



## A producer under the Verpackungsgesetz is:

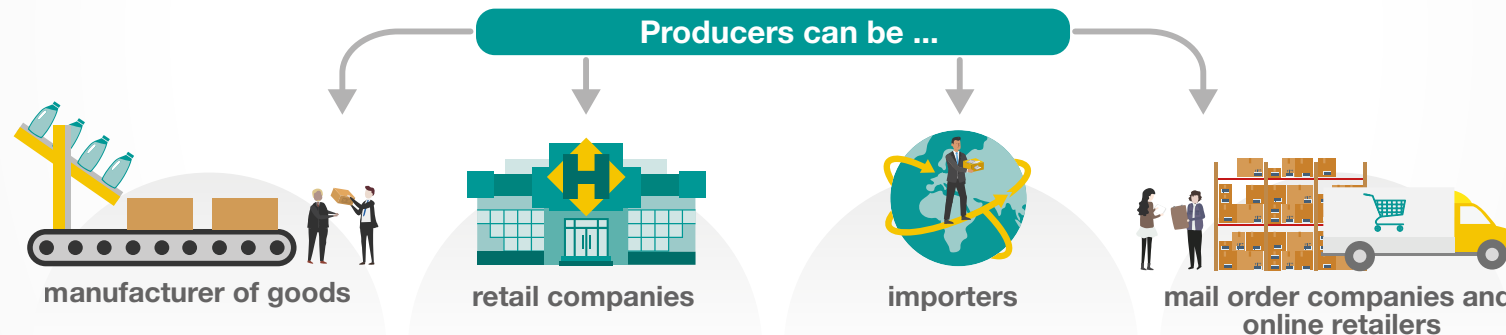
- + the first to place
- + packaging filled with goods
- + on the German market
- + on a commercial basis

No matter what type of packaging a company places on the German market with its goods – the company has to register with the **LUCID Packaging Register**, stating which packaging types are distributed under what brand names. That's the law. Any additional packaging law obligations for the company depend on whether the packaging it places on the market is **subject to system participation or not**. Packaging subject to system participation, unlike packaging that is not subject to system participation, is packaging that typically accumulates as waste with **private final consumers**. It requires that companies not only register with the LUCID Packaging Register, but also undertake system participation.

In addition to **private households**, **private final consumers** as a group also includes so-called **comparable sources of waste generation**, such as restaurants, accommodation establishments, bakeries, commercial kitchens and canteens because of the type and amount of packaging waste that accumulates there. Furthermore, it includes craft enterprises and agricultural holdings where their packaging waste is collected at the rate that is normally associated with private households and in **waste bins that do not exceed 1,100 litres** per collection group. A list of examples of comparable sources of waste generation can be found at [www.verpackungsregister.org/sources-of-waste-generation](http://www.verpackungsregister.org/sources-of-waste-generation)



Details can be found in the **'Packaging subject to system participation and packaging not subject to system participation – delineation and obligations'** graphic



### **⚠ Please note: for the purposes of the Verpackungsgesetz, a producer is anyone who is the first to fill packaging with goods.**

- + This is usually the **manufacturer** who produces and packages the product
- + It may also be **retail companies** that distribute own brands if the packaging is filled by a third party on the retail company's behalf before being handed over to the retail company and if the packaging bears only the name and/or brand of the retail company
- + **Importers** are also producers if they bear legal responsibility for the goods at the time they cross the border
- + **Mail order companies and online retailers** that fill shipment packaging with goods for the first time also count as producers



The **Verpackungsgesetz**, the German Packaging Act, applies both to companies **located in Germany** and companies **located abroad**, as long as they sell goods in Germany. Anyone who imports or sends packaged goods to Germany and meets the conditions listed above must fulfil their **obligations under German packaging law**.



Information about fulfilling packaging law obligations can be found in our **FAQ**, our **„Three steps“** checklist and in the **'Information & orientation'** section at [www.verpackungsregister.org](http://www.verpackungsregister.org)