



Germany – packaging EPR

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THE SHORT VERSION

Germany asks foreign sellers for **both things at once**. You must register in LUCID **personally** — that part can never be delegated to anyone. And since **12 August 2026** you must *also* appoint an authorised representative in Germany to carry everything else. It is the only country we've found so far that requires both halves.

What changed this month

New obligation, live since 12 August 2026

Foreign producers with no establishment in Germany must now appoint an authorised representative and assign them through LUCID. It was voluntary until 11 August 2026. Sellers already registered have until **12 November 2026** to tell the registry who their representative is. The stated consequence of not doing it is a distribution stop.

This is new enough that most guides you'll find still describe the old position, where a representative was optional in Germany. If something you're reading doesn't mention August 2026, it predates this.

The part that hasn't changed: the representative may take on everything *except the registration itself*. Registering in LUCID remains a personal duty. Anyone who offers to register in your name is offering something that isn't compliant, and that was true before August and is still true now.

This desk covers EPR only. Everything below is the *producer* role — registering, licensing, reporting, paying. If your own name, logo or brand is on the packaging, PPWR also makes you the *manufacturer* of it: a separate set of EU-level conformity duties that took effect on the same date and is not country-specific. See [manufacturer or producer?](#)

Does it apply to me?

German packaging duties attach to the first person to place packaging on the German market. Ship a parcel to a German consumer and that's you — there is no turnover floor and no quantity floor to fall under.

You ship to German consumers, no German establishment

Yes. Register personally in LUCID, join a dual system, and — since 12 August 2026 — appoint a representative.

You're established in Germany

Register and license yourself as normal. The new representative duty is aimed at producers **without** a German establishment.

You sell only B2B

Registration still applies. Dual-system participation is for packaging that typically ends up with private households; B2B and transport packaging sit outside it.

You're tiny – a few parcels a year

No threshold exists. The duty starts with the first shipment. Germany has no small-quantity carve-out of the kind Austria offers.

You sell through Amazon, Etsy or eBay

They are legally required to check you. See [marketplaces must check](#) — being on a platform is not a compliance position.

You use a fulfilment provider that never owns the goods

You are still the producer for the shipping packaging used — the fulfilment provider's client carries it, under [§ 7 VerpackG](#). Worth knowing if you are on Amazon FBA and assumed the platform covered it.

You ship goods *out of* Germany

The VerpackG's scope is Germany. Packaging used to send goods out of the country isn't subject to German system participation — but the destination country has its own rules, which is the whole reason these desks exist. [Austria is the worked example.](#)

Registering in LUCID – the part nobody can do for you

LUCID is the public packaging register run by the Zentrale Stelle Verpackungsregister (ZSVR). Registration has been mandatory since 1 January 2019 and is **höchstpersönlich** — strictly personal.

Legal basis

§ 9 VerpackG — registration duty. The Act has applied since 1 January 2019.

Who may submit it

You, the producer. Any of **your own** employees may do the typing — but not an external service, agency or representative.

Cost

Free. Registration itself costs nothing. What you pay for is the dual system.

How long

A registration number is typically issued within about a day of a complete submission.

What you'll need

Company name and address, tax or registration numbers, brand names you sell under, and confirmation of how the waste is handled.

Is it public?

Yes. The register is public — anyone, including your competitors and the marketplaces, can look you up.

The authorised representative

The newer half of the obligation. From 12 August 2026 a foreign producer must name an authorised representative established in Germany and assign them inside LUCID. They then carry the extended-producer-responsibility duties and can be held liable for them.

Legal basis

Art. 45(3) PPWR together with § 5(2) VerpackDG — the German implementing act.

Who it catches

Art. 45(3) makes it mandatory for producers **established in another member state**. For producers established **outside the EU** the article leaves it as a national option — and Germany has taken that option. So the answer here is the same either way, but the route differs, and it may not be the same in every member state. Worth knowing if you're outside the EU and working through the other twenty-six.

Mandatory since

12 August 2026. Voluntary up to 11 August 2026.

Deadline if you're already registered

12 November 2026 to notify the registry of the appointment.

What they take on

All the producer-responsibility processes and duties — **except the registration**, which stays with you.

How they're appointed

Named and assigned through LUCID.

If you don't

A distribution stop is the stated consequence.

