BOXON GROUP AB

PPWR Q&A November 5th, 2026

PPWR Q&A Connected to Online Webinar

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1. Important Disclaimer

All answers below are based on Boxon's interpretation of the content within PPWR and should be viewed only as supporting guidance that can help you collect more information towards your own interpretations. Our answers are not to be seen as any form of legal advice or legal recommendations.

2. Questions & Answers from the Webinar

2.1 Roles, Responsibilities, and Classification Questions

Question: What is a standard packaging for Boxon? Is FIBC a standard packaging?

Answer: Standard packaging is classified as a product whose design and specifications are defined by us (Boxon). However, if at any point during our agreement you play a part in the design, construction, or branding of the packaging, you as the customer assume the legal role of the manufacturer. So a FIBC article can be both a standard article and a customer-unique article, depending on who has designed it (in this case, Boxon or you as a customer).

Question: As a supplier to an end customer, if I assist them with developing a new customized packaging solution, who holds legal responsibility for the Declaration of Conformity (DoC) and technical documentation—is it our company or the end customer? Additionally, is providing support for this documentation a service that Boxon offers?

Answer: When packaging is customized or brand-specific, the customer who dictates the design or places their trademark on the packaging legally assumes the role of the 'Manufacturer' under the PPWR. Therefore, the legal responsibility to compile the technical file and issue the final Declaration of Conformity (DoC) rests with the end customer. Additionally, we provide templates and are willing to help you with questions you have regarding this topic

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Question: Under the PPWR, if packaging is customized and features our website address or branding, how does this affect our legal role as the manufacturer, and what are our compliance responsibilities regarding the technical file and Declaration of Conformity?

Answer: If the packaging is customer-unique, it is your responsibility to create the DoC for the packaging and keep this in your records for 5 years together with all additional documentation when and if you need to show it to national market authorities (please see the page in the presentation on this for more info).

Question: If the customer orders packing products with their own logo, and the customer is the end user of packaging, the producer should be considered to have manufacturer obligations, not the customer. Is this correct?

Answer: That statement is partially confusing on how the PPWR defines roles. If the customer orders packaging printed with their own logo, custom dimensions, or proprietary branding, they are legally dictating the design. Under the PPWR, the entity whose brand or trademark appears on the packaging assumes the regulatory role of the manufacturer for those specific items, not the supplier. Therefore, for custom-branded packaging, the customer holds the responsibility for the final Declaration of Conformity, while Boxon acts as a supportive partner by providing the necessary technical data and material compositions so they can fulfill that obligation.

To clarify a common point of confusion: there is a major legal difference between being a 'producer/end-user' of a packaged product in a commercial context and being the 'manufacturer' of the packaging itself under PPWR definitions. Just because your company is the end-user or buyer of the packaging in a B2B relationship does not exempt you from being designated as the legal 'manufacturer' of the packaging if you dictate its custom design, dimensions, or branding.

Question: If corrugated cardboard is used exclusively as protective packaging for products during transportation, and shrink film is used for the same purpose, who is considered the manufacturer, and what are the requirements regarding the logo on the shrink film?

Answer: This depends on whether the packaging is a customer-unique article or not. If it is customer-unique, then you as the customer will be the manufacturer. If it is part of our Standard Assortment, then Boxon will be the Manufacturer. On the other hand, for stretch film is currently not possible to print or mark with PPWR information, and we don't see that this will be required. Instead, accompanying documentation should be enough and provide the necessary information for each packaging.

Question: What are the requirements on marking when the packaging is only used as a transport packaging between two manufacturers and no one is the producer who puts the packaging on the EU market?

Answer: The producer is not related to the role of Manufacturer in this case. We would say that the requirements are the same in this situation. This is because the packaging regardless of if it is classified as transport packaging, ends up on the EU market. Please see more information in the presentation where the requirement for marking is expressed.

2.2 Declaration of Conformity and Documentation Questions

Question: We see that the Declaration of Conformity (DoC) is being sent to us as a PPWR compliance document. Can we send customers alternative compliance statements accompanied by technical documentation instead of the DoC?

Answer: When you, as a customer, act as the manufacturer under the PPWR, the primary legal document you are required to issue and show is your own Declaration of Conformity (DoC). This signed document demonstrates that you have performed a conformity assessment in accordance with Annex VII of the regulation. If a national market surveillance authority issues a reasoned request for the underlying technical documentation behind your conformity assessment, you have 10 business days to gather and provide those documents for the packaging you distribute.

Question: In what scenarios is it specifically recommended to receive a DoC? For instance, does this apply when a company is acting as an importer?

Answer: The only scenario where a company will be likely to receive a DoC is if the company above it is a manufacturer. This means: If Boxon is the manufacturer, you as a customer will receive a DoC. If you are the manufacturer, then your customer will receive your DoC.

Question: What is meant by "Keep technical documentation"?

Answer: Keeping technical documentation means saving / bookkeeping / storing documentation related to a product / packaging / packaging type for 5 years according to PPWR.

Question: We have a question regarding the collection of technical documents and Declarations of Conformity (DoCs) from suppliers. Do we need to actively collect them with every single purchase order (PO), or is it sufficient to only request and obtain them upon an official request from national authorities?

Answer: Under PPWR, Declarations of Conformity (DoCs) do not need to be provided with every purchase order. DoCs are intended for verification by national market surveillance authorities upon request. If you act as the manufacturer, you simply need to have your DoC drawn up and available at all times so it can be produced if an authority requests it.

Question: Will the PPWR Declaration of Conformity need to accompany every shipment, or is it enough to keep the documentation available and provide it only upon customer, auditor or authority request?

