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2025 minimum standard published – initial touchstone for companies preparing for the EU Packaging and Packaging Waste Regulation (PPWR)

In agreement with the German Environment Agency (Umweltbundesamt), the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) has published the 2025 edition of the minimum standard for recycling friendly packaging. The challenging target is for all packaging on the market to be at least 70 percent recyclable by 2030. Companies need information and enough time to make the necessary adaptations to their manufacturing and procurement processes. The new minimum standard has undergone a major structural overhaul. It helps companies to independently assess the recyclability of their packaging more easily so they can get started with the necessary changes early on.

In response to feedback from businesses, the ZSVR worked in agreement with the German Environment Industry and an Expert Committee to make the 2025 minimum standard even more practice based. The goal was to make it readable for the people who had to use it, which includes many companies as well as packaging manufacturers. The technical elements of the standard remain largely unchanged, but the new edition is very different from its predecessor visually and structurally. The focus is on the packaging categories. They are organised according to the major component's predominant material, which is the same system implemented under the EU Packaging and Packaging Waste Regulation (PPWR).

Packaging category-based determination: essentials and regulations

The methodology used to determine recyclability remains unchanged. The presentation of the individual test steps and the formula for calculating recyclability are new. Users now get detailed information about how to determine the recyclability of their packaging by first assigning it to a packaging category. Then they can make a concrete determination about the recyclability of their packaging's major design parameters. All the relevant information for the determination can now be found bundled together in Annex 2 of minimum standard. The expanded presentation is easier to navigate and reduces misinterpretation. The ZSVR has also released practical guidance to support the minimum standard: a user guide and explanatory background information are already available, with technical documentation and an attribute list to be released at a later stage.

New technical perspectives thanks to an expanded Expert Committee

The ZSVR strategically expanded the Expert Committee for the 2025 minimum standard, with small to medium-sized companies, additional system operators and Forum Rezyklat contributing their perspectives and experience. Its interdisciplinary makeup ensures a high degree of practice-based technical expertise and a broad technical foundation.

Early preparation for PPWR requirements

The new 2025 minimum standard marks an important step on the path from national law to the EU Packaging and Packaging Waste Regulation. "Even though the first provisions of the PPWR will be entering into force in August 2026, the new minimum standard continues to be rooted in section 21 VerpackG (Packaging Act). It cannot pre-empt the outstanding delegated act of the EU Commission on the determination of recyclability, which is expected in 2028, but the 2025 edition provides companies with clear orientation right now. They get solid points of reference for what matters and can assess their packaging early on so they can adapt it strategically," commented Gunda Rachut, Chair of the ZSVR. That means necessary adjustments to the design or to manufacturing can be initiated early on with legal certainty.

The ZSVR

Since the Verpackungsgesetz (Packaging Act) entered into force in 2019, the ZSVR has served as an entrusted body to foster greater transparency and control in packaging recycling. 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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