



Made for Recycling

Standard for Assessing the Recyclability of Packaging

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This manual provides a comprehensive overview of Interzero’s “Made for Recycling” certification system for assessing the recyclability of packaging.

Table of Contents

1	Introduction	3
2	Standard Owner and Standard Development	4
3	Key Aspects of the Methodology	4
3.1	Subject of Assessment	4
3.2	Assessment of Recyclability	5
3.3	Scope of Certification and System Boundary	5
3.4	Reference Disposal Infrastructure	6
3.5	Summary	6
4	Certification Procedure	7
4.1	Procedure	7
4.2	Analysis and Certification Time	8
4.3	Assessment and Calculation of Results	8
4.4	Certification Cycle	9
4.5	Issuance of the Certificate	9
4.6	Recertification	9
5	Seal and Use of the Seal	10
5.1	Violations and Sanctions	10
6	Quality Assurance	13

1 Introduction

Dialogue between stakeholders across the value chain is essential to promote packaging design for recycling. A number of platforms and exchange formats already exist, some of which are closed. Nevertheless, developers, fillers and retailers still have a broad need for further information on the requirements for recycling-friendly packaging design. Section 21 of the German Packaging Act offers potentially strong steering effects by providing for participation fees for sales packaging to be structured according to recyclability. In principle, ecologically structured participation fees are intended to result in lower fees for recyclable packaging and higher fees for non-recyclable packaging. Section 21 of the German Packaging Act addresses the concrete assessment of packaging recyclability to the stakeholders involved throughout a package's life cycle. The following sections present the key framework conditions for a methodology to determine packaging recyclability. The underlying considerations are based, among other things, on waste-management provisions governing packaging disposal, the German Circular Economy Act, the German Packaging Act and the Packaging Ordinance, each in its currently applicable version. The framework set out in DIN EN 13430, "Requirements for packaging recoverable by material recycling", is also taken into account.

The assessment methodology is continuously aligned with the latest version of the minimum standard issued by the German Central Agency Packaging Register (ZSVR) and is reviewed and adapted annually.

The purpose of recycling is to reduce the use of raw materials and energy in the production of new goods by using recycled material. Recyclability is generally understood as a product property that allows the materials used to be returned to the material cycle at the end of the product's life, thereby closing the loop. The degree of recyclability depends on:

- how the packaging is designed and constructed;
- the quality and quantity in which packaging can be made available to material-specific recovery routes and treated there;
- the sorting and recovery technologies used by the waste-management industry to separate individual material streams and concentrate them into target fractions at high yield; and
- the quality achieved by the recycled product, considering that it is intended to substitute primary material.

2 Standard Owner and Standard Development

The standard owner of the system is **Interzero Circular Solutions Germany GmbH**. The scientific assessment methodology was developed jointly with the **bifa Environmental Institute** and validated by the **Fraunhofer Institute for Process Engineering and Packaging (IVV)**. The standard is continuously adapted to current regulatory and technical requirements, for example through updates based on the minimum standards of the German Central Agency Packaging Register (ZSVR). New developments reflecting the state of the art and robust individual evidence regarding packaging properties are also incorporated into the continued development of the standard. This includes, in particular, findings from recognised testing and assessment procedures, such as packaging characteristics that have been successfully assessed and approved for recyclability by RecyClass.

3 Key Aspects of the Methodology

3.1 Subject of Assessment

In accordance with the definitions in the German Packaging Act and DIN 55405, “Packaging — Terminology — Terms”, packaging comprises products used to contain, protect, handle, deliver or present goods and passed on by the manufacturer to the user or consumer.

This concept for assessing recyclability focuses on sales packaging. Sales packaging typically becomes waste at the final consumer after use and is then collected via the collection systems operated by the dual systems or, in the case of deposit-bearing beverage packaging, via retailers’ deposit-return systems. The packaging materials typically used are:

- **Plastics** (e.g. PE, PP, PS, PET)
- **Glass**
- **Paper and board**, including paper-based composites
- **Metals** (aluminium, tinplate)
- **Beverage cartons** (lightweight packaging)

Packaging often contains several materials, sometimes only in small proportions. Packaging components such as labels or closures are also considered part of the packaging in the assessment.

3.2 Assessment of Recyclability

Recyclability must be determined with reference to an underlying recovery infrastructure, such as the collection, sorting and processing methods used. The type of recovery—material recycling, feedstock recycling or energy recovery—and the quality of the resulting recovery products in relation to their potential reuse applications are particularly relevant. By promoting material recycling, Section 21(4) of the German Packaging Act identifies the reference point to which packaging recyclability should relate. Against this background, under the methodology presented here, packaging that, after collection and sorting:

- can undergo **high-quality material recycling** is classified as **recyclable**. Recovery resulting in products that replace primary materials originally used is considered high quality. The availability of high-quality treatment capacities and the extent of high-quality material recycling are taken into account in the assessment.
- can only undergo **energy recovery** is classified as **not recyclable**.

