

# Information about the ZSVR's discussion draft: technical documentation on determining packaging recyclability

The EU Packaging and Packaging Waste Regulation (PPWR) requires producers to prove that their packaging conforms with the PPWR's design-for-recycling criteria. This mandatory declaration of conformity will be based on technical documentation providing a structured overview of a packaging's relevant properties and related evidence.

The Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) is making this template available to producers and all other market participants across the value chain so they can start early with the preparations for meeting the requirements.

## About this document

This document is an example of how technical documentation to determine recyclability can be structured. The structure and parameters (attributes) closely relate to the methodology and criteria set out in the minimum standard for determining the recyclability of packaging (2025 edition).

This document was prepared as a basis for discussion and is meant to provide practical guidance on how the data and evidence required for the determination process could be systemically collected and managed. The template's structure is designed to enable standardised and digital data collection.


## Important legal information:

This template and the examples included are not legally binding and have no normative value. They have been prepared by the ZSVR as optional guidance and do not form part of the minimum standard pursuant to section 21 (3) VerpackG (Packaging Act).

Economic operators using this template are not dispensed from their obligation to check and ensure compliance with the PPWR and the applicable minimum standard.

## Technical documentation example for paper/cardboard

### 1 Packaging master data

Packaging product code (unique identification of the packaging)	"Select"
(multiple selections for groups)	1597864
Packaging GTIN	"Select"
	4265837190248
Photograph or drawing of the unit of packaging (including all its integrated and separate components)	"Upload" image file/technical drawing  Source: iStock
Functional description	"Free text"
	Fibre-based cup, printed and lacquered
Breakdown of the packaging pursuant to section 2 of the minimum standard	Main body with its integrated components

## 2 Object of determination 1

Main body with its integrated components (packaging product code: 1597864)

Main material type	"Select material types pursuant to Annex II, tab 1"
	Paper/cardboard
Packaging category	"Select packaging category no. pursuant to minimum standard Annex I, tab 1, column 0"
	3
Packaging format	"Select packaging format pursuant to minimum standard Annex I, tab 1, column 3"
	Cups, pots
Packaging pursuant to Article 6 (11) PPWR	"Select"
	No

### Details about the packaged product

GPC	"Select segment code"
	73000000
	"Select family code"
	73050000
	"Select class code"
	73050300

### Additional information

Consistency	"Select consistency"
	Liquid
Quantity	"Select"
	200 ml
Weight of the object of determination	6.600 g
Recyclability class	"Select"
Note: Results for which lower thresholds are achieved due to rounding up are not categorised as $\geq$	$\geq 80\%$ and $< 95\%$

## 3 Category-related documentation

Packaging components	"Select by main body and its integrated components"	"In grams to the third decimal place [g]"	"Fluctuation margins (+/- in grams)"			
	Main body	6.600	0.330			
	Closure	0	0			
	Label	0	0			
	Other integrated components	0	0			
	Total weight of the object of determination	6.600	0.198			
Valuable material	"Select by column 'Valuable material' in Annex 2 of the ZSVR's minimum standard, divided into main body and integrated packaging components"	"In grams to the third decimal place [g]"	"Fluctuation margins (+/- in grams)"	"Share of mass in percent, relative to the total weight of the packaging component to the first decimal place [%]"	"Total share of mass in percent, relative to the total weight of the object of determination to the first decimal place [%]"	"Minimum value in percent relative to the total weight of the object of determination to the first decimal place, taking into account the fluctuation margin [%]"
Valuable material main body	Paper/cardboard, other sorts	6.093	0.305	92.3	92.3	85.1
	Mineral pigment coating including binding agent	Included in the weight of 'Paper/cardboard, other sorts'	0.000	0.0	0.0	0.0
Valuable material label	Not applicable					
Valuable material other integrated components	Not applicable					
Valuable material sum for the object of determination		6.093	0.305	-	92.3	85.1

<b>Incompatibilities</b>  This list is illustrative and non-exhaustive.	„Select by column ‚Incompatibilities‘ in Annex 2 of the minimum standard“		
	Bitumen paper	Not applicable	
	Oil paper	Not applicable	
	Wax/paraffin paper	Not applicable	
	Polymer dispersion coatings (thermoplastic)	Applicable	If applicable:
			"Select evidence"
			Individual evidence pursuant to Annex 3.1
	Polymer mineral coating (thermoplastic)	Not applicable	
	Other surface finish	Not applicable	
	Hot-melt adhesive application, criteria of EPRC scorecard not fulfilled	Not applicable	
	Direct printing, with substances on the EuPIA exclusion list	Not applicable	
<b>Design-related valuable material losses</b>  This list is illustrative and non-exhaustive.	"Select by column ‚Examination of design-related valuable material losses‘ in Annex 2 of the ZSVR's minimum standard"		
	Moulded pulp, highly compressed	Not applicable	
	Aluminium lamination	Not applicable	
	Dyed black, using carbon black	Not applicable	
	Dry strength agent: PVOH	Not applicable	
	Wet strength agent, impregnating agent	Not applicable	
	Silicone coating	Not applicable	
	Paraffin, wax, oil	Not applicable	
	Other surface finish	Not applicable	
	Hot-melt adhesive application, criteria of EPRC scorecard not fulfilled	Not applicable	
	Fully lacquered surface – excluding clear protective lacquer up to a thickness of ≤ 5 micrometers – excluding internal bag layers if the grammage is at least 100 g/m <sup>2</sup>	Not applicable	
	Paper (equipped with wet strength agent)	Not applicable	
	Ancillary components made of non-ferrous metal, stainless steel, magnetic materials, steel	Not applicable	
	Plastic-coated surface – excluding internal bag layers if the grammage is at least 100 g/m <sup>2</sup>	Not applicable	
	Metal pigments applied on a large scale (taking up > 50% of the projected surface) (lacquering, print, coating or embossing)	Not applicable	
	> 50% fully printed black (including background) using carbon black	Not applicable	
	Barrier coating on both sides	Not applicable	

<b>Design-related valuable material losses</b>  This list is illustrative and non-exhaustive.	„Select by column ‚Examination of design-related valuable material losses‘ in Annex 2 of the ZSVR’s minimum standard“		
	Non-dry contents – i.e. fibre-based packaging, for example for liquids, certain foodstuffs, oils and emulsions	Applicable	If applicable:
			"Select evidence"
			Individual evidence pursuant to Annex 3.2
<b>Examination result</b>			
"Design-related valuable material losses (absolute value in grams, relative to the total weight of the object of determination)"		"Design-related valuable material losses (in percentage points, relative to the total weight of the object of determination)"	
<b>-0.792 g</b>		<b>-12.0 %</b>	
<b>Calculation of recyclability analogously to section 3.6 of the minimum standard</b>	"Select: applicable or not applicable"		
	Applicable		
<b>Calculation result</b>		In % to the first decimal place	
<b>80.3 %</b>			