturer, the following addresses shall be used:

DE: *[Netto ApS & Co. KG, Siemensdamm 64, DE-13627 Berlin, netto.de](http://netto.de)*

PL: *[Netto sp. z o.o., Motaniec 30, PL-73-108 Kobylanka, netto.pl](http://netto.pl)*

Manufacturer Information on Netto products

Below specifies how the address must be stated depending on the product category

Food Products

The manufacturer shall be indicated in accordance with the “Know Your Product” concept:

*Produced/Imported/Packed by [company name and postal address] for
Netto, Mimersvej 1, DK-4600, netto.dk*

Added to international packaging: DE: **Kundenkontakt: netto.de** / PL: **Kontakt i in-formacje: netto.pl**

Example: Danish packaging



Find all specific requirements for food products in the “Know Your Product” Concept.

Nonfood

"Own Brands" (from both EU and non-EU):

Produced/Supplied/Imported by [company name and postal address + website address, if applicable]

for Netto, Mimersvej 1, DK-4600, netto.dk

or, where specific agreements with Netto apply:

Netto, Mimersvej 1, DK-4600, netto.dk

Example:



Note: There is no legal requirement to identify the supplier, manufacturer, or importer on own-brand products; however, this is a specific requirement imposed by Netto.

Import of Other Brands / No-Name products / A-brands etc.

When Netto imports No-Name products/other brands from outside the EU:

Imported by Netto, Mimersvej 1, DK-4600, netto.dk

As well as the name and postal address of the producer/manufacturer + electronic address



For imported No-Name/A-brand products (outside the EU), Netto must be identified as the "importer", and the product must also be labelled with the manufacturer's address/contact details.

Note: Netto is responsible for the import (=importer) when the product is paid for in **non-EU currency (e.g. £/\$)**. If payment is made to European agents/suppliers in DKK/EU currency, it is not considered an import, regardless of the shipping method (DDP/FOB)

Hazard-labelled products: Chemical mixtures, detergents, adhesives, paints, etc. with a CLP label

Produced by [Manufacturer, postal address, (electronic address, if applicable), telephone number] for Netto, Mimersvej 1, DK-4600, netto.dk*

** The postal address and telephone number may be omitted if stated in the CLP label.*

At the bottom of the CLP label:

*Manufacturer, postal address (electronic address, if applicable) **telephone number***

Example:



Personal care, cosmetics etc.

State both the manufacturer and the "responsible person" and state the country of origin if produced outside the EU.

Produced in [Country outside EU] for Netto, Mimersvej 1, DK-4600, netto.dk

Responsible person^{**}: *Name, postal address + electronic address, if applicable*

^{**}The company that submits the **CPNP** (Cosmetic Products Notification Portal) registration

Example:

Personal care, cosmetics etc.



**Produced in China
for Netto**
Mimersvej 1
DK-4600
netto.dk

Responsible person:
Kosmo Nordic A/S
Søren Frichs Vej 34
DK-8230 Åbyhøj
kosmonordic.dk

If due to limited space, "Responsible Person" cannot be stated, the name and address of the manufacturer/agent may be underlined

Produced in [Country outside the EU]

Produced/supplied/imported by [Manufacturer/Agent (Name, postal address + electronic address, if applicable)]

for Netto, Mimersvej 1, DK-4600, netto.dk

Example:



Special delivery situations (all products except food)

There may be cases where a Danish agent must be stated on the packaging, even if the agent was not responsible for customs clearance and is therefore not the importer. If the country of manufacture is also stated, it must be done as follows:

Produced in [Country]

Supplied/imported by [Agent, postal address] for Netto, Mimersvej 1, DK-4600, netto.dk

Note: There are additional labelling requirements for detergents/products with CLP labelling, as well as cosmetic products (e.g. telephone number and country of origin if outside the EU)

APPENDIX 1: PACKAGING TYPES

Sales Packaging/Product Labelling with Manufacturer Information

Definition:

Sales packaging is also referred to as primary packaging

Manufacturer information and identification do not need to appear on each individual component of the same packaging unit. It is sufficient for the required information to appear on one component, provided that the packaging unit can thereby be identified and linked to the relevant documentation.

Sales packaging (products as sold)

Sales packaging refers to the unit of sale, so the product can be presented and sold directly to the consumer.



Can with paper wrap

The can consists of several sales units, so the product can be sold directly to the consumer.



Tub with aluminium foil and plastic lid

The tub consists of several sales units, so the product can be sold directly to the consumer.