Why this matters for a buying group. Until this month Germany was the one large market where a small seller could handle everything alone and pay only the dual system. That's over: there is now a mandatory bought-in service with a per-seller fee, exactly like Austria. It is the newest and most negotiable line on the whole file, because nobody has had time to settle into a price yet.

Who actually offers this

The ZSVR does **not** publish a directory of authorised representatives, so there is no official list to check a provider against. These are companies we have seen advertising the service in Germany. Inclusion is not a recommendation, we have not used any of them, and none of these prices have been negotiated by us.

ASEKOL DE GmbH

Advertises authorised-representative services in Germany for packaging and other EPR streams

VerpackGo / Der Grüne Punkt

Advertises a German authorised-representative service alongside packaging licensing

MainCompliance

Advertises German packaging authorised-representative support specifically for the August 2026 rules

Zentek / recycling.de

Advertises PPWR and authorised-representative compliance support

Check one thing before you sign

A representative has to be entered in LUCID under their own authorised-representative login and ID, be a natural or legal person with a registered office or branch in Germany, be **independent of your company**, and have a written agreement with you **in German**. Ask any provider to confirm they hold the LUCID authorised-representative login and ID before money changes hands. Anyone who cannot produce it cannot do the job, whatever their website says.

Paid one of these? Post what you were quoted in **#quotes-and-costs** and it goes into the [Observatory](#) dataset, anonymised. This is the single most useful number a German-shipping member can give us right now, because the market is two days old and nobody knows what the rate should be.

Joining a dual system

Registration on its own doesn't discharge anything. You also have to contract with a **duales System** for packaging that typically ends up as waste in private households, and the quantities you report to that system must match what you declared in LUCID.

Legal basis

§ 7 VerpackG — system participation duty.

What must be licensed

Sales packaging and secondary packaging that ends up with private households — including the box, tape and filler you ship in.

What sits outside

Transport packaging, B2B packaging and packaging that isn't system-compatible. Registration still applies to these; system participation doesn't.

Which system

Several are approved and they compete on price — you're free to choose. The current list is maintained by the ZSVR; Der Grüne Punkt, Landbell, Interzero, Reclay, Zentek, Noventiz, BellandVision and PreZero are among the long-standing operators.

What you report, and when

Three separate reporting duties, easily confused with one another.



Planned quantities

An estimate of what you expect to place on the market, given to your system ahead of the year.

2

Actual quantities

What you really placed on the market, reported to your system on the rhythm your contract sets — monthly, quarterly or annually.

3

Completeness declaration

An audited annual declaration filed with the registry — but only if you cross the tonnage thresholds below. Most small sellers never do.

And an EU-level lightening we had missed. Art . 44(8) PPWR gives a producer placing **under 10 tonnes** a year on a member state's market a reduced reporting set — Annex IX Part B point 2 instead of point 1. It is not an exemption from registration, from the dual system, from the representative or from paying, and a member state may set a lower figure for a given year if it would otherwise lack the data it owes the Commission. But it is the one place the Regulation acknowledges that small producers exist, it applies in every member state, and everyone reading this page is under it.

The completeness declaration

The **Vollständigkeitserklärung** is the one duty on this page with a real threshold, and it is the one most small sellers panic about unnecessarily. You only file if you exceeded any of these in the previous calendar year.

Material	Threshold	Below it
Glass	80,000 kg	No declaration
Paper, card and cardboard	50,000 kg	No declaration
Other materials — plastics, metals, composites	30,000 kg	No declaration

Legal basis

§ 11 VerpackG

Deadline

15 May each year, for the previous calendar year.

Who signs it off

An auditor registered with the ZSVR — an accountant, tax adviser or environmental verifier — attesting it with an electronic signature.

Perspective. 30 tonnes of plastic packaging is an enormous amount for a maker. If you ship a few thousand parcels a year you are nowhere near any of these lines, and this section does not apply to you.

Marketplaces are required to check you

Since 1 July 2022, operators of electronic marketplaces and fulfilment providers have their own legal duty to verify that the sellers they carry are registered and have system participation in place. This is why Etsy, Amazon and eBay started asking for your LUCID number rather than handling it for you — the platform is protecting itself from its own liability.

Legal basis

§ 7a VerpackG , in force since 1 July 2022.

What they must verify

That you are registered, and that you have contracted with a system.

What happens if you're not

They may not let you offer the goods. A distribution ban applies.

How they check

The ZSVR gives marketplaces and fulfilment providers register access with daily-updated data. Your entry is checked against it automatically.

