

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 systematically 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 a tube with folding box, PE – rigid

1 Packaging master data

Packaging product code (unique identification of the packaging) (multiple selections for groups)	"Select" 784512963741	
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Packaging GTIN	"Select" Not applicable	
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Photograph or drawing of the unit of packaging (including all its integrated and separate components)	"Upload" image file/technical drawing	
	 Source: iStock	 Source: iStock

Functional description	"Free text"	
	PE-based tube with folding box	

Breakdown of the packaging pursuant to section 2 of the minimum standard	Main body with its integrated components		
	Separate component (with its integrated components) 1	If applicable:	#1: folding box

2 Object of determination 1

Main body with its integrated components (packaging product code: 784512963741)

Main material type	"Select material types pursuant to Annex II, tab 1"
	PE – rigid

Packaging category	"Select packaging category no. pursuant to minimum standard Annex I, tab 1, column 0"
	10

Packaging format	"Select packaging format pursuant to minimum standard Annex I, tab 1, column 3"
	Tubes

Packaging pursuant to Article 6 (11) PPWR	"Select"
	No

Details about the packaged product

GPC	"Select segment code"
	53000000
	"Select family code"
	53180000
	"Select class code"
	53181500

Additional information

Consistency	"Select consistency"
	Pasty

Quantity	"Select"
	100 ml

Weight of the object of determination	21.830 g
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Recyclability class	"Select"
Note: Results for which lower thresholds are achieved due to rounding up are not categorised as ≥	< 70 %

Discussion draft

Category-related documentation of the main body with integrated components (packaging product code: 784512963741)

Packaging components	"Select by main body and its integrated components"	"In grams to the third decimal place [g]"	"Fluctuation margins (+/- in grams)"				
	Main body	12.300	0.615				
	Closure	6.510	0.326				
	Label	0.000	0.000				
	Other integrated components	3.000	0.150				
	Total weight of the object of determination	21.810	0.654				
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	HDPE	6.612	0.331	53.8	30.3	28.0	
	LDPE	5.467	0.273	44.4	25.1	23.1	
	Titanium dioxide	20 % contained in HDPE	0.000	0.0	0.0	0.0	
Valuable material closure	HDPE, MDPE, LDPE, LLDPE, rPE	6.510	0.326	100.0	29.8	27.5	
Valuable material label	Not applicable						
Valuable material other integrated components	HDPE	3.000	0.150	100.0	13.8	12.7	
Valuable material sum for the object of determination		21.589	1.079	-	99.0	91.3	

Incompatibilities	"Select by column 'Incompatibilities' in Annex 2 of the minimum standard"	
PE-X		Not applicable
PE peel (non-specific)		Not applicable
Biodegradable and compostable materials as a layer		Not applicable
PA layer		Not applicable
PAN layer		Not applicable
PEN layer		Not applicable
PET layer		Not applicable
rPET layer		Not applicable
PP peel layer (non-specific)		Not applicable
PVC layer		Not applicable
PVDC layer		Not applicable
PVOH layer		Not applicable
PVOH coating		Not applicable
Other coatings		Not applicable
Elastomer, rubber (non-thermoplastic), density < 1 g/cm ³		Not applicable
PA in applicators with density < 1 g/cm ³		Not applicable
PET (foamed, density < 1 g/cm ³)		Not applicable
PU, density < 1 g/cm ³		Not applicable
Silicone, density < 1 g/cm ³		Not applicable
Other polymer components, density < 1 g/cm ³		Not applicable

Incompatibilities	"Select by column 'Incompatibilities' in Annex 2 of the minimum standard"	
Fibre-based labels if the cellulose share cannot be removed by means of cold washing		Not applicable
PFAS share in food-contact packaging ≥ limit value according to Article 5 (5) PPWR		Not applicable
Sealant cartridges		Not applicable

