

## **General information about the registration procedure for non-system-liable packaging in a dual system for household packaging as well as for secondary and transport packaging**

The following general information about the registration procedure includes a summary of the main information provided by the Central Agency for the Packaging Register (ZSVR), which it has published on its website <https://www.verpackungsregister.org> for this purpose.

This is based on the existing information about the registration procedure for system-liable packaging in a dual system for household packaging. Accordingly, we have taken into account the legislative changes carried out within the scope of the amendment to the German Packaging Act that expand the duty to register to all packaging that is not system-liable packaging in a dual system for household packaging. It is not clear at the current point in time to what extent the ZSVR will allow for deviations within the scope of the registration process for non-system-liable packaging in a dual system for household packaging, which is open since 5 May 2022.

### **I. Information about the procedure**

Two steps must be carried out for the registration:

1. Apply for **access data** for the packaging register LUCID and
2. Enter the **registration data**

To apply for access you must open the website: <https://www.verpackungsregister.org>.

- You will find the button to log in to the packaging register LUCID there. There, you must enter the name of the registering company,
- a natural person with representation authority,
- an email address and
- a password.

If your company has more than one legal representative (e.g. several managing directors), it will be sufficient to specify one of these legal representatives as the contact with representation authorisation. If the legal representative is not a natural person, one of its legal representatives must be given. In addition, the concrete contact with email address must be given so the login details can be issued. At small manufacturers the legal representative and contact will often be the same person.

Once this data has been sent, you will receive an **activation mail** from the ZSVR, which will contain a link. You will now have 24 hours to complete the registration via this link. If you do

not use this link in the following 24 hours, for data protection reasons the ZSVR will erase this data and you will then have to enter this data again for the registration.

Clicking on the links sent will activate access to the **input screen**. **Registration will be completed by entering the additional manufacturer disclosures within seven days.**

Now, enter your **manufacturer data** in the activated input screen. For this purpose, you should

- have available your company's national identification number as a manufacturer, for example, the commercial register number,
- including the European tax number (VAT no.). If you do have these available in the individual case, you can also enter your national tax number as an alternative.

The next step is to request information on the packaging that you, as the manufacturer, place on the market, broken down by:

1. packaging subject to system participation pursuant to Section 3 (8) of the Packaging Act (VerpackG)
2. disposable beverage packaging subject to the mandatory deposit pursuant to § 31
3. the respective packaging not subject to the system participation obligation pursuant to section 15 subsection 1, sentence 1, numbers 1 - 5,

for example:

- Sales and outer packaging,
- transport packaging,
- sales packaging of pollutant-containing contents,
- sales and outer packaging that is incompatible with the system,
- Reusable packaging,

Then, you must enter the **brand names** your company uses to market its products or packaging. For these purposes you should prepare a complete article list of the products you market. If your product does not have a brand name, you should enter the name of your company or, as an individual businessperson not entered in the commercial register, your own name in the field "Brand names" so the products can be allocated to you as the manufacturer.

Finally, you can check your entries in a **summary**. To finish you must confirm that your disclosures are complete and accurate and end the procedure by pressing the field "Complete registration". If you applied to register, the ZSVR will send you the **registration number** by email and the ZSVR will automatically enact and electronically transmit the administrative action for registration.

According to the German Packaging Act the manufacturer or initial distributor of packaging is also obliged to report any **changes** to their registration data to the ZSVR without delay and to

update this data in the packaging register LUCID. You must also update the master data and brand data in the login area of the online register.

Among other things, the registration number, your company name and your trademarks are published in the public packaging register.

The email address used for registration will also be used for all further contacts with the ZSVR. For this reason, you should ensure this email address can be reached at all times. If an email address changes, a so-called login transfer can be carried out in the master data in the register.

Important: A used e-mail address can only be used for one registration. Multiple use of an e-mail address for different registrations is not possible!

## II. Technical preparation for registration

It is only possible to register digitally in the packaging register LUCID. You require an internet connection. You will find information about which browsers are supported on the ZSVR website under "Technical requirements".

To **prepare to log in** you should ensure you are prepared to enter the following data:

- First name and surname of those **responsible/ legal representative** in your company. These people can be, for example, individual board members, a managing director, an authorised officer, an employee with authorisation to act for the company (head of a line department) or the owner of the company. The person responsible must confirm on behalf of the company that the disclosures made for the registration are truthful.

