

Osnabrück, 16 April 2026

## **Responsibility shifts to retailers under the PPWR: companies failing to adjust their system participation may face a distribution ban**

**The EU Packaging and Packaging Waste Regulation (PPWR) begins applying on 12 August 2026, introducing new requirements for system participation. For packaging for own brands and imported third-party brands without a domestic intermediary retailer, retail companies will be under obligation and will bear the responsibility for financing the recycling of such packaging in the future. No transition period is planned: the system participation requirement must be fulfilled before distribution of the packaged goods. Companies must act now to adjust their system participation in good time and report their volumes accurately.**

When the PPWR begins applying, extended producer responsibility will shift considerably. This will concern retail companies in two key scenarios: for packaging for own brands, the responsibility will lie with companies that have products designed or manufactured under their own name or trademark. The system participation requirement may not be transferred to suppliers or contract packagers. At the same time, market participants that import products into Germany without a domestic intermediary retailer have an obligation to participate the packaging for these imports with a system. The decisive factor is who is the first party to make the goods available in the country where the packaging eventually becomes waste.

### **System stability at risk: ensuring across-the-board financing**

If parties previously under obligation deregister their volumes and retail companies fail to fully participate their packaging volumes in good time, it will lead to a financing gap. This shortfall could jeopardise the existence of the competitive packaging waste management system. At the same time, system operators must secure the necessary sorting and recovery capacities at an early stage or risk falling significantly short of recycling quotas.

### **Consistent implementation of the new responsibility is key**

Thanks to close dialogue with the sector and information sharing through various channels and events, most retail companies are aware of their new responsibility. What matters now is consistent implementation: by 12 August 2026 at the latest, system participation must have been fully and completely transferred to the retail sector. This must take place before the packaged products are distributed.

## Retailers must act now

To ensure the stability of the packaging recycling system, the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) worked with an expert committee to develop an action plan for the retail sector. Under the motto 'Retail(ing) responsibly – following the PPWR. Ensuring across-the-board system participation for own brands and imports.', it describes all the steps companies must take now:

- Ask your suppliers for packaging information: you need information about the weights and material groups of the packaging for your own brands and imports so that you can accurately forecast your volumes from August onwards.
- Adapt your system participation in good time: enter into new agreements or expand existing contracts with your system operators for the additional volumes well before the deadline.
- Update your registration data in the LUCID Packaging Register: add all brand names for which you will have to fulfil the system participation requirement to your registration.
- Report your adjusted planned and forecasted volumes in the LUCID Packaging Register: make sure that the information you provide matches exactly what you report to your system operator.
- Keep a logical paper trail: record all the relevant packaging and volume data so that the information forms a robust foundation for your year-end volume report and any subsequent declaration of completeness, including any additional volumes after 12 August 2026.

A transition period is not planned. Only if all the steps are fully implemented by 12 August will retail companies be living up to their future responsibility. This is necessary to ensure that the packaging recycling system is stably financed. Companies need to act now to avoid a distribution ban.

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## 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 enhances packaging design for recyclability by setting standards. Lawyers Gunda Rachut (Chair) and Dr Alexander Dröge form the Foundation's Management Board.

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