The assessment of recyclability also considers that contaminants introduced into existing recycling streams must not jeopardise the success of material recycling, for example in terms of quality and yield. Disruptive substances, materials or material combinations must be identified during the assessment and evaluated with regard to their separability and their effect on product quality.

The recyclability assessment aims to determine efficiently and validly whether, and to what extent, packaging or the materials or material combinations separated from it meet the relevant physical or chemical requirements to remain on the pathway to high-quality material recycling throughout the sorting and recovery processes.

A packaging-specific practical test at real recovery facilities to quantify actual recyclability is not envisaged. As a rule, the physical or chemical prerequisites of the relevant properties are examined on the basis of product information and experimental investigations.

3.3 Scope of Certification and System Boundary

In principle, the recyclability assessment covers the entire disposal chain for packaging from the end of use. The steps are:

- **Collection:** Delivery of used packaging to the relevant material-specific collection system, including possible separation by the consumer into packaging materials, residual emptying performance, estimation of misallocation to a collection system, etc.
- **Sorting:** Sorting of packaging collected in mixed streams.

- **Processing:** Material-specific recycling of packaging materials and provision of a secondary product, such as regranulate.

At every stage of the recovery chain, packaging components may be separated because they are either unsuitable for high-quality material recycling or are lost from this pathway. Under the methodology developed here, recyclability is therefore understood as a gradual property that ultimately evaluates the ratio between the expected quantity of secondary product and the quantity of packaging material used. Consideration of the individual process steps and products of material recycling is essential when assessing recyclability. Merely making packaging available to a high-quality material recycling process as an indicator of recoverability, analogous to the calculation of recovery rates, would be insufficient.

3.4 Reference Disposal Infrastructure

In line with DIN EN 13430, “Packaging — Requirements for packaging recoverable by material recycling”, recyclability is assessed on the basis of the collection and recovery processes currently relevant and used at industrial scale in Germany (status quo). A more detailed description of the material-specific recovery processes is provided in the [Assessment Catalogue](#).

3.5 Summary

The recyclability assessment of packaging characterises the proportion of the materials contained in the packaging that can be used again, after sorting and recovery, to manufacture products from the original primary material. Accordingly, the expected recyclability is determined by evaluating the packaging’s chemical and physical suitability for sorting and recovery. The reference point for this assessment is the packaging-material-specific sorting and recovery processes that are relevant and used at industrial scale in Germany.

4 Certification Procedure

4.1 Procedure

Customer enquiry and order placement



The certification process begins with a customer's request for an assessment of a packaging item's recyclability. Based on the customer's request, Interzero draws up a bespoke quotation. This sets out the scope of services, the contractual terms and all the information required to carry out the assessment. The contract comes into effect upon acceptance of the quotation.

Sample Receipt and Sample Registration



Upon receipt of the packaging samples, the samples are accepted, visually inspected and documented. The samples are then recorded in the central sample management system and assigned a unique sample number. Once recorded, the packaging samples are prepared for laboratory analysis and dispatched to the relevant testing laboratory.

Carrying out the laboratory analysis



Upon receipt of the samples, the competent testing laboratory, accredited to SIST EN ISO/IEC 17025, will carry out the commissioned tests in accordance with the specified test procedures. The analysis results should be available to the Packaging Consulting Team within four weeks of receipt of the samples. The laboratory will provide the results, which will contain all the information necessary for the preparation of the assessment and certification

Report Generation & Transmission



Based on the laboratory results, the report and the accompanying certificate are drawn up in accordance with the **assessment catalogue** and sent to the customer.

Award of the seal



If at least 18 out of 20 points have been achieved in the certification or analysis process, the seal may be used.

If the seal is to be used, the design must be approved by Interzero. As part of the approval process, the design is checked to ensure it complies with the applicable **design guidelines**.

4.2 Analysis and Certification Time

Once the samples have been received, the standard processing time until the results are communicated is generally four to five weeks. In exceptional cases, processing may take longer due to high workloads or other organisational or technical reasons. In such cases, the results will be communicated as soon as possible once the analysis has been completed. If earlier delivery is required, express processing may be agreed upon request. This provides a shorter processing time and is subject to additional charges.

