Are you the "Producer?"

Who's on the hook for packaging EPR?

In packaging EPR laws, the **Producer** is typically the **brand/trademark** owner, followed by their **importer** or **U.S. representative, then the first in-state seller**. Your role affects whether you're obligated to register and report, or must supply another part of the chain with packaging data.

Auto Care Supply Chain Reality Check

- → If you sell **private label**, assume you're a producer until proven otherwise
- → If you **import**, assume you're a producer until proven otherwise
- → Even if you're not the producer, you'll still be pulled into the work via packaging data requests
- → Fastest win: map SKUs to brand ownership + importer of record + channel, then you know where obligations likely land

Quick internal check: ~ 15 minutes

1. Who is the **trademark owner** on the product/packaging?
2. Who **imported** it to the U.S.?
3. Why would anyone think you fit when upstream entities aren't in scope?

Role definitions vary by state and program. This is directional guidance only. Always confirm with your own legal counsel.