

## PRESS RELEASE

### **Minimum standard 2023 – high-quality recycling requires sustainable packaging design and recycling infrastructure**

Osnabrück, 4 September 2023

- ◆ **In agreement with the German Environment Agency (Umweltbundesamt – UBA), the Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) has published the 2023 edition of its minimum standard**
- ◆ **The consultation process saw some important discussions about the existence of actual recycling infrastructure**

It is the objective of the Verpackungsgesetz, the German Packaging Act, to conserve resources and reduce impacts of packaging waste on the environment by promoting recycling. This objective can only be met if companies design their packaging in a way that makes it easy to recycle, and if this recycling-friendly packaging is then really recycled. Just as companies are required to design their packaging accordingly, plant and process technology as well as capacities must be adjusted to the requirements of each material.

That is why under the Verpackungsgesetz packaging cannot be classified as recycling-friendly if no functioning recycling infrastructure exists for this packaging. An annual study commissioned by the UBA scientifically analyses the specific sorting and recycling capacities for various packaging types. The results of this study have an impact on the evolution of the minimum standard. The availability of the existing sorting and recovery infrastructure for different packaging types is quantified. On this basis, the minimum standard has regulated where individual evidence must be produced that recycling has actually taken place. If capacities can be evidenced for more than 80 per cent of the material flow, an adequate recycling infrastructure is deemed to exist. If the sorting and recovery capacities cover less than 20 per cent of the material flow, companies have been required to produce individual evidence of recovery. Where recycling capacities are limited to between 20 and 80 per cent, it has been possible to require individual evidence since 2019.

**A milestone in the evolution of the minimum standard:** To foster high-quality recycling, it makes sense to further outline the classifications regarding the existing sorting and recovery capacities. It is the only way to incentivise building recycling capacities. In fact, capacities for some packaging types have been decreasing, and this must be counteracted. The solution proposed during consultations: eliminate the large range – 20 to 80 per cent – to which no real rule applied. This would make it easier to understand and apply the minimum standard, and promote recycling.

**Weighing the pros and cons during the consultation process:** For the minimum standard to have a sustainable incentivising effect, a holistic solution must be found – with companies designing their packaging for recyclability, and systems and product owners having to ensure that the recycling infrastructure is in fact available. Against this background, the proposed solution made sense. However, it was noted during the consultation process that more time

to prepare needed to be given, and uniform procedures for measurement and testing needed to be defined to determine the adequacy of recycling capacities for specific packaging.

**All is not lost that is delayed:** Following the consultation, the solution was obvious. A stronger focus on recycling capacities is the right way forward and will continue to be pursued, but not for the minimum standard's 2023 edition. The issue already enjoys a high priority in the draft version of the proposed EU packaging regulation. Even though the specific requirements or limits to be applied in this planned regulation are yet to be defined, it can be expected that packaging will always have to be reusable or recyclable in the future. Preparing for that in a timely and systematic way creates an opportunity that ensures that packaging solutions remain marketable.

### **Key changes to the minimum standard in its 2023 edition at a glance**

#### **Waste glass recycling: what matters is translucency**

The ZSVR defined a translucency limit in this year's minimum standard. It is this translucency limit that determines recyclability. Glass packaging that is not translucent is recognised as contaminant and sorted out due to its lack of recyclability. Painted bottles are one example.

#### **Nitrocellulose in inks: recycling impediment**

The minimum standard 2023 defines inks based on nitrocellulose and used in adhesive side printing as non-recyclable. With limited temperature stability, nitrocellulose impedes mechanical recycling and lowers recycle quality.

### **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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