

3 steps to fulfilling registration and system participation

Preliminary question: Are you a party under obligation?

A party under obligation (producer) under the Verpackungsgesetz (Packaging Act) is anyone who is

- + the first
- + to commercially place
- + packaging filled with goods
- + on the German market



'Quick check': Do the obligations apply to me?
www.verpackungsregister.org/en/quick-check



Information about private final consumers
www.verpackungsregister.org/who-is-a-private-final-consumer

If that packaging typically accumulates as waste with private final consumers, then this packaging is subject to system participation.

You can use the [system participation requirement catalogue](#) to figure out **whether a type of packaging is subject to system participation or not**. The catalogue is an extensive database that allows you to search for products or articles of packaging and determine their system participation requirement status directly for yourself.

If the obligations do apply to you:

1 Registration in the LUCID Packaging Register



- + You can register as a 'producer' in the LUCID Packaging Register
 ➔ <https://lucid.verpackungsregister.org> and provide your brand names ➔ [Who is a producer?](#)
- + During registration you will receive a registration number that you will need to enter into a system participation agreement



Information about the Registration process
www.verpackungsregister.org/checklist-obligations-verpackg



To make sure that you can log into the LUCID Packaging Register and comply with statutory requirements at all times, please store your login data in a safe place. Please also ensure that messages can always be delivered to the e-mail address you provided to LUCID.

2 Entering into a system participation agreement



- + Determine packaging volumes by material type
- + Enter into an agreement with one or more systems
- + Provide the registration number from the LUCID Packaging Register to the system



Systems overview
www.verpackungsregister.org/en/systems-overview

3 Reporting packaging volumes



- + Log in to the LUCID Packaging Register
 ➔ <https://lucid.verpackungsregister.org>
- + Click on the 'Data reporting' tile
- + Provide the exact same data report that you provide to a system to the LUCID Packaging Register (including when entering into the agreement)




Data reporting information
www.verpackungsregister.org/checklist-data-reporting

Retail and grouped packaging


Retail and grouped packaging is subject to system participation if it typically accumulates as waste with private final consumers.

Please note: shipment packaging counts as retail packaging and is almost always subject to system participation because it almost always is filled with goods for the first time by online retailers and typically ends up as waste with private final consumers. With the **system participation requirement catalogue**, you can search for important product groups, products and packaging and determine what packaging is subject to system participation under the Verpackungsgesetz.

 **System participation requirement catalogue:**
www.verpackungsregister.org/en/catalogue-search

What amendments are coming into force on 1 July 2022?

By 1 July 2022, all companies that place packaged goods on the German market on a commercial basis must have registered in the LUCID Packaging Register. In other words: if you put packaging that is not subject to system participation on the German market – for example **transport packaging, reusable packaging, single-use beverage packaging subject to deposit, industrial packaging**, etc. – in addition to packaging that is subject to system participation, you need to indicate that fact the first time you register or update your existing registration with the additional information (**registration amendment**). The Zentrale Stelle Verpackungsregister (Central Agency Packaging Register – ZSVR) will make it possible to register types of packaging not subject to system participation from **5 May 2022** to ensure there is enough time to register and comply with the law. For packaging not subject to system participation, **no data reporting** about packaging volumes needs to be submitted. You confirm that there are individual packaging types by ticking a **box**.

 **An overview of changes to the Verpackungsgesetz**
www.verpackungsregister.org/en/overview-of-amendments

What happens if someone does not fulfil their legal obligations?

Any breach of obligations under the Verpackungsgesetz (registration, system participation, data reporting) is an **administrative offence**. If registration and/or system participation is not completed, the packaged goods may not be sold in Germany (**distribution ban**). Depending on the severity of the breach, **fines of up to € 200,000** may be issued.

What else is there to know?



Authorising a representative: International producers **without a branch in Germany** can appoint an authorised representative to fulfil their duties. [➔ Here](#) you can find out more.



Declaration of completeness: Producers with volumes of packaging subject to system participation placed on the German market that met or exceeded one of the **three following volume thresholds** for the previous year (glass: 80,000 kg, paper, paperboard, cardboard (PPC): 50,000 kg and ferrous metals, aluminium, plastics, beverage cartons, other composites (lightweight packaging): 30,000 kg) must submit an audited declaration of completeness about their annual packaging volumes. Further details can be found [➔ here](#)



Further information about fulfilling packaging law obligations can be found in our [FAQs](#) and in the 'Information and orientation' section at www.verpackungsregister.org

For **IT-related questions about the LUCID Packaging Register**, please do not hesitate to call our **support hotline**: +49 541 34310555 | Monday to Friday 9:00 to 17:00 CET.