And since 12 August, the same duty at EU level

§ 7a is no longer the whole story. The PPWR now imposes an equivalent check everywhere in the Union, which matters because it follows you into the other twenty-six countries where there is no § 7a.

Before you can sell at all

Art. 45(6) PPWR — the platform must obtain your registration number for the member state where the customer is, plus a self-certification that your EPR duties there are met, **before** allowing you to use its services. It must then make best efforts to check that what you gave it is true.

What a platform *can* do for you

This is the part people get wrong in the other direction. Under **Art. 45(4)**, a platform **may pay your EPR fees** on your behalf on the basis of a written mandate. What it may **not** do is your registration or your reporting — only you, your PRO or your authorised representative can, unless you appoint the platform itself as your representative.

Fulfilment providers too

Art. 45(7)–(9) — a fulfilment provider must collect the same information when it contracts with you, check it, and ask you to fix anything inaccurate or out of date. If you don't, it must **suspend the service** and tell you why. You can challenge that in court in the member state where the provider is established. If you use Amazon FBA, this is the mechanism that stops your goods moving.

Why it reads as the platform being difficult. It isn't discretionary. The platform is discharging its own legal duty and carrying its own liability, which is why "can you just handle it for me" gets a no — and why the one thing it *can* legally absorb, the fees, is the thing nobody thinks to ask for.

What happens if you don't

Breaches are administrative offences under § 36 VerpackG, on a three-tier scale. The ceilings are far above Austria's.

Tier	Maximum fine	Covers
Top	€200,000	Includes failing to participate properly in a system (§ 36 Abs. 2, nos. 3, 4, 12, 13, 18)
Middle	€100,000	Includes placing packaging on the market contrary to § 5 (nos. 1, 5, 5a, 6–8, 11, 14–17, 19–23, 25, 26)
Base	€10,000	All remaining cases

These are German figures, not PPWR ones. The Regulation's own penalty article, Art. 68, only requires member states to lay down PPWR penalties by **12 February 2027**. Germany already had the VerpackG scale above, which is why there is something to quote here at all — in several member states there currently isn't.

There is a grace period, and it stops short of this page

The Commission's August FAQ says enforcement from 12 August "should not disrupt trade flows", that a member state must **first require the operator to put an end to the non-compliance**, and that authorities should support operators rather than take a sanction-oriented approach.

That rests on [Art. 62](#), headed **Formal non-compliance**, whose list is conformity-side only: missing or defective declaration of conformity, incomplete technical documentation, Art. 15 and Art. 18 administrative failures, Articles 24 to 29. **Not registering, and not appointing a representative, are not on that list.** Those stay with § 36 VerpackG and with the distribution stop the ZSVR advertises. Read the grace period as covering what is printed on your packaging, not whether you are in the register.

In practice the more common consequence for a small seller is commercial rather than penal: a marketplace suspending your listings under § 7a, or a competitor warning letter. Both arrive faster than a regulator does.

Do you have to print anything on the box?

Not for the German system, and not yet for the EU one — with one exception that catches anyone who brands their own mailers.

The harmonised sorting label

The EU pictogram telling the customer which bin the material goes in.

[Art. 12\(1\) PPWR](#) applies it from **12 August 2028** at the earliest — the trigger is 24 months from the entry into force of the implementing acts, whichever is later. Nothing to do now.

A German mark

None required for ordinary shipping packaging. The Grüner Punkt mark is a licensing scheme's own trademark, not a legal obligation — paying a dual system does not oblige you to print anything.

The one that *does* apply now

If your name or logo is on the packaging you are probably its **manufacturer**, and [Art. 15\(5\)](#) and [15\(6\)](#) want an identifier plus your name and a postal address on it, from 12 August 2026. EU-wide conformity duty, nothing to do with LUCID. See [manufacturer or producer?](#)

GPSR is a separate problem

Packaging EPR and product safety are different regimes with different representatives. The General Product Safety Regulation requires an EU-based **Responsible Person** for consumer products, with no exemption for small sellers. Your German packaging representative is *not* automatically your GPSR Responsible Person, and your dual system certainly isn't. Check what you are actually buying.

Known traps

Guides written before August 2026

Almost everything published about Germany says a representative is optional there. That stopped being true on 12 August 2026. Check the date on anything you read, including this page.