Design-related valuable material losses	"Select by column ,Examination of design-related valuable material losses' in Annex 2 of the ZSVR's minimum standard"		
	Aluminium foil layer	Not applicable	
	Multilayer structure, density > 1 g/cm ³	Not applicable	
	Multilayer structure (except PE-EVOH)	Not applicable	
	Dyeing using carbon black (also when used for internal layers)	Not applicable	
	Absorber (mineral)	Not applicable	
	Lime, chalk	Not applicable	
	Talc	Not applicable	
	Titanium dioxide	Applicable	If applicable
			"Select evidence"
			Self-declaration including calculation
Design-related valuable material losses	"Select by column ,Examination of design-related valuable material losses' in Annex 2 of the ZSVR's minimum standard"		
	Metallisation	Not applicable	
	Presence of ferromagnetic components ≥ 5% by weight in relation to the object of determination	Not applicable	
	Label/sleeve, density > 1 g/cm ³	Not applicable	
	Large labels (taking up > 50% of the projected surface) made from non-valuable material	Not applicable	
	Full sleeve labels	Not applicable	
	Additives in valuable material	Not applicable	
	Different types of plastic used on front and back sides	Not applicable	
	> 50% fully printed black (including background) using carbon black	Not applicable	
	Metal pigments applied on a large scale (taking up > 50% of the projected surface) (lacquering, coating or embossing)	Not applicable	
Examination result			
"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)"	
-12.079 g		-55.4 %	
Calculation of recyclability analogously to section 3.6 of the minimum standard	"Select: applicable or not applicable"		
	Applicable		
Calculation result		In % to the first decimal place	
-43.6 %			

3 Object of determination 2

Separate component (with its integrated components) 1
(product packaging code: 784512963741)

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"
	2
Packaging format	"Select packaging format pursuant to minimum standard Annex I, tab 1, column 3"
	Folding boxes, folding cartons
Packaging pursuant to Article 6 (11) PPWR	"Select"
	No

Details about the packaged product

GPC Does not have to be filled in for secondary packaging	"Select segment code"
	/
	"Select family code"
	/
	"Select class code"
	/

Additional information

Consistency	"Select consistency"
	Not applicable (e. g. secondary packaging)
Quantity	"Select"
	Not applicable (e. g. secondary packaging)
Weight of the object of determination	30.600 g
Recyclability class	"Select"
Note: Results for which lower thresholds are achieved due to rounding up are not categorised as ≥	≥ 95 %

Discussion draft

Category-related documentation of the separate component (with its integrated components) 1 (packaging product code: 784512963741)

Packaging components	"Select by main body and integrated components"	"In grams to the third decimal place [g]"	"Fluctuation margins (+/- in grams)"			
	Main body	30.600	1.530			
	Closure	0.000	0.000			
	Label	0.000	0.000			
	Other integrated components	0.000	0.000			
	Total weight of the object of determination	30.600	0.918			
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	29.407	1.470	96.1	96.1	88.6
Valuable material label	Not applicable					
Valuable material other integrated components	Not applicable					
Valuable material sum for the object of determination		29.407	1.470	96.1	-	88.6

Incompatibilities	"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 coating (thermoplastic)	Not applicable
	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
Design-related valuable material losses	"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
Design-related valuable material losses	"Select by column ,Examination of design-related valuable material losses' in Annex 2 of the ZSVR's minimum standard"	
	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 \leq 5 micrometers – excluding internal bag layers if the grammage is at least 100 g/m ²	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 ²	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

Design-related valuable material losses	"Select by column 'Examination of design-related valuable material losses' in Annex 2 of the ZSVR's minimum standard"	
	Barrier coating on both sides	Not applicable
	Non-dry contents – i.e. fibre-based packaging for example for liquids, certain foodstuffs, oils and emulsions	Not applicable
Examination result		
	"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)"
	-0.000 g	0.0 %
Calculation of recyclability analogously to section 3.6 of the minimum standard	"Select: applicable or not applicable"	
	Applicable	
Calculation result		In % to the first decimal place
96.1 %		