A manufacturer as a natural person (e.g. a sole trader) can simply submit the disclosures themselves or give declarations themselves. In contrast, for legal persons there must be a responsible person or an authorised member of the company.

An authorised member of the company can be a clerk, team leader or line manager, for example. This person must be an employee of the manufacturer in any case. The person responsible must vouch on behalf of the company that the disclosures made for the registration are correct. Within the scope of the registration the manufacturer is free to specify the responsible person as a processor as well, or to specify a separate processor. Any separate processor must be equally authorised and be a member of the company.

- First name and surname of the processor. Only a person who is a member of the company can be considered here. Third parties – such as externals or brokers – cannot be specified here. The person responsible and the processor can be identical, but this is not a requirement.

- The person responsible and the processor must be members of the company.
- Disclosure of an email address that will act as the log-in and communications address in the future. Information such as the registration and company name will be published in the public packaging register.
- Setting a self-selected password (eight characters, including one upper case and one lower case letter, one number and a special character).

### **III. Practical preparation for registration**

You should also have the following information prepared to enter the data required to conduct the complete registration:

- Address of the company
- Value-Added Tax number (VAT no.)

In Germany, this consists of the country abbreviation DE and nine figures (example: DE123456789). If you do not have a Value-Added Tax number, you can also give your company's tax number. The VAT no. must be entered without any special characters.

- National identification number

For example, a commercial register number, business registration number, employers' liability insurance association membership number etc. can be deposited as the national identification number in the packaging register LUCID. If you do not have any of the identification numbers that can be selected in the register, you can select "Other" and enter the national identification number there as free text. In individual cases, with regard to the business registration number and other national identification numbers the issuing authority and the issue date must also be given.

- Supplementary details on the indication of the brands

List of all brand names that your company uses to market non- or system-liable packaging in a dual system for household packaging for the first time (e.g. producers, mail order companies, importers).

If a product has an umbrella brand and additional sub-brands, it is sufficient to disclose the umbrella brand. You can enter the sub-brands as supplements. It does not have to be a registered trademark in the sense of trademark law. If a market withdrawal has

been decided for individual/several brand names, you can enter the market withdrawal date under “Brand valid until”.

Do not enter e.g. type designations, product designations, model designations, article specifications, filling sizes.

- If you market products without brand names, and for secondary and transport packaging, enter the company name again (not: “No name” or “No brand” etc.)
- If you want to enter the brands to be given via an XML interface, you will find the instructions to use XML interfaces on the ZSVR website.

#### **IV. Data required for registration**

It is necessary to disclose the following data for the registration:

- Manufacturer’s name, address and contact details (in particular post code and town/city, road and building number, country, telephone number and the European or national tax number)
- In the case of authorisation by a foreign manufacturer: name, address and contact details of the authorised representative as well as written commissioning by the manufacturer
- Brand names the manufacturer uses to market its packaging
- Specification of a natural person with representation authorisation
- Disclosures about the packaging that the manufacturer markets, broken down into system-labile packaging in a dual system for household packaging as per section 3 (8), packaging as per section 15 (1) 1 Nos. 1-5 and one-way drinks packaging subject to mandatory deposits as per section 31
- National identification number of the manufacturer and email address; if in the event of an authorisation, the same disclosures about the authorised representative (if available, commercial register no., alternatively the trade licence no.)
- Declaration that all the disclosures are truthful

#### **V. Information about disclosures on the brands**

The ZSVR refers to the following with regard to the disclosures required for brands in the registration:

The disclosure requires a list of the brand names used by the obligated party to initially market the packaging (e.g. producers, mail-order retailers, importers). If a product has an umbrella brand and additional sub-brands, it is sufficient to disclose the umbrella brand. These do not have to be registered brands in accordance with branding law.

The following disclosures must not be entered:

- Type names, article specifications, model names
- Filling volumes
- Product names

If you market packaging without brand names, and for secondary and transport packaging, enter your company name also under “Brand names” (not: “No name” or “No brand” etc.).

If a market withdrawal has been decided for individual/several brand names, you can enter the market withdrawal date under “Brand valid until”. If new brands are added, these must be subsequently entered under “Update brand names” at any time.

If you use the XML upload function for entries, please note that when you upload a new file the old entries will be overwritten. This will also happen if you initially entered brands manually and then upload an XML brand list later.