Believing a service can register for you

They can't, and the new representative rule does not change it — the registration is explicitly carved out. Anyone selling "we'll do your LUCID registration" is selling something non-compliant.

Registering but not licensing

LUCID registration and dual-system participation are two separate duties. Doing only the free one is the single most common mistake, and it is the one that carries the €200,000 tier.

Quantities that don't match

What you report to your system and what you declare in LUCID have to agree. The registry compares them, and a mismatch is visible without anyone visiting you.

Assuming an Austrian setup carries over

It doesn't, in either direction. An Austrian representative cannot register you in Germany, and your German LUCID number means nothing in Vienna.

Forgetting the shipping box

The outer carton, the tape and the filler are packaging you placed on the market. People license the product's own box and forget everything they wrapped it in. We keep a concrete list: [what counts as packaging](#).

Believing you can buy pre-licensed packaging

Pre-licensing is real but narrow. Under § 7 Abs. 2 VerpackG it exists only for **Serviceverpackungen** — packaging filled at the point of handover, like bakery bags and coffee cups. It expressly does not cover shipping packaging; a shipping carton is not service packaging. And even where it does apply, only the system participation transfers — the LUCID registration stays personal and cannot be delegated. The burden of proving the packaging was pre-licensed sits with you, the seller.

Sources

Primary law first, then the registry itself, then the secondary summaries we cross-checked against.

- 1** **Verpackungsgesetz (VerpackG) — full text** (<https://www.gesetze-im-internet.de/verpackg/>)
Official federal law portal. § 7 system participation, § 7a marketplace checks, § 9 registration, § 11 completeness declaration, § 36 penalties
 - 2** **§ 36 VerpackG — penalty provisions** (https://www.buzer.de/36_VerpackG.htm)
Source for the €200,000 / €100,000 / €10,000 tiers and which offence numbers fall in each
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- 3** **Zentrale Stelle Verpackungsregister (ZSVR)** (<https://www.verpackungsregister.org/>)
The registry itself — LUCID, the approved dual systems list, and the completeness-declaration audit guidelines
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- 4** **LUCID — the register** (<https://lucid.verpackungsregister.org/>)
Where you register, personally
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- 5** **Mandatory representative for foreign producers from 12 August 2026** (<https://www.verpackungsgesetz.com/en/bevollmaechtigenzwang-auslaendische-hersteller/>)
Secondary. Source for the Art. 45(3) PPWR / § 5(2) VerpackDG basis, the 12 November 2026 notification deadline, and the registration carve-out
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- 6** **§ 11 VerpackG — completeness declaration** (https://www.gesetze-im-internet.de/verpackg/_11.html)
Source for the 80 t / 50 t / 30 t thresholds and the 15 May deadline
-
- 7** **Händlerbund — guide to the VerpackG** (<https://www.haendlerbund.de/de/ratgeber/recht/4032-das-verpackungsgesetz>)
Secondary. Cross-check on the personal-registration rule and the absence of any threshold
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- 8** **Regulation (EU) 2025/40 (PPWR) — EUR-Lex** (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040)
Read in full, 14 August 2026. Source for Art. 44(3) on delegating registration, Art. 44(8) on the 10-tonne reporting threshold, Art. 45(3) on the representative and its separate treatment of third-country producers, Art. 45(4), (6) and (7)–(9) on marketplaces and fulfilment providers, Art. 12(1) on the 2028 label, Art. 62 on formal non-compliance, Art. 68 on the February 2027 penalties deadline
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- 9** **ZSVR — what changes from 12 August** (<https://www.verpackungsregister.org/en/i-want-to-know-what-will-change-from-12-august>)
The registry's own page on the new representative duty. Source for the statement that LUCID registration "remains the manufacturer's personal responsibility. No exemption can be made", and that the representative must be named in LUCID at the time of registration
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- 10** **European Commission — PPWR Frequently Asked Questions, 2nd edition** (https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en)
DG ENV Unit B01, August 2026 (KH-01-26-068-EN-N). **Read in full, 14 August 2026** — this page previously said we hadn't. Source for the enforcement approach from 12 August, the scope of what platforms may do on a producer's behalf, and the confirmation that there is no general micro-enterprise exemption from EPR
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- 11 European Commission — PPWR guidance (Commission Notice), 30 March 2026 (https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en)

The guidance document, distinct from the FAQ above and complemented by it. **Still not read in full by us**, and we are not summarising its contents



An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.