Bottle with lid and label

The bottle consists of several sales units, so the product can be sold directly to the consumer.

Secondary Packaging (multipack)

Definition:

Secondary packaging (also referred to as a multipack) is packaging designed to **group together a specific number of sales units**, allowing the products to be **presented and sold either as a group or individually** to the customer at the point of sale. Examples include sales trays/shelf-ready packaging, film wrapped around cans or bottles, or cardboard sleeves around bottles/cans, where the customer may have the option to remove or purchase a single product or buy the entire multipack.

Manufacturer information and identification must, as a general rule, appear on the packaging. If the size or nature of the packaging does not allow this, the information may be provided via a relevant QR code/data carrier or an accompanying document in accordance with PPWR Article 15(5) and (6)

Secondary packaging (multipack)

Secondary packaging groups a defined number of sales units, so the product can be presented and sold directly to the consumer.



Bottles of water in shrink wrap

The film groups several sales units, so the product can be sold directly to the consumer.



Juice cartons in shrink wrap

The film groups several sales units, so the product can be sold directly to the consumer.



Products in display tray

The display tray groups several sales units, so the product can be sold directly to the consumer.

Secondary packaging includes, for example film or trays that enclose several products and are displayed with the products in the store or are sold together/separated and sold individually.

The Danish Environmental Protection Agency states:

- If packaging consists of several components (drums, film, screws, labels, signs, tape) does each individual component need to bear identification?

The identification must follow the packaging unit, i.e. sales packaging, transport packaging etc.

- The cardboard box containing packs of cold cuts is often also used as transport packaging. In that case, is it considered multipack packaging or transport packaging?

Multipack packaging that is also used for transport will still be considered multipack packaging. The Commission's updated guidance of 3 August 2026 clarifies that multipack packaging also includes display packaging and that it can be removed without altering the characteristics of a product, as is the case with the cardboard box containing the packs of cold cuts.

Tertiary/Transport Packaging

Definition:

Tertiary packaging (also referred to as transport packaging) is packaging that facilitates the handling and transport of multiple sales units/multipacks and prevents physical damage during transport.

Examples include transport boxes, shipping cartons that are not sold to the customer, plastic wrapped around goods on pallets, straps etc.

Tertiary packaging (transport packaging)



Colli boxes

Colli boxes consist of several sales units, so the product can be sold directly to the consumer.



Pallet, pallet wrap etc.

Pallets and pallet wrap consist of several sales units, so the product can be sold directly to the consumer.

Manufacturer information and identification must, as a general rule, appear on the packaging. If the size or nature of the packaging does not allow this, the information may be provided via a relevant QR code/data carrier or an accompanying document in accordance with PPWR Article 15(5) and (6)

Note: Netto is very rarely the manufacturer of transport packaging, as Netto does not require its logo/own design on this type of packaging.

The manufacturer of generic transport packaging is therefore often the European producer/importer.

APPENDIX 2: QUESTIONS AND ANSWERS TO PPWR Q&A

1. Netto pays a supplier/agent for products (not own-brand) manufactured in China. Payment is made in **DKK**, but Netto arranges the transport itself (FOB). Would this be considered an imported product for which Netto assumes responsibility as the manufacturer?

Answer: *No. If Netto pays for the product in DKK/EU currency, as a general rule, the agent/EU-based company is considered the importer, provided that this company has placed the product on the EU market. The fact that Netto arranges the transport from China itself does not change this. The decisive factor is which party legally brings the product from a third country onto the EU market and thereby act as the importer – “follow the money”.*

2. Is it necessary to state both the manufacturer and the importer under the PPWR in the case of DDP (Delivered Duty Paid) / FOB (Free On Board) for other brands or private label products?

Answer: Other brands/No-name product, DPP/FOB: *The decisive factor is not the shipping method, but where the product is purchased, i.e. “follow the money”. If the product is paid in EU currency, Netto is not the importer, whereas Netto becomes the importer if payment is made in non-EU currency.*

Private label, DDP/FOB: *For all private label products, Netto becomes the manufacturer, regardless of how the product is paid for/shipped. Therefore, there is no requirement to also state Netto or another party as the importer. However, Netto requires the importer to be stated. The Blue Guide (<https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=OJ:C:2022:247:FULL>) contains examples of how this information should be provided depending on the specific situation.*

3. Does Netto become the importer of A-branded products purchased in Sweden in shelf-ready displays?

Answer: *No, the A-brand has the manufacturer responsibility for both primary and secondary packaging. Netto will be the producer and pay the packaging fee.*

