PRESS RELEASE

ZSVR publishes new minimum standard on packaging recyclability – why fibre-based packaging and product residues are problematic for recycling

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When is packaging recyclable – and when not? The minimum standard has answers. The 2022 edition of the minimum standard for determining the recyclability of packaging (section 21 (3) Verpackungsgesetz (Packaging Act)) was published on 31 August 2022 by the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) in agreement with the German Environment Agency (Umweltbundesamt – UBA).

Compared to the previous edition, the current minimum standard reflects various new developments.

Fibre-based packaging: new record-keeping obligations

Not as green as one might think: in the wake of the plastic backlash, the production of fibre-based packaging is on the rise. It is used to distribute pastries, coffee, sausages and other products. While fibre-based packaging seems to be more ecological to consumers, the truth is that it is often more difficult to recycle than packaging consisting purely of plastic. The recyclability of fibre-based packaging is largely dependent on whether the fibres separate during the recycling process, so that they can be reprocessed to new fibres. This issue is reflected in the new minimum standard with the following provision: for fibre-based composite packaging (except for liquid packaging board) that does not typically contain dry contents, evidence of recyclability must now be provided. Without exception. The same applies for paper packaging that contain liquids or paste contents.

Nets and demijohns: preventing the recycling of waste glass

Waste glass is usually highly recyclable – if it is duly recovered and sorted. However, with glass packaging there are some packaging characteristics or material combinations that complicate or prevent recycling. For example, bottles that are covered by a fine metal net. Before waste glass is melted and reprocessed into new products, it must be fragmented and freed from other materials. However, the metal net prevents the separation of the glass fragments from each other. Demijohns, i.e. bottles covered with a basket that are used to distribute wine, are another example for this kind of packaging. This year's minimum standard places an emphasis on such incompatibilities, which, going forward, will remain in focus. That is because even more precise regulations are planned in this area in line with the results of future studies.

Nail varnish, bitumen, wax: a case-by-case approach

Residues of nail varnish that remain in the vial, or of bitumen that stick to the bucket – there are different products that leave residues in packaging that are difficult or impossible to remove. Waxes or various chemicals and building materials are also included in this group. Such product residues resulting from packaging design can negatively impact the recyclability of the packaging. These cases have to be viewed individually. The impact of the residues on recycling largely depends on the respective contents,

the packaging design, and the packaging material used. But one thing is clear: the effects of the product residues must be taken into account when determining the recyclability of a packaging. This fact is also reflected in the ZSVR's new minimum standard.

Three criteria have proven effective: on the structure and application of the minimum standard

Even in its fourth edition, applying the minimum standard is as easy as always: descriptions of the determination procedure and examples help companies determine the recyclability of their packaging. The underlying structure with its three standard criteria has proven successful and will be maintained. When answering the question of whether a particular article of packaging is highly recyclable, the existence of a recycling infrastructure, whether the packaging can be sorted and separated, and the recycling incompatibilities have to be reviewed and considered.

Recycling-friendly packaging design – progress has been made, but...

Based on the minimum standard, the (dual) systems are required to create incentives for recycling-friendly packaging design. For example, companies benefit financially if they fulfil their producer responsibility and consistently base their packaging on the waste hierarchy. Over the past few years, significant progress has been made: four out of five plastic articles of packaging in private households are now recyclable according to the findings of a recent study by the Gesellschaft für Verpackungsmarktforschung mbH (GVM) for the year 2020. The study found that 74 percent of the packaging made from plastic that is collected in yellow bags/bins is recyclable. By comparison, a 2016 survey put this figure at 66 percent. Other packaging materials show a similar picture. According to the German Environment Agency, 71.6 percent of packaging waste in Germany was recycled in 2019 (+2.6 percent compared to 2018) – a very good rate by international standards.

But not every packaging trend is beneficial for recycling. In addition to the above-mentioned composite packaging, increases in PET films and trays as well as paper cups coated on both sides are further examples of counter-productive developments in the packaging industry that negatively impact recyclability. The same applies with respect to the growing share of packaging made from materials such as wood, bamboo or textiles, which are not proving sustainable. Because these materials are not even sorted out in the sorting process, their recyclability according to this minimum standard is zero: in practice, they are not recycled and are usually burned instead.

About the ZSVR

Since the Verpackungsgesetz (Packaging Act) entered into force on 1 January 2019, the Stiftung Zentrale Stelle Verpackungsregister (Foundation Central Agency Packaging Register – ZSVR) has served as an entrusted body to foster greater transparency and control in the packaging recycling market. To this end, the ZSVR maintains a register of all industrial and commercial companies under legal obligation, reconciles volumes between producers and systems, and provides for more recycling-friendly design by setting standards. Lawyer Gunda Rachut is the Chair of the Foundation.

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