What to prepare for LUCID

A checklist for online sellers who ship packaged goods to consumers in Germany.

What changed in 2026

Since 12 August 2026, a producer with no establishment in Germany must first appoint an authorised representative based in Germany. The representative has to be entered in LUCID before your first sale.

On 20 October 2026 the European Parliament voted (616 for, 9 against, 39 abstentions) to postpone this obligation until 2035 for small businesses established in the EU: fewer than 50 staff and under €10 million turnover.

On 21 October 2026 the Council of the EU agreed its negotiating position. It also supports an exemption for producers established in the EU.

> This is not law yet. The change applies only once it is adopted and published in the Official Journal of the EU. Until then the obligation applies, also to small sellers.

1. Company data

- [ ] Legal name and address, exactly as in your business register
- [ ] Phone number and e-mail address
- [ ] VAT number and tax reference number (if you have them)
- [ ] Company registration number or national ID
- [ ] A contact person who can answer ZSVR

2. Authorised representative in Germany

- [ ] A person or company based in Germany and not affiliated with you
- [ ] A written agreement in German, signed by hand or with a qualified electronic signature (QES)
- [ ] Only one representative per producer
- [ ] The representative needs their own LUCID account; you enter them in your registration

3. Brand names

- [ ] Every brand name under which you sell packaged goods in Germany
- [ ] No brand of your own? Use your company name

4. Packaging

- [ ] A list of all packaging that reaches consumers: shipping boxes, envelopes, filling material, product packaging
- [ ] The material of each item (paper/cardboard, plastics, glass, metal, etc.)
- [ ] An estimate of the weight per material for the year, in kilograms

5. Dual system

- [ ] A licence contract with a dual system (system participation) for your packaging
- [ ] The same company data and brand names as in LUCID

6. Reporting and marketplaces

- [ ] Report the same quantities in LUCID as to your dual system
- [ ] Keep your LUCID registration number at hand: marketplaces ask for it
- [ ] Use the same company data in your marketplace account

Sources (checked 1 November 2026)

1. ZSVR: authorised representative (PPWR): https://www.verpackungsregister.org/en/ppwr/authorised-representative
2. ZSVR: registration in LUCID: https://www.verpackungsregister.org/en/registration/find-out-about-registrations
3. Regulation (EU) 2025/40 (PPWR), EUR-Lex: https://eur-lex.europa.eu/eli/reg/2025/40/oj
4. Council of the EU, press release 21 Oct 2026: https://www.consilium.europa.eu/en/press/press-releases/2026/10/21/simplification-council-agrees-negotiating-stance-to-cut-red-tape-for-small-packaging-producers/
5. Council negotiating mandate, doc. 14765/26: https://www.consilium.europa.eu/media/vsldwcbf/st14765en26.pdf
6. prodlaw.eu: Parliament vote of 20 Oct 2026 (report A10-0266/2026): https://prodlaw.eu/2026/10/european-parliament-supports-temporary-suspension-of-epr-authorised-representative-for-eu-smes/
7. Packaging Europe: Parliament votes to exempt small businesses until 2035: https://www.packagingeurope.com/eu-parliament-votes-to-exempt-small-businesses-from-representative-rules-until-2035/

Not legal advice. This checklist summarises public sources as of the date above. Rules can change: check the official sources before you act.

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