



# Register of Producers




Key facts and experience with the German register of producers with a view to Art. 39 of the Proposal for a Regulation on Packaging and Packaging Waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

## Lessons Learned

 Compulsory registration in a national packaging register leads to more transparency, less free-riders and thus fairer competition; more producers comply with EPR and participate in PROs.

 Publicity of the register enables competitors and consumers to see which producers comply with their EPR obligations for packaging and which don't (self-monitoring of the market).

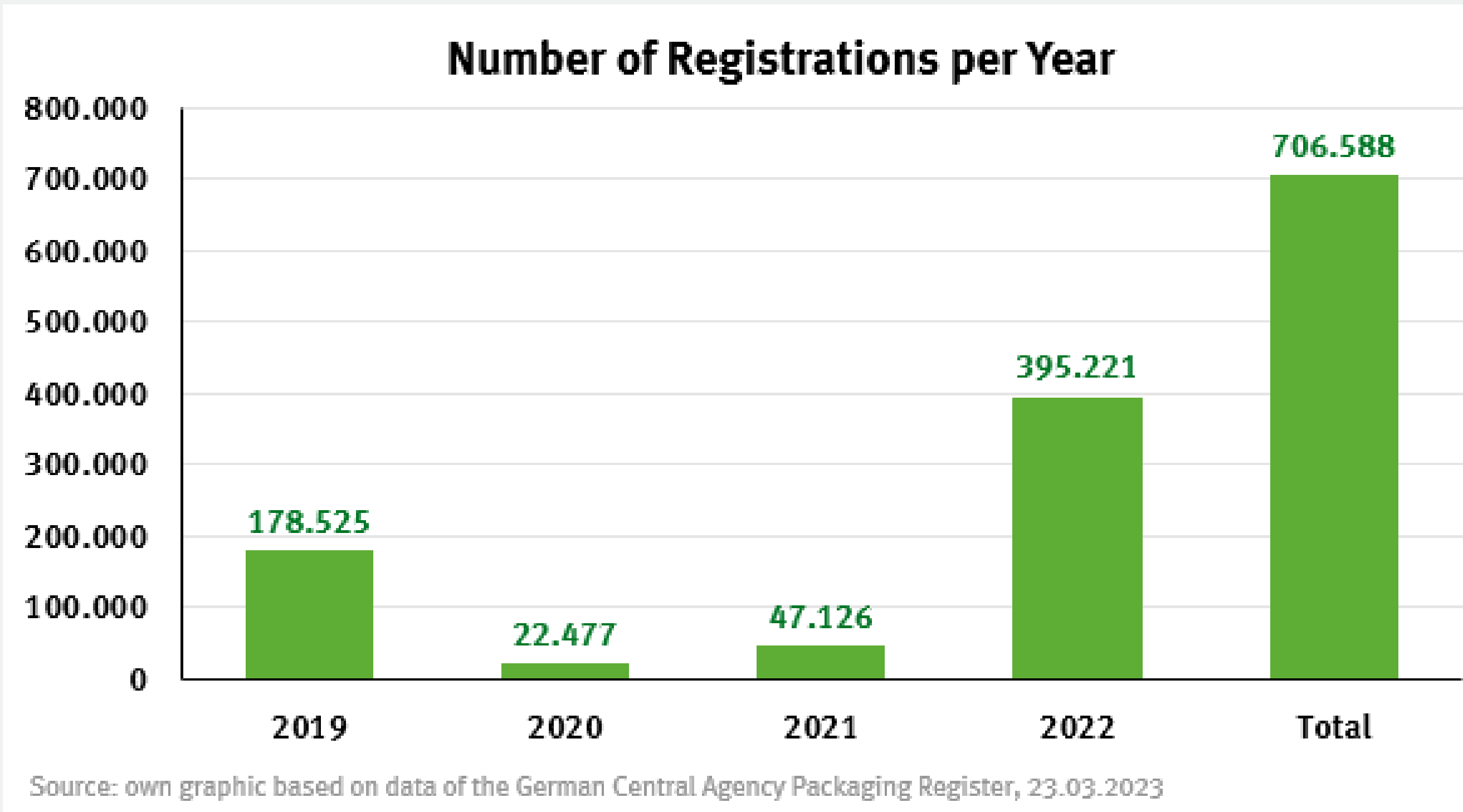
Full digitalisation of the register allows for

-  easy digital registration,
-  fully digital data reporting on packaging placed on the market,
-  access for law enforcement authorities to hold non-compliant producers accountable.

 An obligation of online platforms and fulfilment service providers to verify registration before offering their service to producers lead to a steep increase in registrations, also from non-EU countries.

## Background Information

A national register for producers of certain end consumer packaging was established in Germany as of 1<sup>st</sup> January 2019. It was extended to producers of all kinds of packaging on 1<sup>st</sup> July 2022. All producers that place packaging filled with goods on the German market must register with the Packaging Register and provide details about their different packaging types as well as their brand names. The registration must be done before placing any packaging on the market.

