

# Comparison of the requirements of the German Packaging Act



## Product in packaging for the German market? § 2 German Packaging Act

- ▶ System participation obligation
- ▶ Registration obligation
- ▶ Data reporting obligation
- ▶ Declaration of completeness

private  
final consumer

commercial  
final consumer

- ▶ Take-back obligation
- ▶ Recycling obligation
- ▶ Financing obligation
- ▶ Registration obligation
- ▶ Documentation obligation

## What type of packaging is it? § 3 (1) German Packaging Act

▶ Sales packaging ▶ Secondary packaging ▶ Transport packaging

Product in packaging for  
private final consumers?  
§ 3 (11) German Packaging Act

Product in packaging for industrial/  
commercial final consumer?

Packaging liable to system  
participation in a dual system?  
§ 7 German Packaging Act

Packaging **typically** liable to  
system participation in a dual  
system?  
§ 7 German Packaging Act

Packaging **typically NOT**  
liable to system participation  
in a dual system?  
§ 15 German Packaging Act

Evaluate distribution/drop-off point principle according to private & commercial

Registration at the ZSVR  
§ 9 German Packaging Act

Registration of commercial packaging not liable  
to system participation at LUCID/ZSVR  
§ 9 German Packaging Act

or

Participation in a dual system ?  
§ 7 German Packaging Act

**Self-organised take-back**  
(in compliance with the necessary  
obligations)  
§ 15 German Packaging Act

**Commissioning third parties**  
(**industrial take-back system**)  
e.g. RIGK-, PAMIRA- & Verena-SYSTEM)  
§ 35 German Packaging Act

Disposal/ recovery after use by  
private final consumers via the  
nationwide municipal waste  
disposal at 14-day collection  
frequencies.

Free take-back of used, empty  
packaging from commercial  
final consumers. Disposal/  
recovery incl. verification  
documentation by  
manufacturer/distributor.

Disposal/recovery after use via  
the nationwide disposal  
structures of the industrial take-  
back systems in the region of  
the commercial final consumer,  
incl. verification documentation.

*This information is a brief summary. It does not claim to be complete and does not constitute legal advice.*

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