

The most important amendments to the 2026 minimum standard – rationale

1 Composite definition updated under 5 (page 17)

When the EU Packaging and Packaging Waste Regulation (PPWR) began applying on 12 August 2026, its provisions and definitions took effect immediately – including for packaging placed on the market in Germany. As a result, the previous definition of composite packaging / composites has been updated accordingly in the minimum standard.

2 Definition of fibre-based packaging eliminated under 5 (page 17)

After aligning the minimum standard with the structure of the PPWR last year, there is now a consistent distinction between its three packaging categories. These are: 'paper/cardboard packaging (excluding composite packaging)', 'liquid packaging board' and 'composite packaging of which the majority is paper/cardboard (excluding liquid packaging board)'. This means that the more general term 'fibre-based packaging' no longer exists and defining it is unnecessary.

3 Level of transmittance of glass clarified with a glass sample description (page 31)

Whether translucency is sufficient can now be determined even more accurately for painted or tinted glass. The minimum standard no longer refers only to the level of transmittance, but instead now describes, as a reference, a glass sample with precisely defined technical parameters in test specification P2.2 of Annex 2.1. The previous specification could not adequately ensure that the level of transmittance could be validly determined because measuring instruments available on the market produce different readings when used on identical pieces of glass. The new pragmatic approach not only provides greater clarity but also more reliable results. By adopting it, the minimum standard follows a suggestion put forward by the packaging industry.

4 Components of fibrous material in Annexes 2.2, 2.3a and 2.3b (pages 32–46)

The components of fibrous material are no longer contained exclusively in a separate definition. They are also listed individually in Annexes 2.2, 2.3a and 2.3b. To make them directly identifiable when using the Annexes to determine recyclability, the Annexes now set out the individual fibre components instead of only the fibrous material. This amendment was made in response to requests from the packaging industry.

5 Completing, clarifying and streamlining the packaging attributes listed in Annex 2

- Where the Expert Committee did not find the listed packaging attributes to be comprehensive enough, such as the polyolefin variants, we made additions. For example, 'Paper (fibre-reinforced)' has been added to Annex 2.2, 'Label / adhesive tape', 'Material'.
- Where the experts considered the previous list to be lacking in detail, further distinctions were made, such as in Annex 2.8b, 'Main body', 'Coating', between PVOH coatings that are water-soluble in hot wash and those that are insoluble.
- Where all of a particular configuration's variations resulted in the same categorisation, they were consolidated to simplify the minimum standard, e.g. in Annex 2.2 'Ancillary components', 'Seam adhesion', 'Adhesive': there is now only a single entry, 'Adhesive application', instead of multiple variations, because all adhesive applications are categorised as 'separable or conditionally compatible' and therefore no differentiation is necessary.

Changing all the minimum standard's Annexes in these ways was designed to make it easier to use and read. The changes were made under the guiding principle 'as simple as possible, as nuanced as necessary'.

6 Categorisation of incompatibilities amended in Annexes 2.2, 2.3a and 2.3b (pages 32–46)

In contrast to the previous version of the minimum standard, some packaging attributes in Annexes 2.2, 2.3a and 2.3b are no longer categorised as recycling incompatibilities and are instead listed in the yellow category with mandatory testing in accordance with test specification P8. This applies in particular to polymer dispersion coatings and hot-melt adhesive applications.

This amendment is not substantive in nature but is due to a systemic change: instead of categorising an attribute as a recycling incompatibility in general but making an 'exemption test' possible, it is now initially categorised as 'separable or conditionally compatible', although this categorisation remains provisional until a successful test has been performed. It is still the case that yellow category categorisation is not possible without appropriate testing.

7 General note on changes to the categorisation of incompatibilities

Incompatibilities specified in the minimum standard may have a significant impact on the packaging used by economic operators. Due to this, changes to the categorisation of a packaging characteristic as an incompatibility in the minimum standard (amendment, addition, deletion, reverse exception) are, as a general rule, subject to the following conditions:

- Scientific data (e.g. study, research findings, test report, etc.) is available on the specific issue. The data must refer to the minimum standard's definition of the particular incompatibility and the minimum standard as a whole. The data provides a sufficiently clear indication of what adjustment to the minimum standard is required.
- The data is provided to the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) and the German Environment Agency in good time before the consultation on the minimum standard begins (in principle, by the end of April of each year at the latest).
- The data is published in a form accessible to the general public, i.e. on a website or in a specialist publication; or it has been made available to the ZSVR free of charge for publication on its website.
- A critical review by relevant stakeholders took place within Expert Committee III of the ZSVR, or at least such a review by stakeholders is possible as part of the consultation process.
- If a reverse exception to an incompatibility is requested, the change does not affect only the products of a single company; in such cases, the option of providing individual evidence is available.

The ZSVR and the German Environment Agency check whether the specified criteria are met. If the matter stands up to scientific scrutiny, the incompatibility will be adjusted.