Answer: Under the EU Packaging and Packaging Waste Regulation (PPWR), a formal Declaration of Conformity does not need to accompany every individual shipment or purchase order; rather, it is designed for verification by national market surveillance authorities upon a reasoned request, requiring compliance dossiers to be kept available for production within a 10-day window.

Question: Are the formal statements and assurance declarations mandatory to create a DoC, or is it enough with the conformity assessments?

Answer: To clarify, formal statements and assurance declarations (such as those covering heavy metal thresholds and PFAS compliance) are mandatory foundational components required to validly execute a conformity assessment and issue a Declaration of Conformity (DoC). A conformity assessment is the overall compliance evaluation process outlined in Annex VII of the regulation, while the assurance declarations serve as the necessary legal and technical proof that substance-of-concern limits are met. You cannot validly issue a DoC without them. When national market surveillance authorities request verification, they evaluate your conformity assessment process, and the documents you present will depend on your role: if you are not the manufacturer, you provide the DoC; if you are the manufacturer, you must provide the underlying technical documentation and substance declarations backing up that conformity.

Question: In an EMS business, one packaging solution may contain components defined by different parties, for example, customer-branded boxes, customer-specified pallets, supplier packaging materials and manufacturer-added packaging items. Can each packaging component be documented separately by its owner, or is one PPWR Declaration of Conformity expected for the complete packaging solution with different materials?

Answer: The PPWR expects a DoC per packaging unit not per packaging solution. The packaging unit includes all its integrated and separate components. The manufacturer is the

party that makes the packaging or has it designed or made under its own name or trademark, even if another trademark also appears on it.

Take a radio packaging as an example as an example. **Company B sells radios**, and **Company A supplies B's packaging**. The box is a cardboard carton with protective inserts, designed with A's input but made to B's needs and carrying B's design and logo. Company B is the manufacturer of this packaging unit and signs one DoC covering the carton, inserts, inks, adhesives and labels. Company A, do not issue separate declarations for the carton or the inserts. They give B the evidence it needs, such as heavy metal and PFAS data so Company B (the manufacturer) can draft its own DoC.

The stretch film and the pallet that is transporting the packaging unit are different. Wrappings and straps are separate packaging types, each requiring its own assessment and its own declaration. They are not covered by B's declaration for the box. If Company A supplies the pallet and film to Company B under its own name or has them made to its own design, Company A is their manufacturer and issues a separate DoC for each.

So, the radio shipment ends up with one DoC for the box unit, signed by Company B, and separate DoCs for the pallet and the stretch film signed by Company A. In an EMS setting, the practical step is to agree in writing, for each packaging item, who the manufacturer is, who signs, and who supplies the evidence.

Question: For how long does the documentation have to be kept available?

Answer: For regular packaging, up to 5 years. For re-usable packaging, up to 10 years.

2.3 Packaging Marking & Traceability

Question: One of the manufacturer's key obligations under the regulations is to mark packaging with a traceability number and include the manufacturer's address. For generic, unprinted packaging such as stretch film—where Boxon is considered the manufacturer—how can these two marking and address requirements be practically fulfilled once the stretch film is applied and used?

Answer: Certain types of transport packaging, such as stretch film, cannot be physically marked. Therefore, under the PPWR, this packaging is classified in a way that accompanying documentation is legally sufficient to fulfil compliance requirements.

Question: Under the PPWR, can packaging marking (such as traceability numbers and manufacturer details) be provided via the shipping note, or is it sufficient to reference the company's website instead of printing it directly on the packaging?

Answer: Based on our current interpretations and ongoing discussions with industry stakeholders—including TMR in Sweden—our position is that marking packaging with your logo and website is sufficient. This approach works because it is expected that all necessary manufacturer information and compliance details will be published directly on your website.

Question: What if the packaging is customized and we would need our www. on the package?

Answer: This will be up to you to decide, but in our opinion, there is not a big difference between having a company name (brand name) and adding www.brandname.com. In our interpretation, it

is clear that your brand name indicates that you are the Manufacturer, even without the website. But again, this has to be your decision.

Question: If we have our logo on the box, is that sufficient as labelling?

Answer: According to the text in PPWR, no it is not sufficient; but as explained in the webinar, this will be a decision you need to make. See the slide where you can see our interpretation on this and what we have done, but it is ultimately up to you to decide when you are considered to be the manufacturer (which you are if your logo is on the packaging).

2.4 Implementation Timeline, Transition & Practical Compliance

Question: For packaging already purchased or put into use before 12 August 2026, will suppliers still need to provide a PPWR Declaration of Conformity or other PPWR compliance documents?

Answer: Our short answer is no, since the regulation started on Aug 12th, 2026, and before that the requirements do not need to be met. Every product introduced on the market starting Aug 12th, 2026, is in scope.

Question: You are saying that you are not filling Excel templates. We did decide to go with a supported external tool, which will send a request for the relevant information by mail and ask you to fill information directly in that tool. How will you handle these requests?

Answer: We would say that it depends on the template you send, since we have seen many templates that we cannot fill in due to information not being in place yet, regulatory aspects that haven't started, etc.

Question: Regarding EPR fees, if Boxon shall be the one paying the fees, will that only be in the member state they deliver to? Your customers might ship the transport packaging to other member states; how will this be handled?

Answer: This is exactly what we are not sure of yet, and we are investigating these areas right now. Honestly, we can't see how this can be done in practice yet, and we don't know where our customers ship their products.

Question: What about the obligation for the suppliers of being registered in the national waste databases (in a European country) where the waste (packages) are sent to? You do not have to report about the volumes yet, but you need to be registered there according to the PPWR regulations?

Answer: Correct, our recommendation is that you register in those countries where you will have the duty of Producer Responsibility. More information will most likely come within this area as well soon.
