

How to fulfil your obligations under German packaging law in three steps

Preliminary question: Are you a party under obligation?

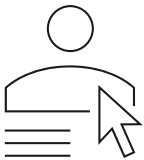
The Verpackungsgesetz (Packaging Act) uses the collective term 'producer(s)' to refer to parties under obligation: they are the first to commercially place packaging filled with goods on the German market.



Regardless of what type of packaging you use to distribute your goods commercially in Germany, you have to be registered with the LUCID Packaging Register. You may have additional obligations to fulfil depending on your packaging. If your packaging typical-

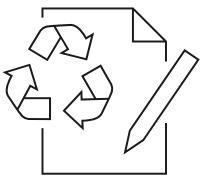
ly accumulates as waste with private final consumers, you need to pay for its recycling. This is called 'system participation'. You can use the system participation requirement catalogue [↗](#) to figure out if an article of packaging is subject to system participation.

If you are a party under obligation:



1. Registering with the LUCID Packaging Register

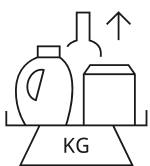
- During registration you will receive a registration number that you will need to enter into a system participation agreement



2. Entering into a system participation agreement

- Determine packaging volumes by material type
- to enter into a participation agreement with one or more system operator(s).
- When entering into the agreement, you need to share your LUCID Packaging Register registration number with your system operator

An overview of the systems available can be found on our website [↗](#)



3. Reporting packaging volumes

- You now have to regularly report your packaging volumes to both your system operator and the LUCID Packaging Register (data reporting)
- Click on the 'Data reporting' tile
- You must provide the exact same data report that you provide to a system to the LUCID Packaging Register (including when entering into the agreement)



Your login credentials are important: you need them to log in to the LUCID Packaging Register in order to file data reports on your packaging volumes and keep your data up to date.

Further information

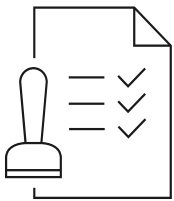
What happens if you do not fulfil your statutory obligations?

Any breach of your obligations under the Verpackungsgesetz (registration, system participation, data reporting) is an administrative offence. If you have failed to register or participate your packaging volumes with a system, you are prohibited from selling your packaged goods in Germany. Your goods are banned from distribution. Depending on the severity of the breach, fines of up to 200,000 euros may be issued.

What else is there to know?

Authorising a representative

International companies without a branch in Germany can appoint an authorised representative to fulfil their duties under German packaging law. Further information can be found under 'Authorising a representative' on our website [↗](#).



Declaration of completeness

Companies with high packaging volumes have to submit a declaration of completeness for the previous year, checked by an auditor registered with the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR), by no later than 15 May of each year. The obligation to file such declarations applies to companies whose packaging volumes in the previous calendar year reach or exceeds at least one of the following three volume thresholds. This applies regardless of whether they distribute their goods in packaging subject to system participation or not.

- Glass: 80,000 kg
- Paper, paperboard, cardboard (PPC) in total: 50,000 kg
- Ferrous metals + aluminium + plastics + beverage cartons + other composites (lightweight packaging) in total: 30,000 kg

Further information can be found under 'Declaration of Completeness on our website [↗](#)

Where can I find further information?

All information about registration [↗](#)

Overview of system participation requirement and data reporting [↗](#)

LUCID Packaging Register [↗](#)

Do you need IT-related support or do you have general questions regarding the obligations under German packaging law?

Contact our support team at +49 541 34310555

Monday to Friday from 9:00 to 17:00 CET (public holidays in Lower Saxony excepted)