4.3 Assessment and Calculation of Results

The assessment criteria and the procedure for calculating results are set out in the **Assessment Catalogue**.

4.4 Certification Cycle

The certificate is valid for **two years from the date of issue**. If changes are made to the certified packaging components during this period, the certificate becomes invalid with immediate effect. Changes to the packaging must be agreed in advance and, where necessary, reviewed as part of a follow-up assessment.

4.5 Issuance of the Certificate

A certificate is issued on the basis of a report that documents the results of the completed examination and assessment in a transparent manner. A certificate is issued only if the assessment result is not classified as “not recyclable”.

4.6 Recertification

After the validity period expires, recertification is required to extend the certification. Recertification is offered on more favorable terms than initial certification. Any changes to the packaging must be disclosed so that they can be considered separately during recertification.

5 Seal and Use of the Seal

The “Made for Recycling Interzero” seal is awarded when packaging achieves **at least 18 out of 20 possible points** in the assessment conducted in accordance with this methodology. The seal may be used for advertising purposes only if this condition is met.



Image of the “Made for Recycling Interzero” seal

The “**Made for Recycling Interzero**” seal is registered by the system operator Interzero and protected under trademark law. Its use by companies following a successful assessment is subject to the conditions set out above.

In addition, the **design specifications** for printing the seal, as detailed in the **design guidelines**, must be observed.

5.1 Violations and Sanctions

The “Made for Recycling” seal may be used only for packaging that has been successfully assessed in accordance with the assessment methodology applicable at the time and meets the specified requirements for displaying the seal.

Use of the seal is tied to the packaging examined during the certification procedure and to the applicable terms of use. Holders of the right of use are required to maintain the conditions for displaying the seal throughout the entire period of use.

Violations include, in particular:

- use of the seal for packaging that does not meet the requirements of the assessment methodology or does not have valid certification;
- use of the seal for packaging other than the certified packaging;
- changes to certified packaging, its materials, components, weight proportions, printing or finishing elements, or other properties relevant to recycling that may

affect the assessment result, without prior review and approval under the certification system;

- misleading, ambiguous or otherwise impermissible use of the seal in advertising, product communications or other publications;
- use of the seal after the right of use has expired, been suspended or been withdrawn;
- provision of incorrect, incomplete or misleading information during the assessment or certification procedure;
- refusal or failure to provide, within the specified period, the evidence and information necessary to verify eligibility to use the seal;
- any other violation of the terms of use or requirements of the certification system.

Procedure in the Event of a Suspected Violation

In the event of a suspected or confirmed violation, the company concerned will be informed in writing and given an opportunity to submit a statement within a reasonable period.

Additional evidence, documents or information may be requested to investigate the matter. The company concerned is required to cooperate in clarifying the facts.

Sanctions

If a violation is confirmed, the following measures may be taken, in particular, with due consideration for the severity, scope and effects of the violation:

- written notice of non-compliance and a request to remedy the violation within a specified period;
- an obligation to correct, adapt or remove impermissible markings, advertising claims or other representations;
- temporary suspension of the right to use the “Made for Recycling” seal;
- withdrawal of certification or permanent revocation of the right to use the seal;
- an obligation to cease immediately all use of the seal in print, online and other communication media;
- documentation of the violation and initiation of further contractual or legal measures where necessary.

In the case of serious or intentional violations, or repeated violations, the right of use may be revoked without prior suspension.

All confirmed violations, investigations and measures are documented to safeguard the integrity, credibility and legally compliant use of the “Made for Recycling” seal.

6 Quality Assurance

A systematic quality assurance process has been established to ensure the transparency, integrity and credibility of the “Made for Recycling” seal. As the operator of a private certification system, Interzero complies with the requirements of Directive (EU) 2024/825 (the Empowering Consumers Directive) and its national implementation in the German Act Against Unfair Competition (UWG). These require objective monitoring of compliance with the certification system’s requirements.

Monitoring is carried out under an objective and independent procedure by an external third party with the necessary technical expertise, ensuring substantive compliance with international standards. The laboratories responsible for the laboratory analyses are accredited in accordance with SIST EN ISO/IEC 17025 and therefore ensure that analyses are performed in conformity with the standard.

As part of the quality assurance process, the analysis results are re-examined by a technically qualified and independent third party at defined regular intervals and on the basis of a specified sample size. This defined sampling procedure serves to verify the analysis results and assess the conformity of the certification system. These measures ensure that the seal is based on an objective, transparent and reliable certification system. At the same time, compliance with the system requirements is continuously monitored and documented, ensuring the seal’s long-term validity and preventing misleading environmental claims.