

FACT SHEET – SEPT. 2026

CONTRACT PACKING AND UNPACKING: **WHO ARE THE PRODUCERS?**

PPWR and logistics companies

FACT SHEET FOR:

- logistics companies (contract packers) carrying out operations on behalf of a principal
- principals that entrust their storage, unpacking, packing or repacking to a logistics company (contract packer).

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PPWR AND LOGISTICS COMPANIES

PPWR FOR LOGISTICS COMPANIES AND THEIR PRINCIPALS

Packing or unpacking for another company: who is the producer?

Do you store, unpack or pack goods for another company? Or do you outsource these tasks to a service provider? This factsheet helps you identify who the producer is and what your obligations are in that capacity.

The PPWR, in a nutshell

The PPWR is the European regulation on packaging and packaging waste. It has been in force in the European Union since 12 August 2026. Its main aims are to reduce waste, promote reuse and recycling, and design more sustainable packaging.
It defines and harmonises who is considered a **producer**.

Who does what?

The principal is the company that commissions the work from the logistics service provider.
The logistics provider, also known as a 'contract packer', stores, unpacks, packs, repacks or dispatches goods on behalf of another company. It does not become the owner of the goods.
The producer is the company that bears the obligations relating to packaging, in particular the financing and proof of recycling.
This is not necessarily the manufacturer or the company that packs the goods.

1. You unpack goods for third parties

You remove the packaging from goods belonging to your principal.
In the table, first identify their country, then the origin of the goods.

The principal is based in...	The goods come from...	Who is the producer?
In Belgium	From a Belgian supplier	The Belgian supplier
In Belgium	From a foreign supplier	The Belgian principal
Abroad	From a Belgian or foreign supplier	The logistics provider

Example: you are unpacking goods for a French company

Your logistics company, based in Belgium, unpacks the plastic wrap and cardboard boxes from goods belonging to a client based in France. Your company is the producer in Belgium for the packaging removed, even though the goods do not belong to it.

Do you also pack or repack? Look at this activity separately on the next page.

2. You pack or repack goods for third parties

The principal is usually the manufacturer. The service provider carries out a service: they are not usually the company that first places these goods on the market.

How to read the tables? Select the country of the prinicpal, then the place where the customer receiving the goods is located.

Does the customer use the goods or resell them?

The end-user uses the goods for their own needs, without reselling them. A customer who buys them to resell them is a **non-end-user**.

2.1 Your principal is in Belgium

The customer is based in ...	**Who is the producer?**
In Belgium	The Belgian principal
Abroad and the end user	The Belgian principal is **likely** to be **a producer in another Member State**
Abroad and not the end user	The foreign customer is **likely to** be **a producer in another Member State**

2.2 Your client is based abroad

The customer is established ...	**Who is the producer?**
In Belgium and an end user	The principal in another Member State
In Belgium and not the end user	The Belgian customer
Abroad	The principal or the foreign customer is **likely** to be **a producer in another Member State**

Example: you are packaging goods for a Belgian company

A Belgian principal has commissioned you to pack goods delivered to their customer in Belgium.
The Belgian principal is the producer, not the logistics company. For unpacking, follow the rules on page 1.

'Probably' means: to be confirmed.
For cases abroad, please check the regulations in force in the relevant Member State.

Your obligations in Belgium as a producer

Are you identified as a producer in Belgium? The obligations below relate to the packaging for which you are responsible, not automatically all the packaging you handle.

- **Contribute to the costs**: you contribute to the funding of the collection, sorting and recycling of the packaging in question.
- **Proving results**: demonstrate each year that the recycling targets have been met.
- **Knowing where packaging is recycled**: you must track its journey to the location where it is actually recycled, and keep records of this.

Recycling targets in Belgium

For each material, Belgian legislation sets the recycling rates that must be attained each year.
You must meet these rates for the packaging for which you are the producer.

Material	Recycling rate
Glass	90%
Paper / cardboard	90%
Metal	90%
Aluminium	75%
Plastic	55%, (65% as from 2030)
Wood	80%

You can count on Valipac

The simplest way to meet these obligations is to become a Valipac customer. Each year, you declare the quantities of packaging for which you are responsible in Belgium; Valipac takes care of the rest of the procedures associated with these obligations.

Your next steps

- **Identify your role in each situation**. Use the tables on pages 1 and 2. Your role may vary depending on the situation and the companies involved.
- **Keep hold of any relevant information.** Note down the origin of the goods and the identity of the principal for each supply chain and the quantities of packaging involved, so that you can substantiate your role in the event of an inspection.
- **Report the relevant packaging quantities to Valipac** via your declaration if your company is regarded as a producer in respect of part of its activities..

Any questions? We're here to help you clarify your role

Write to customer@valipac.be . To help us respond, please specify the origin of the goods, the origin of the principal and the customer, and whether the customer uses or resells the goods.

This fact sheet sets out Valipac's interpretation based on the text of the PPWR. It may be subject to change in line with evolving practices and interpretations.