

## Information about the minimum standard for determining the recyclability of packaging subject to system participation pursuant to section 21 (3) VerpackG – 2025 edition

### 1 The minimum standard gets a fresh look

The 2025 edition of the minimum standard for determining the recyclability of packaging design has a dramatically different look. The Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) and the German Environment Agency (UBA) updated it in response to feedback received from industry stakeholders. In brief, the reasons were:

- a. The European Packaging and Packaging Waste Regulation (PPWR) will enter into force (on 12 August 2026) while this minimum standard is in force (the 2026 calendar year), meaning changes needed to be made to bring the minimum standard into line with the provisions of the PPWR. It made sense to go ahead and incorporate the classification system set out in Article 6 PPWR now to make it easier for companies to transition later on.
- b. The new minimum standard is designed to be easy to understand for those who need to use it: packaging manufacturers. That is why the determination rules are now presented in relation to the individual packaging categories so manufacturers can find all the information for their packaging format gathered together in one place in Annex 2. Before now, users had to look for a packaging unit's information in different places in the document, sorted by criteria. The new format improves readability while also widening the scope of the minimum standard significantly.
- c. An expanded presentation covers the methodology for all packaging categories and prevents misinterpretation. Now a clear result can be determined for the major design parameters of the packaging categories. This result leads to a recyclability percentage.

The underlying methodology remains unchanged. To determine the share of a packaging unit that can find a second life in typical applications for that material, actual sorting and recovery practices are taken into consideration, i.e. the available and established collection, sorting and recycling processes that have proven themselves in an operational environment. That principle also underpins the approach in Article 6 PPWR. The legal basis for the 2025 edition of the minimum standard remains section 21 VerpackG (Packaging Act).

## 2 Drafting the minimum standard with an expanded Expert Committee

To ensure that a range of different perspectives was incorporated into the redrafting process, the ZSVR's Expert Committee III was expanded. The following additions were made:

- a. Involvement of medium-sized enterprises
- b. Experts for specific material types
- c. Incorporation of all system operators
- d. Tie-in of GS1 Forum Rezyklat

In terms of content, the preliminary work of the Forum Rezyklat was expanded on, and its expertise was incorporated. Doing so resulted in a significantly broader technical foundation for this edition of the minimum standard.

## 3 New structure, new annexes

The updated presentation rooted in the producer's perspective is reflected in the minimum standard's structure, now featuring the following parts:

- Introduction for users
- Delineation of the object of determination (Chapter 2)
- Assignment of a unit of packaging to a PPWR packaging category (Annex 1)
- Determination requirements for the individual packaging categories (Annex 2)
- Provisions for additional evidence necessary in certain cases (Annex 3)

In addition, the minimum standard contains supplementary background information about the legal framework (Chapter 1) and explanations of the methodology and the criteria for determining recyclability (Chapter 3).

In detail:

A new opening chapter has been added to the minimum standard. It explains how the process of determining packaging recyclability works and includes a structural illustration. This chapter gives users a clear and concise overview of how to use the document.

Chapter 2 explains how to delineate the object of determination and is based largely on the old system in Chapter 3 of the minimum standard (2024 edition). Amendments have been made to bring it into line with the PPWR.

That is because under the PPWR, the determination of recyclability is based on the packaging category: in Annex 1 of the minimum standard, packaging is placed in the categories contained in Annex II table 1 of the PPWR. Packaging formats relevant from a practice perspective have been added to the non-exhaustive list of examples. For every category, the Annex references the relevant page in Annex 2 where the determination

requirements for this packaging are consolidated. If a specific case requires additional evidence, Annex 3 sets out the relevant general requirements.

The supplementary background information helps users follow the system while also explaining how the ZSVR and German Environment Agency determined the content, especially of Annex 2. In addition, it contains relevant fundamental principles to boost comprehension. Users do not need to run through everything again for each and every determination.

## 4 Technical amendments

The minimum standard is a guideline to determine recyclability by employing a uniform methodology for all material types. It needs to be updated regularly, not only to reflect scientific advances but also to account for technological changes to established recycling processes.

Compared to the 2024 minimum standard, this edition is largely unchanged in terms of the determination principles. The content that has been updated, including detailing how to calculate valuable materials shares. These updates serve to ensure consistent application and a precise determination result.

Beyond that, only a few relevant amendments have been made:

- It is now possible to classify a material or a material formulation as a valuable material with individual evidence. This is intended to pave the way for packaging innovations to enter the market if they are recyclable.
- The same requirements to ensure sortability are placed on packaging designed from paper/cardboard as are placed on paper-based composite packaging. This ensures that paper/cardboard packaging, regardless of collection type, can go into high-quality recycling.
- The restriction of PFAS in certain units of packaging provided for in the PPWR is now incorporated into the minimum standard as an incompatibility. The same applies for direct print with substances on the EuPIA Exclusion List.
- Reference applications for the aluminium shares of liquid packaging board, bottles made from PET-A and thermoforms made from PET-A and PET-C were added or specified in more detail.
- The silicone density was also specified.

## 5 Validity

The 2025 minimum standard will enter into force on 1 January 2026. This is due to the legal situation to date. It should also be mentioned that the 2025 minimum standard does not contain any noteworthy technical changes for packaging.

In terms of any future updates to requirements on recyclability in connection with the PPWR, it must be noted that a transition period of four months would be too short to make technical changes to packaging. The transition periods would need to be far more generous. The current legal situation in Germany prevents these from being incorporated.

## 6 Additional documentation – auditability

The PPWR will make the determination of recyclability and the relevant documentation an obligation throughout Europe. That makes it all the more important to enable all manufacturers, especially small manufacturers, to fulfil this requirement early on and to organise all the corresponding data and information. This is why the 2025 minimum standard is being accompanied by additional documentation; these documents are not part of the minimum standard, however. They are not legally binding but can provide valuable guidance:

- Practical user guide: a step-by-step guide describes the practical procedure of determining packaging recyclability in an easy to understand and detailed manner. They are accompanied by practical examples and illustrations to help manufacturers get to grips with the different case groups.
- Attribute list: manufacturers are often reliant on information provided by suppliers when it comes to determining recyclability. Under the PPWR, suppliers have an obligation to supply this information. In practice, there are a variety of designations and descriptions for the relevant design parameters, with individual brand names being used in some cases. As a result, it is often difficult or impossible to make consistent determinations, making the evaluation impossible to understand. Add to this the fact that inconsistently named design parameters also make digitising and linking them with manufacturer's merchandise management systems impossible. With this in mind, an attribute list with consistent names for every design parameter has been created. It includes the design parameters required by Annex 2 of the minimum standard to make determinations. It makes it possible to digitally organise all the relevant information. They can be connected to a barcode, in turn enabling the recyclability grade to be seen automatically and transparently.
- Technical documentation: the PPWR provides for an EU declaration of conformity based on technical documentation, which will be subject to monitoring by market oversight authorities. Efficient oversight can only be achieved if documentation can

be digitally evaluated. Because of this, a form has been developed that meets these requirements, enabling manufacturers to quickly evidence that their packaging meets requirements and that they are in compliance.

These documents help to efficiently implement the provisions of the minimum standard digitally and pave the way for the implementation of the PPWR, especially for small manufacturers.

The technical documentation and the attribute list will be published in September 2025, after the 2025 edition of the minimum standard for packaging design for recycling. The user guide will be published together with the minimum standard on the ZSVR website starting 29 August 2025.