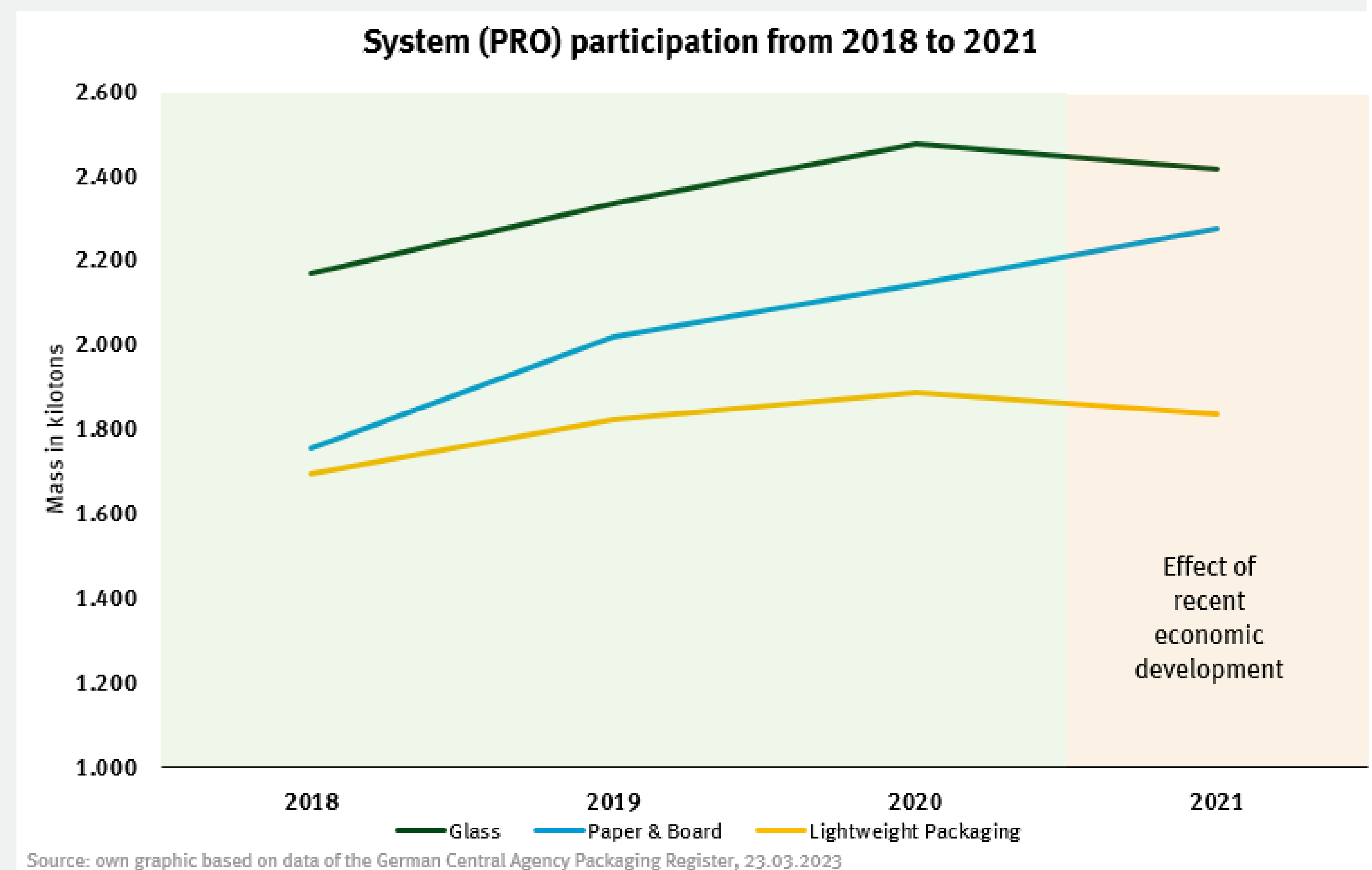


With the start of the register in early 2019 about 130.000 producers registered and up to about 230.000 by autumn of 2021. Currently, there are 706.588 registrations (reporting date 17th March 2023). This increase has also been due to the new obligation of operators of online platforms and fulfilment service providers to verify the registration of producers before providing services to them (see fact sheet "Online Platforms & Fulfilment Service").

The new transparency of the packaging register enables a fairer competition as competitors ensure a functional self-monitoring of the market. If producers do not register and/or do not participate their

packaging with a PRO before placing it on the market, fines may be imposed by the competent authorities, and a distribution ban applies to such packaging.

Free-riding has been significantly reduced from about 33-40 % before the start of the register to about 25 % currently. The process of ensuring PRO participation for all registered producers is currently still ongoing due to the large number of newly registered producers. A further decrease of free-riding is being expected.



A fully digital national register is put in place in Germany. Producers can register online within minutes. All data reporting obligations can be fulfilled online in an efficient, easy procedure. Information such as explanatory videos, step by step guides and specific explanations for certain groups of producers can be provided to support the process.

A fully digital register allows for easy access for competent authorities to up to date data. Thereby the register supports the prosecution of free-riders. Online platforms and fulfilment service providers can be provided with access to registration information in order to allow for an automatic registration verification of producers who want to use their services (see fact sheet "Online Platforms & Fulfilment Service").

## Links

[LUCID German Packaging Register \(verpackungsregister.org\)](https://www.verpackungsregister.org)

## Contact:

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Section III 1.6 Plastics and Packaging and  
Subsection Implementation of the German Packaging Act