4. Who is the manufacturer of an unbranded transport box?

Answer: *If the transport packaging is generic and standardized, the manufacturer is, as a general rule, the company that physically manufactures the packaging. If the packaging has been ordered with specific design specifications by another company, the role of manufacturer must be assessed based on who placed the order and determined the design specifications*

5. Does an imported “no-name” glass vase manufactured in Turkey need to be labelled with Netto’s address?

Answer: *It depends on whether Netto imported the product itself or purchased it from another company in the EU that imported the product. The company responsible for the import must be identified as the importer.*

6. Netto has a product range that is developed by the supplier but sold exclusively to Netto, for example Let's Party or Fixer. Is Netto considered the manufacturer of these products, and must Netto be identified on the labelling?

Answer: No. As the products/concepts are developed/designed by the supplier, the supplier is considered the manufacturer and must be identified on the packaging.

7. When does Netto become the manufacturer?

Answer: Below are a number of examples and answers regarding products that are supplied:

Product type	Example	Is Netto the Manufacturer?	Address / sender information
Product with a registered Netto brand	Nord, Derfor, Innerli, Powermaker, Prolight and Bodyguide.	YES	Produced by [company name and postal address + web address] For Netto, Mimersvej 1, DK-4600, netto.dk
Product with a non-registered Netto brand, where Netto has no influence on the name, design, packaging, etc.	E.g. "Let's Party" and "Fixer". Brands developed by suppliers . (If exclusivity has been agreed for the products, this may in some cases affect the assessment and must be assessed on a case-by-case basis.)	No*	Produced by [company name and postal address + web address]
Product where there is no registered Netto brand, but with a defined campaign design manual from Netto, and where Netto has influence on the name, design and packaging , etc.	E.g. Christmas packaging, where the design manual is shared with several suppliers to ensure a consistent look / Shared Design.	YES	Produced by [company name and postal address + web address] For Netto, Mimersvej 1, DK-4600, netto.dk
Seasonal product where there is no registered Netto brand, and where Netto has influence on the name, design and packaging , etc.	Seasonal / SA collections with a design manual developed by Netto, often shared with several suppliers.	YES	Produced by [company name and postal address + web address] For Netto, Mimersvej 1, DK-4600, netto.dk
* If Netto determines the product range, design and suppliers, Netto will be considered the <i>manufacturer</i> .			

8. Does the shipping carton (which is not used for in-store display) for Netto's own brands, e.g. Egelykke Yoghurt or Nord Scented Candles, also need to be labelled with Netto's address?

Answer: Shipping cartons must not display a logo in Netto and are, as a general rule, considered the supplier's transport packaging, unless the shipping cartons have been specifically designed by Netto. Therefore, Netto should generally not be stated as the manufacturer.

See also Question 8 regarding secondary packaging, as a shipping carton may end up being used as a sales display and thus constitute secondary packaging.

9. Should a shipping carton bearing a label stating Netto's product name and other product information be considered an own-brand product and therefore be labelled with the manufacturer's address?

Answer: A sticker displaying Netto's name, product information and similar details is not considered a logo/trademark or a "modification" of the packaging.

- If a price sticker is applied (e.g. due to price reduction on a product approaching its expiry date), would this be considered a "modification of the packaging" and thus result in assuming the manufacturer's obligations?

The Commission has verbally confirmed that applying a sticker to packaging does not make the party applying the sticker the manufacturer. The Commission will update its FAQ to reflect this.

10. Does applying a sticker, label, price sticker, etc. to packaging make you the manufacturer?



Answer: No. See the response from the Danish Environmental protection agency below

- If a price sticker is applied (e.g. due to price reduction on a product approaching its expiry date), would this be considered a "modification of the packaging" and thus result in assuming the manufacturer's obligations?

The Commission has verbally confirmed that applying a sticker to packaging does not make the party applying the sticker the manufacturer. The Commission will update its FAQ to reflect this.

11. Is a sales tray considered secondary packaging, and is Netto the manufacturer if the product is a private label product?

Answer: Yes, sales trays are secondary packaging, and Netto will always be the manufacturer, regardless of whether a logo is printed on the packaging, as the secondary packaging accompanies the shelf-ready product.



12. What should we do with packaging that was already ordered/delivered before 12 August 2026?

Answer: Packaging that was produced before 12 August 2026 but has not yet been placed on the market does not necessarily have to be destroyed, reproduced or relabeled. Where the requirements cannot be met directly on the packaging, accompanying documentation may be used in accordance with the PPWR.