BUYING PPE checklist for each product

You are a:

- **User**: buying PPE for my own use or for the use of my employees?
- **Manufacturer**: buying PPE that are marked with my own brand/company name/private label mentioned?
- **Importer**: buying from an economic operator (importer/distributor) inside the EU?
- **Distributor**: modifying the product (including packaging, documents,...), without agreement of the manufacturer or is the change/modification not foreseen in the Technical Documentation of the manufacturer?

Am I buying PPE for my own use or for the use of my employees?

- **Yes**: you are a **User**
- **No**:
  - **Yes**: Am I buying PPE that are marked with my own brand/company name/private label mentioned?
  - **No**: Am I modifying the product (including packaging, documents,...), without agreement of the manufacturer or is the change/modification not foreseen in the Technical Documentation of the manufacturer?

Is only my brand/company name/private label mentioned?

- **Yes**: you are a **manufacturer**
- **No**: Is the manufacturer based in the EU?
  - **Yes**: you are an **importer**
    - **Attention**: a clear indication of:
      - “manufactured by” followed by name and address of the manufacturer
      - “imported by” followed by name and address of the importer
    - **No**: you are a **distributor**
  - **No**: you are a **distributor**

Is the manufacturer based outside the EU?

- **Yes**: you are a **distributor**
- **No**: you are an **importer**

Am I buying from an economic operator (importer/distributor) inside the EU?

- **Yes**: you are a **distributor**
- **No**: you are an **importer**

Manufacturers based in the EU

- address is in the EU; mentioned on the EU type examination certificate, on the declaration of the conformity, on the user instruction, on the product marking.

Attention:

- A manufacturer based in the EU can produce outside the EU:
  - In that case bringing the products from the production plant into the EU is not importing according to the PPE legislation.
  - This doesn’t mean that this is not import for other legislations (e.g. customs)

Production plant

- place where the production takes place.
- is not necessarily the manufacturer.
- it can be owned by the manufacturer or be a subcontractor.
- even if the manufacturer is located in the EU, the production plant can be located in the EU or outside the EU.

Distributor is a broad term that include many players in the supply chain, such as wholesalers, retail, webshops, ...

User:

- company buying PPE to be used by the employees of the company
- consumer buying for his own use.

Users are not selling PPE to third parties. Users are not an economic operator in the sense of the PPE Regulation.

**Disclaimer** - see www.eu-esf.org FAQ

**Economic operators**

- **Manufacturer**: any natural or legal person who manufactures PPE or has it designed or manufactured, and markets it under his name or trademark.
  - Is placing the PPE on the market

- **Importer**: means any natural or legal person established within the Union who places PPE from a third country on the Union market.
  - Is placing the PPE on the market

- **Distributor**: any natural or legal person in the supply chain, other than the manufacturer or the importer.
  - Makes PPE available on the market

- **Authorised representative**: any natural or legal person established within the Union who has received a written mandate from a manufacturer to act on his behalf in relation to specified tasks.

---


www.eu-esf.org