

PACKR8 RESOURCE GUIDE

EPR for German producers, LUCID and Zentrale Stelle.

How LUCID registration works, the Zentrale Stelle role, system participation declarations, and what changes under PPWR.

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Contents

01 LUCID and Zentrale Stelle in plain terms

02 Who must register

03 Picking a dual system

04 System participation declarations

05 What changes under PPWR

06 Practical filing rhythm

07 Frequently asked questions

01 / LUCID and Zentrale Stelle in plain terms.

Germany's packaging law is the Verpackungsgesetz (VerpackG). The agency that runs it is the Zentrale Stelle Verpackungsregister (ZSVR), and the public register every producer must appear in is called LUCID. Once you are registered in LUCID, you contract separately with one of several private dual systems (Duales System) which actually collect, sort, and recycle.

So three names, three jobs. Zentrale Stelle is the supervisor. LUCID is the register. The dual system is the operator you pay. Producers tend to confuse them; the regulator does not.

02 / Who must register.

Anyone who places packaging filled with goods on the German market, for the first time, in the course of a commercial activity. Unlike the Netherlands there is no tonnage threshold. Even a single shipment requires registration first.

The legal definition is the 'first distributor' (Erstinverkehrbringer). For non-German producers selling into Germany, that is usually the importer or the marketplace, depending on the route. Online marketplaces are co-responsible: they must verify their sellers are registered in LUCID before listing.

03 / Picking a dual system.

There are roughly half a dozen authorised dual systems operating in Germany. The major ones are Der Grüne Punkt, BellandVision, Interseroh+, Reclay, Veolia Umweltservice Dual, Zentek, and Noventiz. Each sets its own fee per tonne by material; the prices move with the recycle market.

Producers can switch annually and many do, chasing the lowest fee for their material mix. The system participation contract is what proves you are paying for the recycling of the packaging you put on the market. Without it, the LUCID registration is incomplete and you are not allowed to sell.

04 / System participation declarations.

Once a year, every producer files a Datenmeldung (data declaration) with both their dual system and Zentrale Stelle. The declaration says how much packaging by material was placed on the German market.

If those two declarations diverge, Zentrale Stelle will write to ask why. The most common cause is producers under-declaring to the dual system to keep fees low while declaring honestly to Zentrale Stelle. The mismatch shows up immediately and triggers an investigation.

The Vollständigkeitserklärung trap. Producers above 50,000 kg of plastic, 80,000 kg of glass, or 80,000 kg of paper / cardboard / aluminium / steel must also file an annual Vollständigkeitserklärung (completeness declaration), audited by an independent expert, and uploaded to Zentrale Stelle by 15 May. Missing the deadline is straightforward and the fines are immediate. Mark it in your calendar now.

05 / What changes under PPWR.

VerpackG remains the German law. PPWR sits on top of it and harmonises the data definitions. From 2026 the categories you declare to Zentrale Stelle align with PPWR Article 6 (recyclability grade) and Article 7 (recycled content). The Vollständigkeitserklärung audit also tightens: the auditor will verify that the figures filed with the dual system, with Zentrale Stelle, and with PPWR Declarations of Conformity all reconcile.

Producers who already keep a single packaging master are advantaged. The figure is the figure, regardless of which portal it gets posted to. Producers maintaining separate German workbooks find they are now triangulating three numbers instead of two.

06 / Practical filing rhythm.

January to February: prepare the previous-year Datenmeldung. Reconcile sales volumes against packaging master data. Run quality checks on material classifications.

March: file the Datenmeldung with the dual system and with Zentrale Stelle through the LUCID portal.

April to May: if you cross the Vollständigkeitserklärung threshold, an external auditor reviews the figures. The audited document goes to Zentrale Stelle by 15 May.

Year-round: keep LUCID up to date for material changes, brand changes, and any new packaging variant placed on the market.

07 / Frequently asked questions.

Is there a registration threshold for LUCID?

No. Even one shipment of packaged goods to Germany requires registration in LUCID first. Marketplaces must verify seller registration before listing.

Do I need to register with both Zentrale Stelle and a dual system?

Yes. LUCID registration with Zentrale Stelle is the public record. The dual system contract is the private operator that handles your packaging. Both are required.

What is the Vollständigkeitserklärung?

An annual completeness declaration audited by an independent expert. Required for producers above 50,000 kg of plastic, 80,000 kg of glass, or 80,000 kg of paper / cardboard / metal. Due to Zentrale Stelle by 15 May.

Will PPWR replace VerpackG?

No. VerpackG remains the German national law. PPWR harmonises the data definitions used in EPR filings across the EU, so the figures align across countries, but each country's filing portal stays national.

08 / About PackR8.

PackR8 is the packaging compliance platform for European producers preparing for PPWR and EPR. One source of truth for packaging data, with PPWR Declarations of Conformity, EPR filings, and audit evidence generated automatically from your records.

We started PackR8 because the same data problem was breaking the same teams every year. Smart sustainability leads with real strategies, stalled by packaging data that lived in eleven tabs of a spreadsheet maintained by someone in another country.

PackR8 fixes that. One packaging record per SKU. Full version history. Evidence pinned to every claim. Role-aware views for sustainability, packaging, and compliance teams. From that foundation, Declarations of Conformity, EPR filings, and audit responses become outputs rather than annual fire drills.

Talk to us.

The person you book a demo with is one of the team that built the platform. No SDR. No discovery calls. No funnel. Just a thirty-minute conversation about your packaging programme, and an emailed quote afterwards if it makes sense to keep going.

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