

Minimum standard: FAQs

This document answers frequently asked questions relating to the 2025 edition of the minimum standard for determining the recyclability of packaging subject to system participation pursuant to section 21 (3) VerpackG (Packaging Act).

1 General questions and questions on methodology

1.1 Is there a tool for calculating recyclability?

The 2025 minimum standard defines the methodology and criteria for determining a packaging unit's recyclability. The ZSVR does not currently provide its own calculation tool. If tools from other organisations or providers are used, the calculation must follow the rules defined in the minimum standard, especially those set out in Annex 2. This must be checked and verified in each case.

1.2 Recyclability of composite packaging: does the <5% limit still apply?

The 2025 minimum standard defines 'composite packaging' as packaging made from two or more different material types that cannot be separated by hand and where no single material type accounts for more than 95% of the packaging mass. This means that packaging with a mono-material share of 95% or more is not considered composite packaging under the specific definition contained in the 2025 minimum standard. In this case, the dominant material (main material) will be the primary factor for determining recyclability.

Please refer to the specific determination provisions set out in Annex 2 of the minimum standard to see which shares of a material type count as valuable material. Falling into the 'composite packaging' category is not necessarily fatal for a packaging's recyclability percentage – unless the materials or combination of materials contained in the specific packaging unit are categorised as 'incompatibilities'. Please note, however, that combinations of many composite materials often do not count as valuable material or can cause design-related valuable material losses, which is why a high level of recyclability – especially of more than 95% – is unlikely.

1.3 Does the minimum standard also cover the recycling quotas for individual material types?

The minimum standard as such determines a packaging unit's recyclability based on its individual design and material composition. The application rates used in the minimum standard (e.g. for lightweight packaging) reflect the actual collection and sorting practice in Germany and are based on data provided by the German Environment Agency (UBA). These application rates are a factor in the overall determination of recyclability. The national recycling quotas for individual material types specified in the Verpackungsgesetz (Packaging Act) represent overarching targets to be achieved (i) by determining the recyclability of the individual packaging units and (ii) by the system operators creating monetary incentives using system participation fees.

2 Scope of application and terminology

2.1 Does the German Environment Agency's (UBA) survey on packaging sorting and recovery practice only refer to packaging waste collected in yellow bags or bins? What happens to single-use beverage packaging subject to deposit?

In terms of its scope of application, the minimum standard draws heavily on the UBA's recycling infrastructure survey 'Packaging sorting and recovery practice within the meaning of section 21 VerpackG'. The minimum standard refers to the share of packaging placed on the market within a specific packaging category that is actually transferred for recycling. Whenever the UBA survey refers to 'without deposit' or 'without packaging subject to deposit' in the context of application rates, this means that single-use beverage packaging subject to deposit collected via return systems (e.g. PET single-use bottles subject to deposit) is not taken into account when determining the application rate of lightweight packaging (yellow bag/bin). Under the minimum standard, the determination of recyclability is usually limited to packaging subject to system participation which is collected in glass and paper bins/containers or is subject to the mixed collection of lightweight packaging (yellow bag, yellow bin, recycling bin).

Packaging subject to deposit pursuant to section 31 VerpackG (Packaging Act) does not fall under the system participation requirement. This applies to all materials subject to deposit. As packaging subject to deposit must not be disposed of in yellow bags/bins, it is not taken into account when determining the application rate.

2.2 Does the minimum standard also apply to B2B packaging?

The minimum standard applies to packaging subject to system participation pursuant to section 21 (3) VerpackG (Packaging Act). Whether packaging is subject to system participation or not does not depend on B2B or B2C relationships, the packaging type, the distribution channel, the sector or the individual case. It solely depends on whether

the specific retail, grouped or shipment packaging typically accumulates as waste with private final consumers. This was the result of an overall market assessment. Please refer to the ZSVR's system participation requirement catalogue for classification guidance.

For packaging that is not subject to system participation (e.g. transport packaging, industrial packaging, packaging subject to deposit, etc.), other requirements apply, for example the Commercial Waste Ordinance. In this case, too, it makes sense from an ecological point of view to design such packaging for recyclability in order to make its recovery easier.

