

Information about the minimum standard for assessing the recyclability performance of packaging subject to system participation pursuant to sec- tion 21 (3) VerpackG – 2025 edition

1 The minimum standard gets a fresh look

The minimum standard for assessing the recyclability performance of packaging design has a dramatically different look. The change from the previous version was made by the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) and the German Environment Agency (UBA) 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 it 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 read for those who need to use it: packaging manufacturers. That is why the assessment 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) The expanded presentation covering the methodology for all the packaging categories prevents misinterpretation. Now a clear result can be determined for the major design parameters of the packaging categories that leads to a recyclability performance percentage for a unit of packaging.

The underlying methodology remains unchanged. To assess what share of a packaging unit can find a second life in typical applications for that material, actual sorting and recovery practices are taken into consideration. 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 GS1 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)
- Placement of a unit of packaging within the PPWR packaging categories (Appendix 1)
- Assessment requirements for the individual packaging categories (Appendix 2)
- Requirements for additional evidence necessary in certain cases (Appendix 3)

In addition, it contains supplementary **background information** about the legal framework (chapter 1) and explanations of the methodology and the criteria for determining recyclability performance (chapter 3).

In detail:

A new chapter has been added at the beginning to explain how the assessment process works, including an illustration. It shows users succinctly and comprehensively how to use the document.

Chapter 2 explains how to delineate the object of assessment 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.

Under the PPWR, the assessment of a packaging unit's recyclability performance is based on its 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 Appendix references the relevant page in Annex 2 where the assessment requirements for those units of packaging are bundled together in one place. 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 assessment.

4 Technical amendments

The minimum standard is a guideline to assess recyclability performance 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 assessment principles. The content that has been updated, including detailing how to calculate valuable materials shares, serves to ensure consistent application and a precise assessment 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 innovative types of packaging to enter the market if they are recyclable.

The same requirements are placed on packaging designed from paper/cardboard (PPC) to ensure sortability as are placed on composite packaging based on paper. This ensures that PPC packaging, regardless of collection type, are transferred for 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.

Important note about the consultation:

As part of the consultation, we ask all stakeholders to check whether the old provisions from the 2024 minimum standard for their packaging categories have otherwise been adopted without any changes into the new format. In some areas more concrete, detailed lists have been drafted that are not meant to result in new incompatibilities. If you notice any inconsistencies, please let us know.

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 [not a subject of the consultation]

The assessment of recyclability performance and the relevant documentation will become an obligation throughout Europe under the PPWR. 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 binding but can provide valuable guidance:

- Guidelines: guidelines describe the assessment process in detail. 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 performance. 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 assessments, 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 is 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 performance grade to be seen automatically and transparently.
- Technical documentation: the PPWR provides for an EU declaration of conformity based on technical documentation. It will be subject to monitoring by market oversight authorities. Efficient oversight can only be achieved if documentation can be digitally evaluated. To do so, 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 requirements of the minimum standard digitally and pave the way for the implementation of the PPWR, especially for small manufacturers.