2.3 What happens to packaging intended for export?

As a rule, packaging and/or packaged goods exclusively intended for export and not placed on the German market are not subject to system participation under the Verpackungsgesetz (Packaging Act). As such, it is not directly subject to the determination of recyclability under the German minimum standard. Instead, it is subject to the rules and regulations of the importing or exporting country, which means that the regulations for determining recyclability applicable in the country in question must be adhered to.

Note on the system participation requirement: if, however, packaging is placed on the German market (e.g. for filling) before being exported, it must be checked whether the packaging is subject to system participation in Germany.

3 Schedule and applicability

3.1 From what date will a packaging unit's recyclability be reflected in the EPR fee? Will it have an effect on packaging volume reporting to system operators in 2026?

Pursuant to section 21 (1) VerpackG (Packaging Act), the results of the determination of recyclability under the minimum standard form the basis for the amount of participation fees imposed and modulated by the systems. This means that the Verpackungsgesetz (Packaging Act) indeed stipulates that EPR fees (i.e. system participation fees) are directly linked to recyclability. This will be implemented by the system operators.

The 2025 minimum standard entered into force on 1 January 2026.

3.2 Is there a transition period for the application of the new 2025 minimum standard?

3.2.1 When will the 2025 minimum standard take effect?

As defined in section 21 (3) VerpackG (Packaging Act), the minimum standard for determining the recyclability of packaging is published on 1 September of each year by the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) in agreement with the German Environment Agency (UBA). It enters into force on 1 January of the following year, i.e. 1 January 2026 for the 2025 minimum standard.

3.2.2 Who is required to implement the minimum standard?

System operators must implement the minimum standard. Pursuant to section 21 VerpackG (Packaging Act), they are required to create incentives for companies or distributors of packaging to use recyclable packaging by imposing system participation fees based on packaging recyclability.

Companies (producers/distributors) are not legally bound to implement the standard. However, the minimum standard may have an indirect effect if recyclable packaging is cheaper than packaging that is very difficult or impossible to recycle when it comes to system participation.

In addition, the new 2025 minimum standard paves the way for future requirements under the PPWR. From 2030 onwards, more than 70% of packaging content must be recyclable or reusable. It will no longer be permissible to place packaging falling below this limit on the German market.

4 Components and separability

Can the size of a packaging unit or its components have an impact on recyclability pursuant to the minimum standard?

The 2025 minimum standard specifies the procedure for determining recyclability by material type and integrated or separate packaging components. Whether recyclability can be determined for a single component depends on its separability during use or under mechanical stress during transport or sorting. The size is not the most important factor. Determining a packaging unit's recyclability under the minimum standard does not involve measuring its size. In addition, the 2025 minimum standard does not mention any explicit size restrictions for recyclability.

5 Exemptions and support

5.1 Is it possible to apply for exemptions for certain types of packaging?

The 2025 minimum standard defines the criteria for determining recyclability. These criteria generally apply to all packaging subject to system participation. The Verpackungsgesetz (Packaging Act) does not provide for general exemptions from the determination obligation, the minimum standard's criteria or its use for certain types of packaging or material. However, it is possible to provide individual evidence regarding the recyclability of packaging. This is described in Annex 3 of the minimum standard. While the minimum standard primarily relates to packaging subject to system participation, the PPWR will require all packaging to be either reusable or designed for recyclability.

5.2 How are innovative packaging materials assessed that are not yet included in the minimum standard?

The 2025 minimum standard is based on the state of the art in sorting and recycling. Innovative packaging materials not yet explicitly listed in the annexes of the minimum standard must be assessed based on existing criteria and the underlying methodology. This means that the recyclability of such materials must be determined based on their chemical composition, separability from other materials and their compatibility with established recycling processes. The Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) is working on continually adapting the minimum standard in line with technical innovations and new developments in packaging design. Companies using innovative materials should consult the ZSVR and the system operators to ensure that their packaging is categorised correctly. Doing so may contribute to evolving the minimum standard for determining packaging recyclability.